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LANGDON

A WORLD OF TASTE



H.J. Langdon & Co Pty Ltd
Modern Slavery Annual Statement
2021-2022

MODERN SLAVERY REPORT



This is the third Modern Slavery Statement from H.J. Langdon & Co Pty Ltd (ABN 89 006 641 701) under the Modern Slavery Act 2018 Australia. This report was prepared for fiscal year 2021-2022.

The purpose of this statement is to comply with reporting requirements under the Australian Act to demonstrate an understanding of risk within our organisation and extended supply chain for Modern Slavery and the measures taken to address those risks.

This statement has been approved by the Board of H.J. Langdon & Co Pty Ltd (referred to in this statement as the “Company”).

We recognise that our corporate and social responsibilities reside as much in our supply chain as they do in our own activities. Therefore, we continually seek to ensure the ingredients and services we source are ethically produced. We do this by working with our suppliers to positively influence our social, ethical and environmental performance. The Langdon Supplier Code of Conduct, Modern Slavery & Vendor Risk Review along with the Supplier Ethical Data Exchange (SEDEX) program are tools used to assess our Supplier’s social and environmental compliance.

The Company is a family-owned business. Our supply partners and processes are an extension of our business and the protection of human rights across our wide-reaching supplier base is paramount.

ABOUT H.J LANGDON & CO PTY LTD

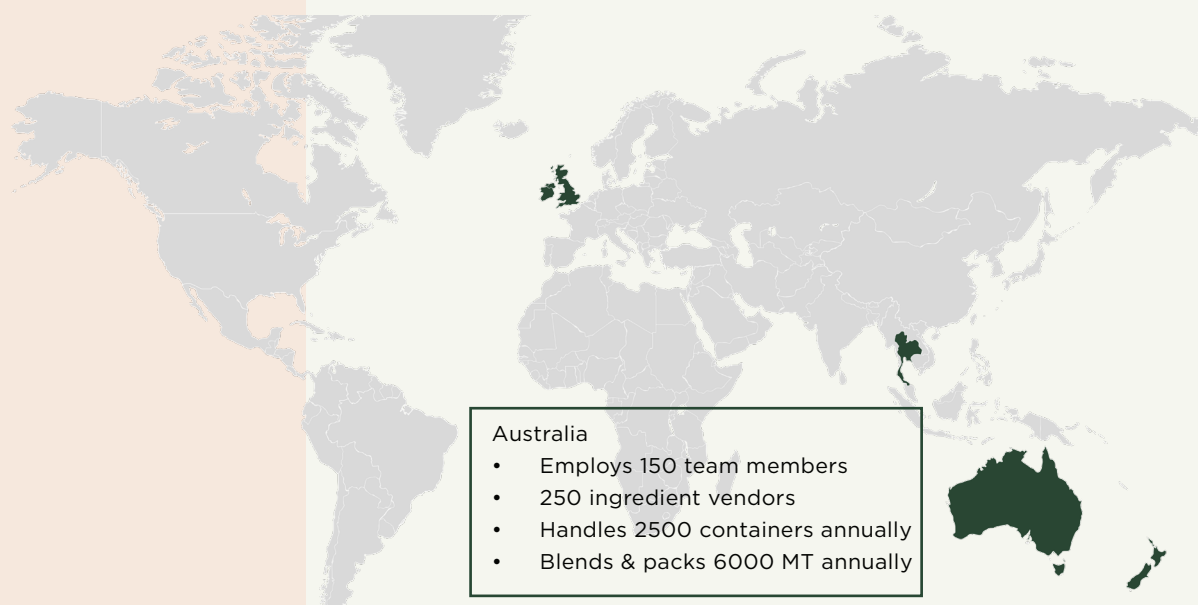


H.J. Langdon & Co Pty Ltd, a fifth-generation family-owned business, was established in Melbourne, Australia in 1852. It is one of the region's leading distributor and importer for a wide range of food ingredients sourced from Europe, Africa, U.S.A, South America and Asia. We have a growing blending and packing facility supplying food manufacturers and retailers.

Our offshore entities are in New Zealand, U.K, Ireland, Thailand and Singapore. Our Australian business employs approximately 150 employees managing supply chain activities including procurement, technical, transport, warehouse, production, including other core business functions.

The Company's supply chain includes a mixture of food ingredient manufacturers and traders. Our key product categories are herbs, spices, functional ingredients, flavours, colours, sweeteners, frozen, herbs, fruits, vegetables, dried fruits and nuts, seeds ancient grains beans and pulses, dehydrated vegetable ingredients, botanicals teas and organics.

The end product which the Company trades or blends has come from a complex supply chain which extends from agricultural growing, harvesting, primary processing to more highly refined and processed conditions. These items are globally procured with a complex web of processors, sellers, and re-sellers where contributions to the final product might come from numerous suppliers and geographical locations.



POTENTIAL RISKS OF MODERN SLAVERY



The Company has a strong reputation in supplying high quality, ethically sourced ingredients supported by global certifications.

