

GOODMAN FIELDER PTY LIMITED MODERN SLAVERY STATEMENT 2024



goodman fielder



INTRODUCTION

At Goodman Fielder, we strive for sustainability in our operations and are committed to doing business in a way that is ethical, respectful and ensures the most vulnerable are protected from exploitation. To that end, we are continuing to build on previous efforts in relation to managing modern slavery risks and ethical sourcing practices.

This joint Modern Slavery Statement covers the reporting period pertaining to the calendar year of 1 January 2024 to 31 December 2024 (**CY24**). 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 entities.

This Statement has been prepared by Goodman Fielder Pty Limited in its own capacity and on behalf of the following entities, which it owns and that are reporting entities under the Modern Slavery Act 2018 (Cth) (the **Act**):

- Goodman Fielder Pty Limited;
- Goodman Fielder Consumer Foods Pty Limited; and
- Quality Bakers Australia Pty Limited

(together **Goodman Fielder** or **GF**).

Internal stakeholders of each of the above entities were consulted and have provided input into this Statement.

The Board of Goodman Fielder Pty Limited approved this Statement on 18 June 2025 on behalf of all entities that it owns or controls that are reporting entities under the Act as at 31 December 2024.



Matthew Albion
Managing Director

OUR ORGANISATIONAL STRUCTURE, OPERATIONS AND SUPPLY CHAIN

OUR STRUCTURE

Goodman Fielder Pty Limited is a privately-owned company, registered in Australia. It is an indirect, wholly owned subsidiary of Wilmar International Limited (**Wilmar** or **Wilmar International**), Asia's leading agribusiness group. As at 31 December 2024, Goodman Fielder Pty Limited had 31 subsidiaries (the **Subsidiaries**) and is one of Australia's leading food companies. Operations in Australia include a major support office (with associated R&D facilities), 10 manufacturing sites and a network of 58 depots. These operations are supported by a national sales and distribution network.

Goodman Fielder Pty Limited and its subsidiaries share centralised governance, procurement, finance and legal functions together with common policies and procedures.

OUR OPERATIONS

Goodman Fielder manufactures, packages, distributes, markets and sells a wide range of food products in Australia. Together with our offering of retail and consumer products, GF also services the industrial and food service segments including in the hospitality, healthcare and government sectors.

Goodman Fielder has a significant portfolio of brands, including Meadow Lea, White Wings, Helga's and Praise. Goodman Fielder's leading product offering is supported by efficient and effective distribution networks that enable delivery to over 8,000 outlets every day including supermarkets, service stations and institutional customers (eg hospitals and aged care facilities).

While Goodman Fielder manufactures the majority of its products internally and typically in the market in which they are sold, some GF products are manufactured outside of the market and in some instances, by third party manufacturers. Goodman Fielder works with over 1,700 suppliers globally and employs approximately 1,500 people.

OUR SUPPLY CHAIN

Goodman Fielder's supply chain is diverse, with more than 200 direct suppliers and over 1,500 indirect suppliers across approximately 30 countries. While most of Goodman Fielder's key ingredients are sourced locally, for example flour, sugar and grains, our broader supply chain extends into Asia, North America, Europe and South America.

Our supply chain includes the procurement of:

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

Where feasible, Goodman Fielder endeavours to partner with related entities within the group of companies owned by Wilmar International (the **Wilmar Group**). Generally, this provides us with greater oversight of the materials/ingredients being sourced as well as economies of scale.

MODERN SLAVERY STRATEGY AND PROCESS

Goodman Fielder Australia has established and implemented specific policies aimed at minimising modern slavery risk across our operations and supply chain.

The Goodman Fielder Modern Slavery Policy and its implementation is ultimately overseen by Goodman Fielder's Australian Leadership Team and managed by a management representative committee comprising the Chief Financial Officer, General Counsel & Company Secretary and the Head of Supply Chain & Procurement. Specific actions and focus areas encompass assessing and managing supplier risk, both in key commodities and third-party service providers.

