

FY23
**Modern
Slavery
Statement**

Year ending 31 July 2023



arnotts.com



REPORTING ENTITY

This Statement describes the actions taken by The Arnott's Group to address modern slavery risks in our business and supply chains in the year ending 31 July 2023 pursuant to the requirements of the *Modern Slavery Act 2018* (Cth). In this Statement, The Arnott's Group refers to Snacking Investments Holdco Pty Ltd (ACN 634 908 482) and its related bodies corporate, as defined in Section 50 of the *Corporations Act 2001* (Cth). This Statement is given by Snacking Investments Holdco on behalf of itself, as a reporting entity, and the other reporting entities in The Arnott's Group.¹

¹ This Statement is made for the following reporting entities within The Arnott's Group: Snacking Investments Holdco Pty Ltd (ACN 634 908 482), Snacking Investments MezzCo Pty Ltd (ACN 634 908 795), Snacking Investments MidCo Pty Ltd (ACN 634 908 893), Snacking Investments Bidco Pty Ltd (ABN 18 634 909 032), Arnott's Group Holdco Pty Ltd (ABN 17 635 109 081), Arnott's Bidco Pty Ltd (ABN 50 635 108 851), Campbell Australasia Pty Ltd (ABN 28 004 456 937), Arnott's Holdco Pty Ltd (ABN 80 007 245 105), Arnotts Pty Ltd (ABN 41 000 003 001), Arnott's Biscuits Limited (ABN 44 008 435 729), Good Food Partners Holdco Pty Ltd (ABN 47 646 575 662) and Good Food Partners Pty Ltd (ABN 38 104 048 400). This Statement predominantly describes the operations of Arnott's Biscuits Limited, Campbell Australasia Pty Ltd and Good Food Partners Pty Ltd, being the only reporting entities that operate The Arnott's Group's business in Australia.



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Creating an *ethical* supply chain

As an iconic Australian company, we have an obligation to use our network and reputation as a force for good.

This means that our purpose, to create delicious moments for consumers, must be balanced with our responsibility to ensure that human rights are respected across our operations and supply chain.

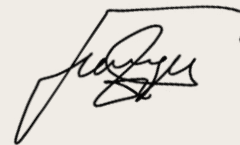
Modern slavery is one of the most severe human rights challenges facing our world, and it is incumbent on all of us to work determinedly to eliminate the risks both within our business and beyond. Our team has made great progress in identifying, minimising and mitigating potential modern slavery risks related to our operations, and will continue to do so.

Over the past year, we have:

- Launched a new online system for managing suppliers. It requires our suppliers to comply with modern slavery requirements and provides data on their ethical and responsible practices.
- Continued to educate employees on modern slavery risks by reinforcing our guidelines in a compulsory training module.
- Continued to ensure access for suppliers to our anonymous whistleblowing platform for the reporting of modern slavery and ethical concerns relating to our business and its operations.
- Continued to strengthen controls relating to employment across our network to ensure that our people are remunerated accurately and fairly for their work.

- Released our third annual Sustainability Report outlining our efforts to improving the environmental and social impact practices across our value chain.

Our 2023 Modern Slavery Statement builds on our previous disclosures, shares our progress, and details The Arnott's Group's ongoing commitment in this space across our business activities in Australia, New Zealand and Asia. We pledge to play our part in supporting the prevention, and hopefully eradication, of modern slavery.



George Zoghbi
CEO, The Arnott's Group
Director, Snacking Investments
Holdco Pty Ltd



1

Fostering equality, diversity & sustainability

2

High performance, with integrity

3

Balancing decisions from our head & heart

4

Delighting our customers every time

WE STAND FOR

01 Structure, Operations & Supply Chains

The Arnott's Group portfolio of brands continues the 158-year legacy of the Arnott family.

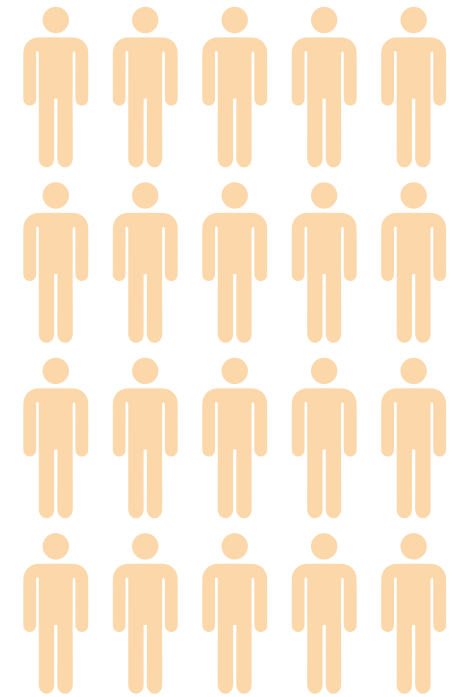
We employ over 4,000 people in markets across the Asia Pacific region to provide high quality, great-tasting food to create delicious moments for consumers across the world. Our business is head quartered in Sydney and we operate bakeries in Australia in Sydney, Brisbane and Adelaide. We also operate bakeries in New Zealand and Indonesia.

In addition to the Arnott's brand, our portfolio also includes Campbell's products which are sold into countries including Australia, New Zealand, Malaysia, Hong Kong, Indonesia and Japan,

with manufacturing operations for these products in Shepparton, Australia and Petaling Jaya, Malaysia.

The Arnott's Group is also the majority owner of cereals and snacking business Good Food Partners. Good Food Partners is transitioning and consolidating its operations (formerly in Scoresby, Dandenong South and Leeton in Australia) to the one site in Rowville, Victoria.

Collectively, The Arnott's Group sources direct inputs to our products, and other goods and services for our operations, from suppliers all over the world.



4,000+

people are employed in markets across Asia Pacific

STRUCTURE

Snacking Investments Holdco Pty Ltd (ACN 634 908 482) is an Australian private company which owns the key reporting entities within The Arnott's Group:

- Arnott's Biscuits Limited (ABN 44 008 435 729), which operates the biscuits and snacks portfolio; and
- Campbell Australasia Pty Ltd (ABN 28 004 456 937), which operates the juice, soup and stock portfolio.

