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Modern Slavery Statement 2024

Reporting Year

Associated
British Foods
plc

Introduction

Associated British Foods plc (“**ABF**”) is a diversified international food, ingredients, and retail group with a revenue of approximately £20.6 billion, 138,000 employees and operations in 56 countries across Europe, Africa, the Americas, Asia, Australia and New Zealand. ABF has a devolved operating model across its five business segments of Grocery, Sugar, Agriculture, Ingredients and Retail.

This modern slavery statement is a joint report covering ABF’s Australian and New Zealand group of companies¹ with the relevant reporting entities being AB Mauri ROW Holdings Pty Ltd (ABN 12 115 524 886) (“**AB ROW**”), AB Food & Beverages Australia Pty Ltd (ABN 93 100 637 849), Food Investments Pty Limited (ABN 85 008 426 177) (“**FIL**”) and their wholly owned subsidiaries which have operations in Australia or New Zealand. For a full list of ABF subsidiary undertakings, please see note 29 of the notes to ABF’s financial statements in the ABF plc 2024 Annual Report¹.

These entities shall be referred to as “**ABF’s Australia Group**” for the purposes of this statement.

In addition, this statement covers the operations of New Food Coatings Pty Ltd, trading as Newly Weds Foods (Australia) (“**NWF**”), a company 50% owned by FIL and 50% owned by Newly Weds Foods Inc (a company registered in the United States of America).

This statement was prepared in consultation with each of the relevant reporting entities.

1. <https://www.abf.co.uk/content/dam/abf/corporate/ar-assets-2024/pdfs/abf-annual-report-2024.pdf.downloadasset.pdf>

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In summary, the key developments for ABF's Australia Group and NWF this reporting period have been:

- George Weston Foods' ("**GWF**") businesses have moved to implement the 2023 collective decision to partner with (Supplier Ethical Data Exchange) ("**SEDEX**"), and to require their supply chains to provide relevant information via SEDEX surveys, as a first step to developing and implementing an audit and grievance process for GWF business supply chains. The GWF business, Tip Top, is leading the implementation of SEDEX.
- GWF has agreed in principle to work with Jordans Dorset Ryvita in the UK ("**JDR UK**"), and other UK businesses in the Grocery division of ABF, on the common handling and storage of SEDEX related data, to streamline risk analysis, auditing and diligence.
- GWF and its businesses have begun the work to develop an overall Ethical Sourcing and Human Rights strategy and implementation plan which is expected to be finalised during 2026.
- GWF has also agreed in principle to work with some UK businesses in the ABF Grocery division to develop joint auditing and due diligence approaches where they have ingredients and supply chains in common.
- Tip Top has undertaken an initial risk analysis of its supply chain, as a template for other GWF businesses to adopt.
- JDR Australia, as part of the Grocery division of ABF, has requested their suppliers join SEDEX including some indirect suppliers in areas of highest risk. JDR has also increased its audit follow up thresholds.

- Twinings Ovaltine ("**Two**"), of which AB Food & Beverages Australia Pty Ltd ("**Twinings Australia**") forms part, commissioned an independent human rights specialist to conduct a review of its approach to human rights due diligence and make recommendations to strengthen it. These recommendations are now being addressed within the Twinings approach.
- NWF, a member of SEDEX, has sent out supplier questionnaires and NWF's suppliers are asked to sign and agree to a code of conduct prior to engagement.

ABF's Australia Group remains committed to respecting human rights across operations, supply chains and products. ABF's diversity means that its operations are widespread, and supply chains are far-reaching and complex.

ABF expects its businesses to apply the principles set out in the ABF Group Supplier Code of Conduct in their supply chains, including zero tolerance for forced labour and modern slavery. As stated above, some of them do this through their own equivalent supplier codes of conduct and others use the ABF document.

ABF expects its businesses to carry out due diligence on the risks of forced labour in their own operations and supply chains and to provide remediation to those who have been impacted where this is appropriate.

