

GOODMAN FIELDER PTY LIMITED MODERN SLAVERY STATEMENT

2020



INTRODUCTION

Goodman Fielder Pty Limited (Goodman Fielder) is a privately-owned company registered in Australia. It is an indirect wholly owned subsidiary of Wilmar International Limited¹, Asia's leading agribusiness group. Goodman Fielder has 39 subsidiaries, operating in 6 jurisdictions and is a leading regional food company across Australia, New Zealand and Asia Pacific. Goodman Fielder and its subsidiaries share centralised governance, procurement, finance and legal functions together with common policies and procedures. Each subsidiary of Goodman Fielder also shares a common Board of Directors.

Goodman Fielder manufactures, packages, distributes, markets and sells a wide range of food products across in Australia and New Zealand and currently employees over 3,400 employees. Goodman Fielder has a significant portfolio of over 90 brands, including MeadowLea, White Wings, Helga's, Praise, Molenberg, Edmonds and Meadow Fresh. Our leading product offering is supported by efficient and effective distribution networks that enable delivery to over thirty thousand outlets every day including supermarkets, dairies, service stations, cafes and restaurants.

This Modern Slavery Statement covers the period 1 January 2020 to 31 December 2020. This statement will describe the structure, operations, supply chain, risks of modern slavery, actions to assess and address those risks and consultation processes for the reporting entity.

This Statement was approved by the Board of Directors of Goodman Fielder Pty Limited on 22 June 2021.

Gurpreet Vohra



Chief Executive Officer

Goodman Fielder Pty Limited

1 - <https://www.wilmar-international.com/about-us>

ORGANISATIONAL STRUCTURE

OPERATIONS

Goodman Fielder's is a leading manufacturer of bakery, grocery and dairy products for industrial, food service and retail customers across Australia and New Zealand. Operations in Australia and New Zealand include 2 major offices (with associated R&D facilities), 23 manufacturing sites, and a network of 94 depots. These operations are supported by a national sales and distribution network in each country. We also have a small presence in manufacturing, sales and logistics across the Solomon Islands, New Caledonia, Hong Kong and China make up the remaining operations for Goodman Fielder.



SUPPLY CHAIN

As a diverse food company Goodman Fielder's supply chain has a global reach. While many of our key ingredients, for example flour and milk, are sourced locally, our broader supply chains extend into Asia, North America, Europe, Africa and South America.

Our supply chain includes the procurement of:

- Raw ingredients
- Externally manufactured finished goods
- Packaging
- Indirect materials such as uniforms, personal protective equipment, plant and equipment
- Maintenance, cleaning and other services
- Warehousing, linehaul and logistics services
- Professional services including IT, recruitment, travel, marketing



MODERN SLAVERY RISKS

Goodman Fielder has undertaken an initial review of its operations to understand potential modern slavery risks in its operations and supply chain and built the foundations for a robust modern slavery risk assessment. The full extent of modern slavery risks throughout the supply chain has not yet been fully mapped, however the following table lists potential areas Goodman Fielder deems as high risk and key groups of workers who may be vulnerable. These risks have been considered as part of the development of our approach to addressing the risk of modern slavery within our operations and supply chain.

	ACTIVITY	POTENTIAL MODERN SLAVERY RISK AREA
OPERATIONS	Offices	Cleaning workers
	Manufacturing sites	Cleaning, Casual and labour hire workers.
	Logistics	Drivers and independent logistics contractors.
SUPPLY CHAIN	Raw materials	Palm oil, rice, fruit and cocoa.
	Processing	Casual, seasonal, labour hire and migrant workers.
	Manufacture and packaging	Casual, seasonal, labour hire and migrant workers.
	Logistics	Shipping, drivers and port workers.

Table 1: Potential Modern Slavery Risk Areas.

KEY ACTIONS TAKEN TO ADDRESS MODERN SLAVERY RISKS

GOVERNANCE AND POLICES

Goodman Fielder (GF) understands the importance of a robust governance system to support its commitment to upholding fundamental human rights. We maintain several policies and standards to assist in the management of modern slavery risks. These policies seek to ensure that our practices protect human rights, both within our business and across our supply chain.

POLICY/CODE	DESCRIPTION
Workplace Behaviour Policy	<p>This Policy applies to everyone who works for or at a GF sites, including employees and independent contractors, and sets out expectations with respect to compliance with applicable legislation, including:</p> <p>Australia:</p> <ul style="list-style-type: none"> • Australian Human Rights Commission Act 1986; • Age Discrimination Act 2004; • Disability Discrimination Act 1992; • Sex Discrimination Act 1984; • Fair Work Act 2009; • Racial Discrimination Act 1975; • Workplace Gender Equality Act 2012; and • Relevant state and Territory laws. <p>New Zealand</p> <ul style="list-style-type: none"> • Human Rights Act 1993; • Employment Relations Act 2000; and • Parental Leave and Employment Protection Act 1987 <p>The Policy sets out GF's expectations of appropriate workplace behaviour with respect to the following areas:</p> <ul style="list-style-type: none"> • Equal opportunity, discrimination, harassment and bullying; • Anti-bribery and corruption; • Acting with integrity; and • Responsibilities of managers.
Fraud Policy	<p>GF's Fraud Policy sets out our position in relation to fraud, including employee responsibilities, investigation procedures and corrective action. This policy outlines GF's grievance reporting mechanisms and details on our independently operated whistle-blower service –Goodman Fielder Awareline to facilitate the reporting of concerns, issues or instances of suspected unethical or corrupt conduct.</p>