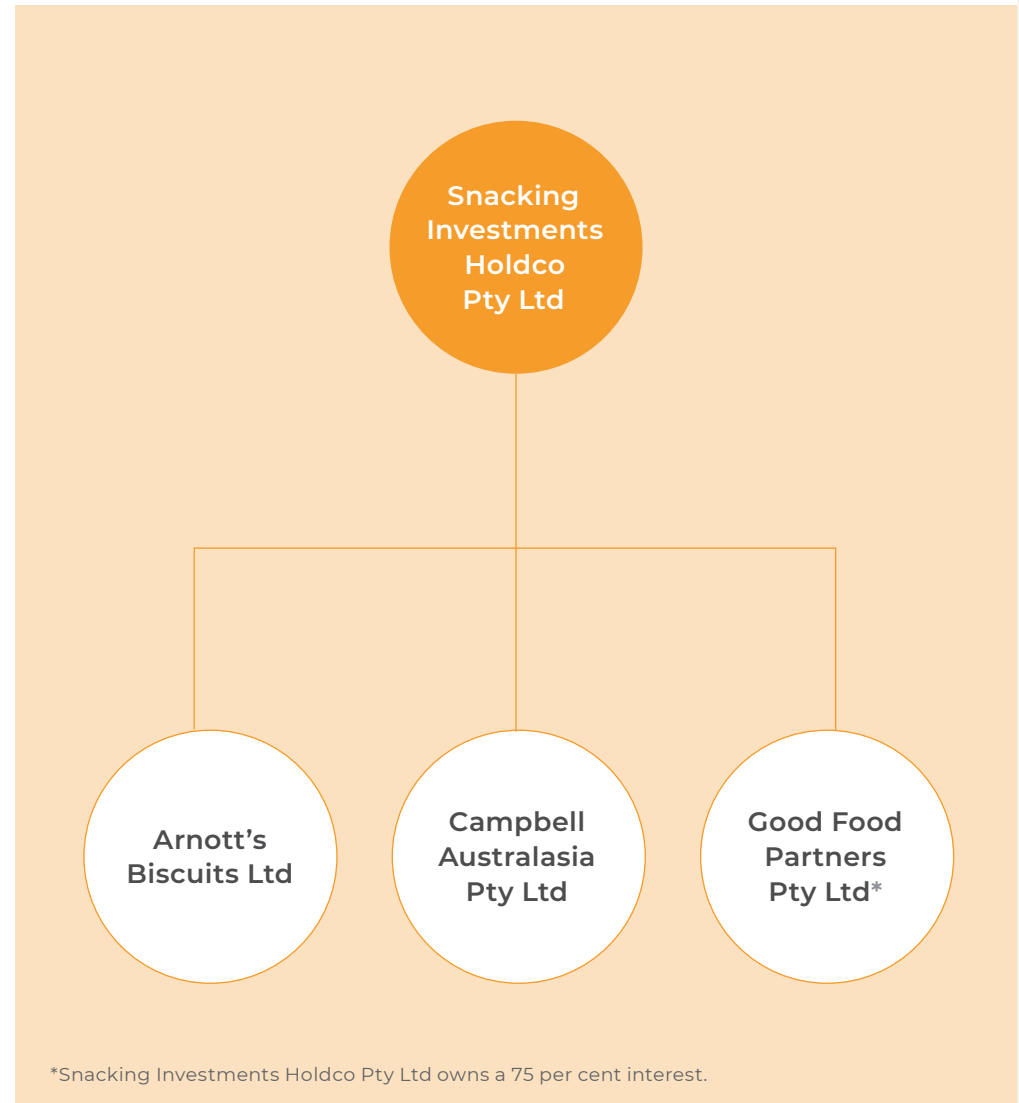
These two companies essentially operate as a single business using the same policies and processes, and under the management of the same leadership team.

Snacking Investments Holdco also owns a 75 per cent interest in Good Food Partners Holdco Pty Ltd (ABN 47 646 575 662), which is the holding entity for Good Food Partners Pty Ltd (ABN 38 104 048 400).

Good Food Partners Pty Ltd operates a cereals and snacks portfolio as a standalone business unit within The Arnott's Group (referred to in this statement as "Good Food Partners"). This statement includes the activities of Good Food Partners Pty Ltd as the operating reporting entity for the Good Food Partners business.

The registered office for all reporting entities in The Arnott's Group is in North Strathfield, New South Wales.

Outside of Australia, Snacking Investments Holdco owns The Arnott's Group operating entities in Hong Kong, Indonesia, Japan, Malaysia and New Zealand. Snacking Investments Holdco does not itself carry out The Arnott's Group's business activities.



BRANDS

The Arnott's Group's portfolio of brands includes household names such as Tim Tam, Shapes, Iced VoVo, SAO, Vita-Weat, Salada and Tiny Teddy. We also own the full range of 180 Degrees' crackers and biscuits brands, following the acquisition of the New Zealand manufacturer in 2021. In addition, we own brands such as Nyam Nyam, Good Time and Kimball, which we make and sell in Asia.

Our portfolio also includes Campbell's soup, stock and juice brands. We own the Country Ladle brand within this portfolio and use other key brands

(such as Campbell's Real Stock, Prego and V8) under licence from Campbell Soup Company.

Good Food Partners is a business unit of The Arnott's Group that has a portfolio of cereals and snack brands that includes Messy Monkeys, Heritage Mill, Arnold's Farm, Freedom cereals, Sam's Pantry, Sunsol and Joy St.



