



Bega Cheese Limited

**MODERN  
SLAVERY  
STATEMENT  
2025**



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# This Statement

This Modern Slavery Statement (this Statement) has been provided by Bega Cheese Limited in accordance with the Australian *Modern Slavery Act 2018* (Cth) ("The Act") for the period of 1 July 2024 to 30 June 2025 ("FY2025", "the reporting period", "the year", or "FY25").

This is a joint Statement made by Bega Cheese Limited (ABN 81 008 358 503) of 23 Ridge St, North Bega, New South Wales, 2550 and the additional reporting entities listed on page 37. Bega Cheese Limited is a publicly listed company on the Australian Securities Exchange (ASX Code: BGA).

In this Statement, the terms "Bega", the "Company", "Reporting Entity", "the Group", "our business", "organisation", "we", "us", and "our" refer to Bega Cheese Limited and its controlled entities collectively, unless otherwise stated.

We take a consolidated approach with Group-wide governance and common management systems. This means that the findings and management practices set out in this Statement refer to the collective entities unless otherwise stated. All entities in the Group comply with policies and procedures relevant to modern slavery (with limited exceptions, as noted in this Statement).

To develop this Statement, we sought relevant data and information from all the companies the Group owns and controls as well as input from relevant internal and external subject matter experts. We have consulted with our Risk & Sustainability Committee. This Statement has then been approved by the Board. The Statement has been signed by our CEO.

This Statement describes our efforts to identify, assess, manage, prevent, and remediate risks of modern slavery in our operations and supply chain during the reporting period.

"Modern slavery"<sup>1</sup> refers to extreme forms of labour exploitation, where individuals are deprived of their freedom through coercion, threats, deception, and violence. It is a severe violation of human rights. Modern slavery often goes unrecognised and unreported throughout the global supply chains of products and services and exists in Australia.

This report contains forward-looking statements, including references to our future commitments, objectives and intent. These are based on our assumptions and expectations at the time of publication. These are subject to change and cannot be guaranteed or relied upon.

To read more about our business, visit [www.begagroup.com.au](http://www.begagroup.com.au) and see our 2025 Annual Report and 2025 Sustainability Report. See page 38.



<sup>1</sup> Global-Slavery-Index-2023.pdf; Criminal Code Act 1995 (Cth), Divs 270 and 271

## CEO reflections

We are pleased to present our sixth annual Modern Slavery Statement.

During the reporting period, we continued to deliver against our sustainability strategy, guided by our core principles of circularity, community and collaboration. We maintained our commitment to human rights and ethical sourcing, as reflected in our Better Future Strategy, to manage and mitigate modern slavery risks.

The reporting period was one of significant geopolitical change, and supply chain uncertainty. We faced shifting market dynamics, cost pressures and sourcing challenges which put greater pressure on supply continuity. Within this context, it is even more important to continue our commitment to sustainability and to respecting and supporting our people. Throughout this time, our team navigated these challenges while deepening our understanding of risks in key categories including citrus, labour hire and logistics.

The procurement team focussed their efforts on increasing spend with our approved suppliers, reducing modern slavery risk by onboarding 30% fewer new suppliers than in the prior period. We also proactively engaged with key partners to educate them on modern slavery risks and Bega's requirements for shared supply chain management.

We continue to hold ourselves to account, with monthly meetings ensuring the delivery of our FY2025 action plan and the implementation of key new policies for known high-risk categories and a new e-learning module to increase the awareness, understanding and implications of modern slavery risks in our sourcing processes.

FY2025 provided many learnings which will inform our future plans and aspirations to create great food for a better future by ensuring we continue to address potential human rights impacts in the delivery of our iconic brands to our customers and consumers.



Pete Findlay  
Chief Executive Officer



# FY2025 in review

## HIGHLIGHTS

During FY2025, we:

- continued structured governance through 12 Modern Slavery Working Group meetings and reference to actions in six Board reports
- refined and updated supplier risk assessment assumptions resulting in a higher proportion of suppliers being subject to increased due diligence measures such as Sedex registration
- sustained a comprehensive Responsible Sourcing Program where 60% of identified high risk categories had focused due diligence efforts
- our Group quality team conducted 83 supplier audits for which 79% of non-conformances (NCs) were resolved
- continued a focus on sound labour practice for our workforce, employing 56% of workers on Enterprise Bargaining Agreements (EBAs), conducting annual wage compliance audits against national minimum wage rates, and providing 100% of workers with mandatory onboarding training on their rights
- undertook a deep dive on indirect labour at six of our sites reviewing conditions and risk factors for labour hire, temporary workers, contingent labour and contractors (see Spotlight on page 21)
- trained over 1,000 participants (with 68% completion in 3 months) via new mandatory modern slavery training program, achieving strong positive feedback from participants
- launched two key sustainable sourcing policies, for coffee and cocoa, that guide internal action
- increased targeted due diligence for five high-risk categories or emerging risk areas including logistics, fruit supply, labour hire, cocoa and coffee including risk analysis and stakeholder engagement.

## LESSONS

Our program is centred on continuous improvement through learning. During FY2025, we noted six key learnings.

- 1 A flexible approach is needed.** We worked collaboratively and flexibly with supplier partners to balance setting high standards with adjusting to context and supplier circumstances. This means keeping the focus on our intended outcomes, instead of applying blanket compliance requirements. (See case studies and actions throughout Section 4 of this Statement).
- 2 Training is about both quality and quantity.** We found that delivering complex messages in training content challenged participants but also led to increased knowledge and engagement (see our Case study – Training, page 20).
- 3 A risk-based approach helps us target what matters.** Focusing on high-risk sourcing categories and suppliers focuses our time, resources and attention. We found value in going deeper on selected issues. (see Section 4 – Actions in our supply chain).
- 4 Effectively engaging site leadership is key.** During our review of indirect labour relationships and conditions, it was essential to work closely with site-based teams to build understanding of practices and buy-in for changes in process (see Spotlight on Indirect labour, page 22).
- 5 Complex issues need a broader approach.** We learned that addressing complex issues – such as conditions in the domestic fruit sector – requires a longer-term approach with strong stakeholder and industry engagement (see Spotlight on fruit, page 27).
- 6 Actively monitoring labour conditions is critical.** We learned that not all labour groups are the same, and different approaches are needed to establish appropriate controls. We found that indirect labour at our manufacturing sites must be closely monitored to ensure workers are not disadvantaged by contractual arrangements (see Spotlight on Indirect labour, page 22).

## FUTURE

Going forward we aim to:

- deepen our understanding of risk drivers in our critical sourcing supply chains, so that we are targeting mitigation actions
- focus on citrus as a critical sector while sustaining our responsible sourcing efforts for other key raw ingredients
- build our remediation capacity by reviewing and stress-testing our approach
- equip our people through continuing our all-employee training and targeting capability building for key personnel
- continue modern slavery due diligence efforts as we expand international third-party manufacturing (TPM) to support our innovation and international expansion goals

# Our structure, operations and supply chains

## OUR PURPOSE

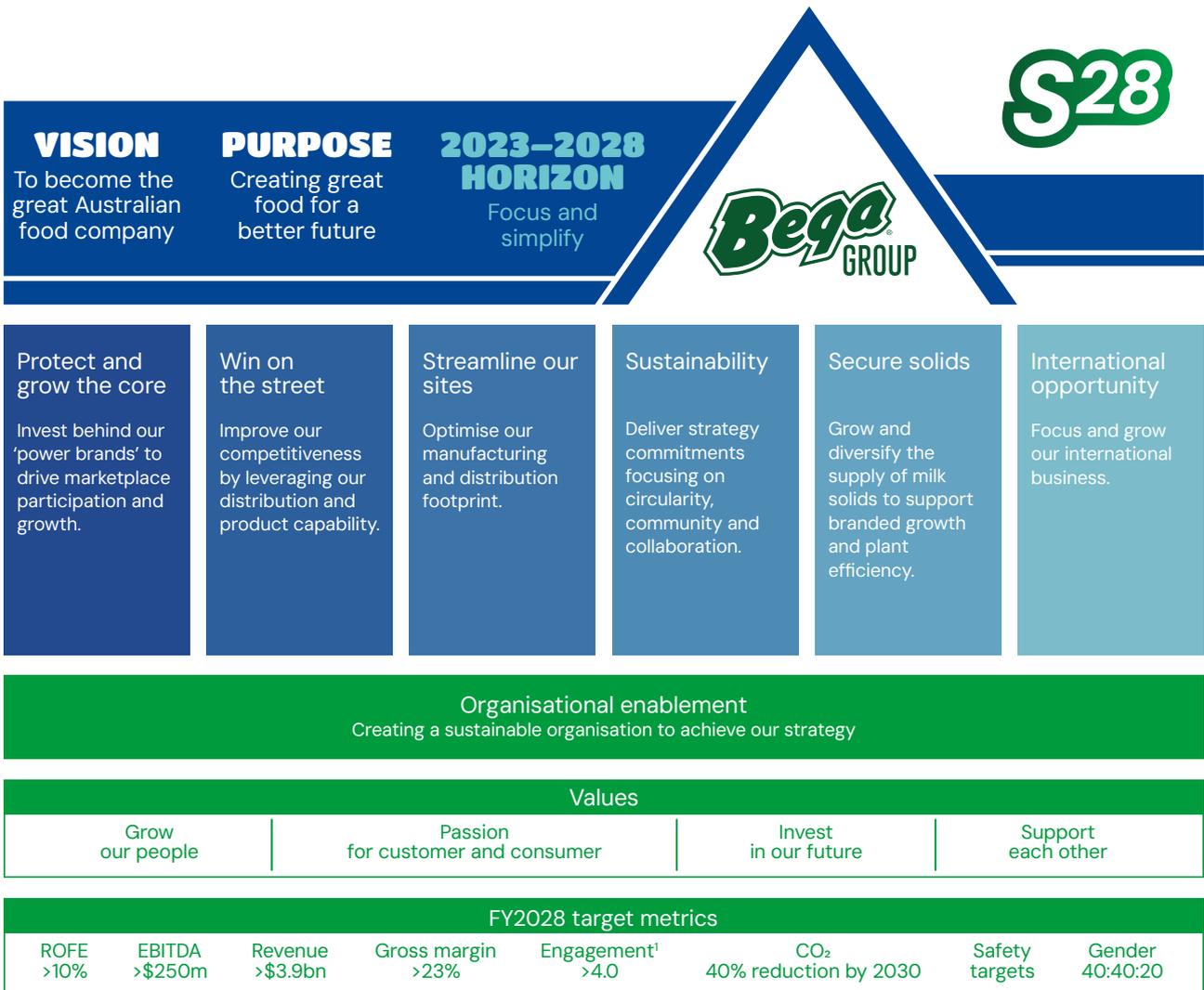
Our purpose is to create great food for a better future.

Bega is a leading Australian food and beverage company. We have been proudly Australian owned and operated for over 125 years.

Our purpose connects us to our people, customers, consumers, suppliers, and the communities in which we operate. It drives our strategic direction, decision making, values, and behaviours. Our brands are market leaders, and our sustainability and ethical sourcing practices have a wide impact throughout our industries and communities.

Our **Better Future Strategy** sets out our focus on sustainability, including the identification of responsible sourcing and human rights as material topics. You can read more about our strategy and sustainability initiatives in our 2025 Annual and Sustainability Reports.

Our modern slavery response sits under the Collaboration pillar of the Better Futures Strategy, as we acknowledge that managing and mitigating risks within our supply chain is a task shared with both our supply and customer partners in conjunction with all levels of government and wider civil society.



<sup>1</sup> Engagement measured by Gallup's Q12 employee engagement survey.

# Our structure, operations and supply chains

## OUR STRUCTURE

Bega Cheese Limited is a publicly listed company on the Australian Securities Exchange (ASX Code: BGA). Our structure comprises a listed holding company (Bega Cheese Limited) and a number of wholly owned or controlled subsidiaries (see Appendix page 37). We take a consolidated approach with respect to compliance and reporting where all entities in the Group comply with our policies, risk assessment activity and processes. Our organisational structure remained largely consistent during the year with limited changes described below. More details about our structure and entities can be found in our [2025 Annual Report](#).

During the reporting period, we secured a binding Agreement to sell a juice extraction factory in Leeton, NSW to juice maker 'Grove Juice'. Grove Juice will continue to process fruit at the Leeton site on our behalf as a part of a long-term supply agreement. It will also use the site to process its own fruit from the region for its own products.

In March 2025, Tatura Milk Industries Pty Ltd (TMI) purchased 40% of the shares in Infant Nutrition Canning Australia (INCA). This acquisition secures a fully integrated supply chain for infant nutrition powders at Tatura. The purchase was structured with a management services agreement whereby we take full operational management at site level. This grants us to control of all sourcing and labour-related decisions.