There has been notable progress made since the last Statement inclusive of: increasing the percentage of supplier spend on Supplier Ethical Data Exchange (**SEDEX**) registered suppliers and the number of audits through the SEDEX platform (described further below), identification and close out of identified risks and an increase in third-party cleaning contractor and logistics contractor audits. In addition, no modern slavery related incidents have been reported via the grievance reporting processes provided for in the relevant policies or otherwise.

MODERN SLAVERY RISKS

Goodman Fielder conducts a thorough analysis of our supply chains on an ongoing basis and considers the potential to cause, contribute or be directly linked to modern slavery risks.

As part of our commitment to identifying and mitigating modern slavery risks, our supply chain analysis includes evaluating suppliers using a comprehensive risk assessment matrix which is aligned to the Walk-Free global slavery index. This matrix takes into account a range of indicators including, but not limited to:

- The country of origin of raw materials;
- The location of manufacturing and processing sites;
- The nature of the product or service supplied;
- Industry-specific risk factors; and
- Third-party certifications or audit history.

This structured approach enables us to identify suppliers and supply chains that are more likely to pose a higher risk of modern slavery. The results inform our prioritisation process, directing our focus and due diligence efforts toward the areas of highest potential impact.

As a result of this assessment, the suppliers deemed to have the highest potential for modern slavery risks in GF's operations and supply chains include:

- Suppliers of the following commodities:
 - Cocoa powder;
 - Rice; and
 - Palm Oil;
- Logistics providers; and
- Cleaning providers.

Goodman Fielder is committed to prioritising ongoing targeted assessments of our third-party suppliers which fall into the above categories. In CY24 we continued to conduct SEDEX risk assessments of third-party suppliers, audited domestic suppliers in relation to compliance with workplace laws and identified and triaged third-party supplier risk based on ingredient type and/or country of origin.



KEY ACTIONS TAKEN TO ADDRESS MODERN SLAVERY RISKS

Goodman Fielder has made an ongoing commitment to support and uphold human rights, and to take measures that will mitigate modern slavery risks in our operations and supply chain. Goodman Fielder is guided by the United Nations Guiding Principles on Business and Human Rights, specifically:

- A policy commitment to respecting human rights;
- An ongoing human rights due diligence process to identify, prevent, mitigate and account for how the business addresses impacts on human rights;
- Processes to enable the remediation of any adverse human rights impacts the business has caused or contributed to; and
- A process for reporting and continuous improvement.

These commitments and processes are reflected in Goodman Fielder's policy framework, which includes the following:

- **(Wilmar Group Policy) No Deforestation, No Peat, No Exploitation (NDPE) Policy:** This Policy sets out the Wilmar Group's commitment to respecting and promoting human rights across its operations and supply chain, and explicitly prohibits the use of forced labour, bonded labour, and child labour within the Wilmar Group's operations and supply chains. The Wilmar NDPE Policy has particular application to Wilmar ingredients used in GF's manufacturing as well as those distributed directly to our customers. This provides GF with a standard whereby we can ensure our ingredients are monitored and managed from a range of lenses, including modern slavery risk. As our parent company, the accountability for implementation and management of the NDPE policy sits with Wilmar head office. The NDPE Policy is available on the Wilmar website: <https://www.wilmar-international.com/sustainability/policies>.
- **Ethical Employment Policy:** GF's Ethical Employment Policy ensures that employees are aware of their obligations to maintain an acceptable and satisfactory level of conduct and personal behaviour, which includes a commitment to human rights as required by applicable law and internationally recognised standards reflected in various treaties and conventions. Accountability for the implementation and management of this Policy is managed by the GF Chief People Officer.
- **Modern Slavery Policy:** Established during CY23, GF's Modern Slavery Policy provides a framework for assessing and monitoring modern slavery risks in GF's operations and supply chains and provides a grievance mechanism for any modern slavery related complaints received. Further detail about the Modern Slavery Policy is set out below. GF's Australian Leadership Team is ultimately responsible for ensuring that GF and its external stakeholders uphold GF's commitment as set out in this Policy. Within GF, accountability for the implementation and management of this Policy is managed by a steering committee which includes the Head of Supply Chain & Procurement, Chief Financial Officer and General Counsel & Company Secretary. The Modern Slavery Policy is available on GF's website: <https://goodmanfielder.com/sustainability/better-business/modernslavery/>.