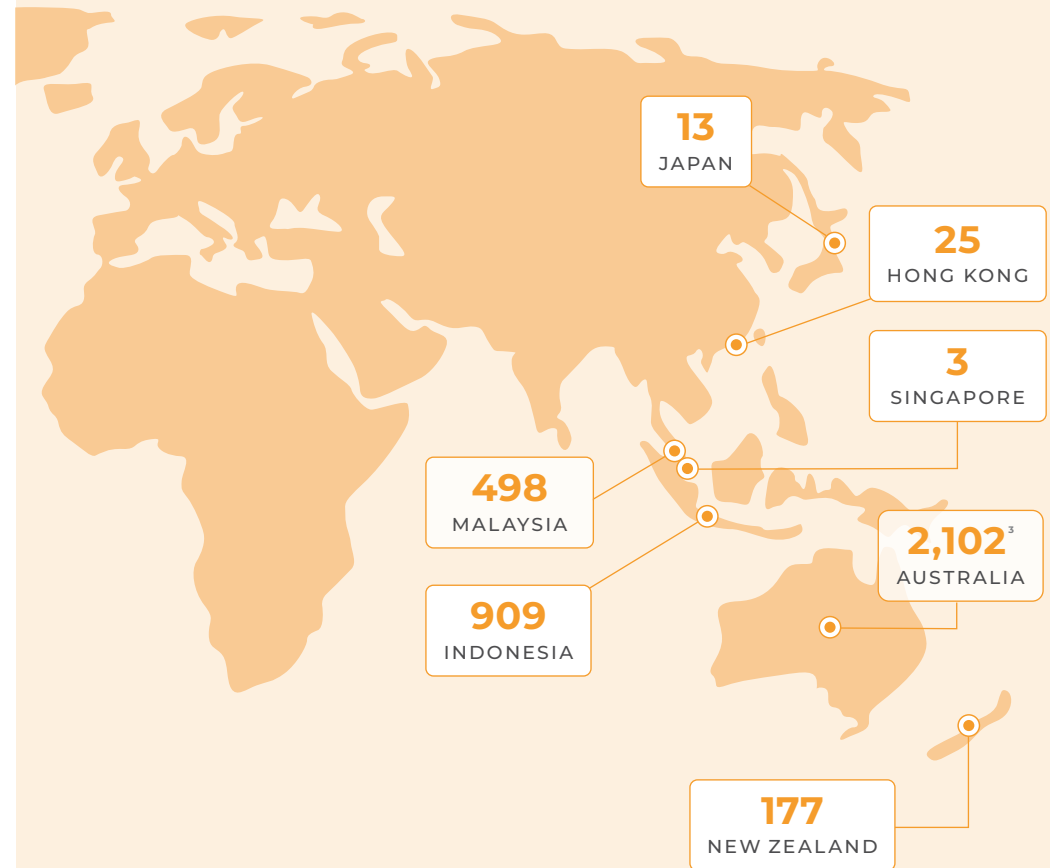
OPERATIONS

The Arnott's Group undertakes a range of activities in pursuit of our business objectives and standards.

These include:

- Direct and indirect employment in manufacturing, field sales and corporate activity;
- Procurement and purchasing of ingredients, packaging and other materials and services;
- Production of biscuits, crackers, snacks, cereals, meals, soups, stocks and juices;
- Development of new food products;
- Merchandising services at customer retail premises;
- Product distribution, marketing, sales and exports; and
- Operation of The Arnott's Foundation, a charitable arm supporting community initiatives.

Number of Employees²



² Approximate employee numbers (excluding casual and non-direct employees) as at 31 July 2023 based on country of incorporation of employing entity. This includes Good Food Partners.

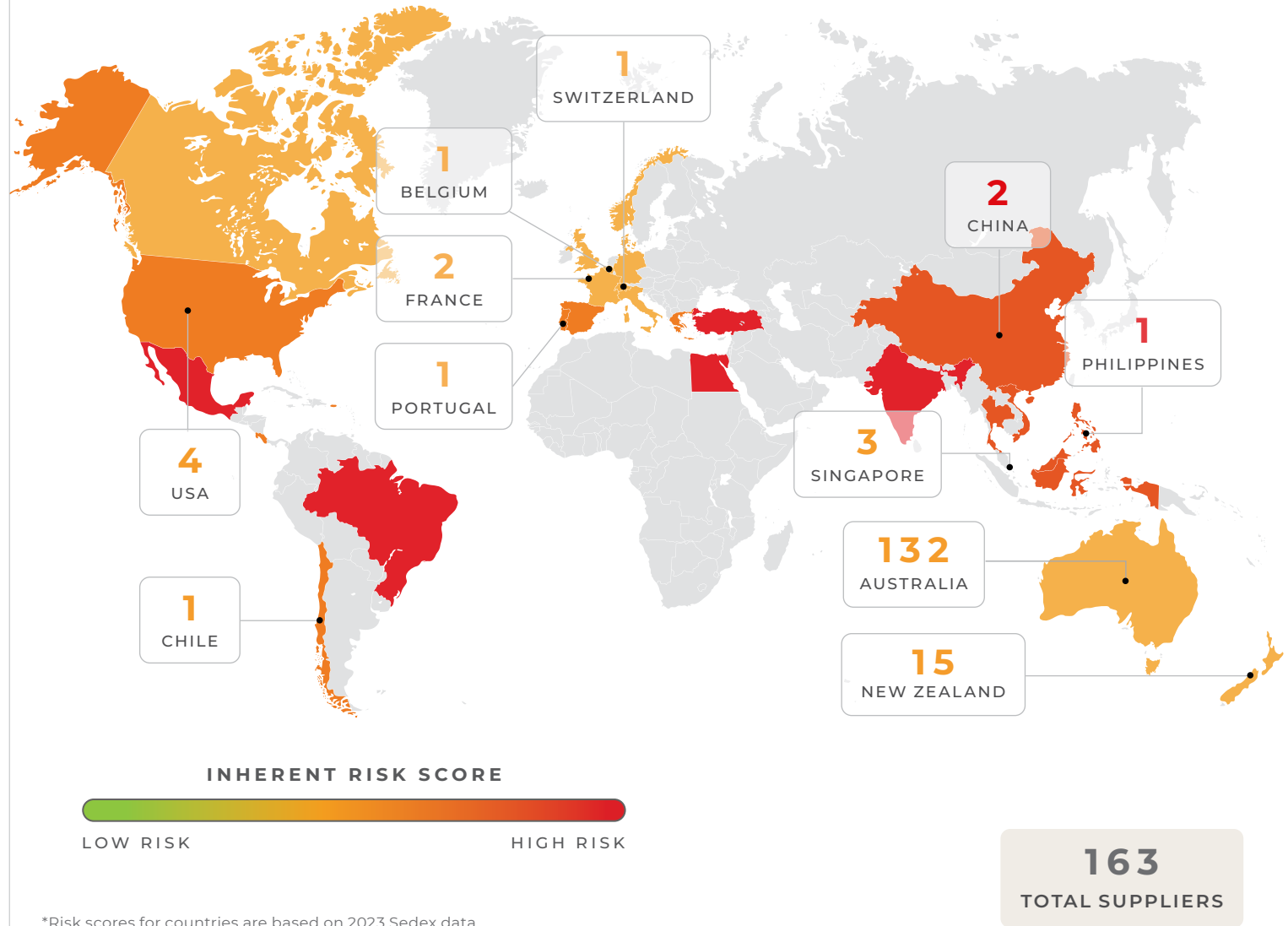
³ Of this number, 1,701 were employed by Arnott's Biscuits Limited, 129 were employed by Campbell Australasia Pty Ltd and 272 were employed by Good Food Partners.

SUPPLY CHAINS

The Arnott's Group's (excluding Good Food Partners) supply chain arrangements were largely the same as in the previous reporting period. Most of our long-term arrangements with key ingredient (being wheat flour, sugar, oils, dairy and cocoa products) suppliers remained in place, and we continued to utilise short-term arrangements as necessary. We also continued our commitment to local manufacturing, with more than 99 per cent of products sold in Australia made in Australia.

During the reporting period, The Arnott's Group's Australian operations (excluding Good Food Partners) sourced inputs for our products directly from approximately 163 suppliers, the majority of which are based in Australia.⁴ These included ingredients such as flour, dairy, salt, flavours, colours, juice concentrates, vegetables, spices, fruits, yeast, diced tomato and tomato paste, sugar and other sweeteners, cereals, malt, cocoa, nuts, eggs, chocolate and oils, as well as packaging such as paper, plastic and adhesives.

