

HUMAN RIGHTS POLICY

Purpose

Monde Nissin Australia (MNA) believes in bringing delicious and nutritious food to every home, in a way that steps lightly on the planet. Our vision of being “Simply Good for People and Planet” is ingrained within our culture and we are committed to ensuring human rights and fair labour practices are upheld within our business and within our supply chain.

MNA's Human Rights Policy provides the principles that must be met and incorporated into related policies, programs and ways of working that include our Supplier Code of Conduct, and business policies covering diversity, health and safety and employee relations.

Scope

This policy applies to all MNA Directors, employees, contractors, and suppliers in Australia and overseas. It incorporates our own operations and supply chain including all third-party suppliers, including labour hire, and contractors engaged, irrespective of the geographical location of their operations.

Commitment to Respecting Human Rights

Human Rights

Human rights recognises the inherent value of each person, regardless of background, where we live, what we look like, what we think or what we believe.

Our commitment to fundamental human rights is unwavering, and we respect the dignity, health, and wellbeing and human rights of our staff, and the workers across our operations, supply chains and in the communities that we serve and in which we live.

In line with the UN Guiding Principles on Business and Human Rights, we base our commitment on the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. It includes a commitment to work to ensure that there is no modern slavery in our operations and supply chain and demonstrating continuous improvement in this regard through our annual reporting under the Modern Slavery Act 2018 (Cth).



Modern Slavery

Modern slavery refers to cases of exploitation where the victim is tricked or trapped due to the presence of threats, violence, coercion, or abuse. Modern slavery includes eight types of serious exploitation, including forced labour, servitude, slavery, forced marriage, child labour, deceptive recruitment, and debt bondage.

Modern Slavery can occur in any supply chain regardless of the geographical location. The International Labour Organisation (ILO) estimates that over 40 million people globally are experiencing modern slavery¹, with 75 percent of these people living in the Asia-Pacific region — including in Australia and Australian supply chains².

Modern slavery victims are usually individuals in vulnerable situations due to factors such as: poverty, their migration status, lack of education, cultural inequalities, or barriers to accessing basic social protections and due to its nature, it is usually subtle and difficult to identify. In Australia only 1 in 5 victims of slavery are believed to be identified. That means that 80% of victims do not get the support they need and remain in slavery-like conditions and the cases reported are likely to be a small proportion of the scale of trafficking and slavery in Australia³.

Our Principles

MNA recognises the importance of maintaining and promoting the fundamental human rights of people within our supply chain, and the communities in which we operate. Collectively, we will ensure we uphold the following principles to;

- Recognise and respect the diversity, cultures and rights of Aboriginal and Torres Strait Islander people and embed reconciliation in the delivery of core business practices and decision making.
- Maintain a zero tolerance for harassment and discrimination at any phase of the recruitment cycle including recruitment and selection, promotion and transfer, day-to-day management, performance and remuneration reviews, training, and development opportunities.
- Promote cultural safety, diversity, and inclusion across MNA.
- Ensure all personnel have a right to fair pay, employment agreements and reasonable work conditions.

¹ International Labour Organization and Walk Free Foundation. (2017). Global Estimates of Modern Slavery: Forced Labour and Forced Marriage (Report). Retrieved from https://www.ilo.org/global/publications/books/WCMS_575479/lang--en/index.htm

² Global Slavery Index. (2018). Country Studies: Australia. Retrieved from <https://www.globalslaveryindex.org/2018/findings/country-studies/australia/>

³ <https://antislavery.org.au/modern-slavery/>.



- Support the right for every employee, contractor and worker in our supply chain to freedom of association with others and the right to bargain collectively.
- Respect the right of freedom of movement.
- Provide a healthy and safe work environment for our employees and contractors including the development of robust management systems to regulate, control and develop safe work practices.
- Prohibit any form of slavery in our operations and supply chain, including but not limited to forced, bonded or the worst forms of child labour.
- Undertake due diligence activities to identify risk to people, and improve systems and processes that prevent, mitigate, monitor and report potential adverse human rights impacts across our supply chain.
- Provide access to (independent) grievance mechanisms that are victim centric and not obstruct access to other judicial or non-judicial remedies.
- Provide a direct remedy if human rights principles are found to be violated.
- Transparently disclose our approach to Human Rights including our policies and processes.

Implementation

Governance structure

MNA recognises that respecting human rights throughout our own operations and supply chain requires a formal, consistent, and risk-based approach to identify, manage, and mitigate actual and potential Human Rights impacts.