KEY ACTIONS TAKEN TO ADDRESS MODERN SLAVERY RISKS (CONT)

POLICY/CODE	DESCRIPTION
Ethical Employment Policy	<p>GF's Ethical Employment Policy sets our expectations on fundamental rights at work including the following labour rights:</p> <ul style="list-style-type: none"> • All employees have a written employment agreement; • Employment is freely chosen; • No forced, bonded or involuntary labour; and • Employees are not required to lodge deposits or their identity papers and free to leave their employment after providing reasonable or agreed notice period. <p>The Policy also defines that freedom of association is respected, safe and hygienic working conditions are mandated and that child labour is prohibited.</p>
Supplier Code of Conduct	<p>GF's Supplier Code of Conduct contains clauses obliging suppliers to comply with all applicable labour laws and standards in their respective jurisdictions including obligations that they must:</p> <ul style="list-style-type: none"> • Not use forced or involuntary labour; • Not use child labour; • Pay fair wages and benefits • Ensure Working Hours to comply with maximum working hours for relevant location. • Respect Freedom of Association; and • Have a grievance process in place. <p>GF has identified that its Supplier Code of Conduct can be strengthened to explicitly state our expectations in relation to the identification and management of modern slavery risks, escalation procedures and consequences for non-compliance. This will be a focus for 2021.</p>
Human Rights Policy (Wilmar Group)	<p>This Policy applies to all Wilmar subsidiaries (including Goodman Fielder). The Policy draws on guidance from the UN Universal Declaration of Human Rights; ILO Core Conventions on Labour Standards and Food and Agriculture Organization's Voluntary Guidelines on the Responsible Governance of Tenure and covers the following labour rights:</p> <ul style="list-style-type: none"> • Freedom of association; • No forced or bonded labour; • Prohibition on child labour; and • Conducive working conditions.

KEY ACTIONS TAKEN TO ADDRESS MODERN SLAVERY RISKS (CONT)

POLICY/CODE	DESCRIPTION
No Deforestation, No Peat and No Exploitation (NDPE) Policy (Wilmar Group)	<p>GF has adopted Wilmar's NDPE Policy which applies to all GF operations. The Policy sets out the core principals which all GF operations must abide by, including:</p> <ul style="list-style-type: none">• Respect and support for internationally recognised human rights;• Respect and recognise the rights of all workers;• Respect and protect the rights of children and their welfare; and• Remediation measures that can be implemented where it is identified that the company has allowed, caused or contributed to negative human rights impacts.





CONTROLS, ACTIONS AND CASE STUDIES

WHISTLEBLOWER MECHANISM - GF AWARELINE

GF Awareline is Goodman Fielder's "whistleblower hotline." It is an independent service operated by Deloitte and provides Goodman Fielder employees and other parties in Australia, New Zealand and the Pacific Islands with a mechanism to report concerns, issues or instances of suspected unethical or corrupt conduct. While the GF Awareline encourages whistleblowers to identify themselves, it also provides an option for the whistleblower to remain anonymous.

The service provides a number of confidential and secure reporting and disclosure mechanisms, including telephone, email, post and a web-based platform. All reports are handled in strict confidence by the Internal Audit Group and Legal Department of Goodman Fielder and are carefully assessed for subsequent investigation and follow-up action.

blow the whistle

on misconduct

GFAwareline

SEDEX

Supplier Ethical Data Exchange (SEDEX) is one of the world's largest ethical trade service providers. Goodman Fielder is an AB member of the SEDEX platform. As part of this membership all Goodman Fielder manufacturing sites across Australia have completed a Self-Assessment Questionnaires (SAQs) on business ethics, labour standards and Health, Safety and Environmental (HSE) practices and shared information about performance with key customers.

In 2021, Goodman Fielder will utilise the SEDEX platform to further streamline its approach to managing modern slavery risks through its supplier base. Key actions will include:

- Linking to existing suppliers registered on SEDEX and onboarding priority Tier One suppliers;
- Utilising the SEDEX "Radar" tool to assist in identifying key labour, human rights risks across Goodman Fielder's supplier base;
- Developing an audit program for suppliers who have been deemed high risk; and
- Management and monitoring of non-conformance and corrective actions.



CASE STUDY ONE: RISK ASSESSMENT AND REMEDIATION IN GOODMAN FIELDER'S LOGISTICS NETWORK

The following case study describes controls and remediation measures implemented following a risk assessment of Goodman Fielder's independent bread contractor logistics network.

Since 2017, Goodman Fielder has been actively auditing its Independent Contractor Network of 350 businesses for their compliance with labour laws. The Audit process began following a risk assessment of approximately 80 independent contractor businesses. It was identified that over 95% were non-compliant with several relevant labour standards including workplace agreements and workers engaged outside visa conditions.

