



## Annual Modern Slavery Statement

**This is a statement for Ballantyne Pty Ltd its associated entities.**

**Reporting Period: Financial Year ending 30<sup>th</sup> June 2025**

### 1. Introduction and reporting entity

This annual modern slavery statement is submitted by Ballantyne Pty Ltd (ACN 006036684) and its subsidiaries as a statement under section 13 of the Act:

The Ballantyne Group is committed to respecting human rights and taking a proactive approach to identifying and mitigating modern slavery risks within our operations and supply chains. This Modern Slavery Statement is made pursuant to the Modern Slavery Act 2018 (Cth) (**Act**) and outlines the steps we have taken to assess and address modern slavery risks for the reporting period.

The Ballantyne Group fully supports the aims of the Act and is committed to operating free from forced labour, slavery and human trafficking. We have a zero-tolerance approach to all forms of modern slavery in our operations and supply chain.

This Statement is made pursuant to section 13 of the Act in respect of the financial year ended 30<sup>th</sup> June 2025.

This Statement is approved by the principal governing body of Ballantyne Pty Ltd, being its Board of Directors, and is structured in line with the mandatory criteria set out in the Act. As each entity listed above in the Ballantyne Group uses the same policies and processes and operates in the same sector with many shared suppliers, this statement sets out a consolidated description of the actions undertaken by all of the Ballantyne Group entities listed above to address modern slavery risks.

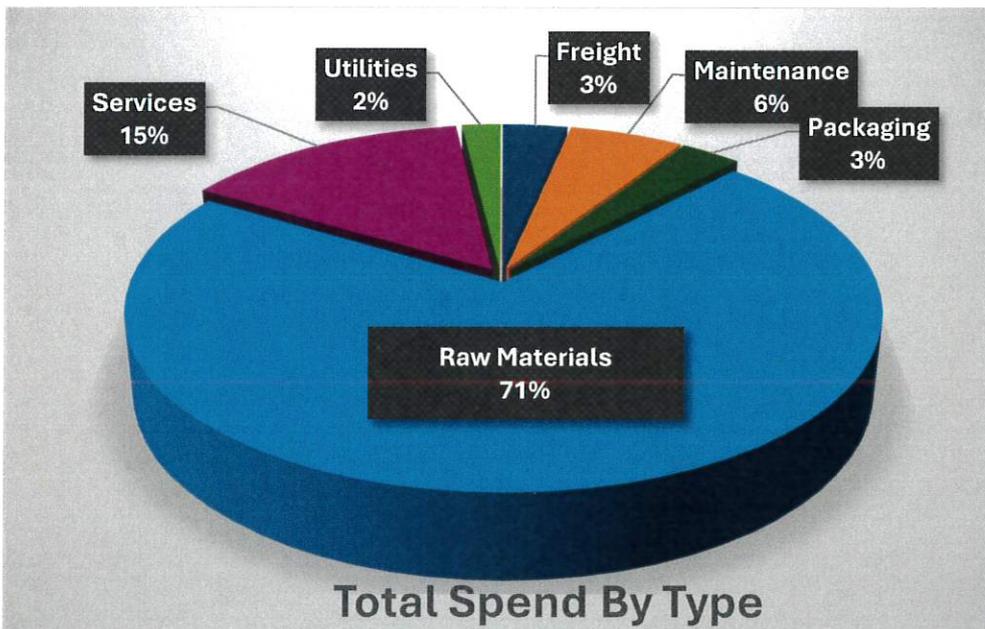
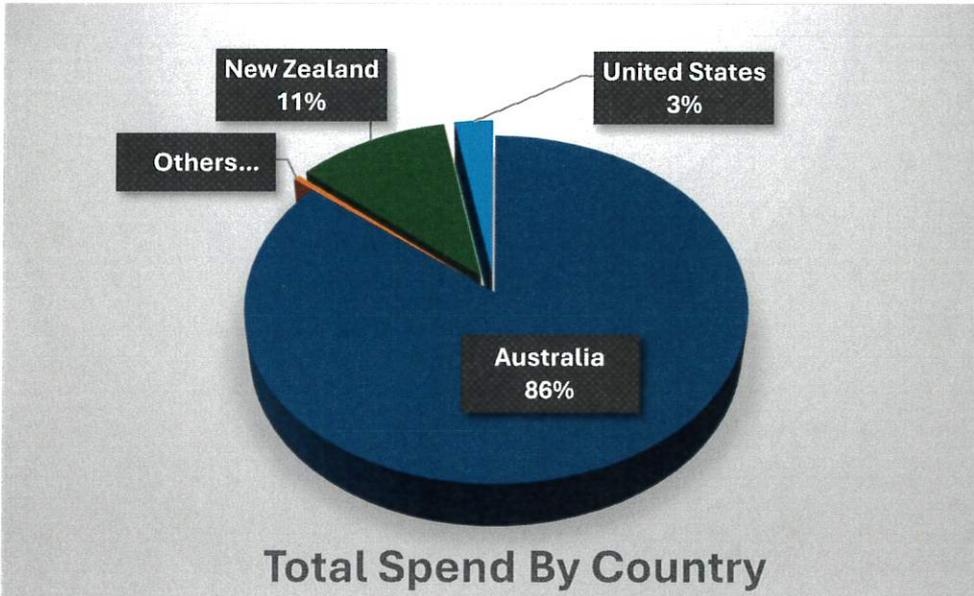
### 2. Structure, Operations, and Supply Chains

Ballantyne Pty Ltd is privately owned and headquartered in South Melbourne, Victoria, Australia.