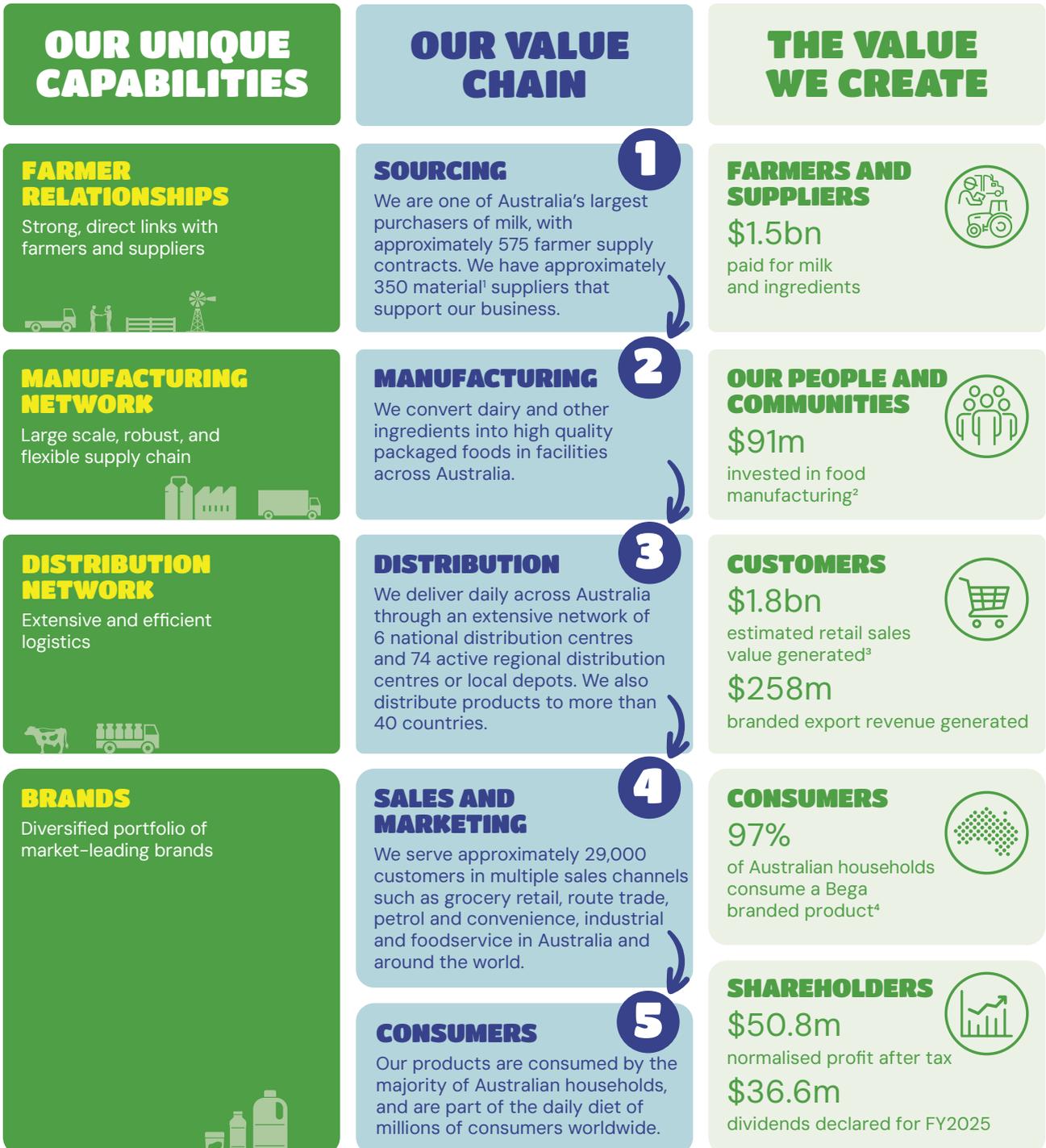


# Our structure, operations and supply chains

## OUR OPERATIONS

Bega Group is an integrated producer of packaged foods, beverages and ingredients that millions of people use every day. We operate across two business segments:

1. Branded – consumer and foodservice products sold through grocery, route, foodservice, petrol and convenience channels.
2. Bulk – nutritional powders and dairy ingredients sold primarily to food manufacturers



1 Suppliers with annual purchases over \$1 million.  
 2 Annual supply chain capital and research and development expenditure.  
 3 Combined Bega categories, MAT to 29 June 2025, Aus Grocery + Aus Convenience combined. Circana Total Business Scan Database.  
 4 Circana IHP Combined Unify Panel MAT to 15 June 2025.

# Our structure, operations and supply chains

## BRANDS AND CATEGORIES

We continue to produce a portfolio of leading iconic brands in seven consumer categories. Our brands have become trusted household names over several generations. Our brands and products are shown in Figure 1, below<sup>1</sup>.

As a leading Australian food and beverage company we source, produce, manufacture, sell and distribute a range of consumer goods, across four key product categories:

- white and flavoured milk
- yoghurt and culinary
- non-dairy beverages
- spreads.

Our top eight brands generate the majority of our branded revenue. They span a wide mix of products, from everyday essentials to discretionary food items.



Grocery category	Bega market share	Bega market position	Australian retail categories \$m <sup>2</sup>	Bega brands
Milk-based beverages	46%	1	1,142	
Yoghurt	24%	2	2,114	
Spreads	28%	1	776	
Chilled juice and drinks	18%	2	729	
Fresh white milk	12%	3	2,145	
Creams and custards	8%	4	665	
Water ice	89%	1	67	

Bega Group Brands  
Figure 1

<sup>1</sup> Please note our colby and natural cheddar cheese products branded as Bega and sold in Australia are excluded as the distribution and sale of these are managed by Fonterra Australia Pty Limited. We also manufacture and distribute cheese products sold to our international customers under the brands Bega, Dairymont, Melbourne, Royal Victoria and Tatura. These products are not sold in Australia and therefore not included above.

<sup>2</sup> Source: Data (retail sales value) sourced from Circana Market Edge 12 months to 29 June 2025 based on data definitions provided by Bega. (Market: AU Grocery Unweighted and Structured Convenience). Excludes Costco, Aldi, local trade and unstructured convenience. Yoplait brand used under licence.

# Our structure, operations and supply chains

## MANUFACTURING AND DISTRIBUTION

Our integrated network produces and delivers chilled food daily across Australia. This extensive reach and our strong retail partnerships ensure our brands are readily available nationwide. By aligning our Bulk and Branded businesses, we extract more value from the milk collected each year by the Group. This approach helps us manage seasonal milk supply, reduce input costs, and realise the most value from every component of the milk we process. We continue to invest in scaling this network to drive efficiency, optimise capacity utilisation, and support long-term growth.

## GEOGRAPHIC LOCATIONS

We operate across the world, including Australia, Japan, China, Southeast Asia, and the Middle East. Our registered office is in Bega, New South Wales, Australia. We have corporate offices and manufacturing and processing sites throughout Australia. At the end of the reporting period, we employed over 3,700 people across our Australian-based head office, our Australian manufacturing sites, and our international sales offices. Approximately 20% of our employees work at corporate offices and the remaining 80% work in production.

At our corporate offices, we have teams working in marketing, sales, research and development, quality, procurement, category management, safety, capital engineering, and administrative support services such as finance, human resources, legal, and IT.

We have 18 production sites, 6 national distribution centres and 74 depots in Australia (Figure 2). Our technical team members work at these sites, with responsibility for production, maintenance, quality assurance, and food safety.

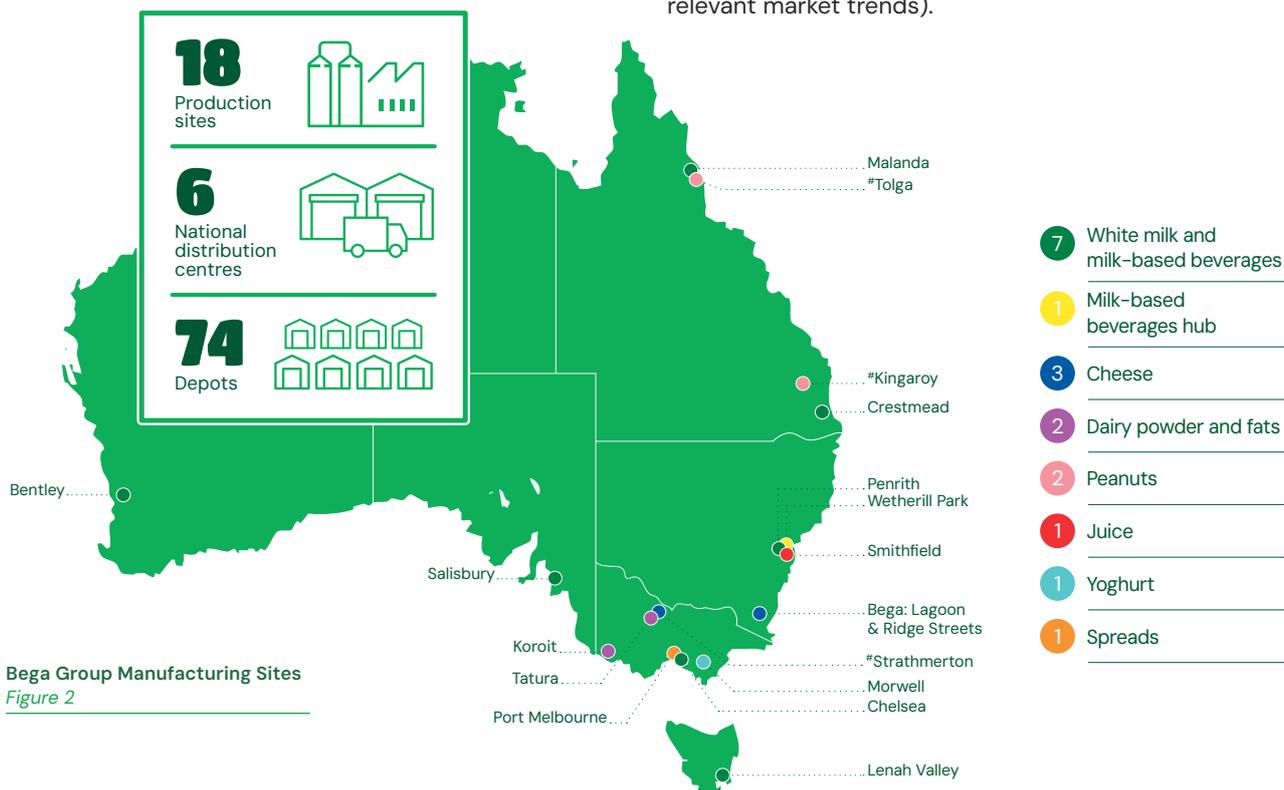
We have three international sales offices. They are located in the United Arab Emirates, China, and Malaysia. There are 14 team members who work from these locations.

Of our total employees, 93% are employed on a permanent basis, and 7% are contingent workers, including temporary, casual, agency, or contracted workers. Additional detail on our contingent workforce can be found in Our Actions, page 21.

We sell our products in over 30 countries to a variety of customers, including manufacturers, retailers, distributors, and sales agents.

In Australia, we sell our goods to leading retailers including major grocery outlets, independent grocers, petrol and convenience outlets, route outlets, foodservice outlets, and quick service restaurant channels. Our customers also include cafes, government institutions, and operators in the aged care and healthcare sectors.

Our international customers are in a range of markets including Southeast Asia, China, Japan, South Korea, the United Kingdom, France, and the Middle East. We maintain several business-to-business relationships with international companies for both bulk and branded goods. We continue to strengthen in-market capabilities in relevant markets (see our 2025 Annual Report for relevant market trends).



# Site exit planned by FY2027.

# Our structure, operations and supply chains

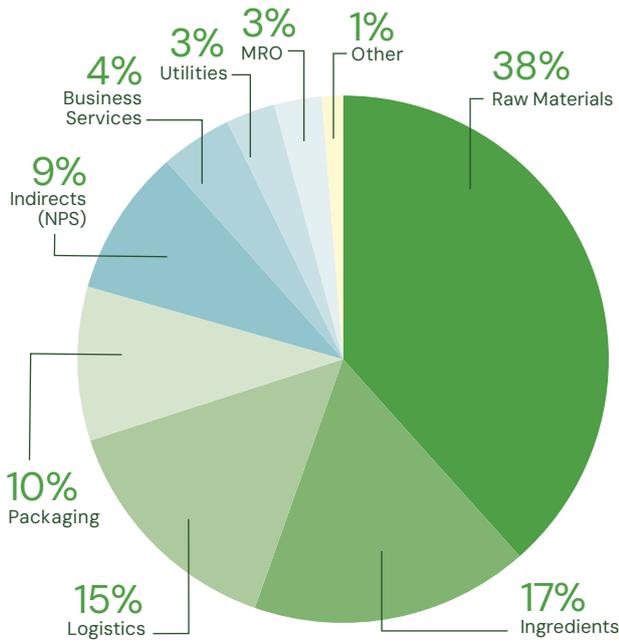
## OUR SUPPLY CHAIN

In FY2025, our supply chain consisted of over 4,000 direct suppliers. This included over 200 new suppliers who provided a variety of goods and services both domestically and internationally.

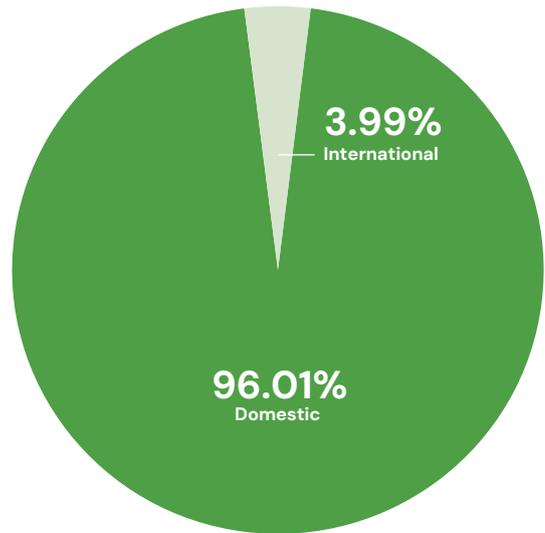
In FY2025, our total procurement spend was \$2.8bn. A breakdown of our main procurement categories and proportion of spend is shown below in Figure 3. Expenditure on raw materials and ingredients equates to over 55% of total spend when combined.

