



GOODMAN FIELDER COMPANY POLICY

MODERN SLAVERY POLICY - AUSTRALIA

Coverage	This Policy applies to Goodman Fielder Australia’s operations, including Goodman Fielder Pty Limited and its subsidiaries (GF).
Purpose	<p>GF is committed to doing business in a way that is ethical and respectful and ensures that the most vulnerable are protected from exploitation.</p> <p>To deliver on this commitment, GF is committed to ensuring that all applicable laws and regulations relating to modern slavery are upheld in both its workplaces and its supply chain.</p> <p>In accordance with the expectations of its employees, customers, the community and the requirements of the law, GF endeavours to operate ethically and responsibly, and expects that its stakeholders and supply chain will act ethically and responsibly.</p> <p>Maintaining a reputation for upholding legal and ethical standards in its dealings with its employees, supply chain and other key stakeholders is critical for GF’s ongoing success.</p>
Policy	<p><u>What is Modern Slavery?</u></p> <p>We acknowledge the widely recognised forms of modern slavery¹, which include the following:</p> <ul style="list-style-type: none"> a) <u>Human trafficking</u> – recruitment, harbouring and movement of a person for exploitation; b) <u>Forced labour</u> - where a victim is either not free to stop working or not free to leave their place of work;

¹ In this Policy, ‘modern slavery’ refers to the range of serious exploitative practices as defined in treaties of the United Nations (UN) and the International Labour Organization (ILO), including the ILO Forced Labour Convention (No. 29), Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime and Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour. See also <https://www.walkfree.org/what-is-modern-slavery/>.



- c) **Slavery** – where an offender exercises powers of ownership over a victim including the power to make a person an object of purchase;
- d) **Servitude** – where a victim’s personal freedom is significantly restricted, and they are not free to stop working or leave their place of work;
- e) **Debt bondage/bonded labour** – where a victim’s services are pledged as security for a debt and the debt is manifestly excessive, the victim’s services are not used to liquidate the debt, or the length and nature of the services are not limited and defined;
- f) **The worst forms of child labour** – where children are exploited through slavery (including for sexual exploitation), engaged in hazardous work which may harm their health or used to produce or traffic drugs;
- g) **Deceptive recruiting for labour or services** – where the victim is deceived about whether they will be exploited through a type of modern slavery;
- h) **Forced Marriage** – where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.

GF’s commitment

GF condemns modern slavery in all its forms.

GF is committed to acting ethically and respectfully in our business dealings and ensuring that potential modern slavery risks in our supply chain and operations are identified and managed. GF expects that its stakeholders (including GF’s suppliers, licensors, and contractors) and supply chain will act in the same way.

The Australian Leadership Team (**ALT**) is responsible for ensuring that GF and its external stakeholders uphold GF’s commitment as set out in this Policy.

The actions which GF take will be determined by GF having regard to the nature of GF’s business and operations and any areas of risk which may be identified from time to time. Such actions may include:

- a) communicating GF’s expectations with respect to modern slavery with its supply chain, including by ensuring GF’s suppliers agree to adhere to GF’s Responsible Sourcing Code of Conduct or other similar document developed by GF and used with GF’s suppliers;