The roles and responsibilities for the review, assessment and implementation of this Policy are the following

Board of Directors

- Approve this Policy and any future revisions.
- Encourage a culture of reporting and transparency, and act promptly to remedy any adverse human rights impacts.

Sustainability Steering Committee

- Ensure an aligned organisational approach.
- Coordinate implementation of this Policy including grievance mechanisms and remediation processes concerning modern slavery or human rights impacts.
- Ensure requirements under this Policy are communicated to suppliers, consultants and contractors including via the Supplier Code of Conduct, service agreements and contracts



Monde Nissin Policies

- Assess identified grievance mechanisms to determine their effectiveness.
- Monitor MNA practices, policies, and procedures to ensure human rights impacts are prevented either internally or externally, knowingly or unknowingly and responding rapidly when identified.
- Conduct an annual review and approval of the Human Rights and Modern Slavery Policy to ensure currency, relevancy, and effectiveness.

Business Excellence Business Unit

- Provide review and oversight of human rights related risks and opportunities and performance.
- Identify all internal business functions with responsibility to implement the policy and define responsibilities in writing to provide clarity and create accountability within internal functions across MNA.
- Coordinate implementation of this policy and ensure human rights considerations are included in relevant policies, procedures, frameworks and action plans and associated training programs.
- Review existing training programs, manuals and materials and identify opportunities to embed human rights education at all levels of the business. This includes ensuring staff, contractors and suppliers understand MNA's commitment to human rights, roles, and expectations, and available grievance procedures.

Head of Safety & Sustainability

- Consult with relevant stakeholders to assess actual and potential human rights impacts and communicate our human rights progress to external stakeholders including through our annual modern slavery statements.
- Ensure appropriate supplier due diligence is conducted to identify potential modern slavery risks.
- Ensure qualitative and quantitative key performance indicators for monitoring grievance mechanisms are developed and monitored.
- Identify any reporting regulations MNA is required to comply with based on the countries it operates.

All MNA Staff (Managers and team members)

- Following the requirements of this policy.
- Participating in human rights and modern slavery training as required.
- Reporting any human rights related concerns that arise, including any suspicions that adverse human rights impact may occur or have occurred.

Suppliers and Contractors

- Following the requirements of this policy
- Comply with MNA's Supplier Code of Conduct (Code)



Human Rights Due Diligence

We recognise that human rights risks may change over time as our business operations and operating context evolve.

We continuously evaluate our actual and potential adverse human rights impacts, integrating and acting on findings, tracking responses and communicating how the impact is addressed including engaging with suppliers and other business relationships.

Remediation and Reporting

We encourage our staff, everyone who works with us, and all those affected by our business operations to promptly raise a concern about anything that they reasonably believe may be illegal, improper or involve misconduct or human rights violations. This includes a concern about a safety or environmental issue, a financial matter, a breach of our values or Code of Conduct, including a human rights violation.

Persons can report through one of several channels available to them without fear of reprisal including contacting their direct line manager, People & Culture Partner, or next level-Manager. In the event that a person wants confidentiality and increase sense of protection, they can report via the independent Integrity Hotline.

Our Integrity Hotline Policy details local-level, complaints and grievance mechanisms, and how reports in relation to Reportable Conduct will be acknowledged, investigated as appropriate, and documented. Reportable Conduct usually relates to the conduct of our people, but it can also relate to the actions of a third party, such as a customer, supplier or service provider.

Where concerns are investigated and substantiated, we take appropriate remedial actions, advise the reporter (where possible), and document the outcomes. We will provide, or cooperate in providing, appropriate remediation where we have caused or contributed to adverse human rights impacts.

Under our Integrity Hotline Policy, we do not allow any form of punishment, discipline, or retaliatory action to be taken against anyone for speaking up or cooperating with an investigation in good faith under this policy.

Alternatively for complex incidents linked to violence or criminality, report the suspected criminal wrongdoing to the relevant authorities:

In Australia:

- Police (calling 000)



Monde Nissin Policies

- The Australian Federal Police Human Trafficking Team (131 AFP).
- [Fair Work Ombudsman](#) (13 13 94)

Reporting

We are committed to enhancing our capability to track the effectiveness of our responses and to communicating our human rights progress for external stakeholders, including our annual modern slavery statement, made in accordance with the Modern Slavery Act 2018 (Cth).

Related policies

- MNA Discrimination, Harassment and Bullying Policy (EEO)
- MNA Code of Conduct
- MNA Integrity Hotline Policy
- MNA Work Health Safety and Wellbeing Policy
- MNA Flexible Work Policy
- MNA Parental Leave Policy
- MNA Privacy Policy

Policy Owner	BOARD of MNA
Date of Policy	JULY 2022