We prioritise sourcing locally. Over 96% of our expenditure is with Australian suppliers. Our international spend is primarily with suppliers in the United States, Argentina, China, New Zealand, and Singapore. Figure 5, on page 17 details the geographic distribution of our spend.

In addition, we engage third-party manufacturers (TPMs) to produce Bega-branded products and finished goods, which we then distribute. Our 18 TPM partners manufacture our branded products on an exclusive basis to our quality standards and ingredient requirements. Our TPM partners are thoroughly vetted to ensure their supply chains are transparent and managed.



FY2025 spend by category  
Figure 3



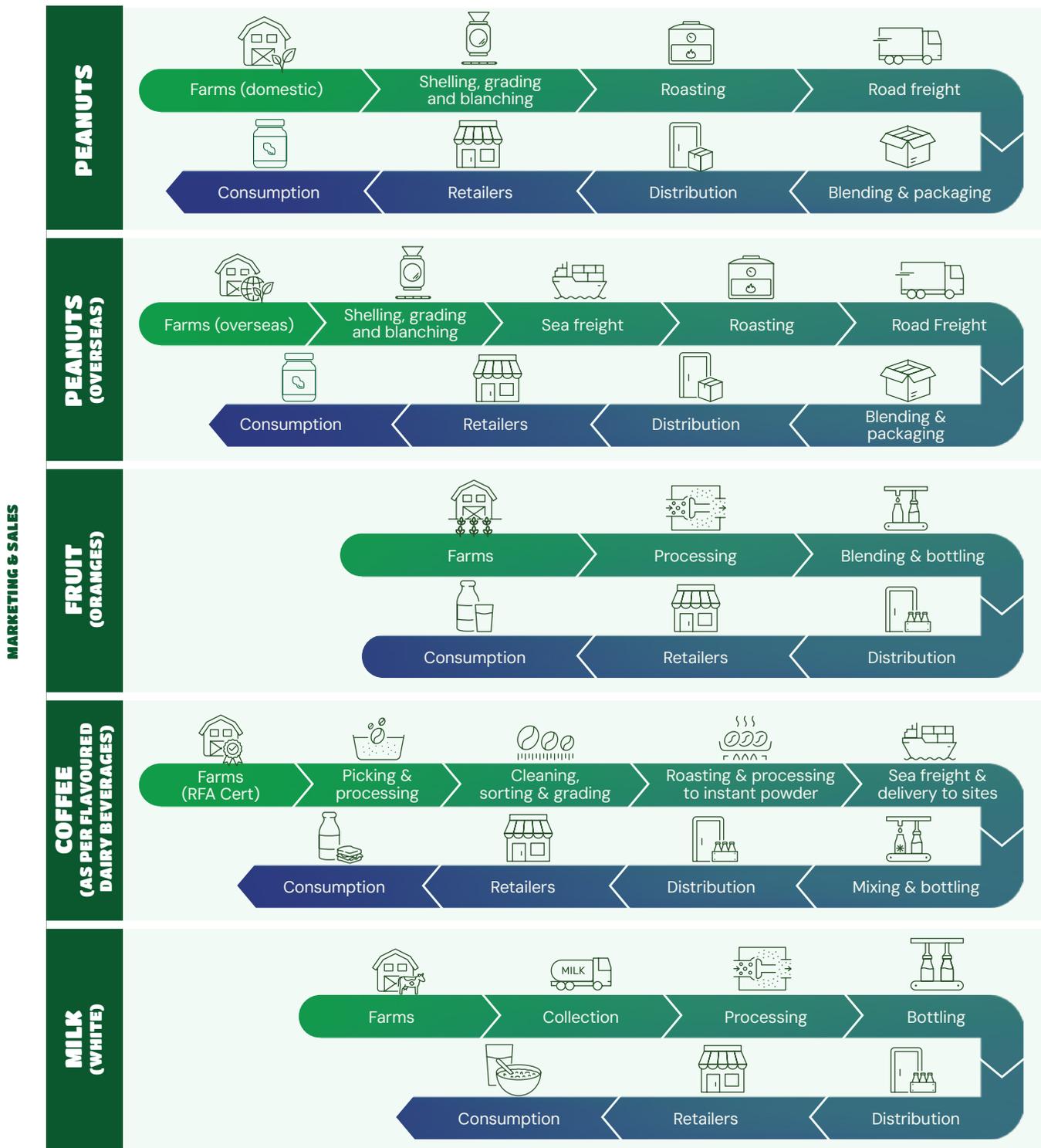
FY2025 spend by source  
Figure 4

# Our structure, operations and supply chains

## OUR KEY COMMODITIES: VALUE CHAIN OVERVIEW

During the reporting period we continued efforts to map the supply chains for our most significant commodity items. This informed our risk assessment and management approach for modern slavery and other sustainability priorities.

Below we outline value chain representations for the product value chains for milk, coffee, juice and peanuts. In Section 3 we discuss risks in some of these commodities.



# Our modern slavery risks

## HOW WE UNDERSTAND MODERN SLAVERY RISK

Our understanding of modern slavery risk is guided by the *Modern Slavery Act* including the associated Guidance for Reporting Entities and the United Nations Guiding Principles on Business and Human Rights (UNGPs).

In accordance with this guidance, we define modern slavery risk as *risk to people or a risk of people experiencing modern slavery in our supply chain and operations*. Modern slavery risk (understood as risk 'to people') is distinct from risk to our business but can influence business risk in a range of ways. We have integrated modern slavery into our enterprise risk framework.

Our approach to identifying modern slavery risk is informed by credible research and reports<sup>1</sup>. We focus on inherent risk factors associated with goods or services to inform further efforts to understand and mitigate these risks. We also gather a range of other risk data, including in relation to the suppliers' own practices and the situation of workers. Key factors we consider in risk identification and prioritisation include:

- **geographic risk (from source country)** the potential for modern slavery and labour rights abuses to occur in a country or geographic region
- **sector risk** the potential for modern slavery and relevant labour abuses to occur in a particular sector or industry
- **worker vulnerability** the presence of vulnerable worker types (e.g. migrant workers or workers who are isolated) notably when combined with other risk factors
- **high-risk practices** practices that increase vulnerability to modern slavery such as subcontracting, and the use of high-risk, third-party labour practices such as labour hire
- **supplier performance and additional data** data gathered through our day-to-day sourcing risk management activity, which might pertain to a particular commodity or geographic area or to the performance of a specific supplier
- **industry insights** insights and trends in industries which affect our risk exposure and awareness, such as the findings in the Fair Work Ombudsman's Horticulture Compliance Report
- **business factors** factors for consideration, such as our level of spend, the nature of supplier relationships including our level of influence, and the criticality of specific goods and services to our business
- **our level of involvement** we assess and manage our modern slavery risks through a lens of our relationship or level of involvement to a potential or actual risk. This is informed by the UNGPs' Continuum of Involvement<sup>2</sup> which focusses on an organisation's causal relationship to potential harms and human rights impacts. These levels of involvement are:

- i. **cause:** the business' operations (activities including omissions) directly result in modern slavery practices

- ii. **contribute:** the business' operations or actions in its supply chain may contribute to modern slavery, including through acts or omissions that facilitate or incentivise slavery

- iii. **linked:** the business' operations, products or services may be connected to modern slavery through the activities of another entity with which it has a business relationship.

In tables 1 and 2 on pages 14 and 15, we set out our understanding of the most significant modern slavery risks in our operations and supply chains.

### Our actions to identify and assess risks

We undertook a comprehensive assessment of the risks across our operations and supply chain in FY2023. This assessment informed a baseline understanding of high-risk countries, categories and commodities which we continue to utilise, test and refine. During the reporting period, actions to validate our risk ratings and inform supplier prioritisation included:

- review of potential changes in the risk profile of specific goods, services or countries of origin based on external organisations and bodies such as Sedex, Walk Free and the Office of the Anti-Slavery Commissioner
- review of any relevant changes in our sourcing activity including shifts in raw inputs and services
- review and adjustment of internally assigned risk levels against Sedex and expert third-party data (including review of country risk profiles against Sedex RADAR [Sedex's supply chain risk assessment tool] profiles)
- review of supplier risk ratings based on information gained through our ongoing responsible sourcing activities including Sedex registration and review, social audit, and integration of ethical sourcing and modern slavery topics in our quarterly business review (QBR) with suppliers
- review of any changes to industry requirements and regulations
- continued strengthening of internal screening of new suppliers and third-party manufacturers including increasing pre-award requirements
- streamlining and standardising our risk data collection and analysis
- in depth assessments in identified high-risk areas, including labour hire in our operations, finished goods logistics, and fruit to better understand modern slavery risk factors and inform actions.

Refer to Our Actions, page 18 for more detailed information about these activities.

<sup>1</sup> Global-Slavery-Index-2023.pdf; Global Rights Index; 2024 Trafficking in Persons Report; List of Goods Produced by Child Labor or Forced Labor; Guidance on Reasonable Steps; Due diligence and reporting | Communities and Justice

<sup>2</sup> The 'Continuum of involvement' is set out in the UN Guiding Principles on Business and Human Rights. Official Modern Slavery Act Guidance

# Our modern slavery risks

## RISKS IN OUR OPERATIONS

### Our workforce

Our operations are primarily based in Australia, with sales offices in other countries. While Australia is considered to have low inherent modern slavery risk, we recognise that we operate in some high-risk industries. Notably, in Australia, the agricultural sector is considered high-risk for modern slavery and labour exploitation. Additional risk factors in agriculture include a high proportion of vulnerable worker groups such as migrants, the use of labour hire providers which results in reduced transparency and oversight, and potentially hazardous working conditions. Workers in this sector have been found to experience deceptive recruitment and coercion, underpayment or withholding of wages, confiscation of identity documents, deprivation of freedoms, and restriction of movement.

In Australia, 56% of our direct workforce are employed under enterprise and union bargaining agreements (EBAs). The remaining 44% are engaged under modern awards or are award-free and salaried. Risks are primarily associated with rates of pay. As noted in the next section, we monitor and audit our team members annually for wage compliance.

Conversely, while our international sales teams are based in countries with moderate to very high inherent modern slavery risk due to a lack of worker protections, socioeconomic inequality, and geopolitical factors, they are engaged in industries considered to be lower risk.

As part of considering modern slavery risks in our operations, we have also included consideration of indirect workers hired through third parties.

The following table sets out identified modern slavery risks in our operations, including relevant risk factors and consideration of our level of involvement. Our actions to manage these risks are set out in detail in Our Actions, page 18.

Sector	Workers	Risk factors and level of involvement
Horticulture, agriculture, facilities management (including cleaning, security services, and grounds management), maintenance and operations services, maintenance equipment servicing	Direct workforce including workers engaged under an enterprise and union bargaining agreement, modern award, or award-free contract	Contracts for direct workers' arrangements carry a potential risk of labour exploitation. This would relate to compliance issues with labour requirements such as minimum rates of pay and terms and conditions of employment.  We have the potential to <b>cause</b> this risk through our direct employment of workers. We consider this risk to be unlikely given the controls in place, as set out in Section 4.
	Indirect workforce including labour hire, operations services workers, temporary and seasonal workers, contingent workforce and workers in third party manufacturers (TPM)	We engage indirect workers to perform work on our sites for a range of services such as facilities management and operations service tasks. Indirect workers in Australia, particularly labour hire, temporary, and seasonal workers, are known to be vulnerable to labour exploitation due to isolation, widespread use of migrant and temporary workers, and subcontracting. Common types of exploitation include unsafe working conditions, deceptive recruitment and debt bondage, underpayment and withholding of wages, piece-rate payments, and deprivation of other freedoms.  We may be <b>directly linked</b> to this modern slavery risk via outsourcing services to labour hire agencies. We may <b>contribute</b> to this risk if we do not undertake sufficient due diligence with our labour providers and TPM partners. We consider this to be a priority risk area.
Sales and marketing	Direct workforce – based in the United Arab Emirates, Malaysia and China	We employ workers in countries other than Australia which are moderate-to-high-risk for modern slavery due to weak or limited worker protections. Common types of exploitation in these regions includes forced labour, deceptive recruitment, trafficking, and restriction on freedoms of association.  We could have the potential to <b>contribute</b> these risks as the direct employer of workers in these jurisdictions. We consider this risk to be unlikely as we engage high-skilled workers and monitor labour conditions.

Risks in our operations  
Table 1

# Our modern slavery risks

## RISKS IN OUR SUPPLY CHAIN

### Supply chain sector risk

High priority modern slavery risks identified in our supply chains are set out below, in Table 2. Our actions to manage these risks are set out in detail in Our actions, page 18.

