

Modern Slavery Statement: Australia and New Zealand 2021

**Associated
British Foods
plc**

This modern slavery statement is a joint statement covering the Australian and New Zealand businesses within the Associated British Foods plc (ABF) group of companies¹, including those corporate entities that are subject to the reporting requirements of the *Modern Slavery Act 2018* (Cth). The relevant reporting entities for these purposes are AB Mauri ROW Holdings Pty Ltd (ABN 12 115 524 886), AB Food & Beverages Australia Pty Ltd (ABN 93 100 637 849) and Food Investments Pty Limited (ABN 85 008 426 177), and their respective subsidiaries.²

This statement was prepared in consultation with each of the relevant reporting entities, with a steering committee formed from employees of the reporting entities and key subsidiaries. Working groups comprising relevant subject matter experts were also formed within the relevant reporting entities and key subsidiaries, with their due diligence findings and any modern slavery issues being discussed during steering committee meetings.

Overview and structure

ABF is a diversified international food, ingredients, and retail group with sales of £13.9bn, 128,000 employees and operations in 53 countries across Europe, Africa, the Americas, Asia, and Australia. In Australia and New Zealand, we operate in three business segments: Grocery, Agriculture, and Ingredients. GWF and its businesses are classed as part of the Grocery segment within ABF, notwithstanding that the GWF Jasol division is largely focused on cleaning chemical manufacture and distribution.

ABF's diversity means that our operations are widespread, and our supply chains are far-reaching and complex. Despite this, we are wholly committed to respecting human rights across our own operations, supply chains and products.

Modern slavery is a global issue that requires global action. It can occur in many different forms, including, but not limited to, forced labour, child labour and human trafficking. As an international business, we have a role to play in eliminating these practices as well as respecting human rights across our operations and supply chains. We value our ongoing engagement and collaboration with a broad range of interested and concerned stakeholder groups to tackle some of these issues.

Furthermore, we recognise that the UN Guiding Principles on Business and Human Rights (UNGPs) require businesses to address actual and potential adverse human rights impacts, prioritising those that are most severe or where a delayed response would make them irremediable.

¹ This includes but is not limited to AB Food & Beverages Australia Pty Ltd, AB Mauri ROW Holdings Pty Ltd, AB World Foods Pty Ltd, Food Investments Pty Limited, George Weston Foods Limited, George Weston Foods (NZ) Limited, The Jordans and Ryvita Company Australia Pty Ltd and Yumi's Quality Foods Pty Ltd.

² For a full list of Associated British Foods plc's Australian and New Zealand subsidiary undertakings, please see Associated British Foods Annual Report 2021 p200 and p203.

ABF Family

Who makes up the ABF family in Australia and New Zealand?

The ABF family in Australia and New Zealand includes:

George Weston Foods Limited, George Weston Foods (NZ) Limited and Yumi's Quality Foods Pty Ltd (together **GWF**), one of Australia and New Zealand's leading food manufacturers employing over 6,000 people across 40 sites.

GWF's product range is diverse and includes leading brands such as Tip Top, Bûrger, Sunblest, Abbotts Bakery, Golden, DON, KR Castlemaine and Yumi's as well as Mauri (flour, milled products, and animal feed) and Jasol (cleaning and hygiene solutions).

GWF's product range include a range of bakery products including bread, Smallgoods products, flour and related grain products, a range of vegetarian dips and related food products, as well as range of cleaning products and services.

AB Food & Beverages Australia Pty Ltd (**Twinings**), which imports, manufactures, and distributes a range of teas, infusions, coffees, malt drinks and hot chocolates under various brands including Twinings, Ovaltine and Jarrah.

AB World Foods Pty Ltd, which imports, markets, and distributes a range of international sauces, pastes, pappadums, meal kits and chutneys under the brands Patak's and Blue Dragon.

The Jordans and Ryvita Company Australia Pty Ltd (**Jordans Dorset Ryvita**) imports, markets and distributes a range of cereals, crisp breads, and crackers under the brands Jordans, Dorset and Ryvita.

Operations and supply chains

How are the operations and supply chains of ABF's entities in Australia and New Zealand structured?

ABF operates in three business segments in Australia and New Zealand: Grocery, Agriculture and Ingredients. As a result of our diverse operations, our supply chains are global and complex, sourcing ingredients, packaging, finished goods, transport and services from all corners of the globe.

GWF

GWF has over 4,000 supplier vendors and service providers with the majority of these being Australian or New Zealand based.