The Ballantyne Group is an Australian business predominantly engaged in the production of dairy based foods and food ingredients. Our operations and supply chain include manufacturing facilities in Melbourne and domestic and international distribution networks, suppliers and customers.

You can read more about our Australian business here @ <https://www.ballantyne.com.au>

The following graphs provide an overview of our operations and supply chain.



### 3. Risks of Modern Slavery in Our Operations and Supply Chains

We recognize that the manufacturing industry, particularly in supply chains involving offshore suppliers, presents risks of modern slavery, including forced labour, child labour, and exploitative working conditions.

The main program we utilise to verify compliance to Modern Slavery Standards is confirmation of our Supplier Code of Conduct via our Vendor Advocacy Critical Control Program (VACCP).

| Category                         | Risk indicators  |        |                          |      |          |        |                                   |      |     |        |                                |       |           |        |                                 |       |             |        |                                 |      |         |
|----------------------------------|--|--------|--------------------------|------|----------|--------|-----------------------------------|------|-----|--------|--------------------------------|-------|-----------|--------|---------------------------------|-------|-------------|--------|---------------------------------|------|---------|
| <b>Sector and industry risks</b> | <p>Certain sectors and industries, such as the manufacturing industry and supply of raw materials in which we operate, may have higher modern slavery risks because of the nature of the industry characteristics, products and processes.</p> <p>Suppliers of raw &amp; packing materials, which represent 74% of total expenditure, have confirmed compliance with Modern Slavery Standards. Commencing in 2025 we will be expanding the program to include suppliers from high-risk sectors of cleaning, laundry and security and other labor / services providers.</p>   |        |                          |      |          |        |                                   |      |     |        |                                |       |           |        |                                 |       |             |        |                                 |      |         |
| <b>Product and services risk</b> | <p>Certain products and services may have higher modern slavery risks because of the way they are grown, produced, provided or used.</p> <p>We check via our VACCP program that suppliers of high-risk materials verify their compliance to Modern Slavery Compliance standards.</p>   |        |                          |      |          |        |                                   |      |     |        |                                |       |           |        |                                 |       |             |        |                                 |      |         |
| <b>Geographic risk</b>           | <p>In respect of supply chain functions overseas, we recognize that some countries or regions may have higher risks of modern slavery, including due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors like poverty.</p> <p>Using the 2024 ITUC Global Rights Index, this is a breakdown of expenditure by geography and risk.</p> <table style="width: 100%; border-collapse: collapse;"> <tbody> <tr> <td style="width: 10%;">Rating</td> <td style="width: 60%;">5 No Guarantee of Rights</td> <td style="width: 10%; text-align: right;">0.3%</td> <td style="width: 20%;">Malaysia</td> </tr> <tr> <td>Rating</td> <td>4 Systematic Violations of Rights</td> <td style="text-align: right;">2.7%</td> <td>USA</td> </tr> <tr> <td>Rating</td> <td>3 Regular Violations of Rights</td> <td style="text-align: right;">85.9%</td> <td>Australia</td> </tr> <tr> <td>Rating</td> <td>2 Repeated Violations of Rights</td> <td style="text-align: right;">11.1%</td> <td>New Zealand</td> </tr> <tr> <td>Rating</td> <td>1 Sporadic Violations of Rights</td> <td style="text-align: right;">0.1%</td> <td>Denmark</td> </tr> </tbody> </table> <p>We check via our VACCP program that all suppliers from high-risk regions verify their compliance to Modern Slavery Compliance standards.</p> | Rating | 5 No Guarantee of Rights | 0.3% | Malaysia | Rating | 4 Systematic Violations of Rights | 2.7% | USA | Rating | 3 Regular Violations of Rights | 85.9% | Australia | Rating | 2 Repeated Violations of Rights | 11.1% | New Zealand | Rating | 1 Sporadic Violations of Rights | 0.1% | Denmark |
| Rating                           | 5 No Guarantee of Rights   | 0.3%   | Malaysia                 |      |          |        |                                   |      |     |        |                                |       |           |        |                                 |       |             |        |                                 |      |         |
| Rating                           | 4 Systematic Violations of Rights  | 2.7%   | USA                      |      |          |        |                                   |      |     |        |                                |       |           |        |                                 |       |             |        |                                 |      |         |
| Rating                           | 3 Regular Violations of Rights   | 85.9%  | Australia                |      |          |        |                                   |      |     |        |                                |       |           |        |                                 |       |             |        |                                 |      |         |
| Rating                           | 2 Repeated Violations of Rights  | 11.1%  | New Zealand              |      |          |        |                                   |      |     |        |                                |       |           |        |                                 |       |             |        |                                 |      |         |
| Rating                           | 1 Sporadic Violations of Rights  | 0.1%   | Denmark                  |      |          |        |                                   |      |     |        |                                |       |           |        |                                 |       |             |        |                                 |      |         |

