

About this statement

This modern slavery statement (Statement) is made in accordance with Section 14 of the *Modern Slavery Act 2018* (Cth) (the Act). It outlines the actions taken by the reporting entity (the Company or a2MC) and the entities it owns and controls to identify, assess and address modern slavery risks in our operations and supply chains, over the financial year ending 30 June 2024 (FY24 or Reporting Period).

This Statement is a2MC's fifth Modern Slavery Statement under the Act. a2MC's Modern Slavery Statement is available on our website at:

https://thea2milkcompany.com/corporate-governance.

Reporting entities

This Statement is made by a2MC as the parent company of the a2MC Group. It is a joint statement made on behalf of the following reporting entities which were part of the a2MC Group during FY24:¹

- The a2 Milk Company Limited (ARBN 158 331 965);
- a2 Infant Nutrition Limited (ARBN 618 864 958);
- The a2 Milk Company (Australia) Pty Ltd (ACN 125 331 213);
- a2 Australian Investments Pty Ltd (ACN 126 014 275); and
- a2 Infant Nutrition Australia Pty Ltd (ACN 161 773 913).

a2MC entities take a consolidated, whole-of-group approach to ethical sourcing. As such, this Statement addresses the actions taken by all reporting entities within the a2MC Group. Unless otherwise indicated in this Statement, the terms 'a2MC', 'a2MC Group', 'our business', 'we', 'us' and 'our' refer to The a2 Milk Company Limited and its controlled entities collectively (including all reporting entities).

Engaging and consulting with entities to prepare this Statement

The preparation of this Statement by a2MC involved actively engaging with each of the reporting entities and each of the companies that we owned or controlled during the Reporting Period. To facilitate this process, we regularly engaged with relevant members of our Executive Leadership Team (ELT) and other relevant employees.

The consultation process was cross-regional and cross-functional. For example, members of our people and culture, farm services, supply chain, sustainability, risk and legal teams across the regions provide input and information into a2MC's modern slavery risk response and were involved in the drafting of this Statement.

A full list of a2MC Group entities is published on page 133
of The a2 Milk Company Limited's 2024 Annual Report. More
information about the reporting entities is set out in the Appendix.

Mandatory reporting criteria of the Modern Slavery Act

This Statement was prepared to meet the mandatory reporting criteria set out in the Act. The table below identifies where each criterion of the Act is disclosed within sections of this Statement.

MODERN SLAVERY ACT DISCLOSURE REQUIREMENT	LOCATION IN THIS STATEMENT
Identify the reporting entities	Inside cover page
Describe the reporting entities, structure, operations and supply chains	Pages 8-13, Appendix
Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity and any entities it owns or controls	Pages 14-26
Describe how the reporting entities assess the effectiveness of these actions	Page 27
Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Inside cover page
Provide any other relevant information	







CEO MESSAGE

I am pleased to present a2MC's modern slavery statement for FY24. a2MC has long recognised that a company's values, principles and decisions have an impact well beyond its own operations. We strongly believe in the vital role business plays in upholding human rights and consider it our basic responsibility to treat individuals, communities and our environment with respect.

We are committed to taking action to support the elimination of modern slavery by focusing on high standards of responsible conduct, social responsibility and sustainability in all areas of our business, including our operations and supply chains. Our commitment comes not just from an acknowledgement that it is the right thing to do, but from a recognition that the manner in which we and our partners manage social, environmental and economic impacts is critical to our long-term success. a2MC continues to focus on strengthening its modern slavery risk

 A comprehensive risk assessment of our supply chain by an independent third party, with results provided to a2MC in early FY25;

management programme. The actions we undertook in FY24 included:

- Reaching agreement with distributors in China to end the third-party service provider model for engaging full-time brand ambassadors and moving to a model where full-time brand ambassadors are directly employed by the distributor;
- Obtaining Board approval for our Modern Slavery Remediation Plan, which sets out how a2MC would investigate and remediate modern slavery impacts that it identifies in its supply chain; and
- Further improvements to our supplier due diligence processes.

While the progress made in FY24 is pleasing, ongoing commitment is needed to address the risks of modern slavery that exist in our operations and supply chain. We are focused on how we can contribute to a more sustainable future, including with respect to human rights, to deliver on our purpose of *pioneering the future of Dairy for good*.

This Statement for the financial year ended 30 June 2024 was approved by a2MC's Board of Directors on 21 November 2024, on behalf of all reporting entities covered by this Statement.

David Bortolussi

Managing Director and Chief Executive Officer

21 November 2024

ABOUT THE a2 MILK COMPANY

Who we are

The a2 Milk Company is a New Zealand dairy nutritionals company, fuelled by its purpose to pioneer the future of Dairy for good.¹

The Company was founded in 2000 in New Zealand by scientist Dr Corran (Corrie) McLachlan and his business partner, Howard Paterson, who recognised that not all milk is the same. Dr Corrie McLachlan joined Sir Robert (Bob) Elliot – who had earlier discovered that proteins in milk affect people differently – to pioneer research to understand these differences better.

Originally all cows' milk contained only A2 beta-casein protein. The A1 protein arose through a genetic mutation over many years. Today, most ordinary milk contains a mixture of A1 and A2-type beta-casein proteins. Results of several published peer-reviewed human clinical trials have shown that A1 protein can cause digestion issues for some people. A scientific and proprietary way to identify cows that naturally produce A1 protein free milk was also discovered.

Today, a2MC continues to pioneer this science and research, bringing A1 protein free milk to the world, allowing more consumers to enjoy its unique digestive and other potential health benefits.

What we do

The Company produces a portfolio of products made with milk from specially selected cows that naturally produce milk containing only A2-type beta-casein protein and no A1.

These products include fresh milk, ultra-heat treatment (UHT) milk, extended shelf life (ESL) milk, infant milk formula (IMF), plain milk powders (including instant whole and skim milk powder), fortified milk powders providing nutrition for infants, children, adults, pregnant women and seniors and other dairy nutritional products primarily for markets in China, Australia, New Zealand and North America.

The Company's primary business activities are:

- China and Other Asia: Sales of China label and English label IMF, liquid milk, plain milk powder and other nutritional products in offline stores and domestic and cross-border e-commerce channels.
- Australia and New Zealand: Sales of English label IMF, plain and fortified milk powders for children, adults and pregnant women through reseller and retail channels, and sales of liquid milk across Australian and New Zealand retail channels. Production of liquid milk products for Australia and other markets. It is understood that the majority of IMF and milk powder sales to customers in ANZ are ultimately consumed in China.
- North America: Sales of liquid milk, English label IMF and other nutritional products in the United States of America and liquid milk in Canada.
- Mataura Valley Milk (MVM): Production of nutritional and ingredients products for a2MC and other external customers in overseas markets.

Our team members

The a2MC global workforce consists of over 450 team members across Australia, New Zealand, China and the United States, reflecting our established sales markets and production and distribution channels.