Sector / product	Workers	Risk factors and level of involvement
Agriculture, horticulture	Labour hire and contingent agricultural workers	Refer to operations sector risk Table 1, page 14. While labour hire involves third party relationships, we have considered labour hire and contingent labour in the context of our operational modern slavery risks and associated actions.
Agriculture, forestry, fishing, ingredients and raw materials including cocoa, coffee, vanilla, palm oil, peanuts, fruit and fruit-based products	Workers picking, processing, and producing food products in Australia and overseas in both formal and informal employment arrangements	<p>Some ingredients and raw materials that we source are inherently high-risk for modern slavery. These industries are known to include geographic risk and involve high proportions of migrant and lower skilled workers, child and forced labour, due to a lack of worker protections and higher levels of poverty. Complex and opaque supply chain arrangements, and downward price pressure, exacerbate risks of exploitation. Common types of exploitation include withholding and underpayment of wages, debt bondage, deceptive recruitment and trafficking, unsafe conditions, forced and child labour, and excessive overtime.</p> <p>We are <b>linked</b> to this risk through our supply chain relationships. We may inadvertently <b>contribute</b> to this risk through our sourcing of ingredients and raw materials known to be high-risk for modern slavery.</p>
Manufacturing – safety and personal protective equipment (PPE)	Workers processing materials and producing products overseas	<p>Major global manufactures of PPE such as gloves and masks have been found to be engaging in forced labour and exploiting factory workers. General risks also exist in the broader manufacturing sector, and this often combines with geographic risk. Common types of exploitation include forced and child labour, unsafe working conditions, underpayment and withholding of wages, deceptive recruitment, debt bondage, trafficking, piece-rate payment, and excessive overtime.</p> <p>We are <b>directly linked</b> to this risk through our supply chain relationships. We may <b>contribute</b> to the risk if our buying practices prioritise suppliers and business partners who are at high risk of exploitative practices.</p>
Merchandising and licensing relationships – point of sale materials, premiums, branded merchandise	Workers processing materials and producing products overseas	<p>We have several commercial relationships with other companies for merchandising and the licensing of some of our products and brands. As noted above, manufacturing is a high-risk industry, and contract manufacturing presents additional risk as it involves third parties and therefore reduces our visibility of labour conditions. Common types of exploitation include forced labour, underpayment of wages, and unsafe working conditions.</p> <p>We may be <b>directly linked</b> to this risk as we purchase finished products that may have been made under conditions of forced labour, or where the materials were sourced or processed under conditions of forced labour.</p>
Manufacturing in high-risk sectors – textiles (uniforms), machinery, pallets, IT equipment	Workers processing materials and producing products overseas	<p>This group of products is considered high risk for modern slavery notably due to the sourcing of rare minerals and materials from industries with documented exploitation and modern slavery, and from high-risk geographies. The production of raw materials and other inputs for the manufacture of these products has been linked to significant human rights abuses in countries with large populations of low-skilled workers and communities in poverty. Manufacturing as an industry is considered high risk for modern slavery, with tight profit margins and tiered production systems as risk factors. Common types of exploitation include forced and child labour, unsafe working conditions, excessive overtime, piece-rate payment, withholding and underpayment of wages, debt bondage, and trafficking.</p> <p>Broader human rights impacts are also relevant for the extraction and processing of rare minerals and raw materials, including the funding of localised conflict and violence, degradation of natural resources, and the displacement of communities.</p> <p>We may be <b>directly linked</b> to this risk, as ongoing procurement of the goods contributes to sustained demand for the products.</p>

Risks in our supply chain.  
Table 2

## Our modern slavery risks



### CASE STUDY

## RESPONDING TO AI IMPACTS IN MARKETING

Our marketing activities continue to evolve to adjust to new media touchpoints and the growth of new channels including social media.

We continue to monitor potential risks for sustainability and labour issues in this area, noting the potential impact of the continued uptake of AI. During the reporting period, we noted the potential for modern slavery risk due to the upstream labour exploitation in the manufacture and construction of equipment, and software and model testing to support AI infrastructure and outputs.

As a mitigating action, we updated our contractual agreements with agency partners and developed a new Master Services Agreement, for roll-out in FY2026. The new template includes expectations for human-generated outcomes, increased protections for individual outsourced content creators, and clear requirements for agencies who source this talent on our behalf. Building on learnings from FY2024, agencies who source marketing materials on our behalf are now obligated to source from Sedex-registered indirect suppliers.

# Our modern slavery risks

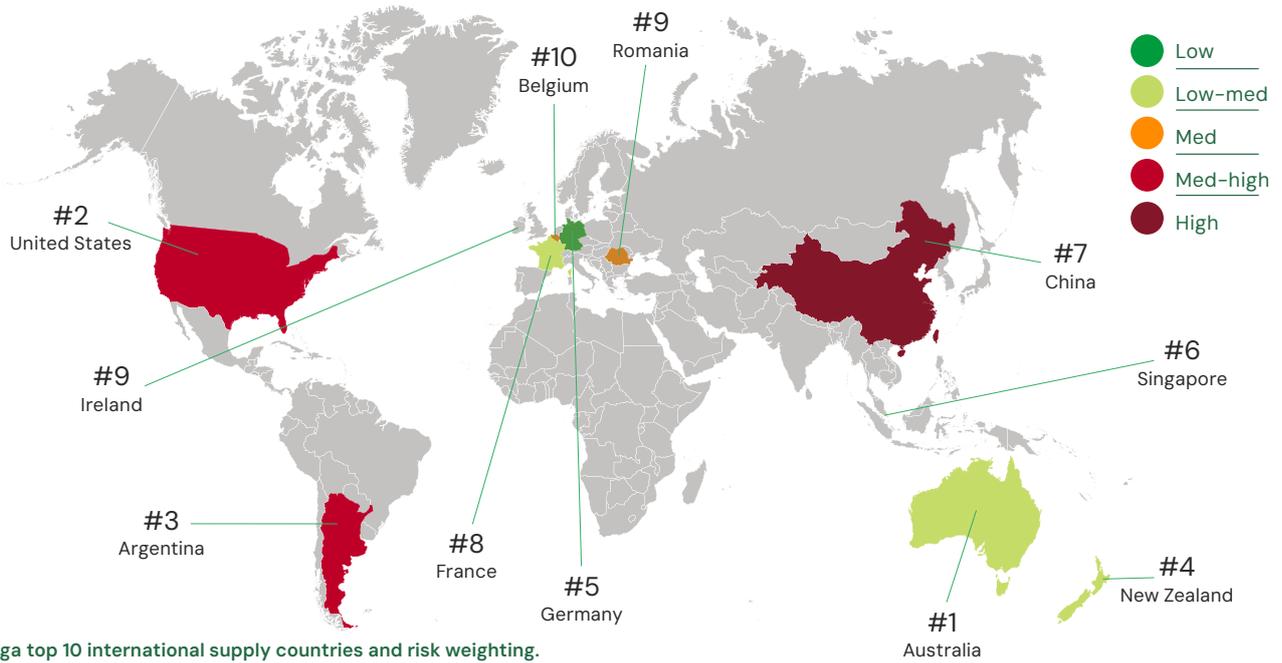
## RISKS IN OUR SUPPLY CHAIN

### Supply chain geographic risk

Geographic risk means that some countries may have higher risks of modern slavery, due to factors including poor governance, weak rule of law, conflict, migration flows, and socioeconomic factors like poverty. This is determined by reference to third-parties, public research and reporting which evaluates governance, corruption, the rule of law, and worker protections in countries around the world. Examples include the WalkFree Global Slavery Index and ITUC Global Rights Index.

We have reviewed our FY2025 spend data and updated the top 10 geographic locations of our direct suppliers. The risk profile for the top 10 sourcing countries is detailed below.

More information about the geographic distribution of our spend is provided in the chart below. This sets out the main countries where our international procurement spend occurs, the percentage of spend in that country and the geographic risk rating for that country as detailed by credible third parties.



Bega top 10 international supply countries and risk weighting. Figure 5

Rank	Country	% FY2025 spend	GSI vulnerability score <sup>1</sup>	GSI est prevalence <sup>2</sup>	ITUC GRI ranking <sup>3</sup>	Risk considerations
1	Australia	96.01%	6.8	1.6	2	Low-risk to medium-risk goods and services with risk levels varying by sector
2	United States of America	1.20%	24.5	3.3	4	Medium-risk services and medium-to-high-risk goods
3	Argentina	1.12%	35.5	4.2	4	medium-to-high-risk goods
4	New Zealand	0.80%	7.8	1.6	2	Low-risk and medium-risk services and low-risk goods
5	Germany	0.20%	10.7	0.6	1	Low-risk services and low-risk goods
6	Singapore	0.19%	24.4	2.1	2	Low-risk services and medium-risk ingredients
7	China	0.13%	45.5	4.0	5	High-risk ingredients and goods
8	France	0.07%	13.3	2.1	2	Low-risk services and medium-to-low-risk goods
9	Romania	0.05%	25.9	7.5	3	Low-risk services and medium-risk goods
10	Belgium	0.05%	10.8	1.0	3	Low-risk services and medium-risk goods

Bega top 10 international supply countries by spend percentage. Table 3

1 Walk Free GSI 2023 . Indicates proportional vulnerability out of 100 to modern slavery, where a higher score indicates higher vulnerability.  
 2 Walk Free GSI 2023 Estimated prevalence of modern slavery per 1000 population.  
 3 ITUC GRI 2025 Measures labour rights violations of countries on a scale of 1 to 5, where a score of 1 indicates good protections for workers and a score of 5 indicates no guarantee of rights.

# Our actions

## HIGHLIGHTS

In FY2025, we continued to action our Modern Slavery Action Plan, alongside our Better Future Strategy, to improve our assessment, management, and prevention of modern slavery risks.

Our key activities included:

- **governance** – building the capability and expertise of our Modern Slavery Working Group (MSWG) and Executive to address modern slavery and human rights risks through our action plan
- **policies** – developed and embedded sustainable sourcing policies for coffee and cocoa; formalised monitoring arrangements for our Sustainable Palm Oil Policy and redeveloped our Ethical Sourcing Policy
- **training and capability** – implemented mandatory modern slavery training of key internal team members and held education and awareness sessions for other functional teams across the Group
- **operations** – took steps to better understand potential and actual risk associated with indirect labour at our sites
- **supply chain** – strengthened decision making pathways for escalation to Group Procurement; conducted deep dives into priority high-risk goods and services; deepened our understanding and awareness of the extended supply chain and country of origin for high-risk fruit and fruit concentration products
- **grievance and remediation** – continued engagement and education with our suppliers on grievance mechanisms; published our incident response process online
- **stakeholder engagement** – held education and awareness sessions with key industry and supplier partners to build capacity for modern slavery risk identification; continued industry participation and leadership.

## GOVERNANCE

We continue to operate and strengthen robust governance frameworks throughout the business for the effective assessment, management, and prevention of modern slavery risks.

Our MSWG is the primary mechanism for our modern slavery governance framework. The MSWG reports quarterly to the Risk & Sustainability Committee (RSC), which in turn reports to the Board.

Our MSWG is a cross-functional group of senior managers with responsibility for our commercial, legal, operational, and supply chain activities. The MSWG meets monthly to review risk data, oversee our compliance with the *Modern Slavery Act* including delivery and effectiveness of our Modern Slavery Action Plan, and address issues raised in our operations and supply chains including responsibility for incident management and remediation. The MSWG is led by the Ethical Sourcing Manager (Group Procurement) who has day-to-day carriage of modern slavery risk assessment and management activity.

In FY2025, the MSWG focused on continuous improvement in the delivery of our Modern Slavery Action Plan and relevant business-wide actions to support our approach. Key actions overseen include new and updated policies, mandatory e-learning programs for internal teams, and procurement category deep dives. Each of these is set out in detail later in this section. The MSWG also participated in a workshop facilitated by a human rights specialist which highlighted industry-specific issues and trends in human rights and modern slavery.

Figure 6 details the structure of our reporting hierarchy and the remit of each of our governance bodies.



FY2025 Modern slavery governance structure. *Figure 6*

# Our actions

## OUR POLICIES

Our policies are an important part of our governance framework. They serve to operationalise our commitment to manage modern slavery risks and transparently communicate our standards and expectations to our people, suppliers, and partners.

We review our suite of policies biannually to ensure policies remain relevant and aligned with regulatory requirements, international frameworks and best practice, and industry and stakeholder expectations. New policies are developed following extensive stakeholder consultation.

Our employees complete refresher training on core policies biannually and changes to policies are communicated through internal channels. Our employee onboarding process requires new team members to read and acknowledge the suite of policies.

Table 4 shows a summary of core policies that relate to modern slavery and ethical sourcing. As set out below, during FY2025 we developed and updated policies for identified high-risk, critical raw ingredients, and updated our Ethical Sourcing Policy and Purchasing Policy.