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ABF's Australia Group – Operations and Supply Chain

In Australia, the entities in ABF's Australia Group comprise:

- George Weston Foods ("**GWF**") which includes the businesses of Tip Top, DON, Mauri ANZ, Jasol and Yumi's. As of 31 July 2024, it also includes The Artisanal Group acquired by AB ROW, which sells speciality bakery products under brands such as Brasserie Bread, Noisette and Jaune.
- Twinings Australia which imports, manufactures, and distributes a range of teas, infusions, coffees, malt drinks and hot chocolates under the Twinings, Ovaltine and Jarrah brands.
- AB World Foods Pty Ltd ("**ABWF Australia**"), which imports, markets, and distributes a range of international sauces, pastes, pappadums, meal kits and chutneys under the Patak's brand and sauces, dressings, spice blends and core ingredients under the Al' Fez brand.
- The Jordans and Ryvita Company Australia Pty Ltd ("**JDR Australia**") which imports, manufactures (via a third-party manufacturer), markets, and distributes a range of cereals, crisp breads, and crackers under the Jordans, Dorset Cereals and Ryvita brands.

In respect of NWF:

- NWF, is a manufacturer of food ingredients, employing close to 700 people across Australia, New Zealand, Thailand and the Philippines.
- NWF supplies breadcrumb coatings, batters, seasonings, sauces, marinades and functional ingredients to poultry, seafood, meat, smallgoods, and pasta processors.

NWF's head office and main manufacturing plant is in Sydney, with a second Australian plant in Perth and subsidiary plants in New Zealand, Thailand and the Philippines which supply local and export markets.

Description of ABF's Australia Group supply chains GWF

GWF has over 4,000 supplier vendors and service providers with the majority based in Australia and New Zealand.

GWF's Mauri ANZ division purchases grain, grain by-products and animal feed ingredients and bakery ingredients. Mauri procures most of its grain from Australian farms.

Ingredients for Mauri ANZ are primarily sourced from Australia, China, Netherlands, USA, New Zealand, India and Malaysia (from Australian and New Zealand businesses).

Packaging for Mauri ANZ is primarily sourced from Australia, India, China, Indonesia and New Zealand (from Australian and New Zealand businesses).

DON's primary ingredient is meat which is sourced from Australia, USA, Canada, Belgium, Denmark, The Netherlands, UK and Ireland.

DON's other ingredients are purchased directly or via Australian distributors who source from China, USA, Canada, the Philippines, Malaysia, Thailand, Germany, Denmark, Türkiye, Morocco, Israel, Brazil, Poland and India.

Tip Top's major ingredient is flour, sourced from Mauri ANZ in Australia and New Zealand. Tip Top sources other ingredients from Australia and internationally including New Zealand, China, Thailand, India, Türkiye, USA, Italy, Belgium, and the Netherlands.

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

Tip Top's packaging is sourced from Australia, New Zealand, Canada, China, Vietnam and Malaysia. Tip Top's equipment is purchased from our long-established local partners, who are currently providing equipment manufactured predominantly in Europe, South Africa, and North America.

Yumi's sources most ingredients from Australia. Other products/ ingredients are sourced from South Africa, Vietnam, Greece, Israel, China, Italy and Türkiye. Most inputs are sourced in Australia however, tahini is currently sourced from Türkiye with a second supplier from Israel being onboarded. Avocado is sourced from South Africa and cashews are sourced from Vietnam. Packaging is mostly from Australia; main lids are sourced primarily from Israel. Pouches, bags and film are sourced from China.

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

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Twinings Ovaltine (TwO)

Twinings is an international tea company with headquarters in the UK and a presence in many countries. It has never owned, and does not currently own, any tea estates or gardens.

Instead, Twinings buys tea from producers around the world and currently sources tea from 140 gardens and estates, which are carefully selected based on quality and ethical standards. The 100 plant ingredients to make Twinings' herbal and fruit infusions are sourced from more than 30 countries. For Australia and New Zealand, Twinings' tea and infusions are packaged at its own site in Poland.

Twinings' Australian manufacturing business also sources other ingredients and finished products from Brazil, Columbia, China, Malaysia, India, Poland, Thailand, France, Germany and Australia. It sources most packaging from Australia and one form of packaging from Vietnam.

Further information at: <https://sourcedwithcare.com/>

AB World Foods Australia

ABWF Australia sources ingredients, packaging, and finished goods from Europe, Asia, and the Indian sub-continent, working with a diverse portfolio of suppliers, a sizeable proportion of which are in the agricultural sector. The business' extended global supply chains include purchasing directly from processing sites or via approved agents.

JDR Australia

JDR Australia imports finished, packaged product from its UK based factories and engages third party manufacturers in Australia to supply finished product under JDR Australia brands.