Risk Score for Suppliers of Direct Inputs*



⁴ As at the end of the reporting period, we had approximately 246 suppliers of direct inputs to production. This included 163 whom we engaged directly, with the remainder engaged through a distributor.

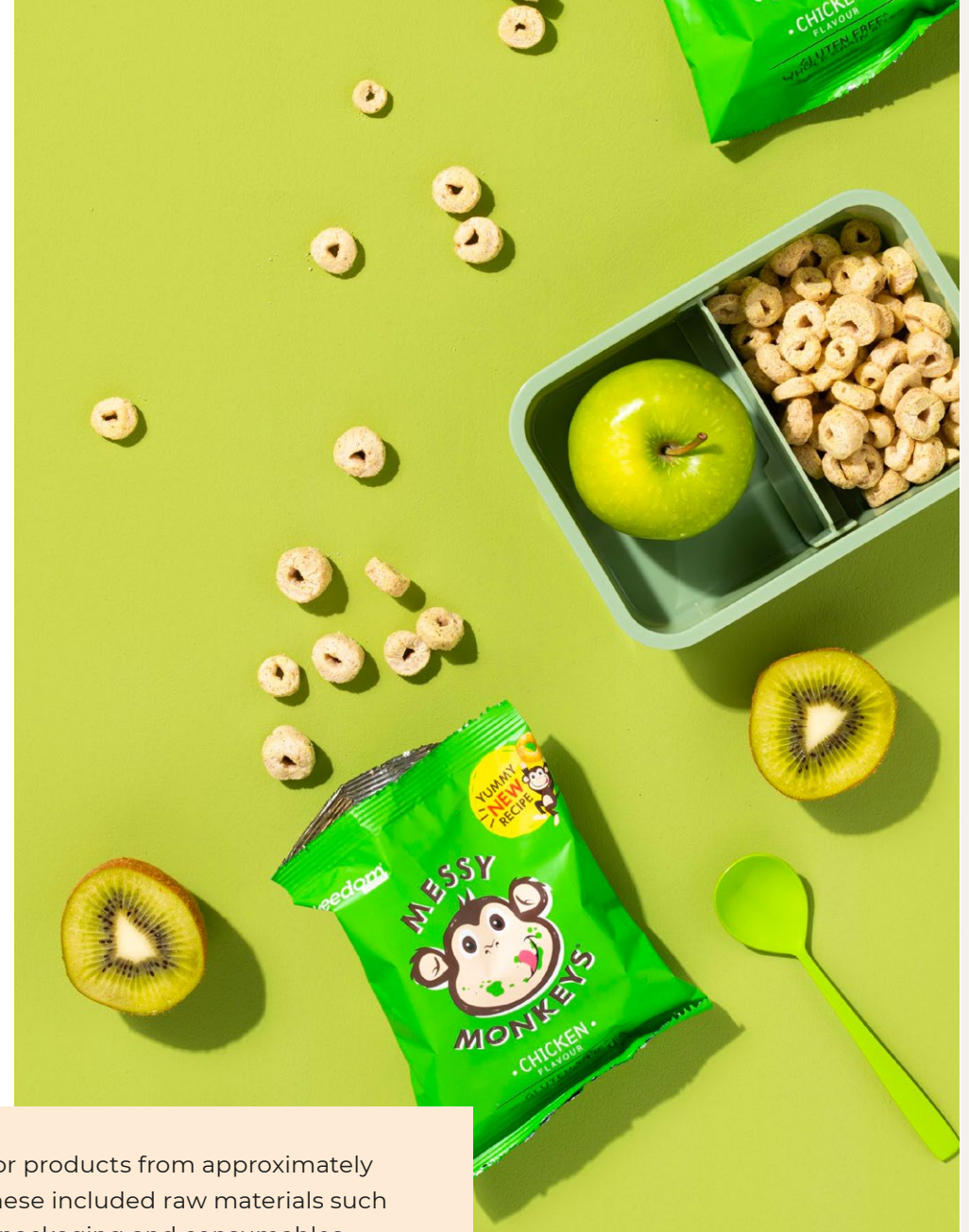
We procured other goods and services from approximately 1,694 other suppliers, including maintenance and operations, marketing, logistics, capital, human resources, corporate, IT and telecommunications and utilities services.

In addition to engaging Australian-based suppliers, we also procured goods and services from suppliers in Belgium, Brazil, Canada, Chile, China, Chinese Taipei, Costa Rica, Denmark, Egypt, France, Germany, Greece, India, Indonesia, Italy, Malaysia, Mexico, New Zealand, Norway, Philippines, Singapore, Spain, South Korea, Switzerland, Thailand, the Netherlands, Turkey, UK, USA and Vietnam.

The Arnott's Group does not engage suppliers in countries that are subject to international sanctions. As a number of these sanctioned countries are also associated with high risks of modern slavery, our sanctions compliance policy indirectly contributes to mitigating modern slavery risks in our supply chains.

We also worked with two Australian co-manufacturers during the reporting period, including one engaged to manufacture some of our gluten-free product lines.

Good Food Partners sourced direct inputs for products from approximately 175 suppliers during the reporting period. These included raw materials such as oats, dried fruits, seeds, syrups and nuts, packaging and consumables. Most of these direct suppliers are based in Australia. Good Food Partners also sources from suppliers in Asia, Europe, South America and USA through arrangements with local suppliers.



02

Salient Issues

In our first reporting period under the *Modern Slavery Act 2018* (Cth), we undertook a comprehensive review of modern slavery risks in our operations and supply arrangements.

As our supply chain has remained relatively consistent over the years, our focus during this reporting period has been on reinforcing our responsible sourcing expectations among our existing suppliers, minimising modern slavery risks when engaging new suppliers and ensuring that there is continued oversight and tracking to ensure that our suppliers, both new and existing, are adhering to modern slavery laws and expectations.

We have described below the salient issues relevant to our business from a modern slavery perspective.



Palm Oil



Cocoa



Tomato Paste



Solar Panels



Sea Freight

CASE STUDY: PALM OIL

Palm oil is the world's second largest oil crop and widely used in various food products. Indonesia and Malaysia are the two largest exporters of palm oil, together producing over 80 per cent of the world's supply of palm oil. We are aware that the palm oil supply chain has a high degree of modern slavery risks due to the use of unskilled migrant labour in regions that are high risk for human rights violations.

The Arnott's Group Australian business (excluding Good Food Partners)

To manage this risk, The Arnott's Group's Australian business (excluding Good Food Partners) sources 100 per cent segregated Roundtable on Sustainable Palm Oil (RSPO) certified palm oil from peninsular Malaysia, from land which has been used to produce palm oil or other agriculture crops.