Policy	Purpose
<a href="#">Code of Conduct</a>	Outlines our expectations and requirements of our suppliers, including child labour and forced labour, working hours, safety and health, wage and benefits, non-discrimination, harassment and abuse, and disciplinary practices
<a href="#">Ethical Sourcing Policy</a>	<p>Outlines the standards our suppliers must meet and the obligations of our staff to work with our suppliers to meet those standards.</p> <p>In FY2025, we updated this policy and its operation to clearly state our expectations and requirements, and broadened its scope to reflect our commitment to respecting human rights. This policy is now an overarching policy and requires adherence to our other policies, including our Supplier Responsible Sourcing Code (SRSC).</p>
<a href="#">Sustainable Palm Oil Sourcing Policy</a>	Sets out our commitment to sourcing palm oil in a socially and environmentally responsible manner, adopting the standards of the Roundtable on Sustainable Palm Oil (RSPO)
<a href="#">Coffee Sourcing Policy</a>	Sets out our commitment to sourcing coffee in a socially and environmentally responsible manner
<a href="#">Cocoa Sourcing Policy</a>	Sets out our commitment to sourcing cocoa in a socially and environmentally responsible manner
<a href="#">Supplier Responsible Sourcing Code (SRSC)</a>	Provides details of the minimum standards we expect of suppliers and includes a focus on human rights
<a href="#">Purchasing Policy<sup>1</sup></a>	<p>Governs our purchasing activities and sets out which team members have the authority to act as buyers and approve spending on behalf of the Group.</p> <p>In FY2025, we completed a pilot program across several sites to understand how these activities can be improved.</p>

Our other policies, which relate to ethical sourcing and modern slavery can be read in full on our website, include:

- [Whistleblower Policy](#)
- [Food Safety & Quality Policy](#)
- [Health & Safety Policy](#)
- [Respect Statement](#)
- [Diversity, Equity & Inclusion Policy](#)
- [Compliance & Integrity](#)
- [Environment Policy](#)
- [Anti-Fraud & Corruption Policy](#)
- [Bega Group Standards of Business Conduct Statement](#)
- [Corporate Governance Statement](#)

Policies relating to ethical sourcing and modern slavery  
*Table 4*

<sup>1</sup> Internal Policy only

# Our actions

## SPOTLIGHT: SUSTAINABLE SOURCING POLICY DEVELOPMENT

During FY2025 we developed and updated policies relevant to modern slavery to set minimum standards, inform buyers and suppliers, and guide consistent internal practices.

**Coffee and cocoa policies:** In FY2025, we developed coffee and cocoa policies which set out minimum standards required when sourcing these raw ingredients common to many of our products. The policies establish expectations of ourselves, and our suppliers including labour standards relevant to modern slavery.

**Ethical Sourcing Policy:** We also revised our Ethical Sourcing Policy to extend our ethical sourcing responsibilities across sustainability, environment, modern slavery, human rights, and business ethics.

In FY2026, we plan to develop our Procurement Policy which will define how this function governs sourcing activities within the Group.

## TRAINING AND CAPABILITY

We update our internal modern slavery training every two years. In FY2025, we launched an extensive internal training campaign to improve our teams' awareness and understanding of modern slavery risks across the business. This included education sessions with internal teams including group quality, marketing, legal, sales, and safety, in addition to mandatory e-learning modules for our procurement and legal teams. Further detail of this training is provided in the case study below.

Resources and supporting materials were provided to both internal and external stakeholders.

### CASE STUDY

## MODERN SLAVERY E-LEARNING

In April of FY2025 we rolled out refreshed modern slavery training modules, to over 1,000 employees including all buyers, supplier managers and people leaders, within key business functions.

As of June 30, over 68% of those enrolled into the course had successfully completed the refresher training.

This year's training included four content modules, and a quiz with a 100% pass mark to demonstrate understanding of the topic. The e-learning modules included guided learning on:

- what is modern slavery?
- what are the risks to Bega?
- how we assess risk
- our governance of modern slavery risk

Participants are guided to identify what modern slavery can look like, assess where risks might exist within our supply chain, and understand the consequences

for the business if risks are not appropriately managed. Participants are then taken through our risk management framework and governance structure, and given directions on what to do if they uncover a risk or wish to report an issue.

Participant feedback was positive with many expressing a new appreciation for the complexity of the topic. Participant feedback also challenged us to consider the level of difficulty of the training quiz and the level of information participants must absorb.

Examples of participant feedback:

*"I found the training to be straightforward and very insightful. It deepened my understanding of the various aspects of modern slavery, particularly in the context of procurement. As a result, it has influenced the way I approach my work by encouraging me to consider the upstream elements of our supply chain and think more critically about how and where we source our materials."*

*"The Modern Slavery training was engaging and eye-opening. It enhanced my understanding of ethical risks in supply chains and has made me more vigilant in spotting potential issues when reviewing contracts and advising on commercial arrangements."*

# Our actions

## RISK MANAGEMENT: OPERATIONS

We are committed to ensuring there are strong labour and human rights safeguards throughout our operations. Our industrial relations, people and capability, legal, and Group procurement teams work together to protect our direct and indirect workforce and mitigate our operational modern slavery risk.

### Our workforce

We are committed to a fair and legally compliant workplace. We also recognise the role of strong labour protections for workers as safeguards that prevent modern slavery and labour exploitation. As part of our ongoing commitment to worker protection, in accordance with Australian workplace law, our Code of Conduct outlines workers' freedoms of association and union participation. Our approach to worker protections includes:

- standard recruitment and employment processes for direct and indirect workers – including age verification
- mandatory onboarding training communicating worker rights and responsibilities under our Code of Conduct, workplace behaviour policies, Whistleblower Policy and grievance channels
- auditing our EBAs every 12 months following the federal minimum wage review and adjusting them to ensure they remain compliant with national minimum wage rates
- auditing salaried team members every 12 months following the federal minimum wage review, to ensure their rates of pay remain compliant with the increases to rates of pay in modern awards and increases to the national minimum wage rate
- raising any compliance issues identified with the Head of Remuneration & Wellbeing and the Executive General Manager of People & Capability, and reporting them to the Nomination, Remuneration, People & Capability Committee of the Board. The Board then arbitrates and dictates the required actions to resolve the matter
- directly managing workers in our overseas offices and ensuring contractors employed overseas are subject to the same pre-employment checks, policy coverage and labour protections, and establishing co-working spaces to support worker wellbeing, collaboration and communication.

## SPOTLIGHT: INDIRECT LABOUR AT OUR SITES

The use of indirect labour, particularly labour hire, is a noted area of modern slavery risk for us and was a focus of our due diligence activity in FY2025. Our risk assessment activities identified that labour exploitation and practices of modern slavery have been noted in Australia, associated with the use of temporary labour hire workers.

To address this we take an "inside first" approach to recruitment, which means we prioritise direct employment wherever possible. When we do engage workers indirectly, we do so through preferred providers who have consistently demonstrated they meet our expectations regarding labour conditions and adherence to our policies.

Our labour hire partners are also contractually obliged to ensure their workers receive terms and conditions comparable to our own EBA employees. Ninety five per cent of our labour hire engagement is with one provider, which is subject to quarterly business reviews (QBRs) and key performance indicators (KPIs) including site-based spend, overtime spend, employee numbers per site, pre-employment requirement checks, maintaining records of skills training and experience, time and attendance records, account management for each site, and diversity and inclusion targets tracking.

### FY2025 deep dive

In FY2025, we undertook a deep-dive assessment at six of our sites to improve our understanding of different types of indirect labour at our sites across Australia.

In doing this we focused on noting key differences in employment types notably labour hire (where a company engages workers on our behalf to complete work), contractors (typically specialists that complete discrete tasks or projects) and other workers (engaged under contractor arrangements but consistently working on our sites).

Workers in the last category were identified as a priority group for ongoing monitoring, given their ongoing role on our sites and our level of responsibility for their work conditions. The deep dive noted the use of long-standing provider relationships at site level, with potential gaps in the application of Group procurement processes.

Based on the findings, we strengthened our procurement processes and governance down to the site level and took steps to continue centralising procurement decisions regarding contingent labour across the whole business, including sites.

### Learnings

Effective engagement with leaders at our sites was critical to this process. Where a site's preferred labour provider had not been subject to our Group-level qualification processes, our procurement and industrial relations (IR) teams supported the provider to meet our expectations for ethical sourcing, such as Sedex registration, and improved documentation and transparency of employment conditions. We also provided our site teams and leaders with education and training about the risks associated with partnering with providers that aren't appropriately assessed. This program supported both our sites and their labour hire providers to improve their risk assessment and management practices to meet not only our standards but evolving market standards as well.

# Our actions

## RISK MANAGEMENT: SUPPLY CHAIN

### Our Responsible Sourcing Program

Responsible sourcing and procurement are central to our efforts to respect human rights and prevent modern slavery. Our Responsible Sourcing Program (RSP) outlines how we work with our supplier partners to promote decent working conditions and prevent labour exploitation – including forced and child labour and modern slavery – within and beyond our Tier 1 suppliers.

Our RSP focuses on the high-risk and moderate-risk materials and countries in our supply chain – as defined by our risk assessment processes. This means that our due diligence activities, including ongoing risk assessment and management are targeted to areas with the greatest potential for harm.

In the paragraphs below, we set out the key components of our RSP for new and existing suppliers, and highlight our key activities and outcomes during the reporting period.

### NEW SUPPLIERS: ONBOARDING

#### Steps

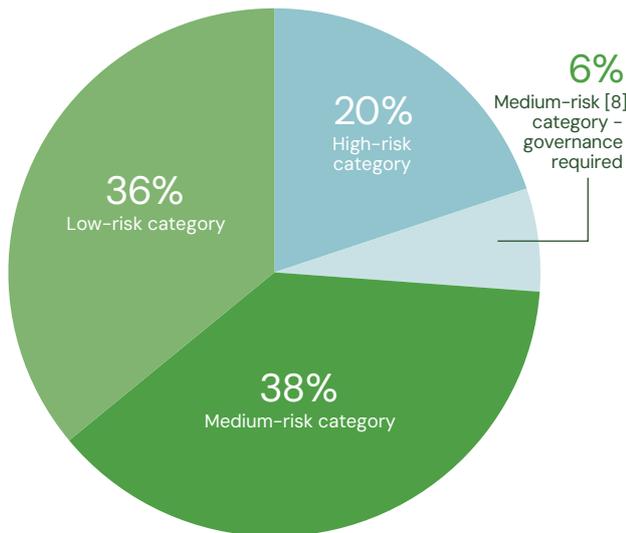
**Pre-contract due diligence and risk assessment:** All prospective suppliers are required to complete and submit responses to an Ethical Sourcing Questionnaire (ESQ). Responses to these are reviewed by our procurement team, considering country and sector risk and contract value, to determine an internal risk rating.

Suppliers are engaged directly by our procurement team and made aware of our standards and expectations and our risk management activities throughout the tender and onboarding processes.

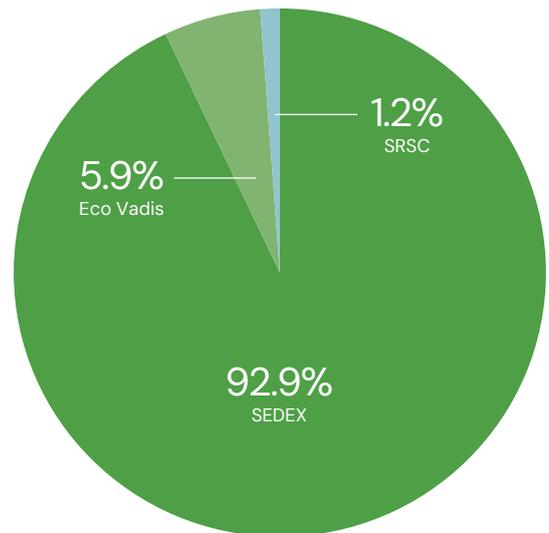
**Further due diligence:** Prospective suppliers that are assessed to be moderate-risk or high-risk are required to register with Sedex or an equivalent service (e.g. Eco Vadis) and complete the platform’s self-assessment questionnaire (SAQ). This questionnaire covers the four pillars of labour standards, occupational health and safety, environment, and business ethics.

If the findings from this step result in a high-risk rating, the supplier may be asked to complete an independent social audit (e.g. Sedex Member Ethical Trade Audit [SMETA]) or provide the results of a recent audit from an alternative platform. Our Group quality team may also request an audit.

**Contract clauses:** All supplier contracts include modern slavery clauses and provisions. Agreement and adherence to our policies, including our Ethical Sourcing Policy and Supplier Responsible Sourcing Code, is a mandatory contractual obligation.



Risk assessment outcomes for new suppliers on-boarded in FY2025  
Figure 7



Governance platform utilised for further due diligence of moderate or high-risk suppliers onboarded in FY2025  
Figure 8

# Our actions

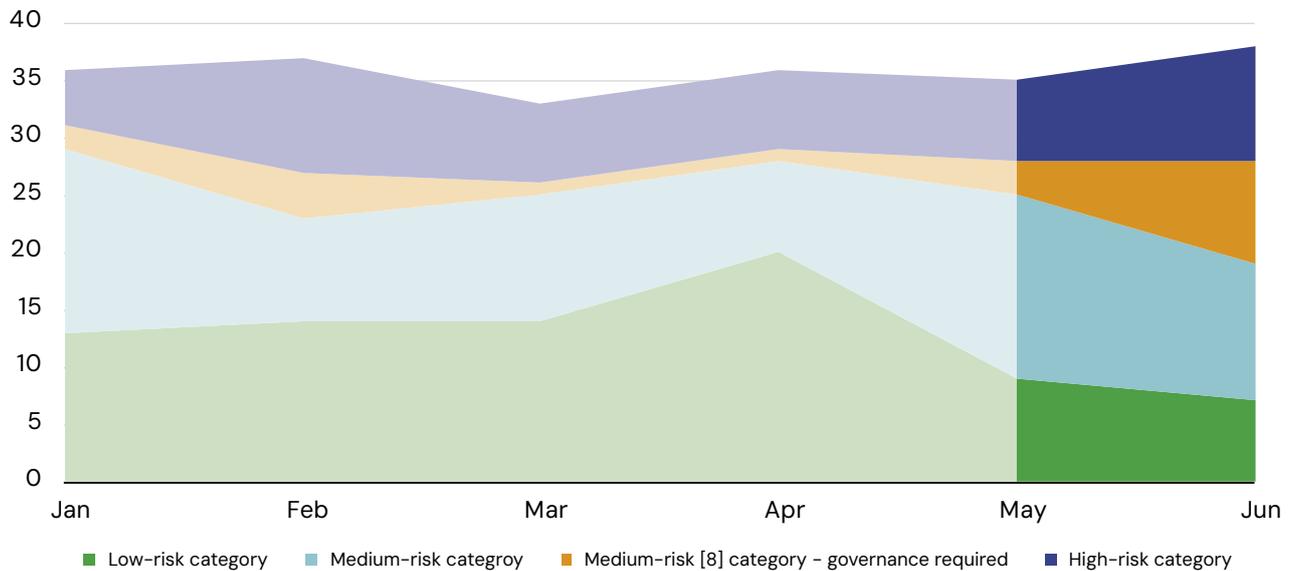
## Key additional activities in FY2025

With the support of the MSWG, we maintained risk management activities for supplier onboarding, and established additional measures to ensure our processes are practical and pragmatic.