NWF

NWF's core ingredients are flour, sugar, salt and canola oil all made from Australian ingredients. NWF also source other ingredients and packaging from local and international traders and manufacturers.

Ingredients and packaging are sourced primarily from Australia, China, Thailand, Europe, USA, New Zealand, India, Pakistan and Malaysia.

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Policy and Management

Embedding Responsible Business Conduct in Policy and Management

At a minimum, ABF businesses comply with applicable regulations related to modern slavery. Furthermore, ABF's Australia Group expect that their suppliers and representatives will comply with ABF's Australia Group's required standards.

ABF has a group 'Supplier Code of Conduct' which sets out certain values and standards. It is based on the Ethical Trading Initiative ("ETI") Base Code, and the International Labour Organization ("ILO") Declaration on Fundamental Principles and Rights at Work (introduced in 1998 and amended in 2022). The ABF Supplier Code of Conduct can be found at: <https://www.abf.co.uk/content/dam/abf/corporate/Documents/About-us/governance/policies/ABF-Supplier-Code-of-Conduct-Policy.pdf>

ABF's Supplier Code of Conduct clearly outlines a zero tolerance of forced or bonded labour. Each of ABF's businesses is responsible for implementing the Supplier Code of Conduct and monitoring compliance with it. ABF expects all its businesses to require their suppliers to comply with the Supplier Code of Conduct and to seek to develop relationships with their own supply chains consistent with principles set out in the Supplier Code of Conduct.

GWF's Responsible Sourcing Code of Conduct includes the same requirements as the ABF Supplier Code of Conduct with some additional local obligations.

Specifically on the risks of modern slavery (forced labour), the Supplier Code of Conduct includes the following requirements:

- There must be no forced or compulsory labour in any form, including bonded, trafficked, or prison labour; and,
- Workers must not be required to lodge 'deposits' or their identity papers with their employer and are free to leave their employer after providing reasonable notice.

ABF's Australia Group are also aware that often the signs of forced labour can manifest through a range of factors so that a confluence of indicators may result in forced labour, rather than one single indicator.

Many of ABF's Australia Group businesses choose to follow and/or benefit from policies developed by their parent ABF businesses that support and strengthen the implementation of the 'Supplier Code of Conduct,' often through consultation and engagement with stakeholders and third-party technical experts.

Some of our businesses have enhanced relevant ABF codes for their circumstances. These include:

- GWF's 'Responsible Sourcing Code of Conduct' (<https://www.gwf.com.au/wp-content/uploads/2021/03/GWF-Supplier-Code-of-Conduct.pdf>) which includes a requirement that GWF's 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.
- Twinings' 'Sourced with Care'² programme was launched in 2016 and aims to improve the lives of people growing tea and herbs used to make its products. Since 2018, Twinings has been publishing its tea sourcing list. By being transparent about who and where it sources from, Twinings endeavours to drive collaboration and tackle industry challenges. In 2023, Twinings published its first human rights report, which describes the steps taken to embed human rights in its business and respect human rights in its supply chain. (<https://cdn.shopify.com/s/files/1/0711/2087/9893/files/twinings-ovaltine-human-rights-report-2023.pdf?v=1685558844>)
- JDR has developed a Preventing Hidden Labour Exploitation policy to support the recruitment and employment of permanent and temporary agency employees across their own operations and supply chains. It is important that workers, and those most at risk of modern slavery, can access and understand our policies and their workplace rights. JDR also has a Responsible Sourcing Policy.
- Newly Weds Foods, Australia (NWF) and its subsidiary companies are committed to sourcing products in an ethical and socially responsible manner. NWF has an Ethical sourcing policy that outlines the Ethical Sourcing and Human Rights Standards it promotes; the commitment and expectations of its suppliers, contractors, and service providers, as part of its supply chain; and its ongoing commitment to eliminate the risk of modern slavery.

ABWF Australia has updated and published a Responsible Sourcing Policy which clearly defines its ambition for supply chain due diligence.

Additionally, ABWF requires identified employees, including their Procurement team, to comply with and have training on, the ABF Supplier Code of Conduct, which includes provisions addressing forced or child labour.