- **Whistleblower Policy:** The GF Whistleblower Policy promotes a culture of honesty and integrity in business dealings and creates a safe and supportive environment for individuals to report genuine concerns about potential, suspected or actual misconduct, including those relating to human rights and modern slavery issues. If an individual suspects that actual or potential misconduct within GF's operations or supply chains has occurred or is occurring, they can be confident that their disclosure will be acted upon in a timely manner and dealt with appropriately. In accordance with applicable whistleblower protection laws, they can also be confident that they will not be subject to any disadvantage, retribution or victimisation for raising their concerns. The Whistleblower Policy is approved and overseen by the Chief People Officer and General Counsel & Company Secretary. The Whistleblower Policy is available on GF's website: <https://goodmanfielder.com/sustainability/better-business/whistleblower-policy/>.

In CY24, GF did not receive notice of any modern slavery related incidents under the above mentioned policies.

In CY24, we took some key actions to address our modern slavery risks, which are explained in detail below.

Our Operations

Goodman Fielder's focus for CY24 was to strengthen the modern slavery framework that we have been developing since CY21. This framework, inclusive of SEDEX self-assessment questionnaires (**SAQs**), ensures that GF is prepared to identify and respond to modern slavery risks across our operations and supply chain on an ongoing basis by implementing appropriate measures.

In CY24, all GF sites in Australia maintained their SEDEX annual requirement for SAQs.

Our Supply Chain

In CY21, Goodman Fielder carried out a thorough assessment of our supply chain against a risk framework, which looked at risks such as inherent commodity/material/service risk, source location and category of spend. Since then, we have used that baseline assessment as a framework to identify and prioritise our efforts on the highest risk suppliers in our supply chain. These efforts continued to be our focus in CY24. In particular, we have continued to prioritise onboarding higher risk suppliers onto the SEDEX Platform. Suppliers on SEDEX are required to complete an SAQ on their business practices, which categorises their level of risk and may require further actions based on severity of the risk rating.

In CY24, we increased the ingredients spend coverage on SEDEX from 51% to 69%. At the end of CY24, there were 83 suppliers linked to SEDEX, comprising 118 individual sites. Of these sites, 111 have completed or commenced SAQs.

In CY 24, 63 SEDEX Members Ethical Trade Audit (**SMETA**) audits were carried out at supplier facilities (an increase from 39 audits in CY23). This included audits at nine high risk sites. Of these high risk sites, GF no longer trades with four of them, two high risk issues were successfully resolved and GF continues to work with three suppliers to address non-conformances, primarily related to fire risk management and verification of employee records. Goodman Fielder remains actively engaged with these suppliers to ensure timely resolution of outstanding issues.

Focus on Commodity Risks

Rice

Goodman Fielder does not source rice directly from primary producers; however, we have made considerable progress in engaging with our rice suppliers to investigate any instances of modern slavery in the rice supply chain. In CY23, there were three high risk issues identified which were subsequently closed in CY24. No additional high risk issues were identified during the course of or were outstanding at the closure of CY24.

Cocoa Powder

Goodman Fielder procures finished goods from third-party suppliers which use cocoa powder in our White Wings products (including baking mixes and fillings) and private label products. Some of our baking mixes and fillings products source cocoa from suppliers who are certified by the Rainforest Alliance program.

Palm Oil

GF is a member of the Roundtable on Sustainable Palm Oil (**RSPO**) and has been since 2005. We continue to adhere to RSPO's Principles & Criteria, which include human rights standards that help to mitigate modern slavery risks. GF supports the production of sustainable palm oil and in 2014, Goodman Fielder committed to sourcing certified sustainable palm oil (CSPO) for all Goodman Fielder products in Australia using the mass balance supply chain model. In support of this commitment, we have achieved supply chain certification for all GF manufacturing sites in Australia that handle ingredients containing palm oil.