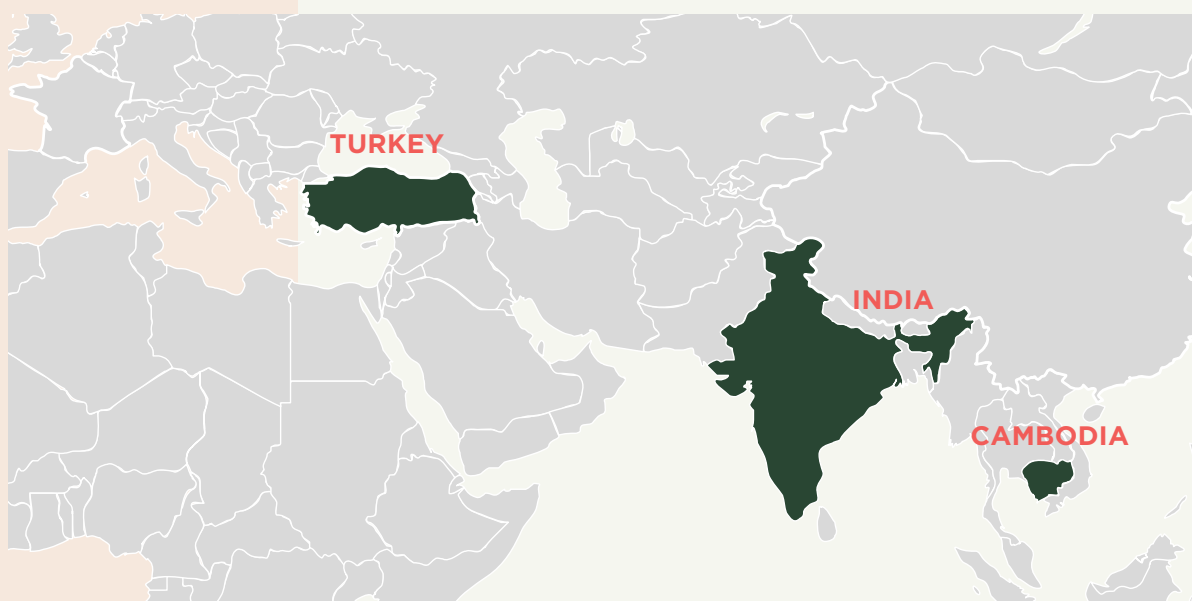
The food supply chain is complex and global, and some commodity items may be higher risk than others due to the loss in visibility of the supply chain or the geography (origin) from which they are derived. Furthermore, the food and beverage sector employ low based skilled workers that are often short term or seasonally employed.

We understand key risk indicators for modern slavery to be;

- Countries marked by conflict
- Countries with state-imposed forced labour
- Countries with higher migrant populations or base skilled workers
- Operations that rely on third party labour sources
- Complex supply chain across several high-risk geographic areas (raw material supply)

The Company recognises the main exposure to modern slavery risk is that of its ingredient supply chain.

Based on our Modern Slavery risk analysis the Company recognises some ingredients are sourced from regions of higher vulnerability to Modern Slavery using the Modern Slavery Index vulnerability scale. The following countries were identified.



All suppliers were able to demonstrate a responsible and ethical commitment, aligned with the Modern Slavery Act 2018.

OUR ACTIONS



The Company is committed to socially and ethically responsible conduct of its operations at all administration, procurement, sales and production sites. We do not condone Modern Slavery in any form.

We have taken the following steps to support the Modern Slavery Act 2018.

- Our Environmental & Socially Responsible Framework (ESR) is a goal orientated framework that drives our cultural focus in social matters.
- Our governing policies and procedures have been revised to include Modern Slavery legislation and refresher training for employees:
 - PR33-015 Modern Slavery
 - POL33-013 Langdon Code of Conduct
 - POL33-39 Langdon SUPPLIER Code of Conduct
 - POL33-038 Whistleblower Policy
 - PR33-004 Staff Grievance Handling Procedure
 - PR33-013 Labour and Wages management
- Our Modern Slavery risk assessment is embedded in our Vendor Approval process for new and existing suppliers.
- Langdon Suppliers are encouraged to be SEDEX members or alternatively complete our Antislavery Principles Commitment Form and Modern Slavery Questionnaire.
- As a SEDEX member we have been audited against the SMETA 4 Pillars standards.
- Our Procurement and Technical team members complete refresher Modern Slavery training annually to support facilitation of their responsibility in identifying Modern Slavery risk in our supply chain.
- Ongoing monitoring of the supply chain with respect to Covid 19, climate change, economic and sustainable challenges.

ASSESSING EFFECTIVENESS OF OUR ACTIONS



Our ESR Framework and Vendor Management system provide the foundation for Modern Slavery mitigation at Langdon. We shall monitor the effectiveness of our actions through:

- SMETA and customer compliance audits for social responsibility.
- Membership and compliance to Responsible Sourcing Palm Oil and Rain Forest Alliance principles.
- Internal policy and procedure audits.
- Annual Modern Slavery Review.
- Reports of modern slavery risk/breach or emerging concerns in our supply chain.

LANGDON ESR FRAMEWORK

**ETHICAL BUSINESS
CONDUCT**

**SAFETY & HEALTHY
WORKPLACE**

**ASSURED QUALITY
& FOOD SAFETY**

**ENVIRONMENT &
SUSTAINABILITY ACTION**

**COMMUNITY
CONNECTIVITY**



CONSULTATIONS & NEXT STEPS



The company is a collaborative organisation. Further development and continuous improvement of our ESR framework including modern slavery is managed through consultation with all key stake holders within our business and in our supply chain.

Over the next reporting period, we will;

- Leverage further the SEDEX portal tool and principles to manage our suppliers
- Continue our Labour Hire compliance audits
- Continue to process Modern Slavery Risk Assessments
- Continue to raise awareness of modern slavery throughout the organisation
- Strengthen Ethical Sourcing training by outsourcing training with industry expertise.
- Continue to deliver on our ESR annual Goals
- Monitor for the impacts of Covid 19 on the food supply chain

Approval

This statement was approved by the Board of H.J. Langdon & Co Pty Ltd and signed by a responsible member of H.J. Langdon & Co Pty Ltd on 22/12/22

A handwritten signature in black ink, appearing to read 'Chris Langdon', positioned above the name and title.

Chris Langdon
Director & CEO of H.J. Langdon & Co Pty Ltd