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Identifying and Managing Risks

ABF's Australia Group businesses are responsible for mapping their operations and supply chains to identify where their key risks are present. Some of ABF's Australia Group businesses have published interactive 'maps' which are updated regularly and show where products are harvested, processed, and manufactured, dependent on the specific business.

Businesses are assessing the potential and actual risks of modern slavery within their operations and supply chains and prioritise those which are most salient for example, those with the most severe or negative impact. This may include the country of origin, the product or industry characteristics such as seasonal cycles, and workforce characteristics such as migrant workers.

To address any risks identified, GWF and the Australian parts of relevant ABF businesses part of this report have either developed or benefit from their own range of appropriate measures.

These range from corrective action plans resulting from any audits or assessments conducted or commissioned, through to more long-term and outcome orientated solutions. Often these longer-term programmes are in partnership with expert organisations and stakeholders. Solutions may also include, where appropriate, the provision of remedy for those that have been adversely impacted.

To undertake this, ABF's businesses refer to a range of credible external and internal resources such as Verisk Maplecroft's risk assessment tool which provides country risk data on over 200 commodities.

GWF businesses are in the process of implementing SEDEX, which utilises data reported by industry bodies, in-depth site and supply chain investigations and assessment, stakeholder reports including those from intergovernmental organisations, civil society, and human rights watchdogs, as well as intelligence gathered from our teams in our operations and sourcing locations.

As ABF's Australia Group, we engage regularly across our businesses to share information and learning on cross-cutting and critical issues, particularly where risks are systemic, severe, and may require enhanced due diligence.

ABF's Australia Group businesses work with a diverse range of suppliers from large businesses to smallholder farmers.

In line with ABF's Supplier Code of Conduct, ABF's businesses prohibit all forms of modern slavery, including forced labour and human trafficking. Alongside this statement, ABF publishes a Modern Slavery Statement in accordance with the UK's Modern Slavery Act 2015.

Human rights due diligence across ABF's Australia Group and NWF

In their application of the ABF Supplier Code of Conduct, ABF's businesses continue to develop and improve human rights due diligence processes in their supply chains.

Our key risks

Within GWF, each business has identified key risks based on our processes described above.

Tip Top has identified as potential risks raisins and sultanas sourced from Türkiye, sesame seeds from India, starches from Thailand, various materials purchased from China, ingredients containing palm oil and packaging sourced from Malaysia. In addition, Tip Top has identified contingent labour used in bakeries in Australia as a risk, which is mitigated by working only with trusted, locally licenced providers.

Mauri ANZ has identified cocoa, and emulsifiers sourced from Malaysia and starch products from Thailand as high-risk focus areas. Mauri is registered with the Rain Forest Alliance for all cocoa supply and work with Tier 1 manufacturers in Malaysia and Thailand and have requested updated SMETA audits to be completed.

The key risk identified by Yumi's is products from Türkiye, principally tahini.

In all these cases, in addition to specific measures mentioned above, businesses communicate the Supplier Code of Conduct with suppliers and are now working to register suppliers onto the SEDEX system.

Our DON Smallgoods business has identified product from the USA, Canada and Denmark. Dons hold regular meetings with suppliers in these countries to communicate their requirements pursuant to the Responsible Sourcing Code of Conduct.

Twinnings Ovaltine is developing a due diligence process which includes evolving its audit procedures and training to support the implementation of its Code of Conduct and Human Rights Policy. These include its Factory Monitoring and Improvement Programme (FMIP), the Twinnings Community Needs Assessment (TCNA), and its Modern Slavery Awareness training programme.

The FMIP includes a risk assessment of tier one suppliers, which considers labour rights risk and the importance of the supplier to the business. Based on this assessment, high-risk suppliers (defined as those with significant potential for human rights and labour rights issues) are audited by an independent third-party at least every three years, and some more regularly based on the audit findings and remediation requirements.

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Low and medium-risk sites undergo ad hoc announced spot check audits, where suppliers are given a two-week window for an audit to be conducted. More than 100 audits of tier one suppliers are conducted each year, including those commissioned by the suppliers themselves upon request of Twinings Ovaltine, which are carried out by third-party auditors. Where audits identify non-compliances, suppliers are required to take action to resolve the issues within a specified time. The programme covers selected tier one suppliers including third party partners and joint ventures producing finished products (such as co-manufacturers, co-packers, licensing partners, packing houses, packaging suppliers and raw material suppliers). It also includes site service providers (such as construction and solar panel providers), branded promotional items, warehousing, and own production sites.