The RSPO sets out environmental and social criteria which participants must comply with that minimise the negative impact of palm oil

cultivation on the environment and communities in producing regions including modern slavery. The RSPO and its members recognise, support and commit to following the *United Nations Universal Declaration of Human Rights* and the *International Labour Organization's Declaration on Fundamental Principles and Rights at Work*. In addition, Cargill, our palm oil supplier:

- Follows “free, prior and informed consent” principles in the palm oil supply chain. This means there is informed, non-coercive, negotiations between it and local communities prior to oil palm farms being established and developed;
- Has controls in place to ensure its supply chain is free from forced labour; and
- Operates a smallholder program to ensure it deals with a range of growers of different size. Smallholder farmers account for around 40 per cent of its palm oil supply. [Learn more.](#)

We also participated in the rollout of Cargill's new PalmWise tool which provides an extra layer of transparency over our Malaysian palm oil supply chain. The tool provides us with a greater level of detail as to exactly where supply is coming from and allows us to monitor for any certification concerns with those suppliers.

This section applies to our direct purchases of palm oil, which make up 95 per cent of the total palm oil (by volume) we use in our products, and does not apply to other ingredients we purchase that may include palm oil from other suppliers.

During the reporting period, palm oil was not used in our New Zealand site.

Good Food Partners

Good Food Partners purchases and uses RSPO mass-balanced palm oil. The mass-balance model is a certification system from the RSPO that monitors the trade of RSPO-certified palm oil products throughout the entire supply chain.

The Arnott's Group Asia business

Our Asia business purchases and uses RSPO mass-balanced palm oil in its export products (for example, products exported to Australia and New Zealand) and non-certified palm oil in products sold locally in Asia that use palm oil.

Our Asia business sources both certified and non-certified palm oil from two suppliers, with both suppliers committing to human and labour rights. In particular, both suppliers have committed to complying with international human rights standards or international best practices where legal frameworks are not yet in place to ensure that the rights of workers are upheld.

In respect of our Asia business, The Arnott's Group has committed to transitioning away from using non-certified palm oil.

Learn more about our palm oil statement [here.](#)



COCOA

We use cocoa in a number of our products, including our chocolate biscuits. Cocoa grows primarily in the tropical climates of Western Africa, Asia and Latin America, countries that have been associated with modern slavery practices.

We identified potential risks in the cocoa products we were sourcing, relating to illegal deforestation and child labour. Due to this and other considerations, we considered alternative sources. In particular, a review against Environmental, Social and Governance criteria highlighted the option to switch from West African to Asian grown cocoa. We also conducted a study through the CSIRO to ensure that switching the origin of our cocoa liquor would not have an impact on the flavour or quality of our products. We now source cocoa liquor products entirely from Asia.⁵

We retained our Rainforest Alliance certification on some of the cocoa we source. The Rainforest Alliance supports cocoa-growing communities, including working with almost one million cocoa farmers to build thriving livelihoods through certification and training. The Rainforest Alliance takes an assess-and-address approach, which requires certified farms and processing facilities to set up internal committees to prevent and monitor child labour, and to quickly remediate any cases that might be found. Currently 15 per cent of the cocoa we source is Rainforest Alliance certified and we are working on ensuring that this reaches 100 per cent by 2035 (by progressively increasing our cocoa certification).⁶

Good Food Partners also took steps to further minimise the risks of modern slavery in the sourcing of cocoa and chocolate. The business continues to procure cocoa products from two suppliers, both of which are Sedex members and supply Rainforest Alliance certified cocoa products.

⁵This applies to our Australian operations. This excludes 180 Degrees and Good Food Partners.

⁶This applies to our Australian operations. This excludes 180 Degrees and Good Food Partners.

TOMATO PASTE

We use tomato paste in our soup and juice products. We recognise that the industry, product and geographic risk indicators for modern slavery practices are high in relation to tomato paste production.

During the reporting period, we sourced tomato paste from a supplier with wider operations in a high-risk geographic region, but that tomato paste was sourced and processed in a lower-risk geographical area. Based on the supplier's annual Sedex Members Ethical Trade Audit (SMETA) audit reports (which are designed to help protect workers from unsafe conditions, overwork, discrimination, low pay and forced labour), we are assured that no modern slavery concerns have been identified in relation to this supplier and the site we are sourcing from.



SOLAR PANELS

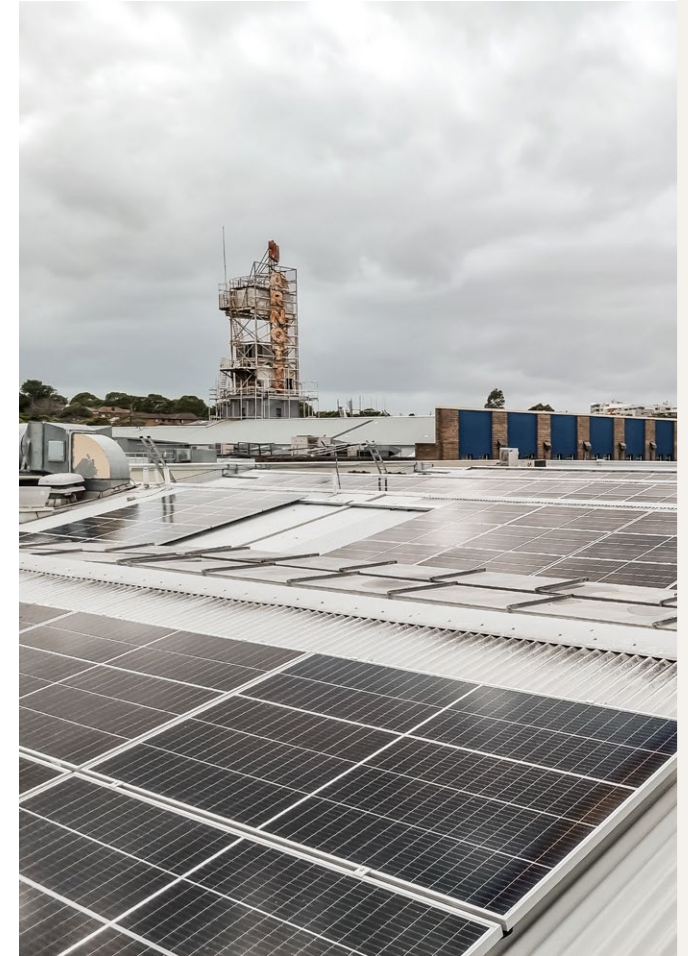
We published The Arnott's Group's Sustainability Report which outlined the progress we have made in creating a more accountable and transparent supply chain.