Our workforce consists almost solely of permanent (on a full-time or part-time basis) employees in Australia, New Zealand, China and the United States. A small portion of our workforce is engaged on a contractual basis, either independently or through various agencies. These contractors are based in Australia, New Zealand or the United States. Many of our employees are office based, but we also have employees who work remotely, including in farming environments, and in manufacturing facilities. Some of our Australian based employees are covered by an enterprise bargaining agreement.

		Number o	f team memb	ers	
Our workforce ²	Total	Australia	NZ	US	Greate: China
Non-Executive Directors ³	5	1	2	0	2
Permanent Full-time	289	122	135	24	8
Permanent Full-time – covered by Enterprise Agreement	20	20	0	0	C
Permanent Part-time	23	20	2	0	1
Casual	2	1	1	0	C
Fixed Term Full-time	146	5	6	0	135
Fixed term Part-time	3	2	1	0	C
Contracted through agency	8	7	0	1	C
Total	496	178	147	25	146
Male	49.6%	50.6%	51.7%	52.0%	45.9%
	50.4%	49.4%	48.3%	48.0%	54.1%

- 1. Information about the a2MC Group structure and reporting entities is on page 29.
- 2. The table excludes team members on independent contracts, which vary from full-time to project-based. As of 30 June 2024, we had 14 such team members.
- 3. Excluding the Chief Executive Officer.



Our Values



Bold passion

We believe in the power of the $\alpha 2^{\text{TM}}$ proposition.

We are pioneers and always find a way to make it happen.

We are passionate about our consumers and customers.



Ownership and agility

We align on outcomes and prioritise initiatives.

We are effective in teams and do what we say we will do.

We are flexible and act with a sense of urgency.



Leading constructively

We are proud of what we do and how we do it.

We encourage and develop ourselves and others.

We are honest, direct and respectful in our interactions.



Disruptive thinking

We think big, creatively and logically to maximise group impact.

We are better together and unlock the power of the collective.

We challenge existing ways of working to achieve better solutions.

China and Other Asia

Our supply chain

Our people

- China State Farm importation agent

and master distributor

- Over 100 distributors

Our spend 33% of total purchases1

Highest risk categories:

146 (headcount)

- Marketing

- Logistics

Our product portfolio



Australia

Our supply chain

Australia (Liquid Milk and Nutritionals)

- Smeaton Grange

(a2MC owned and operated)

- Kyabram (a2MC owned)

- Four third-party processing relationships

Supplier farms

- 21 farmer suppliers

Our people 178 (headcount)

Our spend 20% of total purchases1

Highest risk categories:

- Raw materials

- Marketing

- Logistics

Our product portfolio







Manufacturing sites shown on map are limited to those that are owned by a 2MC.

Data reflects supplier purchases across our operating geographies, covering 99% of the Company's FY24 purchases, excluding MVM operations, intercompany transactions and employee costs.



Supply chain partners









Subsidiary of Bright Dairy

Subsidiary of Lactalis

of Mengniu

Subsidiary Licensee fresh milk New Zealand



New Zealand

Our supply chain

New Zealand (IMF and Nutritionals)

- 75% interest in Mataura Valley Milk

- 19.8% interest in Synlait Milk

- Four third-party processing relationships

Supplier farms

- 198 farmer suppliers

Our people

147 (headcount)

Our spend

38% of total purchases1

Highest risk categories:

- Raw materials

- Logistics

Our product portfolio



North America

Our supply chain

- Three third-party processing

relationships

- IMF sourced from New Zealand

Supplier farms

- 9 farmer suppliers

Our people

25 (headcount)

Our spend

8% of total purchases1

Highest risk categories:

- Raw materials

- Logistics

Our product portfolio



OUR SUPPLY CHAIN AND OPERATIONS

Supply chain and operational overview

a2MC's supply chain can be split into five main sections:

- Raw milk sourcing
- Primary processing
- Transport
- Manufacturing
- Global distribution

The Company's products are manufactured by a range of third-party suppliers in New Zealand, Australia and the United States. In many cases, there are longstanding relationships between a2MC and the supplier. In addition, brand licensees manufacture products branded or co-branded with the $a2^{\text{TM}}$ brand in New Zealand and Canada.

The Group's supply chain and distribution model after manufacturing is complex, with many layers of distribution for some products, particularly for infant milk formula product ranges.

Raw milk

Raw milk is the key input into all of our products. Our naturally A1 protein free raw milk is sourced from over 200 dairy farms in New Zealand, Australia, the United States and Canada. These dairy farms range from small family run herds with no additional employees, to larger enterprise operations with employees. a2MC does not own any dairy farms.

a2MC pays a premium to farmers over and above the prevailing market price, via the relevant processor, for their A1 protein free milk to meet our quality, traceability, animal health and wellbeing and environmental standards.

56% of the raw milk in the milk pools to which a2MC has access is sourced via our partner processors. The commercial supply agreements with the farm are held by the processors. The remaining 44% is sourced directly from MVM in New Zealand.

Our farm services teams work directly and closely with our farmers to support and monitor the implementation of our standards and expectations. Our work with supplier farmers is set out in further detail on page 24 of this Statement.

Infant nutrition

The majority of our infant nutrition products are manufactured by Synlait Milk Limited (Synlait), a New Zealand dairy processor and manufacturer. Synlait is also listed on the NZX and the ASX and is a Certified B corporation which reflects its commitment to high standards of social and environmental performance in New Zealand. All raw materials and other components that go into manufacturing our infant nutrition products produced at Synlait are procured by Synlait. All raw A1 protein free milk that is used for the manufacture of our infant nutrition products by Synlait is sourced locally from New Zealand farms, which undergo a full Lead with Pride™ audit at least every three years, which includes milk quality, environment, animal health and wellbeing, employment practices and workplace health and safety.

a2 Gentle Gold® is manufactured by Yashili NZ, a subsidiary of Mengniu. Mengniu is listed on the HKSX. Yashili is located in New Zealand and specialises in the manufacturing of nutritional formulated powders.

Liquid milk and other nutritionals

The liquid milk category represented approximately 18% of the a2MC Group's sales revenue in FY24 and other nutritionals made up 7% of the Group sales revenue.



Ingredients

MVM's external sales of commodity dairy products and dairy ingredients represented approximately 6% of the a2MC Group's sales revenue in FY24.

MVM manufactures whole and skim milk powders and a range of value-added dairy ingredients, including base powder for a2MC's a2 Platinum® Stage 4 IMF. These products are sold to a2MC and other dairy manufacturers for use in food products.

MVM has direct sourcing arrangements for all raw materials, including milk suppliers and other components used in the manufacture of its powdered products. The raw milk used in MVM's products is sourced exclusively from the South Island of New Zealand, in relatively close proximity to the processing facility.

