

Haigh's Chocolates

Modern Slavery Statement | FY 2026

HAIGH'S CHOCOLATES
MODERN SLAVERY STATEMENT

1. Introduction and Identification

This Modern Slavery Statement is for the reporting entity, Haigh Retail Pty Ltd (ACN 169 377 342) as trustee for Haigh Retail Trust (ABN 70 509 741 385); hereafter referred to as "Haigh Retail".

Haigh Retail operates retail chocolate stores trading under the name "Haigh's Chocolates". The product it sells, the assets it operates and the leases over the stores it runs are manufactured, owned and held by three other legal entities. The supply chains of these entities, while largely separate, are interdependent. In the context of this statement, it makes sense to consider them as a single supply chain. The names "Haigh's Chocolates" or "Haigh's" will therefore be used throughout this document to refer collectively or singularly to the reporting entity irrespective of which legal entity is involved in or manages that part of the supply chain.

1.1 Organisational Overview and Commitment

Haigh's Chocolates is an Australian family-owned, bean-to-bar chocolate manufacturer and retailer headquartered in Adelaide, South Australia.

The business includes three manufacturing sites in South Australia and a total of 24 retail locations in Victoria, New South Wales, Queensland, South Australia and the Australian Capital Territory, as well as an online and corporate sales channel.

Haigh's is guided by the values of Contribution, Determination and Trust. These values shape its culture and establish the standards of conduct expected of its people in the workplace and in their interactions with suppliers, customers, consumers and the wider community.

Haigh's recognises the importance of promoting and respecting human rights across its operations and supply chain. It acknowledges that customers and consumers increasingly seek assurance that the products they purchase are produced and sourced ethically. Accordingly, Haigh's remains committed to transparency, responsible procurement and the ongoing reduction of modern slavery risks.

1.2 Entities

The supply chains covered by this Modern Slavery Statement belong to:

- **Haigh Retail Pty Ltd (ACN 169 377 342) as trustee for Haigh Retail Trust (ABN 70 509 741 385),** which is responsible for the distribution of finished products from the warehouse to retail stores and for retail sales to customers.
- **Haigh Manufacturing (No 2) Pty Ltd (ACN 169 377 244) as trustee for Haigh Manufacturing Trust** (ABN 91 627 818 489), which is responsible for the procurement of raw materials, the manufacture of liquid chocolate and finished products, and the warehousing and dispatch of finished products.

- **A.E. Haigh Pty Ltd (ABN 82 007 873 323),** which is responsible for corporate and online sales channels, together with support functions including Customer Experience, People and Culture, Finance, and Information Technology
- **Haighs Pty Ltd (ABN 84 007 873 332),** which holds, administers and provides assets for the manufacturing part of the business.

Haigh's Chocolates makes this statement in accordance with the Modern Slavery Act 2018 (Cth). The statement reflects Haigh's ongoing commitment to ethical business practices, respect for human rights, and continuous improvement in the way it engages with its people, suppliers, customers and the broader community.

2. Structure and Operations

2.1 Structure

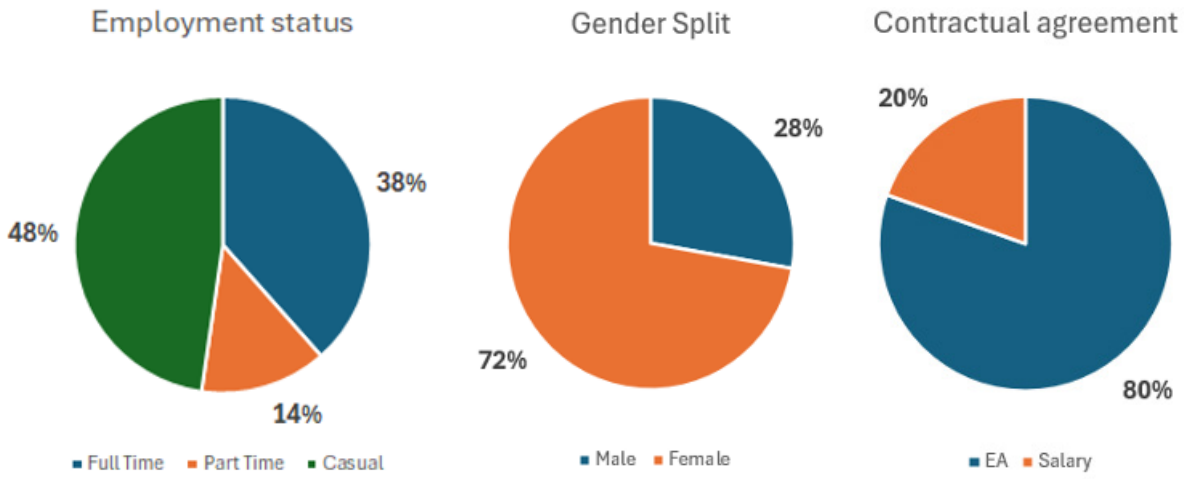
Haigh's Chocolates is managed from its head office at 153 Greenhill Road, Parkside, South Australia. Each entity is a company and has a board of directors, with the Chief Executive Officer reporting to the board. Day-to-day leadership is provided by the Executive Leadership Team, led by the Chief Executive Officer and made up of five General Managers across key business functions. Haigh's currently operates in the domestic Australian market.