Mauri purchases grain, grain by-products and bakery ingredients. Mauri procures most of its grain from Australian farms. The grain is sourced under Grain Trade Australia guidelines and Australian Grain Industry Code of Practice which covers industry best practice in terms of grain handling based on quality. Ingredients are sourced mainly from Australia, China, Netherlands, USA, New Zealand, India and Malaysia (combination of Australia and New Zealand business), and packaging is sourced mainly from Australia, India, China, Indonesia and New Zealand (combination of Australia and New Zealand business). All services are sourced in Australia and New Zealand.

DON obtains most ingredients through Australian distributors who source from overseas including China, USA, Canada, Philippines, Malaysia, Thailand, Germany, Denmark, Turkey, Morocco, Israel, Brazil, Poland and India.

Meat is sourced from Australia, USA, Canada, Denmark, The Netherlands, UK and Ireland.

The major Tip Top ingredient is flour, sourced from Mauri in Australia and New Zealand. Our Tip Top business sources from countries such as Australia, China, Malaysia, India, Turkey, USA, Italy, Belgium and the Netherlands.

Improvers, yeast (except WA) and premixes are sourced from Mauri in Australia and New Zealand.

Packaging for Tip Top is sourced from Australia, New Zealand, Canada, China, and Malaysia. Tip Top Equipment is purchased from our long-established local partners, who import equipment predominantly from Europe and North America.

Yumi's source most ingredients from Australia. Other products are sourced from South Africa, Vietnam, Greece, Israel, China, Italy and Turkey.

Finally, our Jasol business buys almost all chemicals through Australia-based distributors. Raw materials are purchased locally from importers who source from established manufacturers in Korea, Malaysia, China and USA. Packaging is sourced locally. Equipment is sourced from UK, USA, and Taiwan.

Twinings

Twinings does not own any tea plantations and never has done.

Instead, Twinings buys tea from producers around the world and currently sources tea from 160 carefully selected tea gardens, based on quality and ethical standards. Twinings herbal and fruit tea and infusions are sourced from over 100 different plants grown in more than 30 countries around the world. The tea is then packaged at our site in Poland.

Twinings Australian manufacturing business sources other ingredients and finished products from countries such as Brazil, Columbia, China, Malaysia, India, Poland, Thailand, France Germany and Australia. It sources most of its packaging from Australia and one format from Vietnam.

AB World Foods

AB World Foods sources raw materials and packaging from various countries across the globe.

Jordans Dorset Ryvita

As an international company based in the UK, JDR sources raw materials and packaging from various countries.

Risks

How do ABF's entities in Australia and New Zealand see the risks of modern slavery practices in their operations and supply chains?

Throughout the reporting period, ABF's businesses in Australia and New Zealand have continued to monitor their supply chains for any issues of modern slavery, and several initiatives have been undertaken to support their risk assessment processes.

GWF

DON

At DON additional resources have been put in place to manage this important topic. We have appointed a new Supplier Assurance Coordinator to continue our supplier audit process. We are currently working on risk assessment and identifying our top 5 potential risk suppliers. DON has also appointed a new Quality Assurance Manager in our fresh business to handle supplier audit on domestic meat suppliers and 3PM suppliers.

Through this, DON has not identified any modern slavery risks to date, but we are continuing to assess and make appropriate plans to start on-site audits on supplier's plant in mid-2022.

To date there have been no changes to the DON current supplier risk evaluation process via supplier audit and supplier questionnaire. This questionnaire applies to current suppliers and potential suppliers.

Tip Top

In our most recent annual risk review we identified raw materials manufactured or processed in China, India, Turkey, Thailand, and Malaysia as presenting potential modern slavery risks (countries identified using Maplecroft country assessments). We manage and mitigate these by requiring our suppliers to comply with our policies and procedures related to this including our Responsible Sourcing Code of Conduct. Where we have identified specific areas of concern, we have required suppliers to complete our modern slavery questionnaire to understand the risks in detail – for example, this was completed in relation to suppliers potentially sourcing product from Xinjiang.

We also identified a potential risk relating to sultana sourcing out of Turkey. We worked together with ABF procurement and Jordans Dorset Ryvita in Turkey to understand the issue and worked with the supplier to ensure they were complying with our expectations.

Mauri

Mauri have identified risk areas based on spend and supply chain using Maplecroft and we plan to adopt a risk assessment tool (SEDEX) to review these areas in further detail. As Tip Top have done, where we have identified specific areas of concern, we have required suppliers to complete our modern slavery questionnaire to understand the risks in detail – for example, this was completed in relation to suppliers potentially sourcing product from Xinjiang.