Twinings Ovaltine is also a member of SEDEX online database and where appropriate uses the platform to inform its supply chain assessment process for tier one sites.

Twinings does not own any tea estates; the business is dedicated to understanding and where possible addressing the needs of the communities from which it sources its tea and herbs. To achieve this, in 2016 the business developed the Twinings Community Needs Assessment.

The TCNA focuses on learning directly from the workers, farmers and community members through focus group discussions, interviews, surveys and observations. This approach allows Twinings to gain a first-hand understanding of the challenges and aspirations of these communities and identify any areas for improvement.

The TCNA covers ten areas related to human rights and worker welfare, including labour rights, housing, water sanitation, health, gender equality, livelihoods, farming practices, land rights and natural resources. This integrated approach allows Twinings to identify specific issues and develop targeted interventions that help to address the needs of each community.

Grievance mechanisms and remedy

ABF encourages ABF's Australia Group to have an open culture in all dealings between employees and people with whom we and our businesses come into contact.

ABF Groups 'Speak Up Policy' sets out guidelines for the employees of ABF and its businesses who wish to raise issues in confidence; these could include forced labour concerns.

We provide an external advisory service for all staff, including casual or agency staff, and make every effort to protect the confidentiality of those who raise concerns.

GWF is now working with other ABF grocery businesses on a co-ordinated approach to developing appropriate and effective grievance mechanisms across our supply chains.

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Consultation and Transparency Stakeholder Consultation

Different stakeholders including NGOs, trade unions, governments, other businesses (subject to all relevant competition and anti-trust laws) and industry bodies inform the ABF approach to human rights due diligence. ABF Australia businesses work with these organisations due to their expert knowledge and we acknowledge their contribution.

Some of our businesses publish global sourcing maps and provide information about their processes, progress and challenges through corporate reports.

Consultation and Collaboration across ABF businesses

ABF's Australia Group adopt the ABF organisational values of Respecting Everyone's Dignity, Acting with Integrity, Progressing Through Collaboration and Delivering with Rigour. ABF's Australia Group recognise the need for and value of collaboration on a variety of ethical sourcing issues across its network.

GWF

GWF has developed several avenues for its businesses to collaborate both within GWF and across ABF:

- i. GWF Ethical Sourcing Working Group - formal group which will be defining GWF's ethical sourcing way forward as part of the broader GWF Environmental, Social and Governance (ESG) approach.
- ii. GWF Ethical Sourcing Collaboration Group - forum for sharing updates and collaborating across businesses on progress, information and developments in relation to ethical sourcing.
- iii. ABF Grocery Group collaboration - ongoing meetings with ABF Grocery Corporate Responsibility Working Group on ethical sourcing progress and discussion.
- iv. ABF UK Grocery Group leading a cross-business project supporting vine fruit supply chains in Türkiye - relevant ABF businesses including JDR are involved.
- v. ABF Procurement Leadership pillar workstream on ESG focused on collaboration in relation to ethical sourcing tools, processes, best practice etc.

Twinings, ABWF Australia and JDR

Australian operations of Twinings, AB World Foods and JDR all participate in an ABF Grocery Group Corporate Responsible Working Group (GG CRWG), where the relevant Businesses Sustainability Leads meet several times a year, to discuss the supply chain ethical agenda and governance programme. This is co-ordinated by a central ABF UK Grocery Group Sustainability Lead.

Newly Wed Foods

New Food Coatings Pty Ltd, trading as Newly Weds Foods (Australia) ("NWF"), is a company 50% owned by FIL and 50% owned by Newly Weds Foods Inc (a company registered in the United States of America).

As such NWF sits formally outside the ABF Supplier Code of Conduct, and indeed all ABF policies. However, NWF works closely with other GWF businesses on modern slavery matters particularly through community of practise learnings from experiences of GWF businesses.

A key achievement for NWF in 2024, is, as a member of SEDEX, it has sent out supplier questionnaires and NWF's suppliers are asked to sign and agree to a code of conduct prior to engagement.

In respect of NWF:

- NWF, is a manufacturer of food ingredients, employing close to 700 people across its group in Australia, New Zealand, Thailand and the Philippines.
- NWF supplies breadcrumb coatings, batters, seasonings, sauces, marinades and functional ingredients to poultry, seafood, meat, smallgoods, and pasta processors.