As of June 2026, Haigh's directly employed 933 team members. Haigh's people are central to its operations and long-term success.

Haigh's is committed to providing a workplace in which team members are treated with dignity and respect, and are supported to thrive, contribute and participate in the success of the business.

2.1 People

Haigh's is involved in procuring, refining, processing, distributing and selling chocolate products in Australia. This involves domestic employment in manufacturing facilities, retail stores and offices, and dealing with overseas suppliers to procure and import inputs such as cocoa beans and cocoa butter.



All numbers correct as of June 2026

Manufacturing inputs are sourced from Australia and overseas, with a preference to procure locally produced ingredients and packaging where practicable. These materials are used to manufacture finished goods which are stored in Haigh's warehouse before being distributed to its retail stores and online/corporate fulfilment operation.

2.2 Operations

Haigh's is involved in procuring, refining, processing, distributing and selling chocolate products in Australia. This involves domestic employment in manufacturing facilities, retail stores and offices, and dealing with overseas suppliers to procure and import inputs such as cocoa beans and cocoa butter.

Manufacturing inputs are sourced from Australia and overseas, with a preference to procure locally produced ingredients and packaging where practicable. These materials are used to manufacture finished goods which are stored in Haigh's warehouse before being distributed to its retail stores and online/corporate fulfilment operation.

2.3 Supply Chains

Acquisition of key chocolate materials relies on an international network. Haigh's leverages the contacts and industry experience of a cocoa broker to source cocoa beans from Ghana and Central America, while to acquire cocoa from Papua New Guinea Haigh's sources directly from a PNG agribusiness that has been a supplier to Haigh's for almost two decades. Haigh's purchases cocoa butter from wholesalers with offices in Australia; the cocoa butter is manufactured overseas using raw ingredients from West Africa, Central America and Asia.

Wherever and whenever practically possible, Haigh's sources other core and high-volume ingredients from Australia in the interests of quality, stability and standards of compliance with sustainability and employment practices. Core, high-volume ingredients include sugar, milk powder, almonds and most other nuts and fruits. Other minor ingredients such as flavours, toppings or centres can be sourced locally or from overseas (usually Europe or the USA).

Haigh's predominantly sources Australian made packaging materials, but some are also sourced from Italy (via an Australian merchant) and China. The domestic network is supported by a large number of service providers located throughout Australia.

Haigh's downstream operations are powered by a labour force of just over 900 staff members. This workforce is distributed across operational, manufacturing, administration and retail sites in South Australia, Victoria, New South Wales, Queensland and the Australian Capital Territory.

Strategic Takeaways

The dual-sourcing model for cocoa beans balances market access but increases logistics complexity. Sourcing bulk ingredients domestically protects Haigh's from global freight spikes and supply shocks. Finally, the hybrid packaging model balances the offering from overseas with the fast turnaround times of local suppliers.

3. Modern Slavery Risks

Haigh's has considered modern slavery risks for many years, including before the introduction of the Modern Slavery Act 2018. Haigh's recognises the importance of identifying, assessing and addressing potential modern slavery risks across both its operations and supply chains. During the reporting period, Haigh's considered potential and actual risks of modern slavery associated with its workforce, procurement practices, suppliers and broader supply chain arrangements.

Haigh's has identified the following potential risks of Haigh's causing, contributing to or being directly linked to modern slavery practices through its operations and supply chains:

- Haigh's may contribute to modern slavery practices through extended or overseas supply chains, particularly where manual labour is involved in the production, harvesting or processing of raw materials, ingredients, packaging and other components.
- There is heightened risk potential where work is performed by vulnerable workers, including children, migrant, seasonal or casual workers in jurisdictions or industries with limited visibility, oversight or regulations.
- Haigh's may cause or be linked to hazardous working conditions in overseas jurisdictions due to increased demand for production inputs domestically.

4. Actions Taken to Address Modern Slavery Risks

In 2014, Haigh's identified a modern slavery risk within cocoa supply chains and joined the UTZ certification program to support responsible sourcing and farming practices. Following the merger of UTZ and the Rainforest Alliance, Haigh's transitioned to the Rainforest Alliance Standard.

4.1 Due Diligence and Compliance

Haigh's has taken the following due diligence steps to assess and address the risks of modern slavery:

- Haigh's follows a proceduralised recruitment process.
- Haigh's checks that each new employee is eligible to legally work in Australia and follows the conditions set out in their visas.
- Haigh's aims to ensure all our employees are paid a fair salary. Salary structures are guided by national remuneration guidelines and conditions and meet and comply with all legal requirements.
- Haigh's employs a small number of individuals who are under the age of 18. In these cases the relevant regulations for the protection of minors in the workplace are strictly followed.
- Haigh's adheres to and is guided by the Enterprise Agreements it has in place and relevant workplace laws regarding hours of work and paid leave.
- Haigh's complies with applicable Australian employment and health and safety legislation.
- Employees are engaged under employment contracts or relevant Haigh's Enterprise Agreements.