Non-dairy ingredients and packaging

Where our product is processed by partner suppliers, they source ingredients and raw materials to meet our end product specifications. For products produced at MVM and Smeaton Grange, a2MC or MVM directly sources these ingredients and raw materials.

a2MC also directly sources packaging for most fresh milk bottles in Australia, except for products processed in Western Australia, where our processor sources the packaging. In New Zealand and the United States, the processor sources packaging according to a2MC's specifications.

Supply Chain - Infant milk formula

The below summarises the products in the infant nutrition range, locations of sale and manufacturing sites as at 30 June 2024.

Raw milk sourcing

Supply relationships with dairy farms producing A1 protein free milk

Primary processing

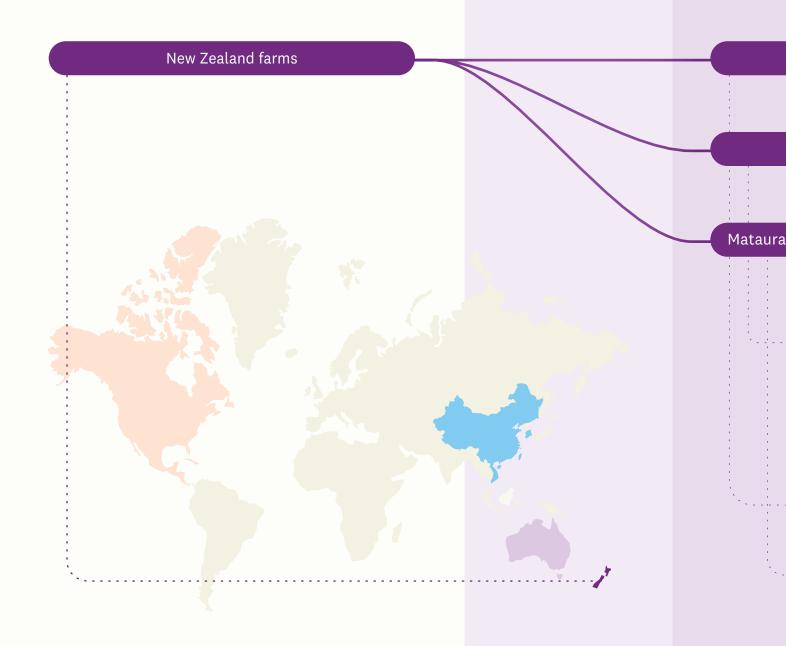
Milking of cows using on-farm workers

Transport

Delivery of milk and other ingredients to manufacturing site

Manufa

Milk and oth processed in and canned processing p



Global distribution to wholesalers cturing

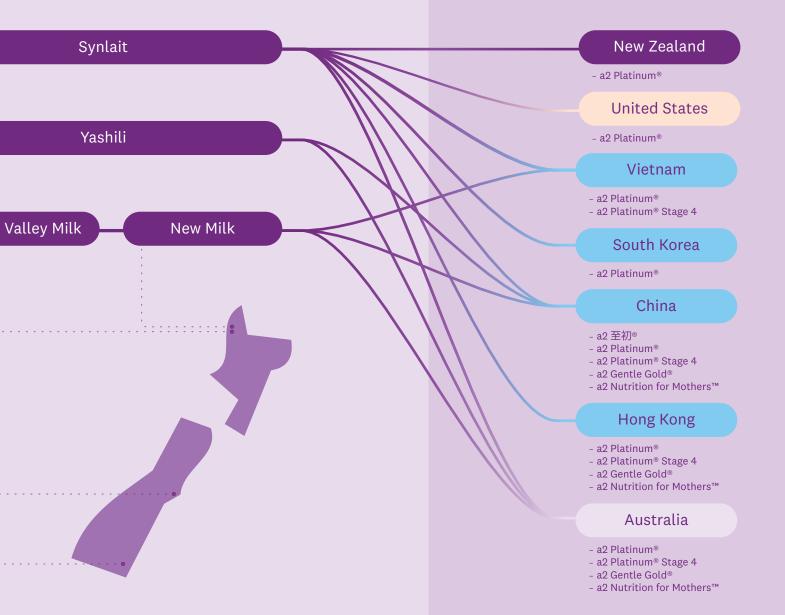
Transport

Delivery

er ingredients are to infant formula and labelled at artners

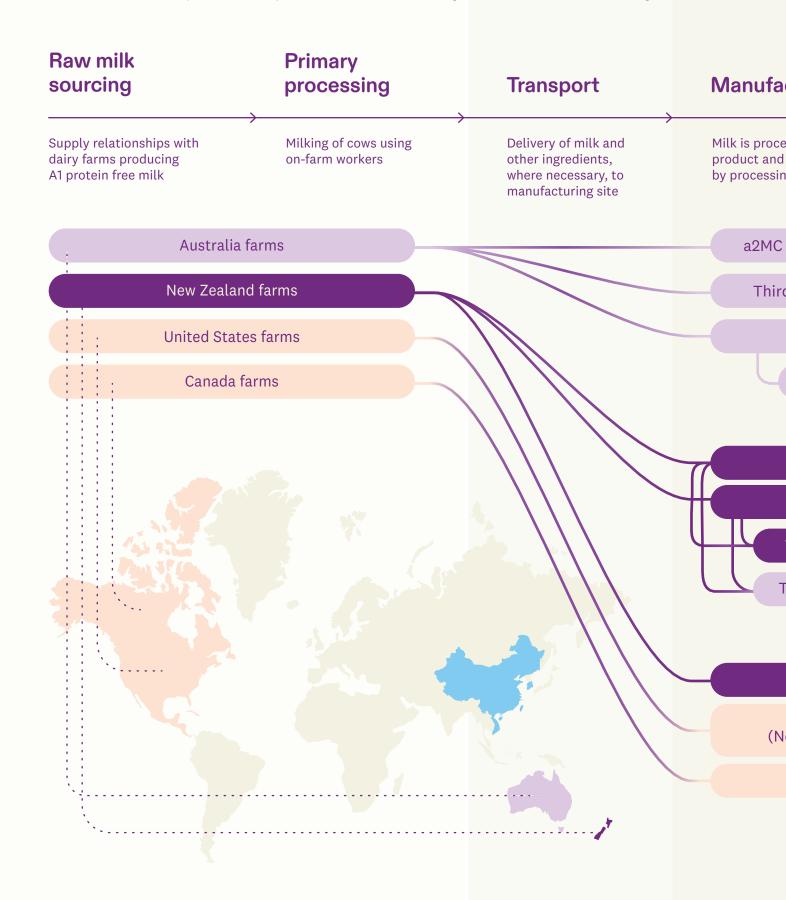
Infant formula is packed and shipped to a range of locations around the world, including Australia, China and the United States

Infant formula is distributed to online and physical stores through in-market distribution networks