One major sustainability project we reported on was the installation of solar energy systems at some of our sites in Australia. As reported in our Sustainability Report, we have installed solar panels at our North Strathfield office and Virginia bakery and are currently installing solar panels at our Huntingwood bakery. We are aware of the risks of modern slavery in the manufacture of solar panels.

We worked closely with our solar panel provider to ensure the solar panels installed on our sites were not be sourced from any manufacturers known or reported to be engaged in modern slavery practices.

As part of this, we obtained contractual commitments from our solar panel provider to accept a Sedex relationship with us, to undertake annual Sedex self-assessment questionnaire (SAQs), and to confirm that no form of modern slavery is used either in its business or by its contractors or subcontractors.

In addition to these contractual commitments, our provider shared information from the manufacturer's annual sustainability report, which included reporting against GRI standards. Relevantly, the manufacturer reported that it does not have any operations or suppliers in which the right to freedom of association and collective bargaining may be at risk, that are highly susceptible of child labour, or that are at significant risk for incidents of forced or compulsory labour or child labour.



Learn more about our sustainability vision and commitments [here](#).



CASE STUDY: SEA FREIGHT

In the reporting period, The Arnott's Group appointed Mondiale and Maersk to provide sea freight services to its Australian and New Zealand businesses. Both Mondiale and Maersk are Sedex members and have committed to comply with our *Supply Base Requirements and Expectations Manual*, *Responsible Sourcing Supplier Code* (RSSC), and sustainability policies.

Sea freight is one of the highest at-risk categories of forced labour and modern slavery. Factors that contribute to this include an uncertain regulatory framework and the risk of seafarers experiencing isolation, excessive overtime, poor working conditions and wage exploitation.

We are assured by the fact that both Mondiale and Maersk have undertaken and continues to undertake various measures to mitigate the risks of modern slavery in their operations.

MONDIALE VGL



MAERSK

Mondiale has:

- Developed a global policy on modern slavery;
- Subscribed to a Learning Management System that includes modern slavery awareness training for employees and managers;
- Conducted surveys and reviews of available supplier policies and practices globally; and
- Addressed any potential modern slavery risks that were identified as a result of its due diligence processes.

For further information, please refer to [Mondiale's latest modern slavery report here.](#)

Similarly, Maersk has:

- Committed to zero tolerance for modern slavery;
- Increased the number of onsite audits of its suppliers;
- Continued to ensure that third party labour they rely on are offered working conditions that meet the standards in their *Supplier Code of Conduct*; and
- Conducted an internal questionnaire to measure the effectiveness of their commitment to respect fundamental labour right.

For further information, please refer to [Maersk's latest modern slavery report here.](#)

03 Assessment & Mitigation of Modern Slavery Risks



In this reporting period, The Arnott's Group continued to progress our efforts to identify, minimise and mitigate modern slavery risks.

During the reporting period, we pursued the following actions aimed at eliminating modern slavery risks in our operations and supply chains.

OUR ACTIONS

- Launching our new Supplier Management Hub
- Reinforcing our Modern Slavery Guidelines and Checklist
- Educating our people
- Utilising Sedex to help identify modern slavery risks in relation to our suppliers
- Leveraging our industry relationships & insights to help identify modern slavery risks in relation to our suppliers
- Reinforcing avenues for reporting modern slavery concerns
- Conducting ethical audits
- Ensuring fair work arrangements for our people



Launching our new Supplier Management Hub

In July 2023, we launched a new online Supplier Management Hub for our Australian and New Zealand operations, which streamlines and automates our existing processes for our suppliers. The Supplier Management Hub allows us to have a more structured and thorough approach in terms of how we onboard and monitor our suppliers, including adherence to modern slavery requirements. This is critical given that we have over 100 ingredient suppliers and in time will manage over 1,700 direct and indirect suppliers.

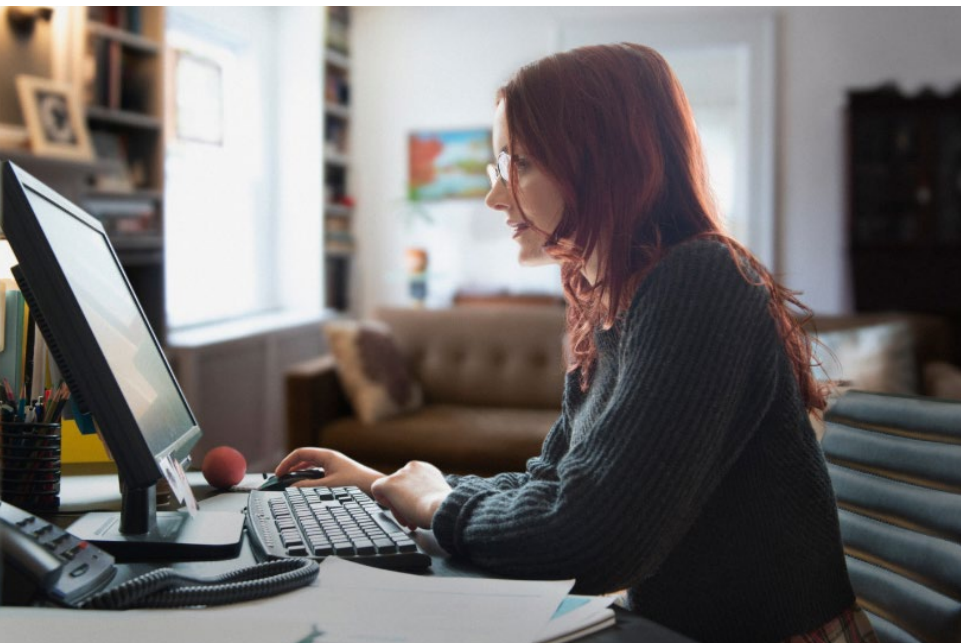
Through the Supplier Management Hub, we can more easily track suppliers' Sedex rating (including any changes to their rating) and their compliance with modern slavery requirements. The Supplier Management Hub allows us to capture details around all our suppliers' risk ratings, audits and instances of non-compliance. In particular, the Supplier Management Hub uses data from the Sedex platform to enable us to have better and more efficient communication with our suppliers.