- Every employee and relevant stakeholder has a right to join a trade union of their choice and be involved in collective bargaining without fear of intimidation or reprisal.
- Haigh's does not discriminate against any person regarding membership of a trade union.
- Haigh's has a Human Rights Policy that is available to all staff and key stakeholders.
- Haigh's endeavours to establish and maintain long-lasting relationships with suppliers and works with them to collectively achieve the best outcome for the companies involved and also for the communities in the place of manufacture.
- Haigh's purchases domestically as much as practically possible as Australia has strong anti-slavery legislation and systems in place which reduce the likelihood of modern slavery practices occurring in its supply chain.
- In the case of overseas supply of goods, Haigh's usually engages an Australian supplier with strong ties and relationships up the supply chain. Partners who are well-acquainted with the overseas manufacturers will have a greater knowledge and understanding around the conditions of the overseas suppliers.
- Two of the higher risk products Haigh's procures are cocoa beans and cocoa butter. Where possible "Rainforest Alliance Certified" beans and butter are purchased, to mitigate the risk of any slave or child labour involvement. Rainforest Alliance Certified products have an accredited external auditor monitoring compliance on an ongoing basis.
- Haigh's purchases cocoa beans through a reputable and trusted broker or agribusiness, and always from the same cooperative in the production countries.

4.2 Remediation Process

A clearly outlined grievance process is set out in writing, and all employees are trained in this procedure. Haigh's encourages employees to raise grievances, concerns or suspected misconduct. Concerns may include matters relating to human rights, labour practices, ethical sourcing or potential modern slavery risks.

Employees can raise concerns through a range of channels, including informal feedback mechanisms, the company's employee survey and feedback platform, the Grievance process and the Whistleblower Policy. Haigh's engages trained personnel to receive whistleblower reports and support the anonymity of disclosers where appropriate.

Other stakeholders (including contractors, suppliers, customers and members of the public) may contact the Haigh's Chocolates customer care team by telephone on 1300 HAIGHS (1300 424 447) or by email to customercare@haighs.com.au.

Any grievances raised (internally or externally) will be investigated and dealt with in line with the applicable Haigh's grievance process.

Haigh's aims to ensure that risks identified are addressed as quickly as possible and preventive measures put in place with ongoing assessment to review their effectiveness and identify if improvements can be made.

4.3 Future Actions

Key actions in the coming years to further strengthen this response include:

Actions to be implemented	Planned implementation date
Start the roll out of modern slavery awareness training for all relevant employees	31 October 2026
Conduct a comprehensive materiality risk assessment of existing suppliers to identify the most salient risks to human rights	31 December 2026
Establish human rights risk criteria to explicitly assess suppliers during pre-qualification as a vendor	31 March 2027
The development and implementation of supplier management processes, a Supplier Code of Conduct, supplier questionnaires for major suppliers, and targeted focus on higher-risk imported materials such as cocoa beans, cocoa butter and packaging materials	31 March 2027
Introduce ongoing monitoring through supplier engagement (with our top suppliers) to ensure alignment with modern slavery related requirements	30 June 2027
Continue to develop policies and governance processes that support the identification, escalation and management of human rights and modern slavery risks across our operation and supply chain	30 June 2027

5. Assessing Effectiveness

Haigh's is committed to continuously improving the effectiveness of its actions to address modern slavery risks. We assess effectiveness through supplier engagement, internal review of procurement and governance processes, monitoring of grievance and reporting channels, and ongoing consideration of opportunities to strengthen policies, training, supplier due diligence and risk assessment processes.

Future priorities include further strengthening supplier due diligence and continuing to align procurement practices with Haigh's commitment to human rights and ethical sourcing.

6. Consultation

In preparing this statement, relevant key employees of the Haigh's entities were consulted and provided with an opportunity to contribute to and review the statement. This included consultation with members of the Executive Leadership Team and relevant functional areas. Following the discussion of the draft document in the executive meeting dated 15 June 2026 and again on 1 September 2026.

This consultation will be extended more widely in subsequent Modern Slavery Statements.

7. Reporting Criteria

The reporting criteria is shown below, as laid out in the legislation (section 16).

Identify the reporting entity	1. Reporting Entities
Describe the structure, operations, and supply chains of the reporting entity	2. Structure, operations and supply chains
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	3. Modern Slavery Risks
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	4. Actions taken to address modern slavery risks
Describe how the reporting entity assesses the effectiveness of such actions	5. Assessing Effectiveness
Describe the process of consultation	6. Consultation
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	No other relevant information

8. Approval

In preparing this statement, relevant employees of Haigh's Chocolates were consulted and provided with an opportunity to review the content, including the Executive Leadership Team. This statement is made on behalf of Haigh's Chocolates generally and specifically for Haigh Retail Trust as the formally identified and obligated reporting entity.

This statement has been approved by the board of directors of the four named entities in their capacity as principal governing body on the 14th September 2026

This statement is signed by a responsible member of Haigh's Chocolates, as defined by the Act:



Carolyn Mitchell
Chairperson of the Board
15th of September 2026