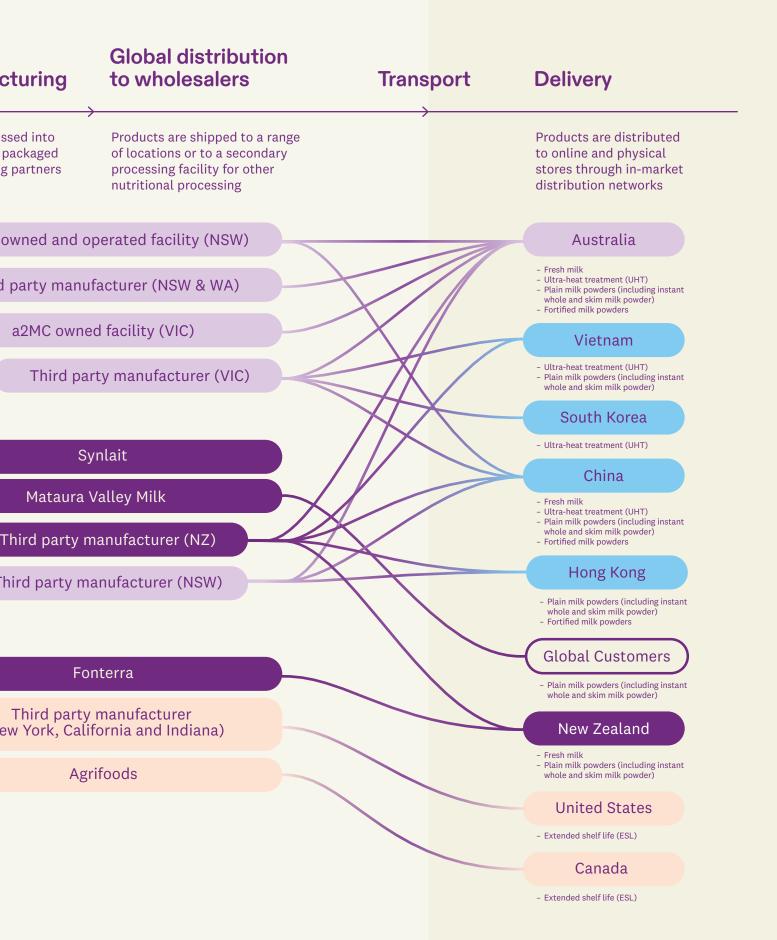


Supply Chain - Fresh milk and other no

The below summarises the products in the liquid milk and other nutritionals range, locations of sale and manufacturing sites as at 30 June 2024.



utritionals



UNDERSTANDING THE RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAIN

Modern slavery risks inherent in our operations and supply chain

In identifying the modern slavery risks that pertain to a2MC's operations and supply chain, the Company considered the following eight main categories of modern slavery, as per the Act:

- Debt bondage
- Deceptive recruiting for labour or services
- Forced labour
- Servitude
- Slavery
- Trafficking in persons
- The worst forms of child labour
- Forced marriage

We recognise that conducting a social risk assessment is essential for developing an evidence-based understanding of the likelihood of modern slavery within our operations and supply chain. To ensure an objective evaluation, we engaged an independent, specialist sustainability consultancy in FY24 to perform this assessment, with the results provided to a2MC in early FY25. The consultancy conducted a holistic review of our modern slavery risk management programme including, but not limited to, purchase data risk mapping and consultation with a2MC team members to enhance our visibility over the existing risk landscape, and identifying gaps and opportunities for improving modern slavery risk management.

The social risk assessment of our operations and supply chain conducted by the consultancy utilised a life cycle assessment (LCA) methodology, combined with a review of global databases and literature, to identify where social risks are present in our supply chain and operations. The global data sources reviewed included:

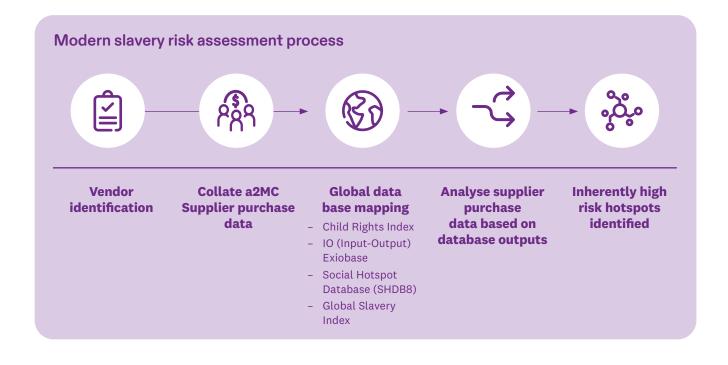
- IO (Input-Output) Exiobase;
- Social Hotspot Database (SHDB);
- Global Slavery Index; and
- Child Rights Index.

Purchase data was analysed to allocate risk ratings for potential modern slavery risks against procurement categories based on two key factors:

- high risk countries of origin; and
- known high risk commodities or industries.

Procurement purchase data from FY23 was converted into internal standardised social risk metrics to form a heatmap indicating relevant issues and impact sources for possible modern slavery risks occurring in each category. Using market models that trace commodities and services across supply chains, the risk assessment considered the likelihood of an issue occurring, and identified the severity and types of risk to people and the environment in our supply chain, and the priority areas for focus to reduce risk and generate positive social outcomes.

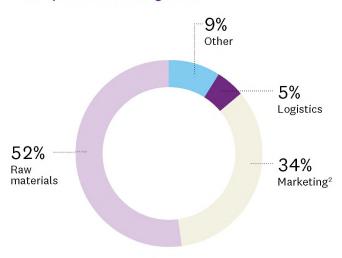
Further details about the priority areas (which comprise the very high and high risks in a2MC's operations and supply chain) are set out below on page 16 and 17 of this Statement. Other risks rated as low and medium were also identified in the risk assessment but have been excluded from the priority list of risks in the Statement.



Purchase Data

The categories to the right represent the most significant high-risk areas within the Company's supply chain. These categories reflect 99% of the Company's FY24 purchases excluding MVM operations, intercompany transactions, and employee costs.

FY24 purchase categories¹



- Numbers subject to rounding.
 Including promotional services and goods not for resale.



Identified risks in our supply chain

RISK AREA	KEY MODERN SLAVERY RISKS	KEY RISK DRIVERS	RISK LEVEL
Promotional services	Modern slavery risks: - Forced labour - Deceptive recruitment - Trafficking in persons Other workers' rights risks: - Wage exploitation - Poor working conditions	 Reliance on temporary and migrant workers who may be isolated or face higher risks due to language barriers and unfamiliarity with local laws Deceptive recruitment practices, including false promises related to wages, working conditions, and contract terms Absence of grievance mechanisms Use of third-party recruitment Retention of identity documents 	Very High
Logistics: On-land and maritime freight, warehousing and distribution	Modern slavery risks: - Forced labour - Deceptive recruitment Other workers' rights risks: - Wage exploitation	 Lack of transparency across the supply chain at each stage of the product life cycle, shipping and transport Deceptive recruitment practices, including false promises related to wages, working conditions, and contract terms Lack of proper oversight and due diligence of subcontractors Absence of grievance mechanisms at supplier sites 	Very High
Raw materials: Including raw milk supply, other food ingredients, pulp (paper) products, metals, plastic	Modern slavery risks: - Forced labour - Child labour - Trafficking in persons Other workers' rights risks: - Wage exploitation - Poor working conditions - Gender discrimination	 Sourcing materials or equipment that are extracted from or manufactured in countries with weak labour regulations Complex and fast-moving global supply chains Reliance on lower-skilled labour across supply chain Reliance on temporary and migrant workers who may be isolated or face higher risks due to language barriers and unfamiliarity with local laws Deceptive recruitment practices, including false promises related to wages, working conditions, and contract terms Retention of identity documents 	High