Yumi's

Yumi's have identified that there may be a potential exposure to seasonal labour management in Turkey, similar to that identified by Jordans Dorset Ryvita. This is discussed in the case study regarding Turkey in Criteria 5 below.

Jasol

Jasol has an Approved Supplier program that ensures suppliers are risk assessed on an annual basis to determine their suitability. They are required to either supply ISO9001:2015 or complete a Desktop Audit. They are also required to complete an Ethical Trading Questionnaire.

Twinings

As part of Twinings' human rights due diligence process, raw material manufacturers in Malaysia have been identified as high risk with regards to treatment of migrant workers. All Malaysian suppliers and business partners employing migrant workers have been required to either undergo a Twinings-commissioned in-depth migrant worker rights assessment, or to organise a similar assessment themselves. Resulting from this, follow up actions have been required for suppliers to be compliant with the Twinings Code of Conduct, including refunding migrant worker fees and improving policies on ethical recruitment.

Jordans Dorset Ryvita

For Jordans Dorset Ryvita, the issue of seasonal labour management in Turkey is one that is being actively addressed. We are managing this through participation in cross industry projects led by NGOs. We have also recruited an ethical trade manager in Turkey to work closely with our suppliers.

AB World Foods

As a world food business, AB World Foods has a global and complex supply chain. We want to ensure that our products are not only made safely and efficiently, but that our ingredients, materials, and finished goods are sourced responsibly. We purchase these both directly from manufacturers, and indirectly through approved agents.

We source raw materials, packaging, and finished goods from a number of countries across the globe, including the Europe, Asia and the Indian sub-continent.

We have taken steps to identify high risks in our supply chains and monitor our risk assessments as required.

Assessment of risks

What do ABF's entities in Australia and New Zealand do to assess and address modern slavery risks?

ABF's comprehensive groupwide Supplier Code of Conduct sets out the values and standards we expect of our suppliers, representatives, and other people with whom we deal.

It is based on the eight core conventions (which cover collective bargaining, forced labour, child labour and discrimination) of the International Labour Organization (ILO) and the Ethical Trade Initiative (ETI) Base Code. ABF engaged with NGOs in the creation of this code and periodically update it to ensure its relevance. It clearly outlines the group's intolerance of forced labour: our suppliers are expected to abide by this Code.

The full Code can be [read here](#).

Honest communication is essential if malpractice and wrongdoing are to be dealt with effectively. Our Whistleblowing Policy, called Speak Up Policy, establishes, among other things: a venue for receiving information on a wide range of matters; and a process for how ABF will handle information of this kind. ABF's businesses in Australia and New Zealand ensure that staff are aware of this policy, and we recognise the key role this policy has in supporting a willingness to report any concerns about forced labour.

Our Speak Up Policy can be found [online here](#).

In addition to our groupwide Code, several individual businesses covered by this statement have created tailored approaches to tackling modern slavery that go beyond this Code. This includes the following:

GWF

GWF has published a [Responsible Sourcing Code of Conduct](#) which includes a requirement that suppliers and their suppliers develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable him or her to attend and remain in quality education until no longer a child.

Modern slavery awareness presentations have been provided to the Tip Top leadership team, baking operations leadership team, manufacturing leaders, sales leadership team, procurement team and presented to the Tip Top business through our monthly webinar.

Within Mauri, modern slavery leads in each key business area have completed online modern slavery training. Updates have been provided to Mauri's leadership team.

Twinings

To ensure suppliers and business partners put their commitment to the Twinings Code of Conduct into action, Twinings commission regular third party independent ethical audits of our high priority first tier suppliers and Twinings sites.

The category of "first tier suppliers" includes suppliers providing raw materials, packaging, processing, and branded items for Twinings. Suppliers who pack Twinings and Ovaltine products are also considered as first tier suppliers. There are currently 730 first tier suppliers who fall into this category.

Common issues identified in the audits include health and safety and working hours. Following audits, the Twinings team and third-party auditors provide factories with an action plan of issues to resolve, along with timelines. Normally, most issues can be addressed by the factory independently, within an agreed timeframe. However, if they identify very complex issues, Twinings respond with an in-depth approach, tailored to the specific needs of the site. For example, this may involve capacity building for management provided by expert partners.

Twinings preference is to work with suppliers and their factories so that they can make the changes required based upon our audit findings. However, in extreme cases, they will take the difficult decision to stop working with a supplier altogether if they feel our trust has been misplaced or a supplier is unwilling to improve.

Jordans Dorset Ryvita

For Jordans Dorset Ryvita the issue of seasonal labour management in Turkish agriculture sector is being actively addressed through participation in cross industry partnership programmes with the Turkish Government and the NGO sector.