	<p>b) conducting risk assessments so that GF is aware of actual and potential modern slavery risks in its own operations and supply chain;</p> <p>c) screening GF 's suppliers for actual and potential modern slavery risks and taking appropriate remedial action as required;</p> <p>d) implementing a training regime to ensure where applicable, employees are educated on the risks of modern slavery as relevant to GF's business;</p> <p>e) complying with all requirements of any modern slavery legislation including submitting statements and/or reporting on modern slavery risks in GF's operations and supply chain, where applicable;</p> <p>f) establishing a standing committee intended to measure the effectiveness of modern slavery initiatives, continuously review initiatives, and implement improvement measures on an ongoing basis; and</p> <p>g) establishing and maintaining suitable reporting processes in relation to any actual or suspected instance of modern slavery involving GF or its external stakeholders, including the application of the Grievance Procedure.</p> <p>GF expects that its external stakeholders comply with all laws, rules and regulations relating to modern slavery that are applicable to them and maintain policies and procedures to ensure such compliance.</p>
<p>Reporting</p>	<p>GF has a number of formal and informal ways in which concerns can be raised depending on the circumstances and the level of seriousness of the issue. Modern slavery concerns or grievances can be notified to GF in any of the following ways:</p> <ol style="list-style-type: none"> 1. for GF employees, by reporting the issue to their Line Manager or Head of Function; 2. writing to GF at its registered office; Level 3, 112-118 Talavera Road, Macquarie Park NSW 2113; 3. reporting through the GF Awareline as set out below; or 4. to obtain protection as a Whistleblower, where applicable) reporting to an Eligible Recipient (as set out in the GF Whistleblower Policy). <p>Please refer to the GF Whistleblower Policy for further important detail about protection for Whistleblowers, including making an anonymous disclosure and GF's Eligible Recipients.</p> <p>The GF Awareline is an independent, free, confidential reporting service run by Deloitte.</p> <p>You can contact GF Awareline toll free as follows:</p> <ul style="list-style-type: none"> • Telephone: (Australia) 1 800 050 722 • Telephone: (New Zealand) 0800 608 257 • Email: gfawareline@deloitte.com.au



	<ul style="list-style-type: none"> • Web: www.gfawareline.deloitte.com.au (username: gfawareline /password: conduct) • Mail: (Australia) GF Awareline, Reply Paid 12628, A'Beckett Street, Victoria 8006 • Mail: (New Zealand) Freepost GF Awareline, PO Box 912028, Auckland Mail Centre, Auckland • Mail: (outside Australia or NZ) GF Awareline, PO Box 12628, A'Beckett Street, Victoria 8006 Australia • Fax: (Australia) +61 3 9691 8182
Grievance Procedure	GF is committed to ensuring that actual or potential breaches of this Policy are investigated, and appropriate action is taken to prevent any further breaches. Investigations in relation to any actual or potential breach of this Policy, whether within GF's own operations or those of any of GF's external stakeholders, will be carried out in accordance with the Modern Slavery Grievance Procedure which is set out in Appendix 1 to this Policy.
Potential Consequences	<p>A finding of a contravention of this Policy may result in:</p> <ol style="list-style-type: none"> a) disciplinary action up to and including dismissal (for GF personnel); b) suspension and/or termination of contractual engagement with GF in accordance with the Suspension Procedures set out in the Grievance Procedure; and/or c) reporting breaches of laws to relevant authorities (where applicable).
Responsibility	<p>The ALT will be primarily responsible for monitoring the effectiveness of this Policy.</p> <p>Management at all levels are responsible for ensuring those reporting to them are made aware of, understand and comply with this Policy.</p>
Related Policies and Documents	<p>GF's commitments under this Policy are further supported by our:</p> <ol style="list-style-type: none"> 1. Ethical Employment Policy 2. Workplace Behaviour Policy 3. Whistleblower Policy 4. Responsible Sourcing Code of Conduct (where applicable) 5. Supplier Contracts (incl. Modern Slavery provisions)
Created	20 December 2023
Authorised By	General Counsel & Company Secretary
Revised	
Next Revision Date	20 December 2024



Appendix 1: Modern Slavery Grievance Procedure

Modern Slavery Grievance Procedure

Purpose

The Grievance Procedure enables stakeholders to raise a grievance against any party in GF's supply chain and/or our owned operations. The Procedure is open to all stakeholders, including internal and external sources.

A grievance is a complaint, concern or problem related to the Modern Slavery Policy which an individual or a group wants GF to investigate and, where appropriate, address. The following matters are covered in the Procedure:

1. Duties and Responsibilities

- a. Grievance Panel - responsible for coordinating and performing all tasks necessary for the successful implementation of the Procedure, including receiving, recording, classifying, and reporting grievances to the Investigation Team and making recommendations about suspension and/or lifting of suspension(s) in respect of GF's engagements with external contractors and suppliers to the ALT. The Grievance Panel will comprise senior GF leaders with the appropriate functional responsibilities.
- b. ALT - responsible for the implementation of the approved actions and/or outcomes at an operational level.
- c. Investigation Team - responsible for investigating grievances to confirm validity and collect information to enable the Grievance Panel to deliberate and address the grievance(s). The composition of the Investigation Team will be determined by the Grievance Panel once a grievance has been assessed as eligible for investigation under this Procedure.
- d. Management of Goodman Fielder Owned Operations: Responsible for taking the necessary actions to resolve and/or settle the grievance(s); and report implementation and result(s) to the Grievance Panel.