RISK AREA KEY MODERN SLAVERY RISKS KEY RISK DRIVERS

Goods not for resale:

Including promotional goods, furniture, apparel, gloves, electronic equipment, timber and construction materials Modern slavery risks:

- Forced labour
- Deceptive recruitment
- Trafficking in persons

Other workers' rights risks:

- Wage exploitation
- Gender discrimination
- Poor working conditions

 Deceptive recruitment practices, including false promises related to wages, working conditions, and contract terms

- Absence of grievance mechanisms at supplier sites
- Use of third-party recruitment
- Reliance on temporary and migrant workers who may be isolated or face higher risks due to language barriers and unfamiliarity with local laws

High

RISK LEVEL

High

Services:

Such as general IT services, cleaners and security and hospitality Modern slavery risks:

- Forced labour
- Deceptive recruitment

Other workers' rights risks:

- Wage exploitation

- Reliance on lower-skilled labour across supply chain
- Reliance on temporary and migrant workers who may be isolated or face higher risks due to language barriers and unfamiliarity with local laws
- Absence of grievance mechanisms in manufacturing facilities
- Lack of proper oversight and due diligence of subcontractors
- Use of third-party recruitment
- Retention of identity documents
- Deceptive recruitment practices, including false promises related to wages, working conditions, debt bondage, and contract terms

Risks in our direct operations

a2MC has risk exposures in relation to the engagement of workers at its offices and sites.

Strong corporate policies, training, accessible grievance mechanisms, robust payroll and recruitment processes and ongoing monitoring are key controls we have in place to reduce the risk of modern slavery in our direct operations (see further details on page 21).

Furthermore, team members in potentially higher risk jurisdictions are professional employees who are employed directly on employment terms and conditions that comply with the Company's global policies and are regulated by the relevant local laws.

a2MC does not engage in external financing activities. Any financial investments, such as the investment by a2MC into AgriZero^{NZ,1} in FY24, are subject to appropriate due diligence.

HOW WE ARE MANAGING THESE RISKS

Modern slavery response protocol

In FY23, we adopted a modern slavery response protocol (Protocol). The Protocol sets out the framework for our modern slavery risk management programme, focusing on the following 'Key Pillars' to identify and respond to modern slavery risk:

- governance;
- risk mapping;
- supplier engagement; and
- grievance mechanisms and reporting.

An overview of each Key Pillar is below.

The Protocol details the Company's structures and processes within each Key Pillar to deliver an appropriate modern slavery risk management programme. We continue to improve and refine our approach under each Key Pillar.

The following sections describe our activities across the Governance, Supplier Engagement and Grievance Mechanisms and Reporting Key Pillars. Refer to pages 14 - 17 for actions taken under Risk Mapping.

Key Pillars



Governance

The governance pillar encompasses the governance framework through which modern slavery risks are identified and managed, the suite of internal policies to support our modern slavery response and training and awareness of modern slavery for a2MC team members.





Risk mapping

This pillar relates to the identification and assessment of modern slavery risks in the Company's supply chain.



Supplier engagement

The supplier engagement pillar is focused on reducing modern slavery risk from our operations and supply chain through due diligence and audit processes, contractual provisions, and supplier ways of working.



Grievance mechanisms and reporting

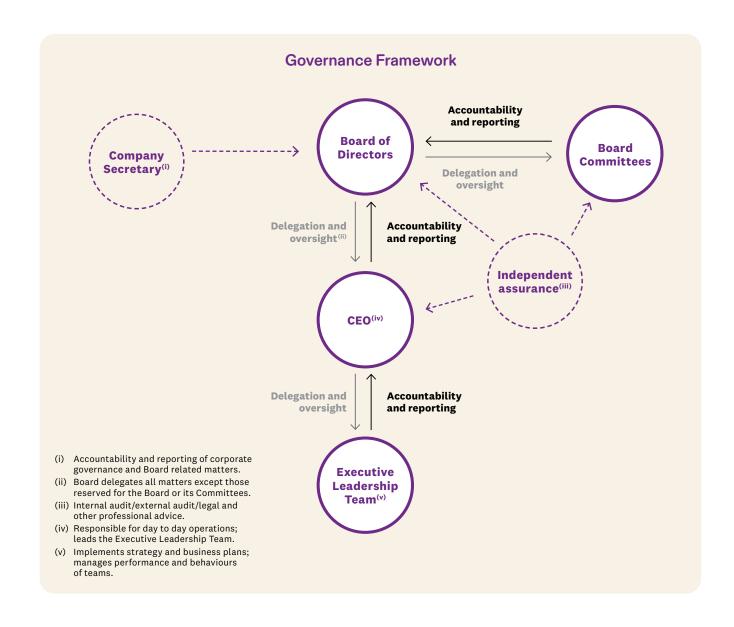
This pillar is focused on reporting procedures for team members and third parties, including in relation to modern slavery, remediation of modern slavery impacts and monitoring.

PROTOCOL KEY PILLAR 1

Governance

Governance Framework

The Company is committed to maintaining high standards of corporate governance. The Company's corporate governance framework has been established to ensure that directors, officers, and employees fulfil their functions responsibly, whilst protecting and enhancing the interests of shareholders.



Modern Slavery Governance Framework

BOARD

The Board is responsible for the overall governance and operations of the Company, guiding the Company's strategic direction, monitoring risk (including modern slavery risk), and overseeing the activities of management. All issues of substance affecting the Company are considered by the Board, with advice from external advisors as required.

The role and responsibilities of the Board are set out in the Board Charter, available on the Company's website at www.thea2milkcompany.com/corporate-governance. The Board delegates certain functions to its Committees and management. Board procedures and reporting ensure that all Directors have the information needed to contribute to informed discussion on all agenda items and effectively carry out their duties. The ELT make direct presentations to the Board and Committees on a regular basis, giving the Directors broader contact with the ELT and enhancing the Directors' understanding of the business, its risks and opportunities. The Board reviews and approves the Company's Modern Slavery Statement each year.

AUDIT AND RISK MANAGEMENT COMMITTEE

The Audit and Risk Management Committee reviews the risk profile including material business risks and provides regular reports to the Board on the operation of the internal control systems. The principal purpose of this Committee is to assist the Board in fulfilling its corporate governance and oversight responsibilities in relation to the Group's risk management and internal control systems, accounting policies and practices, sustainability risk management and strategy implementation, internal and external audit functions, and corporate reporting, including sustainability reporting. Management provides updates to the Committee on the Company's modern slavery programme.