As part of the requirements for maintaining RSPO certification of our manufacturing sites, we undertake a multi-site certification audit annually, including an audit of our head office processes. This annual process is an opportunity to continually improve and hold ourselves accountable to delivering on our commitment to RSPO, including as it relates to human rights standards. In our CY24 Audit, GF received two non-conformances, however these were in relation to ensuring our suppliers were providing up-to-date certification information and tightening up our internal procedures on marketing communications and claims and therefore were unrelated to human rights violations or modern slavery. Both were closed out within the provided 30-day period, with no further action required. GF has continued our RSPO training program outside direct staff to include third party manufactures, including those overseas, on handling palm oil materials and maintaining RSPO principles.

Focus on Third Party Service Providers

Logistics Providers

GF relies on independent contractors as part of our baking logistics network. These independent contractors undertake tasks such as delivery of bread from our bakeries or depots to our customers. They also undertake merchandising tasks. GF's evaluation of risk in this area identified that because of the nature of these roles, there is the potential for an increased risk of unfavourable working arrangements, particularly in the areas of working hours, working conditions, wages and workplace health and safety. GF is also conscious of the potential for modern slavery issues to arise in these circumstances. To address this risk, GF utilises its ongoing monitoring and audit program which seeks to identify and mitigate risks, including those related to modern slavery.

In 2024, we continued to monitor these risks (including the risk of modern slavery occurrences) within our network of delivery contract drivers. The actions carried out during CY24 in this regard included the following:

- 202 confirmations that previously signed statutory declarations from independent contractors affirming their compliance to applicable workplace laws (indicating 100% compliance), were still valid.
- 21 new contracts and 54 contract renewals signed in 2024 requiring compliance with chain of responsibility laws.
- Independent contractors' delivery drivers undertook daily logging of their workplace hours, demonstrating adherence to legal working hours across approximately two million annual deliveries.
- Driver Bakery Contractor Induction (including Chain of Responsibility-related obligations) was completed by 512 drivers.
- 37 audits of independent contractors conducted, all identified as low risk, bringing total audits completed to 357 over the past seven years.

Cleaning

GF engages external cleaning companies to ensure its facilities are maintained to the highest standards of hygiene and cleanliness. The use of unskilled and sometimes temporary labour, coupled with potentially low oversight, increases the risk of adverse working conditions in this industry.

In CY24, 15 cleaning contractors completed self-assessment questionnaires comprising of 16 questions related to modern slavery risk. Through the audit process, no modern slavery concerns were uncovered.



GOVERNANCE AND POLICES

Goodman Fielder understands the importance of a robust governance system to support our commitment to upholding fundamental human rights. In CY24, we built on our existing governance framework that was codified during CY23 with the introduction of our formal Modern Slavery Policy.

Modern Slavery Policy

GF is committed to doing business in a way that is ethical and respectful and ensures that the most vulnerable are protected from exploitation. In order to deliver on this, GF is committed to ensuring that all laws and regulations relating to modern slavery are upheld in both our workplaces and supply chains.

In CY23, we introduced a standalone internal and externally-facing Modern Slavery Policy in respect of GF's Australian operations. The Modern Slavery Policy outlines the kinds of mechanisms and controls that GF may employ to identify and mitigate modern slavery risks in our supply chains and operations, including measuring the effectiveness of and continuously reviewing and seeking to improve our modern slavery initiatives. Our Australian Leadership Team, led by our Managing Director, is ultimately responsible for ensuring that both GF and its external stakeholders uphold GF's commitments set out in the Policy. Within GF, accountability for the implementation and management of this Policy is managed by a steering committee which includes the Head of Supply Chain & Procurement, the Chief Financial Officer and the General Counsel & Company Secretary. The Modern Slavery Policy also establishes a related Grievance Procedure (detailed below) and complements existing policies that are relevant in this space, including our Ethical Employment Policy and Whistleblower Policy.