Jordans Dorset Ryvita has worked with other ABF owned businesses, including AB World Foods, to engage suppliers of vine fruits in Turkey to implement new buying standards that specifically require action being taken to address issues related to labour standards in the supply chain. This has included participating in NGO led site visits to local farmers to collect information and build relationships. The business also continues to support a cross industry initiative looking to address the risk of child labour in hazelnut supply chains. This initiative has been developed in partnership with the ILO, the Turkish Government and other business that purchase and use hazelnuts from Turkey in their products.

Jordans Dorset Ryvita is also a member of cross industry activity to improve the management of seasonal labour practices across agricultural supply chains throughout Turkey.

AB World Foods

The organisation undertakes due diligence when considering taking on new suppliers and regularly reviews existing suppliers. As part of our standard contractual terms, we require all our suppliers to operate to our 'Terms and Conditions of Purchase', which includes a specific requirement to operate according to recognised ethical business standards through ABF's Supplier Code of Conduct.

A key step in our supplier approval process includes an ethical risk review, which also drives greater awareness of the importance of this issue amongst our supplier community. The ABF Grocery Group are well aligned on ethical management within our supply chains.

How do ABF's entities in Australia and New Zealand assess the effectiveness of actions being undertaken to assess and address modern slavery issues?

Our efforts to eliminate modern slavery from our operations and supply chain are guided by four values:

- **Acting With Integrity** – We are committed to tackling the issue of modern slavery and know that a continuous effort is needed if we are to play our part in trying to eradicate it from our supply chains. This Modern Slavery Statement is intended as an account of the efforts we are making to address and mitigate this risk to our businesses and our supply chains.
- **Respecting Everyone's Dignity** – We believe every worker deserves to be treated with dignity and respect. People are at the very heart of our business and whether they work directly for us, or within our supply chain, we take care to treat people well.
- **Progressing Through Collaboration** – We know that we cannot solve or effectively tackle the issue of modern slavery alone. We know that the best solutions will be generated by working in partnership with suppliers and NGOs and by participating in other multi-stakeholder initiatives.
- **Pursuing With Rigour** – We must take great care to thoroughly identify the potential and actual risks of modern slavery connected to our businesses if we are to play an effective role in tackling the issue. With this in mind, we intentionally work to pursue the projects with the greatest positive impact and reach.

ABF's businesses in Australia and New Zealand audit against the relevant supplier codes of conduct, which provide insight into the working conditions and labour standards of the factories that supply our products. If there are any cases where our suppliers are found not to be meeting the expectations and standards laid out in the relevant supplier code of conduct, we work with them, offering training and support, to help them improve.

We may terminate commercial relationships with suppliers if no improvements are made over an agreed timeframe or there is no commitment to make them. If we uncover situations of modern slavery or any other serious violations, we seek to verify and investigate immediately.

We continue to develop and implement the right measurements for both our supply chains and the people we directly employ.

The following items are currently tracked in some of our businesses:

- Internal staff training and awareness of forced and trafficked labour issues;
- Actions taken as part of collaborative initiatives to address modern slavery;
- Our policies relating to forced and trafficked labour;
- Supplier Code of Conduct non-compliance relating to employment being freely chosen;
- Responses to a modern slavery questionnaire by suppliers;
- Registered grievances in our supply chain relating to any form of forced labour; and
- Investigative and remedial actions taken in response to any perceived instance of forced labour in our supply chain.

Within GWF the following businesses undertake the following actions:

DON has an approved supplier programme which incorporates a supplier questionnaire. The supplier questionnaire is completed annually and contains a section on ethical trading and modern slavery. Suppliers are audited based on risk and the questionnaire is completed every year except in the year that the audit is conducted.

Tip Top assesses the effectiveness of its actions in relation to modern slavery through the outcomes it achieves through its programme. For our own operations, Tip Top is required by its customers to comply with their own requirements, and in certain situations complete SEDEX ethical sourcing assessments. By completing these assessments, we can have certain confidence that we are managing our operations and supply chain appropriately. We also assess effectiveness by actions taken because of the risk reviews we complete on our raw materials. In our last risk review, potential risks were identified in relation to certain products sourced from select regions of Asia, and actions were implemented to mitigate those risks.

Similarly, Mauri is required to complete SEDEX ethical sourcing assessments to comply with certain customer requirements. Mauri completed an assessment of product sourced from the Xinjiang region in China and did not identify any issues raised through the ethical trading questionnaire. Mauri suppliers continue to agree to ABF's Code of Conduct and Responsible Sourcing Code of Conduct as a requirement as part of onboarding suppliers as part of continuous improvement. Additional questions have been integrated into tenders to understand our supplier's supply chains further. Also, where appropriate, updated modern slavery requirements are being included into new GWF contract templates relating to capital equipment.