CEO AND MANAGEMENT'S ROLE

Chief Executive Officer

The Board delegates all matters except those reserved for the Board or its committees to the Chief Executive Officer, who is responsible for the a2MC Group's day-to-day operations and leads the FLT.

Executive Leadership Team and modern slavery programme

The ELT is responsible for the implementation of strategy and business plans, and manages performance and behaviours of teams. Functional teams managed by ELT members manage direct relationships with suppliers and distributors and are responsible for ensuring compliance with the requirements of a2MC's policies, where applicable.

The Chief Executive Officer and the Chief Legal and Sustainability Officer & Company Secretary oversee the Company's modern slavery programme, with support provided by other relevant members of the ELT, and team members across the a2MC Group as part of a cross-functional team (including supply chain, procurement, farm services, risk, sustainability, legal and people and culture). Work is underway to formally establish a modern slavery working group to allow more frequent collaboration and information sharing between relevant team members.

Policies and standards

Our approach to human rights is enshrined in the Company's policies and standards, which set clear behavioural expectations through implementation of explicit standards of behaviour for our employees and suppliers in these markets.

We maintain a range of policies to assist us to manage the risks of modern slavery in our operations and supply chain.

Details on our policies and their relevance to modern slavery can be found in the Appendix. Copies of our policies are also available on the Company website at https://thea2milkcompany.com/corporate-governance.

In FY24, we conducted a review of the modern slavery protections provided by laws in the core markets in which we have supply and distribution arrangements (Australia, New Zealand, China and the United States) in order to better understand the mandatory requirements on our suppliers in these markets.

Team member training

Mandatory general awareness training

We established a company-wide modern slavery training programme for our employees, rollout of which commenced in calendar year 2023 and was completed in FY24. This training is delivered through an e-learning module and is mandatory for all employees and aims to assist employees to understand and identify modern slavery risks. 311 team members had completed the mandatory training module as at 30 June 2024.

The module covers what modern slavery is, the Act, how modern slavery impacts a2MC and its stakeholders, assessing risk, ensuring compliance and where to report suspected incidences. Real world scenarios are important to bring training to life for participants. Examples of two of the hypothetical scenarios included in our e-learning module are below.

1. Example 1: While inspecting a dairy farm, you overhear some workers arguing with management over unpaid hours. The manager tells them threateningly, "If you leave, you'll be violating your visa – you'll be arrested by immigration!" When the manager sees you, she laughs the interaction off, and says, "Those kids – always being so melodramatic! Everything is fine, really." Should you report this?

ANSWER: This is definitely a suspicious interaction; even if the manager is paying her workers, she's threatened them if they leave. After you return to the office, you should report this incident for further investigation. You're not required to engage with the farm manager onsite, or discuss the matter further with them. An investigation by a2MC will take the matter further.

2. Example 2: a2MC is building a structure overseas. While getting quotes for building materials, one comes in much cheaper than the others. When you ask the contractor for more details, they can't demonstrate compliance with local labour laws, provide details about their workforce, or grant you access to organise an audit. Should you accept their (cheapest) quote?

ANSWER: Our values and principles have an impact well beyond our own operations as a business. If the contractor can't evidence adherence to local legislation, they pose a modern slavery risk. a2MC doesn't accept this in our supply chain. It's our basic responsibility to make sure individuals, communities and our environment are treated with respect. If a supplier can't prove they meet our standards, we'll find an alternative source.

Targeted training

In addition to the mandatory modern slavery training, team members in supply chain, (including procurement and farm services), sustainability, legal, people and culture, finance and risk, and quality engaged in additional targeted modern slavery awareness training in FY24. The training focused on what modern slavery is and why it matters to us, the potential risks within our supply chain and our legal responsibilities, and how we can contribute to respecting human rights and promote ethical practices.



PROTOCOL KEY PILLAR 2

Supplier Risk Mapping and Management

We are committed to understanding and managing our risks in relation to modern slavery and identifying these risks as part of our Risk Management Programme governed by the Risk Management Policy and framework.

At least annually, the Company's management sets strategic areas of focus for risk identification, including modern slavery. We adopt a structured and disciplined process anchored to ISO31000 to identify, analyse, assess, evaluate, treat, and monitor risks and report on them.

The major activity undertaken under this pillar in FY24 was the external assessment of the inherent risks in the Company's operations and supply chain. Further information about this can be found on pages 14 - 17.

PROTOCOL KEY PILLAR 3

Supplier Engagement

We undertake a range of different actions to engage with existing and potential suppliers on modern slavery risks. These actions include conducting supplier due diligence, the inclusion of relevant contractual obligations, and taking additional actions for some of the higher-risk categories identified in the risk section above.

Supplier Due Diligence

The Company has an anti-modern slavery questionnaire (Questionnaire) for distribution to suppliers and strategic partners to assist us with undertaking appropriate due diligence in relation to modern slavery risk. More details about the way the Questionnaire was developed and the classification of suppliers is set out in our 2023 Modern Slavery Statement. In FY24, we also prepared follow-up questions to seek further information where initial responses received from the Questionnaire indicated a higher potential risk exposure.

The Questionnaire and follow-up questions require our existing suppliers and strategic partners to provide input on their understanding, management and mitigation of modern slavery risk in their operations and supply chain. The Questionnaire asks suppliers to provide information to help identify modern slavery risk, and the follow-up questions facilitate the opportunity to obtain clarity and gather additional information based on the responses. This process aims to better understand each supplier's risk profile concerning modern slavery.



a2MC assesses the information provided by suppliers in response to the Questionnaire, and any follow-up responses together with any prior information provided by the supplier, and determines the need for further action or queries by considering whether:

- supplier responses put a2MC 'on notice' of any known or suspected (or reason to suspect) potential non-compliance or breach of contractual obligations or Company policies;
- a2MC has identified a supplier as 'higher risk' but the supplier's responses suggest an immature approach to modern slavery risks; and
- responses indicate risks associated with sanctions or import control laws.

In FY24, we commenced the rollout of the Questionnaire to our highest risk suppliers (see the Company's FY23 Statement for more information about the process for assessing supplier risk). Since then, we have received responses from 100% of the suppliers we contacted. We analysed all responses and issued follow-up questions to suppliers where the original responses indicated a higher level of human rights or modern slavery risk exposures. We continued rollout of the Questionnaire to some of our mid to high risk suppliers in FY24.

To date, no responses to the Questionnaire or the follow-up questions have required further action or queries.

Audits

While we have not yet conducted any ethical sourcing audits of suppliers, we regularly audit the factories of our manufacturing partners and the warehouses of our distribution partners for other purposes. These audits include site visits to premises. Onsite audits were conducted in FY24 as shown in the below table.