2. Receiving Grievance Cases

Grievances can be received as set out in this Modern Slavery Policy or otherwise in accordance with the reporting procedures set out in the GF [Whistleblower Policy](#).

3. Review and Recording of Grievance Cases

All reports made under the Modern Slavery Policy and all Potential Misconduct that has been determined under the Whistleblower Policy to be a complaint, concern or problem related to the Modern Slavery Policy will be brought to the attention of the Grievance Panel and will be assessed to determine whether the matter is eligible to be assessed under this Grievance Procedure. The assessment will determine eligibility with reference to the recognised forms of modern slavery as outlined in the Modern Slavery Policy and will be carried out by the Grievance Panel in conjunction with the ALT.

4. Investigating Grievances

- a. For all eligible cases, the Grievance Panel will make an assessment in relation to the nature and extent of investigations to be carried out either by the Investigation Team and/or externally. Investigations may involve a combination of direct investigation carried out by the Investigation Team and working with external stakeholders while they carry out their own investigations, as deemed appropriate by the Grievance Panel. Once the Grievance Panel



has made its initial assessment of the appropriate investigation parameters, the Investigation Team will design a detailed investigation plan in order to carry out the investigation.

- b. Results from the review of documentary evidence, interviews, and other information gathered during the field investigation process will be documented.

5. Addressing Verified Grievances Through Time-Bound Action Plans

- a. The Grievance Panel is responsible for making decisions, including approving, or rejecting the recommended actions stipulated in the investigation report. The ALT will then be responsible for the implementation of the approved actions and/or outcomes.
- b. Goodman Fielder's owned operations - actions in the field to resolve the grievance will commence immediately and the relevant Operations Manager will be required to provide an update on the implementation status and result report (Field Action Report) to the Grievance Panel.
- c. GF's third-party suppliers - the Grievance Panel will develop an action plan jointly agreed with the third-party supplier for resolution of the grievance. In the event the third-party supplier refuses to cooperate with GF in relation to a suitable action plan, the Suspension Procedures set out below may be applied, subject to the terms of the contractual engagement between GF and the relevant supplier.
- d. A regular monitoring and evaluation schedule will be developed to check the progress of all action plans in relation to the grievances received and will be overseen by the Grievance Panel.

6. Monitoring grievance handling process

The Grievance Panel will record and monitor the progress on handling the grievance against the timeframes determined by the Grievance Panel after a grievance has been assessed as eligible under this Procedure.

7. Communications

- a. GF will update the grievance raiser during key stages of the development of the case, i.e., upon receipt of the grievance, investigation process, development of a time-bound action plan, where deemed necessary, and closure of the case.
- b. GF will report internally on grievance review, investigation, and resolution.

8. Suspension Procedures

- a. Suspension Procedures for Grievances relating to third-party suppliers – where the supplier is not willing to undertake the actions necessary to comply with the Modern Slavery Policy or when progress has not been made in accordance with the time-bound action plan, the Grievance Panel will determine appropriate remedial actions, which may include suspension or termination of business relationships with supplier(s) in question, taking into account relevant factors including contractual rights and obligations as between GF and the relevant supplier. All decisions shall also be referred to the Chief Operating Officer, Wilmar International.
- b. Resuming sourcing from suspended third-party suppliers - suspended third-party suppliers may, subject to the applicable contractual framework as between GF and the supplier, be re-engaged on a case-by-case basis if they are able to show tangible progress in



implementing an acceptable action plan to demonstrate compliance with GF's Modern Slavery Policy.