There were no incidents reported to GF in connection with the Modern Slavery Policy in CY24.

Grievance Procedure

In conjunction with the introduction of the Modern Slavery Policy, during CY23 we also introduced a specific and related Modern Slavery Grievance Procedure. The Grievance Procedure is integral to the effectiveness of the new Modern Slavery Policy. The Grievance Procedure is a comprehensive procedure that provides internal and external stakeholders with the information necessary to enable them to raise a grievance which is relevant to GF's commitments under the Modern Slavery Policy against any party in the Goodman Fielder supply chain and/or our owned operations. The Grievance Procedure also acts as a framework for the business to ensure clarity and consistency in the event a grievance is raised.

As part of introducing the Grievance Procedure, GF's existing Whistleblower Policy was also amended during CY23 to explicitly confirm that modern slavery-related complaints can also be received through the existing GF Whistleblower Policy, but that the specifically designed Modern Slavery Grievance Procedure will apply to all modern slavery related complaints, regardless of how the complaint is received.

There were no grievances reported under the Grievance Procedure in CY24.

Responsible Sourcing Code of Conduct

GF is working to ensure that our business is fit for the future, and we know that our success is reliant on thriving, productive supply chains. We are continually seeking and welcoming of opportunities to work collaboratively with our suppliers to achieve our collective sustainability goals, and our Responsible Sourcing Code of Conduct (**Code of Conduct**) is one example of this.

The Code of Conduct outlines the standards and principles that GF expects our suppliers to adhere to when conducting business with us and forms part of our written contracts with suppliers. Since the Code of Conduct was reviewed and updated in CY21 to ensure that modern slavery, human rights and business ethics risks were adequately addressed within our operations and supply chains, GF has increasingly incorporated an express commitment by its suppliers to comply with the Code of Conduct into its contractual arrangements with its suppliers, which continued throughout CY24.

The commitments set out in the Code of Conduct include explicit bans on the use of forced labour, bonded labour and child labour, an expectation that workers should enter into employment voluntarily with clear written employment agreements and have the freedom to terminate their employment, a requirement to provide safe and healthy working environment for all employees and mandates in relation to employees receiving fair wages that meet or exceed legal minimums and industry standards, along with appropriate benefits, accompanied by payment practices which are transparent and regular. The Code of Conduct is available on the GF website: <https://goodmanfielder.com/sustainability/better-business/ensure-compliant-and-ethical-business-conduct/>.

There were no incidents reported to GF in connection with the Code of Conduct in CY24.

Training

Goodman Fielder understands the importance of our employees having a solid knowledge and awareness of modern slavery. We recognise that this is especially important for certain functions within our business who have primary responsibility for and oversight of GF's operations and external supply chains, such as our procurement, supply chain, and operations teams.

Targeted and tailored training builds awareness of modern slavery for GF employees and enables our staff to identify potential and actual risks in our operations and supply chain that they may encounter in connection with their roles within GF. It will also ensure that GF employees are familiar with our Modern Slavery Policy, Grievance Procedure and Code of Conduct.

In conjunction with the introduction of the Modern Slavery Statement, in CY23, we conducted targeted and bespoke modern slavery training with the GF Australian and New Zealand Procurement teams. During the course of CY24, this training program was expanded and tailored modern slavery training was provided to the Australian Leadership Team. Additionally, bespoke training was provided to the Operations Leadership Team (primarily comprising GF site leads) for the purpose of equipping that team with the relevant skill-sets to conduct modern slavery audits of external cleaning service providers at GF sites across Australia.

EFFECTIVENESS MEASURES AND CONTINUOUS IMPROVEMENT

Goodman Fielder is committed to an ongoing review of our modern slavery program by continuously assessing the effectiveness of the measures we implement.