All requests for proposals (RFPs) issued in FY2025 included specific questions relating to ethical sourcing and modern slavery.

We updated our internal risk weighting scores and due diligence triggers to be more granular and relevant to specific procurement categories, materials, and services, resulting in a higher proportion of procurement being subject to increased due diligence measures such as Sedex registration.

In May 2025, we reviewed the risks for both category and country in our risk assessment matrix for supplier onboarding, upweighting several categories. The chart below shows the corresponding change to the percentage of suppliers onboarded as a low-risk supplier. This resulted in a higher percentage of suppliers requiring additional governance measures to be successfully onboarded.



Count of new suppliers onboarded by risk level in H2 of FY2025.  
Figure 9

### CASE STUDY

## MANAGING RISKS IN LOGISTICS

We are aware that significant risks exist within the outbound logistics category based on known inherent industry risks.

In FY2025 we undertook a deep dive into this category to better understand and mitigate potential risks.

While the broader category is considered inherently 'high-risk', not all logistics suppliers have high-risk characteristics. Based on further examination of supplier risk factors, and supplier feedback, we reconsidered the value of a blanket requirement for Sedex registration for this category and identified the need for a nuanced and pragmatic approach.

In early 2025, we initiated a pilot program in Queensland for smaller or lower-risk providers. The pilot identified four partners as registered small businesses under the ATO guidelines with no use of subcontractors within their operations. These suppliers were approved to execute our SRSC instead of registering with Sedex. These suppliers were then monitored on a quarterly basis by their Bega supplier manager, to confirm ongoing alignment to Code requirements such as remaining a small business and not using sub-contractors without express agreement.

The pilot has had positive feedback from both suppliers and the logistics teams, and by June 2025, the MSWG had endorsed the pilot for roll out across all states. Suppliers participating in this process will continue to be monitored quarterly, and we will report results throughout the year.

## Our actions

To improve accessibility to smaller vendors or registered small businesses, Sedex requirements (which, in addition to the cost of registration, may be prohibitive to these vendors) may be waived, and adjusted requirements applied. For a specific example of how this is applied see the case study on page 23<sup>1</sup>.

As part of this, during the year we recognised and accepted Sedex alternatives, such as Eco Vadis and LRQA.

We improved accessibility by streamlining our ESQ processes by creating an Excel file form in addition to the online form and implemented an “agree to agree” process, with endorsement from our legal team, for critical vendors who do not participate in platforms such as Sedex. See our Case study, below.

All high-risk suppliers onboarded were registered with Sedex or an equivalent platform. For those registered to Sedex, they are required to complete their self-assessment questionnaire and then link to us on the platform. See Figure 8.

All business critical, or critical non-conformances (NCs) and corrective and preventative action (CAPA) findings from Sedex audits were reported to the MSWG monthly, and an action tracker maintained and outcomes and actions shared with them.

We reviewed our contract templates to ensure alignment with the *Modern Slavery Act* and guidance from the NSW Anti-slavery Commissioner and UNGPs.



### CASE STUDY

## STANDARDS ALIGNMENT WITH MAJOR SUPPLIERS

Some large international suppliers critical to our business do not participate in online risk assessment questionnaires or data exchange platforms such as Sedex or Eco Vadis.

In these exceptional circumstances, we manage potential modern slavery risk through direct collaboration with these suppliers using our “agree to agree” process.

Working with our legal team, this involves a mutual review of the standards, policies, and expectations of both organisations, confirming shared policy alignment and commitments on core principles relating to modern slavery. The parties agree that each party will continue to act and operate under their own policies as they pertain to human rights and labour issues. Secondly, an agreement is structured between the parties to share information to meet regulatory requirements. These obligations are then included in formalised supplier contracts.

<sup>1</sup> Note that Sedex or equivalent still required for all directs (Raw Materials and Packaging)

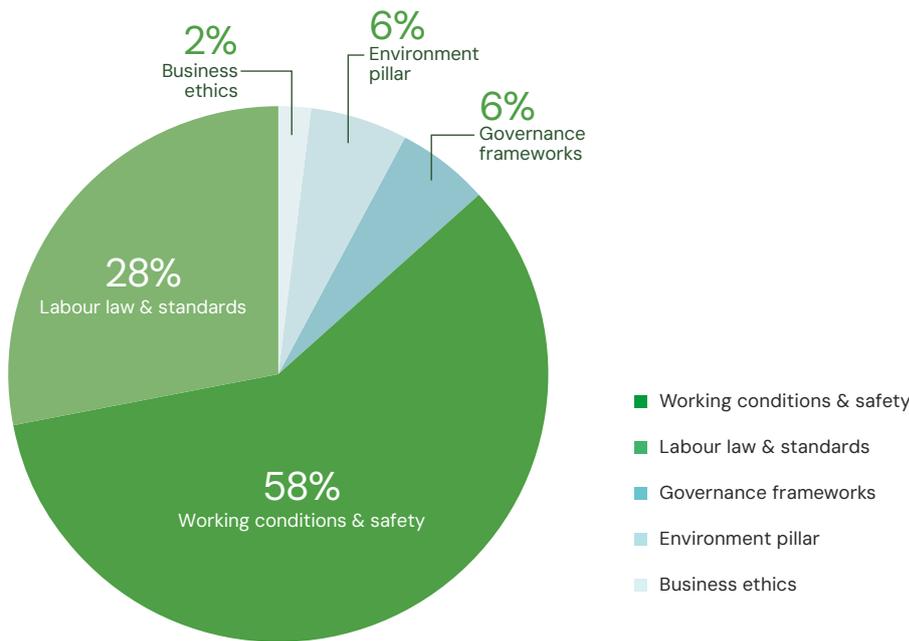
# Our actions

## EXISTING SUPPLIERS

### Governance Program

**Sedex:** Seventeen suppliers linked to Bega and rated as high-risk by Sedex were audited in FY2025. Outcomes of the audit are reported on page 58 of the [2025 Sustainability Report](#). During the reporting period, we actively worked with these high-risk suppliers to ensure business critical and critical non-conformances were closed with urgency. In those cases where non-conformances were open at the end of the reporting period, we had confirmed with the suppliers that the risk to people had been resolved to our satisfaction. We acknowledge that while we can influence these outcomes, the risks remain open and visible in Sedex until their appointed auditor closes the non-conformance in the platform.

Of the suppliers audited under SMETA in FY2025, 370 non-conformances were raised by Sedex auditors. Eighty six per cent of these were related to working conditions and safety and labour laws and standards.



Audit non-conformances for high-risk suppliers in FY2025 by pillar type. *Figure 10*

**Sedex at our sites:** Five of our sites were audited by Sedex in the reporting period, including our Crestmead site, which successfully completed their its ever SMETA audit.

There were 22 non-conformances found across the audited sites and greater than 90% of the non-conformances were closed prior to the CAPA due date.

### Other key Sedex outcomes in FY2025:

# 199

new suppliers  
linked to Bega

# 6

newly linked  
suppliers  
audited

# 75%

of suppliers have SAQ at  
**>90%  
COMPLETION**

**Supplier audits:** Our Group Quality team works closely with our procurement team and ethical sourcing manager to assess supply chain risks, including modern slavery risk. Our suppliers are contractually obligated to agree to audits. See Table 5 for audit outcomes.

# Our actions

**Contract renewal:** We continue to include modern slavery clauses in our supplier contracts and require an acknowledgement and acceptance of our policies and codes.

**Internal escalation:** Teams across our business can identify modern slavery risk factors and raise concerns with the procurement team, which are escalated to the MSWG for investigation and action as required.

**Raw material risks:** We manage our raw material risks through a combination of certification and accreditation schemes, such as the Rainforest Alliance Organisation (RFA).

**Supply chain mapping:** We conduct ongoing engagement with our direct suppliers and research into lower tiers of specific materials to inform our procurement strategy.

## Key activities in FY2025

Our Group quality team conducted 83 audits at supplier sites in Australia, New Zealand, Europe, and Asia (see Table 5, below). This represents a 45% increase in audit numbers compared to FY2024.

Bega quality team supplier audits	Count	% Change
FY2024	57	
FY2025	83	45.6%
<b>140</b>		

Supplier audits completed by the Bega quality team by year.

Table 5

Bega quality team supplier audit non conformance rating	Total non-conformances	% non-conformances
Business critical	0	0%
Critical	7	2%
Major	75	25%
Minor	216	72%
<b>298</b>		

Audit non-conformance outcomes by criticality at supplier sites as audited by the Bega Quality team.

Table 6

Bega quality team supplier audit non conformance status	Total non-conformances	% non-conformances
Closed	234	79%
Open, not yet due	24	8%
Overdue	40	13%
<b>298</b>		

Audit non-conformance outcomes by status at supplier sites as audited by the Bega Quality team as at 30th June 2025.

Table 7

We added modern slavery and labour questions to our quality audit questionnaire, and our quality team increased their awareness of modern slavery and labour exploitation indicators through training (see case study – Training, page 20).

The Group quality team launched a new supplier self-assessment questionnaire (SAQ) for those suppliers who cannot be audited due to location or are deemed low-risk. This includes modern slavery and labour rights questions.

Through our audit program in FY2025, we identified improvement areas, including providing supplier sites with comprehensive information about the types of audit questions to expect so that they were prepared and able to answer effectively. Our Group quality and procurement teams plan to further progress this in FY2026.

Product origin information, collected through Product Information Files (PIF) and specification data includes ethical sourcing and modern slavery considerations. Some of our suppliers are unable to provide complete or accurate information – addressing this is a focus for FY2026.

During the reporting period we developed, implemented and published new sustainable sourcing policies for coffee and cocoa, see Spotlight on Policies, page 20.

100% of products within our Dare range made in our Australian factories were produced with RFA-accredited coffee beans.

We commenced a deep-dive process in high-risk inputs, identifying citrus as a FY2026 priority for supplier and worker engagement.

In response to insights from the Fair Work Ombudsman about risks in the Australian horticulture sector, we conducted an intensive research and engagement program with our fruit suppliers to understand and identify risk factors and drivers in the sector. See our Spotlight on fruit, on page 27.

# Our actions

## RISK MANAGEMENT: SUPPLY CHAIN

### SPOTLIGHT ON HIGH-RISK INGREDIENTS: FRUIT

During the FY2025 year we noted a wave of interest from government, industry and civil society related to challenges in the horticultural industry in rural and regional NSW. This included the NSW Office of the Anti-Slavery Commissioner inquiry into the modern slavery risks faced by temporary and migrant workers in this geography and the Fair Work Ombudsman's Horticulture Compliance Report. These reports highlighted the need for improved education and support for growers, labour hire providers, manufacturers and retailers alike. We have also noted issues across our growers' sites, such as instances of labour hire providers engaging migrant workers without proper documentation. This has brought to our attention the highly complex nature of this issue, and the need to consider overlapping factors such as worker vulnerability, labour rights awareness, labour hire practices and immigration policy.

We are committed to engage closely with our key partners to understand this issue and we recognise the importance of wider industry action to address systemic factors. During the reporting period, we engaged with Citrus Australia to foster closer working ties with the industry body. Within the agricultural industry, the requirement for growers to register to Sedex can be seen as excessive. As a result, we sought an alternative governance platform which is tailored specifically to the industry and needs of our growers. We registered with Fair Farms as a buyer to encourage growers to join the platform to manage labour risks for employees and contractors on farm. We also updated our audit program to include growers, and risks in this sector remained an ongoing agenda item for our MSWG.

In the next reporting period, we will focus on the sourcing of domestic fruit as a priority focus area for further due diligence, supplier and worker engagement and industry collaboration.

## GRIEVANCE MECHANISM AND REMEDIATION

### Complaints channels and worker voice

Effective grievance mechanisms are essential for workers to be able to raise concerns and seek remediation. We recognise the importance for grievance mechanisms to be accessible and safe for workers in line with the UNGPs. Complaints and worker grievances also form a useful warning system to raise issues that may lead to escalated human rights abuses or labour exploitation throughout our supply chains.

During the reporting period, we maintained our grievance framework, which consists of an independent whistleblower service and a consumer care hotline.