A root cause analysis identified that a lack of awareness of relevant labour laws and standards was the overarching cause of these non-compliances.

To remediate the situation, Goodman Fielder formulated an 'Independent Contractor Workplace Laws Compliance Toolkit' (see image, right) and provided contractors a 90-day moratorium within which they were required to review

their business practices, comply and provide Goodman Fielder with a Statutory Declaration that declared compliance.

Since this time Goodman Fielder has conducted over 75 audits each year resulting in most businesses being covered twice over the 3 years. All independent contractors have now been audited and 80 per cent are deemed no / low risk. The remaining medium risk contractors have time bound corrective actions plans and contractors deemed high risk have either been coached to reduce their risk rating or had their contracts terminated.





CONTROLS, ACTIONS AND CASE STUDIES

CASE STUDY TWO: MITIGATING RISK FOR PALM OIL PLANTATION WORKERS THROUGH CERTIFIED SUSTAINABLE PALM OIL (CSPO)

The following case study describes Goodman Fielder's commitment to sourcing certified sustainable palm oil:

We are a member of the Roundtable on Sustainable Palm Oil (RSPO) and support the production of sustainable palm oil. We are adherent to the RSPO's Principles & Criteria (P&C), a set of standards which RSPO members must comply to. The P&C² includes human rights standards pertaining to good labour practices, responsible recruitment, and decent wage, which helps support the mitigation of modern slavery.

In 2014, Goodman Fielder committed to sourcing certified sustainable palm oil (CSPO) for all Goodman Fielder products in Australia and New Zealand using the mass balance supply chain model. We have delivered on this commitment including achieving supply chain certification for all manufacturing sites that handle ingredients containing palm oil.

This commitment is supported by the adoption of Wilmar's No Deforestation, No Peat and No Exploitation Policy³ and which applies to all Goodman Fielder operations. Goodman Fielder tracks the progress of major palm oil suppliers against this (or their equivalent) policy. In 2020, Goodman Fielder achieved the leading score for an Australian Based company on the 2020 WWF Palm Oil Buyers Scorecard- highlighting our efforts to source certified sustainable palm oil.

EFFECTIVENESS MEASURES AND CONTINUOUS IMPROVEMENT

Goodman Fielder is working to develop effective measures for both its operations and supply chain to assess progress and effectiveness of its modern slavery program. Goodman Fielder acknowledges that the success of its modern slavery program will be largely dependent on how it measures the implementation of our planned programs of work. The following items will be tracked by dedicated working groups/teams who will undertake the monitoring of compliance and continuous improvement.

2 - <https://rspo.org/resources/certification/rspo-principles-criteria-certification>

3 - https://www.wilmar-international.com/docs/default-source/default-document-library/sustainability/policies/wilmar-ndpe-policy---2019.pdf?sfvrsn=7870af13_2

CONTROLS, ACTIONS AND CASE STUDIES

<p>Governance and Management Frameworks</p>	<ul style="list-style-type: none"> • Policy robustness as benchmarked for the FMCG sector; • Percentage of employees trained in policies, grievance mechanisms and modern slavery awareness; • Access to grievance mechanisms for both employees and suppliers; and • Feedback from Goodman Fielder Leadership and Board of Directors.
<p>Risk Assessment/ Due Diligence</p>	<ul style="list-style-type: none"> • Percentage of supplier acceptance of updated Supplier Code of Conduct and new contract provisions; • New and existing suppliers on the SEDEX (or equivalent) platform; • Percentage of suppliers identified as high risk that undergo or have undertaken a third-party e.g a SMETA (SEDEX Members Ethical Trade (or equivalent) Audit; and • The completion of a SMETA Audit at a Goodman Fielder manufacturing facility and the closure of any non-conformances identified.
<p>Monitoring</p>	<ul style="list-style-type: none"> • The number of open, ongoing and closed findings resultant from Audits; • Investigative and remedial actions taken in response to any actual or perceived instances of Modern Slavery; • Registered grievances in our supply chain relating to any form of Modern Slavery; and • Remediation of significant registered grievances and corrective actions taken.

CONSULTATION

Goodman Fielder's Modern Slavery Statement was developed in consultation with the Senior Executives of Goodman Fielder, each of whom oversees a group wide function. The Senior Leaders were asked to provide feedback on the statement prior to it being provided to the Goodman Fielder Board, for final review and approval on behalf of Goodman Fielder and its subsidiaries.

**MAKING EVERYDAY
FOOD *better*
FOR EVERYONE**

APPENDIX I

This statement was prepared to meet Goodman Fielder's reporting requirements. The table below references where the mandatory criteria set out in the Act are addressed in this statement.

Mandatory criteria	Location in document
Criteria 1. Identify the reporting entity	Page 2
Criteria 2. Describe the structure, operations and supply chains of the reporting entity	Page 3
Criteria 3. 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	Page 4
Criteria 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	Page 5,6,7 & Case Studies Page 8, 9, 10
Criteria 5. Describe how the reporting entity assess the effectiveness of such actions	Page 10,11
Criteria 6. Describe the process of consultation with any entities that the reporting entity owns or controls	Page 11