NWF's head office and main manufacturing plant is in Sydney, with a second Australian plant in Perth and subsidiary plants in New Zealand, Thailand and the Philippines which supply local and export markets.

NWF's core ingredients are flour, sugar, salt, and canola oil, all made from Australian ingredients. NWF also source other ingredients and packaging from local and international traders and manufacturers.

Ingredients and packaging are sourced primarily from Australia, China, Thailand, Europe, USA, New Zealand, India, Pakistan and Malaysia.

Newly Weds Foods, Australia and its subsidiary companies are committed to sourcing products in an ethical and socially responsible manner. NWF has an Ethical sourcing policy that outlines the Ethical Sourcing and Human Rights Standards it promotes; the commitment and expectations of its suppliers, contractors, and service providers, as part of its supply chain; and its ongoing commitment to eliminate the risk of modern slavery. This policy is informed by the GWF and ABF Supplier Code of Conduct.

For Newly Weds Foods, the key risks are contingent labour in Australia, capital equipment supply, commodity items from China and starches from Thailand.

NWF works with other ABF Australia businesses through participation in the GWF Ethical Sourcing Working Group.

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Actions undertaken by relevant ABF Entities in the Reporting Period

GWF

GWF has identified its raw material, packaging, finished goods suppliers and services suppliers (including security, cleaning workwear, temporary labour, and logistics providers) as its focus. It has begun using SEDEX to understand the risks associated with tier one and relevant tier two priority suppliers' sites in these focus areas.

Other key developments at GWF include the first full year of work for its Ethical Sourcing Working Group across all businesses in Australia.

Over the past year, GWF has continued to work with our sister companies in ABF's UK Grocery segment of businesses on the development of a central data management team to embed procedures to monitor supplier engagement with SEDEX and provide accurate data, which is now distributed monthly to management teams. A key use of this data is to provide status updates on non-conformances derived from ethical audits to allow the businesses to engage with their suppliers to resolve them effectively and in a timely manner.

In addition, GWF and ABF UK Grocery are also looking at mapping tools to better identify risks and communicate them to suppliers and customers.

Tip Top is taking the lead in implementing a risk-based approach to its suppliers, reviewing risk of suppliers of raw materials and other key commodities, and taking mitigating actions which can include requiring them to complete a self-assessment questionnaire, and post details of ethical audits onto the SEDEX platform to help Tip Top identify potential salient human rights risks, prioritise suppliers and supply chains where additional due diligence is required.

Any issues identified are then escalated to Tip Top's Procurement leads as well as business unit leads. Through this process, and the risk matrix model, Tip Top has now begun identifying several supply chain risks.

Tip Top is trialling this methodology for other GWF businesses, with the aim of aligning on a common approach across GWF.

Tip Top has now registered most high-risk suppliers with SEDEX. The ongoing work and learnings of Tip Top are being used by other businesses in GWF as their foundation stone to develop their own risk identification and auditing process.

For example, Mauri ANZ is also rolling out SEDEX and continues to develop its initial pilot. This is being used to help identify areas for improvements and opportunities to streamline Mauri ANZ's procurement and ethical sourcing processes and plans.

Twinings, NWF, and JDR

Twinings' approach is articulated in its Human Rights Policy. It undertakes risk assessments following the framework set out in the UN Guiding Principles for Business and Human Rights ("UNGP") to identify and prioritise salient human rights risks.

This year, Twinings has continued to focus on its Kenyan supply chain following the BBC Panorama's expose in February 2023, which highlighted forced labour indicators relating to gender based violence in two Kenyan tea estates, one of which Twinings was sourcing from. During this year, the business has continued to monitor the situation and received an independent report on the estate's progress towards addressing these serious issues following a separate, independent investigation into the issues detailed in the programme. Twinings' own monitoring process has also identified other issues in tea gardens in its Indian supply chain, which relate to the recruitment process of migrant workers in some of its suppliers' tea gardens. Twinings' team in India is creating a plan to address these issues.

It is understood that these are complex issues endemic to the tea sector and agriculture. Nevertheless, considering the findings and to strengthen its approach, Twinings commissioned an independent human rights specialist to conduct a review of its approach to human rights due diligence and make recommendations to strength it. These recommendations are now being addressed within Twinings.