The independent whistleblower service is set out in our Whistleblower Policy. This service is accessible to all of our existing and previous direct and indirect team members, our suppliers and their employees (whether paid or unpaid; existing and previous), and individuals who are a relative, dependent, or spouse of these people. Suspected, potential, or actual incidences of modern slavery and labour exploitation can be reported through this service. Complaints can be lodged by email or phone 24 hours a day, 7 days per week.

The consumer care hotline, 1800 677 852, is a service through which our consumers can lodge feedback or complaints, including issues related to modern slavery and labour exploitation.

In FY2026, we will look to supplement these with options to directly engage with the experience of workers.

In the reporting period, no complaints pertaining to modern slavery were lodged. We will continue to review the effectiveness of our complaints mechanisms.

# Our actions

## GRIEVANCE MECHANISM AND REMEDIATION

### Remediation

We acknowledge our responsibility to take appropriate steps to remediate human rights impacts that we cause, contribute to, or are linked to. Our approach is informed by the United Nations Guiding Principles on Business and Human Rights (UNGPs). In this, the purpose of remediation is to 'set things right' for the person who has experienced harm and restore them to the position they would be in had the harm not occurred. We recognise that the UNGPs' Continuum of Involvement – refer to section 2, page 14, informs the level of responsibility a business has to remediate a harm they are potentially involved in.

In FY2024, we developed a detailed incident response process that aims to guide our actions in the case of a suspected incident or significant risk of modern slavery in our operations or supply chain. As set out on Page 32 of our FY2024 Modern Slavery Statement the process includes:

- establishing our potential relationship to the harm
- responding appropriately via further investigation and appropriate remediation pathways
- determining actions to manage the incident or mitigate future risk
- steps to protect the safety and well-being of affected persons
- ongoing monitoring by the MSWG and referral to our whistleblower service where appropriate
- activation as needed of formal crisis management and vendor management processes.

During the reporting period, we socialised this program with the MSWG, executive and suppliers. We have committed, during FY2026, to undertake further testing of the process to inform further refinement and readiness to manage a critical incident.

## STAKEHOLDER ENGAGEMENT AND COLLABORATION

In FY2025, we continued engaging with our supplier and industry partners through education and awareness sessions and sharing resources to build management capability across industries. Our external engagement activities focused on farmers and growers, direct suppliers, and industry.

### Farmer and grower engagement

During FY2025 we engaged citrus growers and will continue this engagement in FY2026.

We initiated a partnership with Fair Farms, an Australian training and certification program for social compliance. As part of our program to manage risks in fruit and fruit sourcing, this partnership provides visibility of the experience of growers and workers in the sector. We will expand efforts to hear from potentially affected workers in FY2026.

Our dedicated farm services officers engaged directly and in person with our dairy and peanut farmers and we continued to provide resources such as our Better Farms Program, providing dairy farmers and peanut growers with advice and support, training and development, and capital works grants.

### Direct supplier engagement

We conducted education and awareness sessions about modern slavery with a selection of our high-risk and/or critical suppliers. During these sessions, we outlined our expectations and reporting obligations, and the importance of Sedex and its equivalent platforms in monitoring and managing modern slavery risk.

During the reporting period we presented our Better Future strategy, including modern slavery elements to over 200 supplier representatives at our supplier information morning in February 2025.

### Industry engagement

Throughout FY2025 we participated in industry forums and industry leadership within our spheres of influence, including:

- participation at LRQA's Industry Day
- membership of Dairy Australia's Human Rights Working Group
- membership and attendance at professional development events held by Sustainability Professionals Australia
- speaking on a panel about ethical and sustainable procurement at the Chartered Institute of Procurement and Supply Chain (CIPS) FY2025 Conference.

We partnered with Fair Farms to support direct grower engagement and labour improvements in the Australian horticulture sector.

Membership of Dairy Industry Association and Roundtable on Sustainable Palm Oil and Dairy Manufacturers Sustainability Council. Refer our 2025 Sustainability Report for the full list of memberships.

# Assessing the effectiveness of our actions

## CONTINUOUS IMPROVEMENT

As demonstrated throughout this Statement, continuous improvement is at the heart of our approach to managing and mitigating modern slavery risk. We undertake a range of actions to monitor progress, as well as to reflect critically on the effectiveness of our approach and make ongoing improvements and adjustments. During FY2025, these efforts included:

- monitoring of relevant KPIs and metrics (as set out below) and regular Board reporting, holding ourselves to account for commitments and progress
- our Modern Slavery Working Group monitoring the development and implementation of continuous improvement initiatives, via regular structured reflection on issues, learnings, challenges and progress
- engagement of third-party experts, including human rights experts, to inform and review our approach and support alignment to best practice frameworks and the *Modern Slavery Act*
- listening to feedback from stakeholders across a range of perspectives to inform and review our approach
- systematic review of our effectiveness using the Effectiveness Framework, below, which we developed during FY2024.

## EFFECTIVENESS FRAMEWORK: 2025 REVIEW

We continued to use the Effectiveness Framework developed in FY2024 to assess and measure the effectiveness of our activities on a year-on-year basis.

Focus area	Metric	How do we measure this?	FY2025 outcome
Governance & accountability	Senior management and Board oversight	The frequency of Board report minutes which demonstrate active discussion of our modern slavery risk profile and actions.  The number of MSWG meetings on modern slavery risk and actions.	<b>On track</b>  Modern slavery included in 60% of Board reports.  MSWG met monthly during FY2025.  Modern slavery training provided to key leadership.
	Training	The percentage completion rate of employees finishing their annual mandatory refresher compliance training, broken down by non-management, Executive and Board-level completion.	<b>On track</b>  Updated training rolled out in April 2025, with 68% completion by end of reporting period.  FY2026 intent: continue training rollout, gather participant feedback for continuous improvement purposes.
	Public commitment	Policies associated with modern slavery management include a publicly available position on our approach to modern slavery management and human rights, which are approved by senior management or the Board.	<b>Room for improvement</b>  Relevant responsible sourcing policies reviewed, updated or created during the reporting period.  Initiated awareness building with MSWG on how a broader human rights position could be implemented.  FY2026 intent: continue exploration of the key areas of opportunity to build on existing frameworks and policies relating to human rights.

Bega Effectiveness Framework  
Table 8

Status	Definition
<b>On track</b>	Meets the agreed metric
<b>On track, ongoing</b>	Meets the agreed metric with ongoing work planned for FY2026
<b>Developing</b>	Partially meets the metric with continuous improvement plans
<b>Room for improvement</b>	Does not meet the full metric

# Assessing the effectiveness of our actions

Focus area	Metric	How do we measure this?	FY2025 outcome
Risk identification / assessment	Risk assessment	Annual review of risk assessment approach and risk profile, including as necessary additional assessment of targeted risk areas.	<p><b>On track</b></p> <p>Continued application and review/refinement of existing risk classifications, thresholds and weightings (see Our risks section).</p> <p>Additional effort to identify emerging risks. (see our Actions section).</p> <p>FY2026 intent: expand due diligence to operational decision making e.g. Mergers and Acquisitions (M&amp;A).</p>
	Supplier risk screening	Maintain >95% percentage completion rate of onboarded suppliers who complete risk screening.	<p><b>On track</b></p> <p>Risk screening is a mandatory requirement and continued in FY2025.</p> <p>Review of risk weighting metrics was implemented during FY2025.</p>
	Sedex registration	The percentage of identified high-risk and moderate-risk suppliers that have completed their Sedex registration and SAQ.	<p><b>On track</b></p> <p>All suppliers with a risk score of moderate or higher (8+ in our risk matrix) were registered with Sedex or equivalent platform during FY2025.</p>
Risk management	High-risk category management	The percentage of identified high-risk and moderate-risk categories (identified through our internal review process) receiving mitigating actions. <sup>1</sup>	<p><b>On track, ongoing</b></p> <p>60% of identified categories received concerted action focussed on modern slavery risk during FY2025. The remainder are managed under our supply chain governance framework.</p> <p>Specialised plans for key risk categories (e.g. labour hire, citrus, logistics) were developed.</p> <p>FY2026 intent: continue to develop structured due diligence approach.</p>
	Independent social audits	The percentage of high-risk suppliers audited annually. The percentage of closed non-conformances (NCs) and corrective and preventative actions (CAPAs).	<p><b>On track, ongoing</b></p> <p>All high-risk suppliers completed independent social audits or provided recent reports.</p> <p>Open CAPAs and NCs were reported and tracked monthly through MSWG, with actions directed to supplier managers for close out.</p>
	Risk management approach – Continuous improvement	Demonstrate progress against one or more of key modern slavery management framework criteria in a year-on-year maturity assessment.	<p><b>On track, ongoing</b></p> <p>Made targeted adjustments to the due diligence approach to reflect supplier size, maturity, sector.</p> <p>Increased due diligence requirements for medium risk suppliers while adjusting requirements for smaller, or lower risk suppliers.</p> <p>FY2026 intent: renew program maturity assessment.</p>

Bega Effectiveness Framework  
Table 8.1

Status	Definition
<b>On track</b>	Meets the agreed metric
<b>On track, ongoing</b>	Meets the agreed metric with ongoing work planned for FY2026
<b>Developing</b>	Partially meets the metric with continuous improvement plans
<b>Room for improvement</b>	Does not meet the full metric

<sup>1</sup> Bega will continue to review the supply chains for our highest risk categories and seek to partner with suppliers who can provide certification of supply chain risk minimisation, or who work with downstream suppliers to audit supply partners to meet or exceed Sedex SMETA requirements.

# Assessing the effectiveness of our actions

Focus area	Metric	How do we measure this?	FY2025 outcome
Grievance & remedy	Trusted, accessible grievance mechanism	Grievance mechanism is communicated to suppliers and supply chain workers and is meaningfully accessible to vulnerable groups in the supply chain.	<p><b>Room for improvement</b></p> <p>As per FY2024 a basic grievance mechanism has been in place, but updates or improvements were not in scope for the reporting period.</p> <p>The Whistleblower Policy was updated and is applicable to supply chain stakeholders.</p> <p>FY2026 intent: implement new whistleblower service provider.</p> <p>Responsibly gather worker voice in key risk areas.</p> <p>Review barriers for key workers accessing grievance mechanism.</p>
	Investigation and remediation of modern slavery	<p>Process exists which allows investigation and remediation of allegations and instances of modern slavery and is aligned to UNGPs.</p> <p>Examples of tangible outcomes for workers are disclosed.</p>	<p><b>Developing</b></p> <p>A remediation process was developed in FY2024 with a preliminary focus on internal incident management. No further action was taken in FY2025</p> <p>FY2026 intent: further develop and test the remediation process and align to UNGPs.</p>
	Worker voice	<p>The percentage of our workforce which is unionised, indicating that workers can safely raise issues.</p> <p>Evidence of engagement with workers to inform modern slavery risk management (including grievance mechanisms).</p>	<p><b>Room for improvement</b></p> <p>56.8% of employees are covered by collective bargaining agreements. Opportunities for worker engagement identified and citrus industry engagement initiative commenced.</p> <p>FY2026 intent: undertake targeted engagement efforts with worker cohorts in high-risk areas, working with industry and supplier partners.</p>
Public disclosure & stakeholder engagement	Supplier capability building	<p>The percentage of high-risk suppliers directly engaged to build capability.</p> <p>Evidence that engaged suppliers are improving their modern slavery management.</p>	<p><b>Developing</b></p> <p>Conducted ongoing and increased supplier engagement, education and capability building (see Engagement section).</p> <p>FY2026 intent: partner with Fair Supply for supplier engagement survey.</p>
	Tracking performance	Disclosure within our Modern Slavery Statement which illustrates shifts in internal practice based on learning and reflection.	<p><b>On track</b></p> <p>We regularly adjusted the approach based on learnings, as illustrated in the Learnings and Case study on pages 23 and 24 (logistics, labour hire).</p>
	External consultation and feedback	<p>Number of external parties consulted on organisation's systems for disclosure, risk assessment, risk management.</p> <p>Examples of process and decision-making changes disclosed.</p>	<p><b>On track</b></p> <p>We engaged with stakeholders including suppliers, human rights expert advisors (ERM), government, the Office of the Anti-slavery Commissioner for NSW, Sedex, industry associations (dairy, citrus) and industry partners to build an understanding of market approaches, risks and needs to adjust our approach.</p>

Bega Effectiveness Framework  
Table 8.2

Status	Definition
On track	Meets the agreed metric
On track, ongoing	Meets the agreed metric with ongoing work planned for FY2026
Developing	Partially meets the metric with continuous improvement plans
Room for improvement	Does not meet the full metric

# Assessing the effectiveness of our actions

## OUR FUTURE PRIORITIES

We are committed to continuous improvement and learning throughout our business, including in relation to modern slavery, ethical sourcing, and human rights. Our Modern Slavery Action Plan has been endorsed by our Board, and progress is reported and discussed monthly at MSWG meetings.

Our priorities for FY2026 and beyond include:

- maintaining existing governance and reporting processes
- continuing supplier engagement and capacity building, and industry engagement and leadership
- engaging directly with workers and growers in the fruit sector to better understand modern slavery risks and challenges in the sector, particularly those related to labour hire
- expanding our Group Quality Audit Program to include a focus on citrus as a targeted category for modern slavery and labour exploitation, increasing our oversight and awareness of conditions in the sector
- testing the efficacy of our incident response and remediation processes and refining it as required
- integrating Fair Supply data and insights into our supplier onboarding and risk assessment activities.