Contracts

We continued to build on the work done in previous reporting periods, such as updating our supplier contracts to include an anti-modern slavery compliance clause, so that our suppliers understand our expectations in relation to identification and management of modern slavery risk. We also continued the process of reviewing and, where necessary, updating template agreements used by the Company to include an anti-modern slavery compliance clause with a focus on the agreements used by our China business unit. We continue to track which contracts include a modern slavery clause through our contract management system.

Through our anti-modern slavery contractual clauses, we reserve the right to terminate contractual engagements where a breach or alleged breach of modern slavery laws is found to exist within the supply chains or operations of contracting suppliers or their related bodies corporate. The effectiveness of these clauses in mitigating modern slavery risks was bolstered by the anti-modern slavery remediation plan we finalised in FY24. More information about the plan is set out on page 26 but the plan outlines the ways in which a2MC Group members may come across breaches, or suspected breaches, of modern slavery laws in our supply chain relationships, and the expectations and processes available to them for reporting these findings. Depending on the circumstances, ending a contractual relationship may be appropriate if the related supplier refuses to address the modern slavery concern identified or if there is no prospect of real change occurring to address the modern slavery concern identified, among other factors that will be considered.

Number of onsite audits completed in FY24

	AUSTRALIA	NEW ZEALAND	UNITED STATES
Manufacturing	7	9	0
Warehouse	10	5	2

Supplier engagement for high risk categories

Farms and raw milk supply

We are committed to working with and supporting farmers, who play a vital role in the Company's supply chain not only as suppliers but also as stewards of the environment and as vital contributors to local communities. We continue to engage with our internal farm services teams to identify potential risks with our milk suppliers.

All farmers supplying raw A1 protein free milk for our products are paid a premium for that milk, providing farmers with support to meet their various costs including the appropriate remuneration of their farm workers.

Some of our New Zealand strategic partners and suppliers currently have standards and undertake auditing of employment conditions on our supplier farms as part of their best practice requirements for responsible sourcing and environmental management on-farm. These are intended to manage industry-wide risks of labour exploitation. In the United States, the farms from which we source must certify that they do not use illegal labour, as required by labour laws in that jurisdiction.

Australia and New Zealand

All new on-farm suppliers providing A1 protein free milk for a2MC's products undergo a strict due diligence process to check compliance with social, animal welfare and sustainability standards. Further, the Company requires farmers supplying milk to MVM to enter into a milk supply contract under which they warrant that they are not aware of any modern slavery in their supply chain or operations. Milk supply contracts are mandatory for farmer suppliers and are fixed term agreements, usually for one or two years.

a2MC's farm services team, which has staff in New Zealand and Australia, regularly visits all farms that supply milk to MVM, the Smeaton Grange processing plant and to our third-party suppliers and licensees, including Synlait and Fonterra.

In FY24, we focused on:

- improving our understanding of the modern slavery programmes and actions of four of our Australian suppliers and one New Zealand supplier with substantial milk pools, with a particular focus on policies and training of farmer suppliers in relation to modern slavery risks; and
- updating our MVM Farmer Handbook, which is provided to MVM farmers during the supplier onboarding process, and which assists farmers (amongst other things) in understanding and identifying modern slavery risks.

United States and Canada

As in Australia and New Zealand, we have a small farm services team in the United States. Members of this team regularly visit all farmers supplying milk in the US and

In FY23 we obtained further commitments from our US and Canadian farmers at that time by having them sign a 'Pledge against modern slavery' (Pledge) provided by us, which aligns with the standards in our Responsible Sourcing Policy. The Pledge is a commitment from those farmers to aim to reduce modern slavery risks by, among other things:

- not using any type of slavery, servitude, forced labour;
- treating all of their workers with dignity and respect;
- respecting and ensuring freedom of their workers' movement;
- not requiring their workers to surrender identity papers, passports or work permits;
- paying their workers in accordance with the law; and
- working together with us to use best efforts to reduce and respond to modern slavery risks.

Supplier engagement for high risk categories - continued

China

Distribution Services

China is a key jurisdiction of our operations and has a deeply layered distribution system to bring products to consumers.

The exclusive import agent and master distribution partner in China for our China label products, China State Farm (CSF), is a State-Owned Enterprise. As a State-Owned Enterprise, it is subject to statutory audits by the National Audits Office, with a strong compliance record and reputation. CSF in turn contracts with a number of distributors for the same China label products, with 112 active IMF distributors and approximately 105 UHT and milk powder distributors throughout the country. The Company renewed its agreement with CSF for a term of five years from 1 October 2022. The contract between a2MC and CSF contains requirements that CSF comply with all applicable laws.

Promotional Services

Many of the master distributors use brand ambassadors in mother and baby stores to engage with consumers about the products that the distributor sells. These staff are based in stores but also engage with consumers on social media.

Previously, brand ambassadors were engaged through third-party service providers, with a2MC indirectly paying for the services or sharing costs. We recognised that this arrangement might impact earnings of brand ambassadors. We also recognised that certain requirements, such as familiarity with social media might have influenced the age of the brand ambassadors hired, and affected their contractual arrangements with distributors and third-party service providers.

In FY23, we held extensive discussions with third-party service providers and distributors to improve the brand ambassador engagement model, aiming to provide better benefits and pay, and to reduce the risk of exploitation. In FY24, we agreed with relevant distributors to end the third-party service provider model for full-time brand ambassadors and moved to a model where they are directly employed by distributors. This change means fulltime brand ambassadors receive broad social insurance and full-time employment benefits under Chinese law, which in turn reduces the risk of modern slavery.

Part-time brand ambassadors are still engaged through third-party service providers and other channels. We will continue to assess and mitigate the risk of modern slavery for part-time brand ambassadors. Third-party service providers and distributors are subject to Chinese law, including minimum wage and social insurance requirements, which must be complied with.

We pay above the average market rate for brand ambassador services, enabling the distributors and third-party service providers to take their cost margin while ensuring appropriate compensation for brand ambassadors. The higher fee reflects our need for experienced brand ambassadors who can provide the high level of service and maintain continuity in customer relationships.

The standard operating hours of mother and baby stores limit the potential for overtime.

PROTOCOL KEY PILLAR 4

Grievance Mechanisms, Remediation and Reporting

Whistleblower Process

a2MC's whistleblower process is the primary means by which modern slavery concerns are reported to the business. Our whistleblower process is available for current and former team members, and other individuals such as suppliers and their employees, to report modern slavery concerns for further investigation. Whistleblowers can report relevant disclosures through internal channels to an officer or senior manager of a2MC, preferably to the CEO or another ELT member. In cases where this would be an inappropriate process, reports can be made to the Chair of the Audit and Risk Management Committee or any other Director. Further, whistleblowers may report disclosures through the independent Whistleblower Service available via telephone, post, email, online portal or facsimile.

Whistleblowers can choose to report anonymously. We will not disclose the identity of a whistleblower unless they provided consent to this, or it is required by law. Any whistleblower reports received are referred to the Chair of the Audit and Risk Management Committee and the Chief Legal and Sustainability Officer & Company Secretary, who determine the most appropriate person or person(s) to conduct an initial review and inquiry process.