Jasol has an Approved Supplier program that ensures Suppliers are risk assessed on an annual basis to determine their suitability. They are required to either supply ISO9001:2015 or complete a Desktop Audit. They are also required to complete an 'Ethical Trading Questionnaire.' The results are analysed and then if they have been determined to be a high-risk supplier without sufficient controls a Site Audit will be performed.

Within ABF other businesses covered by this statement:

Twinings

Twinings' first tier suppliers are on an audit cycle of 6 months, 2 years, or 3 years, depending on their previous performance. All non-compliances relating to modern slavery indicators are considered high-priority and would be followed up on and verified within an urgent time frame.

Jordans Dorset Ryvita – we continue to conduct high level risk assessments which assess our raw materials across several measures including country of origin and processing, the type of industry and the method of procurement. This is completed using SEDEX and overseen by our buyers.

Sourcing of ingredients from Turkey.

For many of the entities of ABF operating in Australia, including GWF and its Tip Top Division, Yumi's and Jordan Dorset Ryvita, Turkey is a source of products and ingredients that has warranted closer attention.

For Jordans Dorset Ryvita the issue of seasonal labour management in Turkey is one that is being actively addressed. We are managing these through participation in cross industry projects led by NGOs. We have also recruited an ethical trade manager in Turkey to work closely with our suppliers.

As stated previously in this report, both Tip Top and Yumi's are seeking to work with Jordans Dorset Ryvita in respect to labour management and other management practices in Turkey that may impact on products and ingredients that they source from Turkey.

In this way the Australian operations of ABF, including GWF and its divisions, are using the global presence of the ABF supply chains to jointly address modern slavery concerns and, in this case in Turkey, by using the infrastructure set up by Jordan Dorset Ryvita to inquire into potential issues.

ABF integration & COVID-19

How ABF's entities in Australia and New Zealand work together and consult with other ABF group businesses

ABF's businesses in Australia and New Zealand have established an Ethical Supply Chain Working Group, which includes representatives from each of them and so forms a "community of practice" through which they share what they are doing in respect of ethical sourcing, including in relation to modern slavery. They also use this group to report developments and to discuss compliance with government regulations, such as those relating to modern slavery reporting.

GWF reaches out regularly to other ABF entities operating in Australia covered by this statement and in addition holds monthly meetings with relevant people across ABF to discuss, among other things, modern slavery issues worldwide.

The Impact of COVID-19

The COVID-19 pandemic in Australia and New Zealand and ongoing lockdowns across several states through 2020 and 2021 continued to cause profound disruption and challenges to our business operations, with the DON smallgoods factory closed for two weeks and significant disruption to our bakery operations.

As well, ABF's businesses in Australia and New Zealand have seen the effects of the pandemic and associated human rights and modern slavery risk continued to impact our global supply chains. We have seen significant disruption to supply chains, especially in Asia.

ABF's businesses in Australia and New Zealand have a renewed focus on assessing supply chains throughout our operations. In Australia and New Zealand, GWF has placed a particular emphasis on the safety and wellbeing of employees as well as ensuring business continuity. GWF was proud to ensure that no employee was stood down because of COVID-19 and its effects on our operations.

Notwithstanding the challenges presented by COVID-19, ABF's businesses in Australia and New Zealand continue to work diligently to ensure that our suppliers continue to follow relevant policies regarding ethical sourcing and modern slavery initiatives throughout our supply chains.

However, for some of our GWF businesses, COVID-19 has had a clear impact on the ability to hire the resources needed to implement some of the planned actions and engagement with suppliers that had been planned prior to the introduction of Covid restrictions.

This Modern Slavery Statement is made on behalf of the Australian and New Zealand entities of Associated British Foods plc for the financial year ending 31 August 2021.

This Modern Slavery Statement was approved by the Board of Directors of the parent companies of Associated British Foods plc's Australian operations, in particular:

- AB Food & Beverages Australia Pty Ltd on 22 March 2022;
- AB Mauri ROW Holdings Pty Ltd on 24 March 2022; and
- Food Investments Pty Limited on 23 March 2022.



Craig Scott,
Director and Managing Director of AB Food & Beverages
Australia Pty Ltd



Lorna Raine,
Director, AB Mauri ROW Holdings Pty Ltd



Stuart Grainger,
Director, Food Investments Limited