Reinforcing our Modern Slavery Guidelines and Checklist

In our ANZ business, we have reinforced our modern slavery policies and processes as set out below:

- Our *Modern Slavery Guidelines* sets out the process for assessing modern slavery risk in relation to prospective suppliers, our minimum conditions of engagement, and a process for reporting and dealing with modern slavery concerns that arise. In particular:
 - A preliminary assessment of modern slavery practices is undertaken before engaging new suppliers. This risk assessment is determined using the Sedex platform and guides the level of any further checks (including independent ethical audits for high-risk suppliers) to be undertaken before engaging the supplier; and
 - All suppliers must agree to certain minimum commitments as a condition of engagement. These include: (a) our *Human Rights Policy* (or adopt similar policies within its business); (b) standards and requirements in our *Supply Base Requirements and Expectations Manual*, RSSC and sustainability policies; and
 - (c) maintain supplier membership with Sedex and a relationship with us on the Sedex platform.
- Before onboarding new suppliers, they must also comply with our *Modern Slavery Checklist*. The *Modern Slavery Checklist* includes a requirement for suppliers in industries typically associated with an elevated risk of underpayment of workers to complete a questionnaire in relation to their payment rates and practices, providing us with key data points to assess underpayment risk.
- We continued to implement and strengthen our supplier registration system to include prompts for actions and information to ensure compliance with key steps in our *Modern Slavery Checklist*. These include:
 - Automating the process and confirming the supplier's Sedex membership and rating through our new Supplier Management Hub; and
 - Ensuring suppliers are provided with the key documents that we require them to comply with, including our RSSC.





Educating our people

We continued to educate our employees in managing our modern slavery risk during this reporting period through the following:

- We reinforced our *Modern Slavery Guidelines* in our new procurement training module that we rolled out for all employees.
- We continued our annual communications program that includes the re-communication of the *Modern Slavery Guidelines* and *Modern Slavery Checklist* in English, Indonesian, Malaysian and Japanese.
- We continued to re-communicate to key staff on a quarterly basis of our policy on not doing business with persons and entities based in or affiliated with countries that are the subject of international sanctions.

- We continued to deliver our online modern slavery training course, rolling this out to all new salaried employees within three months of joining our business. As part of this training, our staff are made aware of our *Modern Slavery Guidelines* and *Modern Slavery Checklist* as part of the supplier onboarding process. This reflects our commitment to ensuring that our employees are well informed of The Arnott's Group's stance on modern slavery, and relevant policies and procedures, from the start of their journey with our business.



Utilising Sedex to help identify modern slavery risks in relation to our suppliers

We continued to establish Sedex relationships with our suppliers and to actively request that our suppliers complete SAQs.

99 per cent of our direct suppliers and 51 per cent of our indirect suppliers (by spend) for our Australian business are now members of Sedex and there has been an increasing number of suppliers completing SAQs through the Sedex platform this reporting period. For our indirect suppliers, we focused on suppliers in higher risk areas like transportation, shipping and the provision of contracted labour such as security, cleaning and maintenance.

The increased number of Sedex relationships with our suppliers and SAQs conducted have facilitated a more accurate assessment of modern slavery risks in relation to a greater proportion of our suppliers. As a Sedex relationship enables visibility of a supplier's SAQs and ethical audit reports, we could more readily identify any modern slavery concerns in relation to these suppliers and take appropriate action. We did not identify any high-risk suppliers in this reporting period.

However, if we did, we would work with the supplier to understand the nature of the risk and where the risk was coming from to help guide any steps required to comply with our modern slavery requirements. Established Sedex relationships have also provided greater visibility of any modern slavery risks at an individual site level, allowing us to make better informed decisions about the ongoing engagement of suppliers on a site-by-site basis.



Leveraging our industry relationships & insights to help identify modern slavery risks in relation to our suppliers

In addition to our internal controls, we closely monitor the industries in which our suppliers operate. We do this through strong relationships with our key suppliers and by using external monitoring tools such as Stroom, a comprehensive,

industry leading international media monitoring service. As a result, we are well placed to keep abreast of reported modern slavery issues which emerge that could have potential and/or real impacts on our business.

Reinforcing avenues for reporting modern slavery concerns

As previously reported, we have continued to enable suppliers and other third parties to report any modern slavery concerns confidentially and anonymously. Our RSSC contains a QR code for suppliers to easily and quickly access our whistleblowing platform and we also communicated the platform directly to suppliers at our 2023 Supplier Forum.

We continued our internal “speak up” communications campaign, including reminders at our sites and from our CEO, to promote the platform to our people as a confidential way to report concerns.

Conducting ethical audits

We were subject to third party SMETA audits at our sites in this reporting period. Where any gaps or non-compliances are identified from a modern slavery perspective, we have put in place measures to address these gaps.

Good Food Partners completed a SMETA audit for its Scoresby site in the reporting period. One gap was identified from a modern slavery perspective, which we have now corrected.

Ensuring fair work arrangements for our people

We continued the processes we have in place to ensure people who work at our sites are legally entitled to do so. This includes confirmation of citizenship or the right to work in the relevant jurisdiction, and that minimum age requirements are met.

We respect employees’ right to freedom of association, and we have enterprise or collective agreements with our factory employees at the majority of our sites.

We don’t use “gig economy” models of employment in our business. Only a small proportion of our workforce are casual employees⁷.



⁷In Australia, we have 176 casual employees within The Arnott’s Group, including Good Food Partners.

04 Measuring Our Effectiveness

The Arnott's Group remains committed to identifying, mitigating and eliminating all forms of modern slavery in our supply chains.

As part of this, we continued to assess the effectiveness of our actions on reducing modern slavery practices over this reporting period.

The Arnott's Group, excluding Good Food Partners

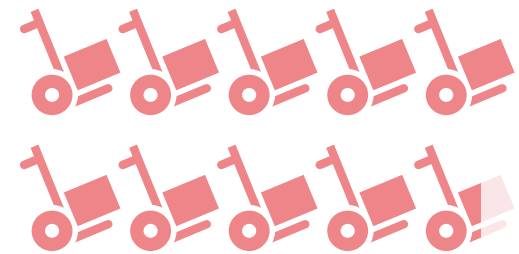
During the reporting period, we adopted the same key measures of effectiveness as we did for previous reporting periods, being:

- The number of our suppliers who confirmed their agreement to comply with our RSSC or their equivalent code.

In this reporting period:

- Over 99 per cent of direct material suppliers to our Australian business (by spend) had either confirmed agreement to our RSSC or undertaken to comply with their own comparable responsible sourcing code.
- Over 79 per cent of direct material suppliers to our Asian business had either had either confirmed agreement to our RSSC or undertaken to comply with their own comparable responsible sourcing code.

We are continuing to target 100 per cent for the next reporting period and beyond.



99%

of suppliers to our Australian business agreed to our RSSC or similar

- **The number of our suppliers who are on the Sedex platform and with whom we have a Sedex relationship.**

- As at the end of the reporting period, 129 of the 163 suppliers of direct inputs to our Australian business were Sedex members. Of those, 119 suppliers had accepted our relationship request on the Sedex platform. We have accepted relationships on Sedex with suppliers who account for 96 per cent of our total spend on direct inputs.