# Consultation

Our policies and procedures apply throughout the Group, and those described in this Statement apply to all entities in the Group. All controlled and owned entities noted in this Statement are subject to the same policies and management systems regarding modern slavery management, which includes ethical sourcing, employment, legal, human resources, supply chain management, and workplace safety.

To develop this Statement, we collated data from across the business, and representatives from each function provided verification and feedback on the Statement's content.

This Statement has been reviewed by our MSWG, Executive, relevant subject matter experts within the business, the RSC and the Board.

# Statement approval

This Modern Slavery Statement was approved by the Board of Bega Cheese Limited on 8 December 2025 in their capacity as principal governing body of Bega Cheese Limited, on behalf of Bega Group and all reporting entities covered by this Statement.

This is signed by Barry Irvin, Executive Chairman, and Pete Findlay, Chief Executive Officer as representatives of the Board of Bega Cheese Limited.



Barry Irvin  
Executive Chairman



Pete Findlay  
Chief Executive Officer

# APPENDICES

BEGA  
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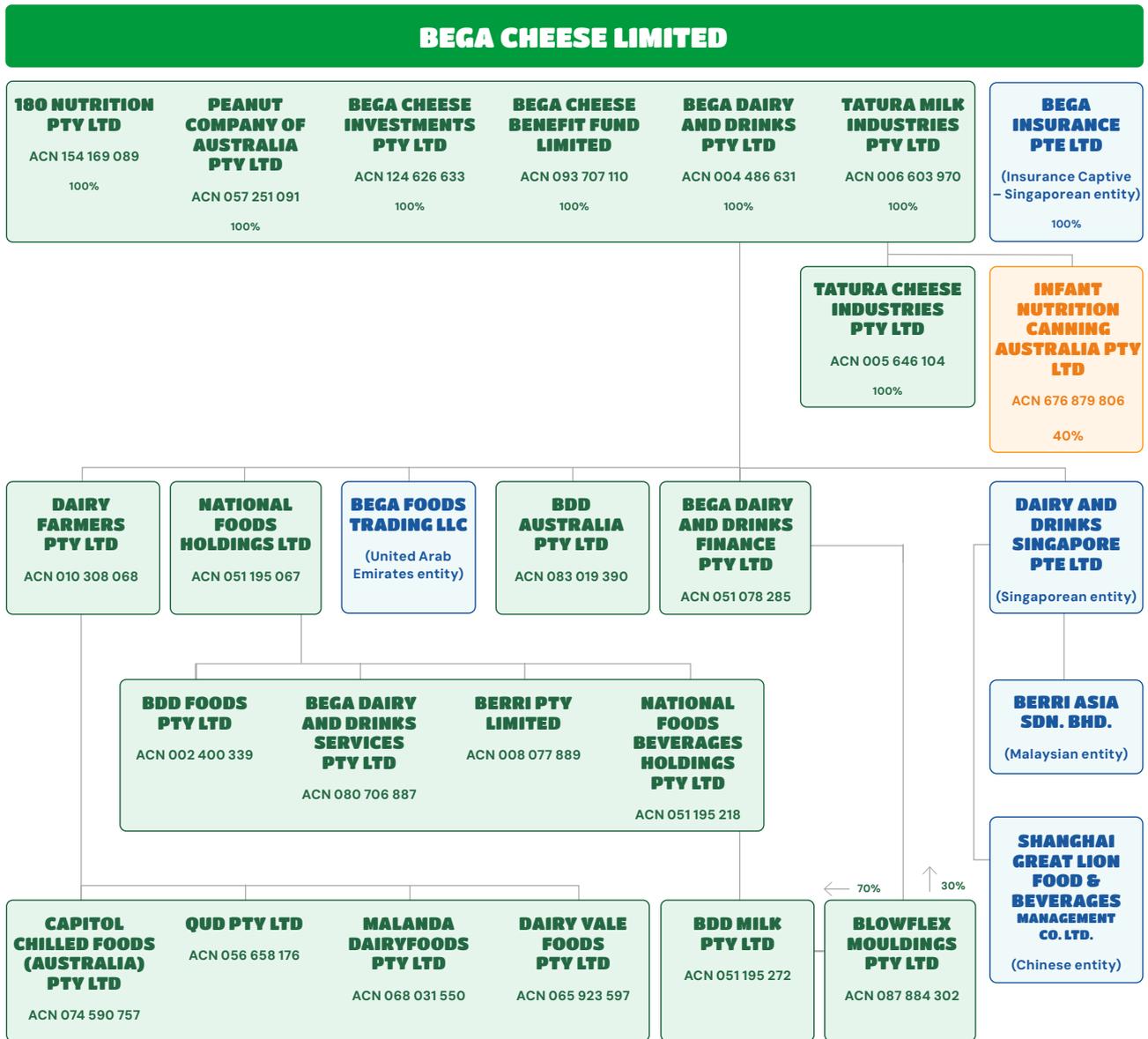
# Appendices

## APPENDIX A: MANDATORY REPORTING CRITERIA

Section	Mandatory criteria	Page
6(1)(a)	1 Identify the reporting entity	3
16(1)(b)	2 Describe the structure, operations and supply chains of the reporting entity	7
16(1)(c)	3 Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entity that the reporting entity owns or controls	13-17
16(1)(d)	4 Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	18-28
16(1)(e)	5 Describe how the reporting entity assesses the effectiveness of such actions	29-32
16(1)(f)(i)	6 Describe the process of consultation with any entities that the reporting entity owns or controls	33
16(1)(g)	7 Include any other information that the reporting entity considers relevant	3-5
4(a)(b)	Principal governing body approval	33

# Appendices

## APPENDIX B: BEGA GROUP STRUCTURE



- Wholly-owned members of the Australian Group
- International entities
- Joint venture

# Appendices

## APPENDIX C: LIST OF REPORTING ENTITIES

Entity name	ENTITY TYPE	2025 % OF SHARE CAPITAL HELD	PLACE FORMED OR INCORPORATED	AUSTRALIAN OR FOREIGN RESIDENT	FOREIGN RESIDENT JURISDICTION
Bega Cheese Limited	Body corporate	n/a	Australia	Australian	n/a
180 Nutrition Pty Ltd <sup>1</sup>	Body corporate	100	Australia	Australian	n/a
BDD Australia Pty Ltd	Body corporate	100	Australia	Australian	n/a
BDD Foods Pty Ltd	Body corporate	100	Australia	Australian	n/a
BDD Milk Pty Ltd	Body corporate	100	Australia	Australian	n/a
Bega Cheese Benefit Fund Ltd	Body corporate	100	Australia	Australian	n/a
Bega Cheese Investments Pty Ltd	Body corporate	100	Australia	Australian	n/a
Bega Dairy and Drinks Pty Ltd	Body corporate	100	Australia	Australian	n/a
Bega Dairy and Drinks Finance Pty Ltd	Body corporate	100	Australia	Australian	n/a
Bega Dairy and Drinks Services Pty Ltd	Body corporate	100	Australia	Australian	n/a
Bega Foods Trading L.L.C. <sup>2</sup>	Body corporate	100	United Arab Emirates	Foreign	United Arab Emirates
Bega Insurance Pte Ltd	Body corporate	100	Singapore	Foreign	Singapore
Berri Pty Ltd	Body corporate	100	Australia	Australian	n/a
Berri Asia Sdn Bhd	Body corporate	100	Malaysia	Foreign	Malaysia
Blowflex Mouldings Pty Ltd	Body corporate	100	Australia	Australian	n/a
Capitol Chilled Foods (Australia) Pty Ltd	Body corporate	100	Australia	Australian	n/a
Dairy and Drinks Singapore Pte Ltd	Body corporate	100	Singapore	Foreign	Singapore
Dairy Farmers Pty Ltd	Body corporate	100	Australia	Australian	n/a
Dairy Vale Foods Pty Ltd	Body corporate	100	Australia	Australian	n/a
Malanda Dairyfoods Pty Ltd	Body corporate	100	Australia	Australian	n/a
National Foods Holdings Ltd	Body corporate	100	Australia	Australian	n/a
National Foods Beverage Holdings Pty Ltd	Body corporate	100	Australia	Australian	n/a
Peanut Company of Australia Pty Ltd	Body corporate	100	Australia	Australian	n/a
QUD Pty Ltd	Body corporate	100	Australia	Australian	n/a
Shanghai Great Lion Food & Beverages Management Co Ltd	Body corporate	100	China	Foreign	China
Tatura Milk Industries Pty Ltd	Body corporate	100	Australia	Australian	n/a
Tatura Cheese Industries Pty Ltd	Body corporate	100	Australia	Australian	n/a

<sup>1</sup> 180 Nutrition Pty Ltd is in "voluntary liquidation" with completion expected in FY2026.

<sup>2</sup> Bega Foods Trading L.L.C. was established by the Group on 4 December 2024.

### Basis of preparation

This Consolidated Entity Disclosure Statement (CEDS) has been prepared in accordance with the *Corporations Act 2001* and includes information for each entity that was part of the consolidated entity as at the end of the financial year in accordance with AASB 10 *Consolidated Financial Statements*.

### Determination of tax residency

Subsection 295 (3A)(a)(vi) of the *Corporations Act 2001* defines tax residency as having the meaning in the *Income Tax Assessment Act 1997*. The determination of tax residency involves judgement as there are different interpretations that could be adopted, which could give rise to a different conclusion on residency.

In determining tax residency, the consolidated entity has applied the following interpretations:

- Australian tax residency**  
 The consolidated entity has applied current legislation and judicial precedent, including having regard to the Tax Commissioner's public guidance in Tax Ruling TR 2018/5.
- Foreign tax residency**  
 Where necessary, the consolidated entity has used independent tax advisers in foreign jurisdictions to assist in its determination of tax residency to ensure compliance with applicable foreign tax legislation (see subsection 295 (3A)(a)(vii) of the *Corporations Act 2001*).

# Appendices

## APPENDIX D: BEGA REPORTS

Bega reports - online links
<a href="#">2025 Sustainability Report</a>
<a href="#">2025 Annual Report</a>

# Appendices

## APPENDIX E: DEFINITIONS AND ABBREVIATIONS

Definitions – Acronyms		Definitions – Acronyms	
BAU	Business As Usual	PIF	Product information form
CAPA	Corrective and preventative actions	PPE	Personal protective equipment
CIPS	Chartered Institute of Procurement & Supply Chain	QBR	Quarterly business review
EBAs	Enterprise bargaining agreements	RADAR	Sedex's supply chain risk assessment tool
ERM	Environmental Resources Management	RFA	Rainforest Alliance Organisation
ESQ	Ethical Sourcing Questionnaire	RFP	Request for proposal
GRI	Global Rights Index	ROFE	Return on Funds Employed
GSI	Global slavery index	RSC	Risk & Sustainability Committee
IHP	Circana IHP panel, a consumer data panel used for market analysis	RSP	Responsible Sourcing Program
ILO	International labour organisation	RSPO	Roundtable on Sustainable Palm Oil
INCA	Infant canning nutrition australia	SAQ	Sedex self-assessment questionnaire
IR	Industrial Relations	Sedex	Supplier ethical data exchange (global data exchange platform)
ITUC	International Trade Union Confederation	SMETA	Sedex members ethical trade audit
KPIs	Key performance indicators	SRSC	Supplier responsible sourcing code
LRQA	Lloyd's Register Quality Assurance	Tier 1	Our direct suppliers of goods or services
M&A	Mergers & Acquisitions	Tier 2	Suppliers of inputs to our direct (tier 1) suppliers
MAT	Moving Annual Total	Tier 3	Suppliers of inputs to our indirect (tier 2) suppliers
MRO	Maintenance, repairs and operations	TMI	Tatura Milk Industries
MSWG	Modern slavery working group	TPM	Third party manufacturers
NCs	Non-conformance (linked to audits)	UNGPs	United Nations Guiding Principles
NPS	Non-Production Spend		

# Appendices

## APPENDIX E: DEFINITIONS AND ABBREVIATIONS

### Definitions – Sedex non-conformance definitions

<b>Business critical non-conformance</b>	Defined by the Sedex Members Ethical Trade Audit (SMETA) Non-Compliance Guidance as a breach of a code item or law which presents an imminent or serious risk of life and limb, or which constitutes a severe human rights impact that could be difficult or impossible to remedy.
<b>Critical non-conformance</b>	Defined by the Sedex Members Ethical Trade Audit (SMETA) Non-Compliance Guidance as a systemic, deliberate or severe breach of a code item or local law which represents a danger to workers or others, or which denies a basic human right; An attempt to pervert the course of the audit through fraud, coercion, deception or interference with the audit process.
<b>Major non-conformance</b>	Defined by the Sedex Members Ethical Trade Audit (SMETA) Non-Compliance Guidance as a systemic breach of a code item, local law that could present a danger to workers or violate upon a human right.
<b>Minor non-conformance</b>	Defined by the Sedex Members Ethical Trade Audit (SMETA) Non-Compliance Guidance as a isolated breach of a code item or local law which represents low risk to workers; A policy issue or misunderstanding where there is no evidence of a material breach of a code item or local law.
<b>Open non-conformance outcome</b>	Non-conformance report that has not yet been closed out by the vendor or is waiting an auditor's review and acceptance of the proposed corrective action plan.
<b>Resolved non-conformance outcome</b>	A corrective action plan has been completed and approved by the auditor with no further works to be completed.

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