JDR undertakes due diligence when considering taking on new suppliers and regularly reviews existing suppliers. As part of that, JDR has extended their suppliers that we request join SEDEX to include some indirect suppliers in areas of highest risk. JDR has also increased audit follow up thresholds.

JDR manages select risks in its supply chain through participation in cross industry projects led by NGOs. A group of sustainability leads from across ABF's UK Grocery Group businesses meets periodically with traders and agents for them to update ABF on processor ethical performance. ABF also uses an ethical scorecard to inform its buying decisions in these supply chains.

NWF has continued to register suppliers and customers on SEDEX, and all its suppliers have been required to complete a self-assessment questionnaire and agree to the NWF Code of Conduct.

In addition, NWF has appointed an extra resource to champion and focused on increasing our utilisation of SEDEX. NWF is utilising SEDEX with its suppliers through its supplier relationship management programme and working through second tier suppliers.

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ABWF Australia

ABWF has been working alongside Stronger Together for several years, and as part of our training programme utilise the ABF on-line Modern Slavery training platform which consists of modules including what Modern Slavery and Forced Labour mean, common indicators, those most vulnerable and roles and responsibilities. This training is concluded by a test to consolidate understanding.

This online training is available for all employees; however, it is mandatory for the Procurement and HR teams, any person in a management capacity across supply chain and manufacturing, and those that regularly interact with people coming to sites, such as reception and security. During 2024 we rolled out refresher training using the latest ABF MS training module to more than 200 colleagues in our manufacturing sites and global hubs.

In addition, an introduction to Modern Slavery is briefed as part of new starter inductions at all ABWF hubs and manufacturing sites. This was refreshed and reissued during 2024. The objectives of the training include being able to identify red flags of potential human rights violations, understand the importance of conducting due diligence for third parties in ABWF supply chains and how to report potential human rights violations.

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Examples of Effectiveness in ABF's Australia Group - actions on Ethical Sourcing:

GWF – Tip Top and Overseas Supply Chain Auditing

All Tip Top suppliers are expected to comply with the GWF Responsible Sourcing Code of Conduct as part of their contract with Tip Top.

To help suppliers comply with the Code, Tip Top has undertaken the following actions – often in partnership with other ABF group entities:

- i. Raisins and sultanas are sourced from Türkiye – Tip Top is collaborating with JDR to address any potential issues in respect to appropriate human rights treatment.
- ii. Sesame Seeds are sourced from India – Tip Top has commenced a review using SEDEX to deepen its understanding of the existing supply chain. Tip Top has now moved to trader purchased product.

ABF businesses with common supply chains in Türkiye

Many ABF businesses have a common exposure to Türkiye in their supply chains.

ABF Grocery Group businesses in Europe and in Oceania meet periodically to discuss the management of ethical risk and best practice.

An outcome of that forum has been the development of a project to mitigate risk with seasonal migrant workers in Türkiye as a cross ABF Grocery Group project.

For Tip Top, raisin sourcing from Türkiye is a prominent issue to work with other relevant ABF businesses on. Tip Top is also reviewing alternative sources of raisins and sultanas and ensuring modern slavery risks are a key part of this review.

Starches sourced from Thailand

Tip Top has initiated discussions with its suppliers during site visits and is prioritising working with long standing partners.

NWF identifies and deals with Modern Slavery issue in its Supply Chain

NWF also collaborate both within GWF and across ABF through the Group Ethical Sourcing Working group.

As part of their developing plan to deal with Modern Slavery, and the heightened emphasis within our business regarding ethical sourcing and Modern Slavery training, a new customer was identified that was associated with allegations of Modern Slavery. As a result, NWF ceased dealing with this customer immediately, as per NWF's own Supplier Code of Conduct.

This Modern Slavery Statement is made on behalf of ABF's Australia Group for the financial year ending 31 August 2024.

This Modern Slavery Statement was approved by the Board of Directors of each of the following companies:

- AB Food & Beverages Australia Pty Ltd on 11 February 2025;
- AB Mauri ROW Holdings Pty Ltd on 4 February 2025; and
- Food Investments Pty Limited on 6 February 2025.



Craig Scott

Director and Managing Director of AB Food & Beverages Australia Pty Ltd



Lorna Raine

Director, AB Mauri ROW Holdings Pty Ltd



Paul Foster

Director, Food Investments Limited