We have assessed the actions we committed to in our previous Statements and provide the following summary of the key actions we have taken against the effectiveness measures set for those actions:

Governance and Management Frameworks

In CY24, GF embedded the Modern Slavery Policy and Grievance Procedure into its Australian operations by conducting further specific training delivered to key internal stakeholders relating to the existence and operation of the Policy and Grievance Procedure. The number of modern slavery related grievances received under the Grievance Procedure was also monitored (being zero in CY24). These actions fulfilled the corresponding effectiveness measures set in our CY23 Statement.

Training

In our CY23 Statement, we committed to continuing to roll out a Modern Slavery Training program to GF leadership and relevant functions. The effectiveness measure was the training program being rolled out to staff in relevant functions at GF's Head Office and at GF sites who are dealing directly with suppliers and third parties. In CY24, tailored modern slavery training was provided to the Australian Leadership Team. Additionally, bespoke training (including in relation to modern slavery issues) was provided to the Operations Leadership Team for the purpose of equipping that team to conduct modern slavery audits of external cleaning service providers at GF sites. The training conducted in CY24 was an expansion of the training program that commenced in CY23, with training provided to GF's Procurement Team, who deal directly with our external suppliers. GF's CY24 actions therefore fulfilled our CY24 effectiveness measure.

Targeted initiatives: third party service providers

In our CY23 Statement, we stated that our focus would be to continue the rollout of an audit program for cleaning service providers, and amend our logistics contractor agreements and audit process to include specific modern slavery clauses and commence the rollout of the revised contract and audit framework. In CY24, 15 cleaning contractors completed self-assessment questionnaires with no modern slavery risks identified. This audit process will continue in CY25. In relation to third-party logistics providers, in CY24 there was an increase in the number of audits carried out with no modern slavery risks identified. In addition, during CY24, our bakery delivery contract templates were updated to incorporate specific clauses committing the contractor to comply with GF's modern slavery framework, including by adhering to the Code of Conduct. From the time these updates were finalised, all new bakery delivery contracts and renewals incorporated those provisions.



Goodman Fielder's priorities for CY25 will be as follows:

	2025 Action	Effectiveness Measure
Governance and Management Frameworks	<ul style="list-style-type: none"> Embed and monitor uptake of the Grievance Procedure 	<ul style="list-style-type: none"> The number of modern slavery related grievances monitored and recorded through the Grievance Procedure
Training	<ul style="list-style-type: none"> Create a plan for an ongoing modern slavery training cycle to build on the initial training programs delivered in CY23 and CY24 to reinforce GF's approach to managing modern slavery risks within the business and ensure internal stakeholders are alerted to any changes or developments that may materialise over time 	<ul style="list-style-type: none"> Internal alignment on the design and components of the ongoing training program
Risk Assessment/ Due Diligence	<ul style="list-style-type: none"> Continue to increase the percentage of supplier spend on SEDEX Close out any identified risks with suppliers clauses and commence rollout 	<ul style="list-style-type: none"> Number of suppliers on the SEDEX platform as a percentage of GF's supplier base Percentage of spend through the SEDEX platform Number of high-risk issues outstanding (that is, not closed out)
Targeted initiatives	<p>Focus on the following identified risk areas:</p> <p>A. Continue annual audit program for cleaning service providers</p> <p>B. Continue logistics contractor audits in line with contract renewals</p>	<p>A. Number of audits completed and (where applicable), remedial action taken by supplier</p> <p>B. Completion of update to logistics contractor audit questions and number of contractors audited. High risk items identified to be closed out with contractors</p>

CONSULTATION

Goodman Fielder's Modern Slavery Statement has been developed in consultation with the Senior Executives of Goodman Fielder Pty Limited, each of whom oversees a group-wide function. The Senior Executives provided their feedback on the Statement prior to it being provided to the Board of Goodman Fielder Pty Limited for final review and approval on behalf of Goodman Fielder and its Subsidiaries. GF has also consulted with the Group Sustainability function of Wilmar International, being GF's parent company. Wilmar International carries out regular consultation with external global stakeholders on Human Rights related matters.

APPENDIX

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 -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 12

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