



Modern Slavery Position Statement

MARCH, 2021

Purpose

Modern slavery refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception and/or abuse of power. This includes but is not limited to forced or bonded labour, child labour and migrant labour exploitation.

Our Modern Slavery Position Statement details Foodstuffs' approach to identifying and eliminating modern slavery within our Own Brand product supply chains and explains what will be required from our suppliers to support this.

Scope

This position statement applies to the sourcing of Gilmours, Value, Pams, and Pams Finest brands and their associated sub-brands and any other owned brands or controlled label products that may be sourced by Foodstuffs Own Brands.

Our approach is based on the principles of the [UN Global Compact](#) and [Ethical Trade Initiative \(ETI\) Base Code](#).

Our commitment

We are committed to working with our suppliers to ensure that everyone involved in our product supply chains is safe and treated with respect.

We will engage with Non-Governmental Organisations (NGOs) such as the Ethical Trade Initiative (ETI) and Fair Labour Association (FLO) to further develop our modern slavery position and associated processes.

We place human rights at the forefront of our sourcing decisions. Foodstuffs Own Brands reserves the right not to do business with suppliers that do not share and demonstrate our commitment to fair labour practices.

We apply a risk-based approach to support our sourcing practices, which will allow us to proactively identify and manage country, sector, and/or site risk of modern slavery. This includes the use of the Supplier Ethical Data Exchange

(Sedex) as a risk assessment and monitoring tool to evaluate our suppliers' risk and performance on issues related to labour, health and safety, and business ethics.

We will progressively evaluate suppliers and manufacturers of our products using the Sedex platform according to the following requirements. We require our suppliers to engage with their upstream suppliers to ensure that the same standards laid out in this document are met.

If existing suppliers and manufacturers do not meet our requirements in this area, we will review the non-compliant issue, identify improvements and agree on a timeframe for their implementation. If the supplier does not action the agreed improvement plan to the required standard within the agreed time frames, we will take steps to end the relationship.

Our requirements

All of our suppliers and/or manufacturing sites must abide by the responsible sourcing principles within the following documents that align with the contents of this policy:

- Foodstuffs Own Brands Supplier Selection Criteria
- Foodstuffs Own Brands Supplier Agreement
- CSR & Ethical Sourcing section of Foodstuffs Own Brands Supplier Guide
- Page 4 of Foodstuffs Compliance Package

Our processing sites outside New Zealand.

Sites outside New Zealand are additionally required to register on the Sedex platform ([Sedex - Empowering Responsible Supply Chains](#)) and complete a Self-Assessment Questionnaire (SAQ) annually. Based on review of both the SAQ and inherent risk, a third-party ethical audit may be required:

STEP 1 Register on Sedex	STEP 2a – Review SAQ risk as on Sedex Platform	STEP 2b – Review inherent risk on Sedex platform	STEP 3 Further actions
Register with Sedex AND Complete the Sedex Self-Assessment Questionnaire (SAQ) on an annual basis	High SAQ risk	Low/medium/high inherent risk	Must undergo third-party ethical audit ²
	Medium SAQ risk	High inherent risk	Must undergo third-party ethical audit
	Medium SAQ risk	Low/medium inherent risk	Third-party ethical audit at our discretion
	Low SAQ risk	High inherent risk	Third-party ethical audit at our discretion
	Low SAQ risk	Low/medium inherent risk	No audit required

Our processing sites within New Zealand.

Sites within New Zealand may also be required to carry out the above process at our discretion.

New Zealand suppliers of fresh produce are specifically required to comply with the following:

- undergo NZGAP Social Module, GRASP, SMETA (Sedex Members Ethical Trading Audit), or Rainforest Alliance ethical audit.

² Third-party ethical audits for overseas produce suppliers include: SMETA, GRASP, or Rainforest Alliance.

Third-party ethical audits for non-produce suppliers include: SMETA, amforiBSCI, or SA8000.