| Category            | Risk indicators   |
|---------------------|---|
|                     | <p>We have sort 100% compliance from our suppliers from Rating 5 and 4 countries.</p> <p>All major suppliers of raw and packing materials from all countries have confirmed compliance.</p>   |
| <b>Entity risks</b> | <p>We will seek to engage contractors and suppliers who uphold our commitment to addressing modern slavery risks.</p> <p>We will not initiate business dealings or enter a contract with a third party without first undertaking due diligence to verify their reputation, skills and activities as well as compliance structures or gaps.</p> <p>We will also undertake ongoing regular monitoring and risk assessment throughout the duration of the business relationship, including in the event of a significant change in their situation (for example a merger or acquisition) or a report or disclosure in relation to them.</p> <p>If a risk is identified throughout the course of an existing business relationship, this will be managed on a case-by-case basis, with the required steps to be taken to address the risk dependent upon the circumstances and level of risk.</p> |

In addition to applying our risk matrix, we propose a range of due diligence measures to reduce risks of modern slavery set out below.

#### 4. Actions Taken to Assess and Address Modern Slavery Risks

To mitigate modern slavery risks, we have implemented the following measures:

- **Policy Development:** Ballantyne has a Modern Slavery Policy. In addition, the company has policies that have relevance to modern slavery which include Code of Conduct, Whistleblower Policy, Anti-Corruption and Bribery Policy, Human Rights Policy, Diversity and Inclusion Policy and Grievance Handling Procedure Policy.
- **Supplier Due Diligence:** Conducting risk assessments of suppliers based on geographic location, industry, and labour practices. Creating and implementing a Supplier Code of Conduct.
- **Contractual Obligations:** Including modern slavery clauses in supplier agreements to enforce compliance with ethical labour standards.
- **Training and Awareness:** Providing training for employees and key suppliers on modern slavery risks and reporting mechanisms.
- **Audits and Monitoring:** Engaging in supplier audits, site visits, and third-party assessments to ensure compliance with labour standards.
- **Grievance Mechanisms:** Establishing confidential reporting channels for employees and suppliers to report concerns related to modern slavery.

The Ballantyne Group's policies and associated processes referred to above will inform our approach to addressing and remediating any instance of modern slavery that is uncovered. This is in addition to our responsibilities to report relevant disclosures to policing authorities. In relation to any instance of actual or suspected modern slavery uncovered in our supply chain or operations, the Ballantyne Group is committed to a remedial and victim-centric approach in working with affected suppliers or persons.

#### 5. Modern slavery policy communication

The Ballantyne Group communicate to all employees on our Modern Slavery Policy. Explaining what modern slavery is and the benefits of prevention.

- How visitors, employees, contractors, consultants and other persons working for the Ballantyne Group in any paid or unpaid capacity (i.e. work experience students and volunteers) can identify modern slavery practices.
- How the Ballantyne Group will seek to address modern slavery risks within its operations and supply chains; and
- The steps an individual can take to address any concerns they may have, including by way of reporting under the Ballantyne Group's Whistleblower Policy.

## 6. Assessment of Effectiveness

We assess the effectiveness of our actions by:

- Regularly reviewing supplier compliance reports and audit findings.
- Identifying and tracking whether our suppliers can demonstrate to us their modern slavery awareness and due diligence processes.
- Monitoring and tracking reported concerns or incidents.
- Conducting annual reviews of our policies and procedures to enhance our modern slavery response.
- Benchmarking our approaches with other due diligence practices reported by comparable businesses in our industry, as reported in their modern slavery statements and leading practice material shared by the Australian Government.

## 7. Consultation and Collaboration

We engage with key stakeholders, including employees, suppliers, and industry partners, to strengthen our approach to addressing modern slavery risks. Additionally, we collaborate with external organizations and government bodies to enhance industry-wide efforts.

## 8. Approval and Signature

This Modern Slavery Statement has been approved by principal governing body of Ballantyne Pty Ltd, being the Board of Directors of Ballantyne Pty Ltd on 1<sup>st</sup> December 2025 and is signed by a responsible member of the Ballantyne Pty Ltd, being Andrew Ballantyne (Executive Chairman):

**Signed:**



**Name:** Andrew Ballantyne

**Position:** Executive Chairman

**Date:** 01/12/2025