- **The number of our suppliers who have completed SAQs**

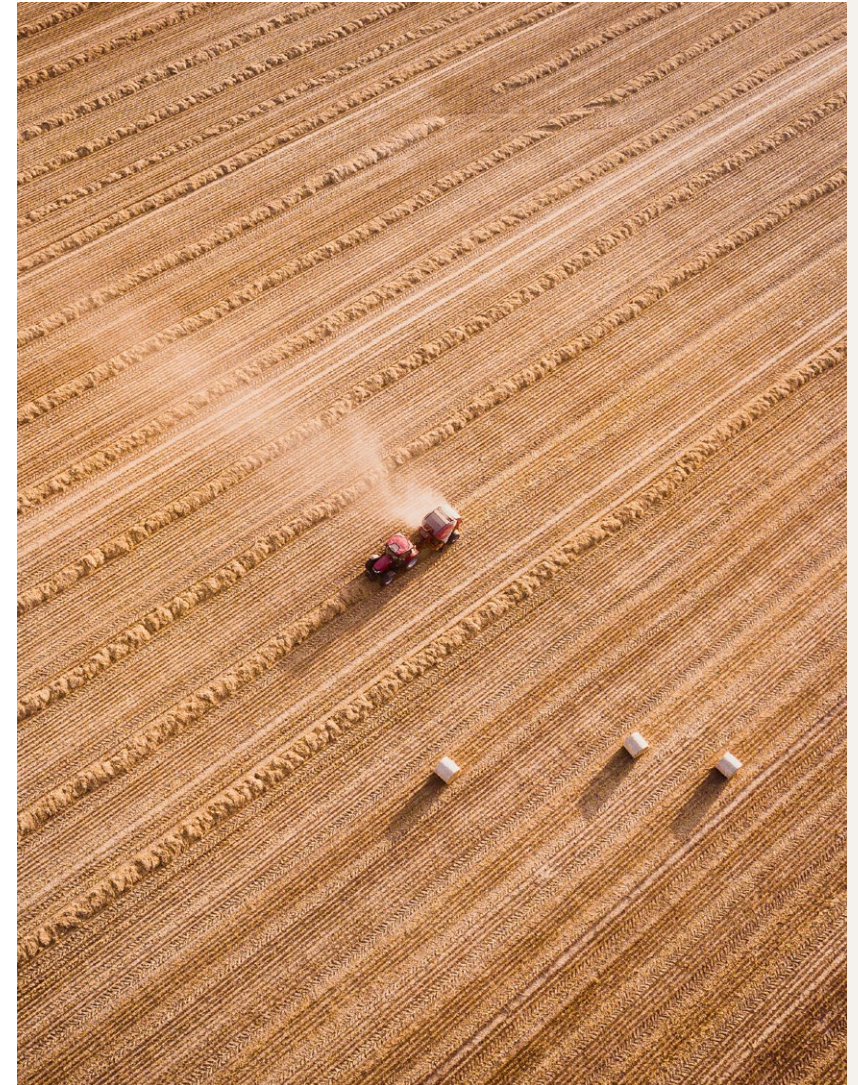
- The number of direct input suppliers to our Australian business who completed a SAQ also significantly increased during the reporting period to include suppliers who account for 96 per cent of our total spend on direct inputs.

- **The findings of SAQs on our sites**

- The completed SAQs for our manufacturing sites are published on Sedex and are available for viewing by Sedex members with whom we have a relationship.

Good Food Partners

The Good Food Partners business completed SAQs during the reporting period for its Scoresby and Dandenong sites. No modern slavery concerns were identified through the SAQs.



05

Consultation & Approval



Our customers & non-government organisations

In addition to working with our suppliers, we consult with our customers and other organisations about the risk of modern slavery in our supply chains.

Our major customers are committed to ensuring their supply chains are free from modern slavery. We work with these customers to answer their questions about our business and we submit to independent ethical audits of our facilities by our customers.

We also work with non-government organisations such as the Rainforest Alliance and the RSPO. These organisations have people working in countries with high risks of modern slavery and provide us with valuable insights about how to responsibly source ingredients in these countries.



Reporting to the Board

All reporting entities in The Arnott's Group ultimately report to Board of Snacking Investments Holdco. The Board's Audit, Risk and Compliance Committee continues to meet at least four times a year, providing a forum for the reporting of key risks affecting the business. The transparent reporting of these risks empowers the Committee to provide direction on our modern slavery risk management strategy as needed.



Our modern slavery working group

The Arnott's Group's Modern Slavery Working Group has continued to lead our modern slavery elimination efforts. The Group is comprised of representatives from our headquarters in Australia, our operations in Asia, and also from the Good Food Partners business.

Having a working group with representatives from all parts of our business ensures we have a comprehensive, whole of business view of the modern slavery risks for The Arnott's Group. It has also helping us develop a consistent approach to our risk mitigation efforts across the group – including the implementation of our policy documents, minimum supplier expectations, supplier contract terms and training program.



Non-operating reporting entities

Our consultation process did not involve the non-operating entities owned or controlled by the reporting entities. Many of the non-operating reporting entities exist only as holding companies and none of them source products.



Our Ongoing Commitment

The Arnott's Group is proud to commit to continually improving our operations and supply chain processes and practices to eliminate modern slavery risks.

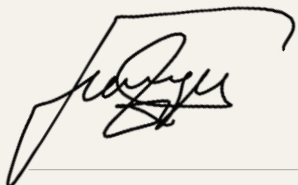
We anticipate our future actions will include:

- Undertaking SAQs for all our Australian sites (including the new Good Food Partners site at Rowville) by the end of the next reporting period.
- Working on ensuring consistency to our approach in identifying and mitigating modern slavery risks across our entire business and supply chain, including our operations in Asia.
- Continuing to monitor and track our suppliers' compliance with modern slavery requirements.
- Continuing to educate our people on modern slavery risk management as part of our regular onboarding and compliance programs.
- Undertaking SMETA audits of our manufacturing sites across Australia if our SAQs deem any of our sites to be high risk (this is consistent with what we require of our suppliers).
- Continuing to work with any suppliers that are deemed to be high risk to understand the nature of the risk and ways to address or mitigate that risk to ensure compliance with modern slavery laws and requirements.
- Continuing to promote our anonymous reporting platform to our suppliers.

For more information about The Arnott's Group, please visit [arnotts.com](https://www.arnotts.com)

Approval

This Statement was approved
by the Board of Snacking Investments
Holdco Pty Ltd (ACN 634 908 482).

A handwritten signature in black ink, appearing to read 'George Zoghbi', written over a horizontal line.**George Zoghbi**

Chief Executive Officer, Director,
Snacking Investments Holdco Pty Ltd



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