If further inquiry or investigation is required, it may be conducted by an officer or senior manager of a2MC, a member of our People and Culture team, or an external investigator.

No such whistleblower reports were received in FY24.

INDEPENDENT WHISTLEBLOWER SERVICE			
	Australia 1800 981 382	China 4001 070 770	
TELEPHONE	New Zealand 0800 100 176	USA 18772050758	
	The a2 Milk Company		
	Reply paid 12628		
POST	A'Beckett Street MELBOURNE VIC 8006		
EMAIL	whistleblowerservice@deloitte.com.au		
ONLINE	www.australia.deloitte-halo.com/ whistleblower/website/a2MC		
FACSIMILE	+61 3 9691 8182		

Modern Slavery Remediation Plan

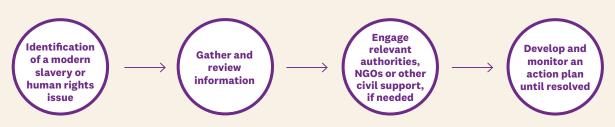
In FY24, we implemented our Modern Slavery Remediation Plan (Plan). The Plan sets out:

- how a2MC Group is made aware of suspected instances of modern slavery in its operations or supply chains;
- how a2MC Group investigates modern slavery concerns;
- remediation processes where there are modern slavery impacts; and
- important considerations to keep in mind when responding to modern slavery concerns.

The Plan provides the steps that will inform the a2MC Group's response to suspected modern slavery impacts, and these steps are designed to facilitate a consistent, principled approach while allowing for flexibility.

There are also a range of principles articulated in the Plan about the approach that would be taken by a2MC in the event that a report requires its use, including that unintended harm should be avoided, actions taken must be in the best interests of the affected individuals and the approach to collaboration. We announced the launch of the Plan to all team members through our Company-wide intranet.

Escalation process for remediation plan



HOW WE ASSESS THE EFFECTIVENESS OF OUR ACTIONS

As our anti-modern slavery programme has evolved since the release of our first Modern Slavery Statement, we have continued to learn how to enhance our effectiveness but acknowledge that there is still more to do. We continue to learn and identify opportunities to improve. We are committed to continuously improving our assessment and management of human rights and modern slavery risk.

We assess the effectiveness of our actions by maintaining strong governance processes, periodically reviewing internal policies and procedures, tracking our actions and outcomes, and continuously engaging with suppliers.

We also monitor specific metrics with respect to some of the actions we take in relation to modern slavery risk management:

FOCUS AREA	HOW WE ASSESS EFFECTIVENESS
Team member awareness of modern slavery risk	We monitor completion rates of the mandatory online training module.
Supplier due diligence	We track completion rates of the Questionnaire, analyse the responses received from suppliers and issue follow-up questions as required.
Whistleblower and other reports	We maintain a register of any whistleblower reports or reports through other channels of modern slavery concerns in our supply chain.
Governance documents	Key governance documents, such as policies, have a specified review cadence.
Anti-modern slavery action plan	The core team members responsible for the action plan meet regularly, usually monthly, to review the status of actions in the action plan and agree next steps, including engagement with other team members.
Contracts	We track whether contracts include an anti-modern slavery clause.
Audits	We track the number of onsite audits of manufacturing and warehouse locations in our supply chain¹.

1. Onsite audits are not for the purpose of auditing ethical sourcing.



SUMMARY OF PROGRESS IN FY24

LOOKING FORWARD

In FY24, we made significant progress against our commitments, including:

- A comprehensive risk assessment of our supply chain was completed by an independent sustainability consultancy, with results shared with a2MC in early FY25;
- Work towards development of a roadmap outlining the requirements for our anti-modern slavery programme over the next three years, including consultation with various stakeholders, training, and an opportunities and risk assessment, was conducted by the same consultancy;
- We reached agreement with distributors in China to end the third-party service provider model for engaging full-time brand ambassadors and moved to a model where brand ambassadors are directly employed by the distributor;
- We obtained Board approval for our Modern Slavery Remediation Plan, which sets out how a2MC would investigate and remediate any modern slavery impacts that it identifies in its supply chain;
- We commenced rollout of the Supplier Questionnaire and prepared a suite of follow-up questions to be used when further information is needed following receipt of the Questionnaire; and
- We completed rollout of the mandatory modern slavery online learning module.

We are committed to continuing to improve modern slavery risk management in our supply chain and operations, and mature our programme approach.

In FY25, we plan to undertake the following actions:

- Complete development of the roadmap;
- Establishment of an anti-modern slavery working group, comprised of key team members across the a2MC Group who manage our supply chain, to improve information sharing and more effectively progress the modern slavery workplan;
- Work towards the introduction of a modern slavery risk assessment as part of the due diligence process for new vendor selection criteria/framework;
- Undertake a supply chain mapping exercise of MVM's supply chain;
- Improvement of internal communications around modern slavery and our whistleblower process; and
- Obtain greater visibility into the ingredients supply chain of one of our key suppliers.



APPENDIX

Reporting entities (for the purposes of section 14 of the Modern Slavery Act 2018)

The a2 Milk Company Limited

ARBN 158 331 965

The ultimate parent company of the a2MC Group is The a2 Milk Company Limited.

The a2 Milk Company (Australia) Pty Ltd

ACN 125 331 213

a2MC Australia is responsible for the a2MC Group's operations in relation to fresh milk in Australia.

a2 Infant Nutrition Limited

ARBN 618 864 958

a2 Infant Nutrition is responsible for the a2MC Group's infant formula and nutritional powders supply chain in New Zealand.

a2 Australian Investments Pty Ltd

ACN 126 014 275

a2 Investments is the holding company of a2MC Australia and a2IN Australia.

a2 Infant Nutrition Australia Pty Ltd

ACN 161 773 913

a2IN Australia is responsible for the a2MC Group's operations in relation to infant formula and other powdered nutrition products in Australia.

The a2MC Group includes 18 subsidiary entities in total. These entities undertake a range of functions in support of the a2MC Group's businesses, including procurement, manufacturing, supply and distribution, and sales and marketing. Subsidiary entities are incorporated in a range of markets that the a2MC Group operates in, including New Zealand, Australia, China, South East Asia, the United States and Canada.

a2MC owns a controlling interest in Mataura Valley Milk Limited (MVM), a dairy processor in Southland, New Zealand. MVM manufactures powdered milk products for a range of customers.

Appendix (continued)

Policies

POLICY TITLE	RELEVANCE TO MODERN SLAVERY	HOW WE IMPLEMENT THIS POLICY
Code of Ethics	The Code of Ethics (Code) sets out the expectations that the a2MC Group has of our employees and suppliers regarding lawful and ethical conduct, including human rights, employment practices, and compliance with applicable laws, regulations and rules. The Code acknowledges a2MC Group's support of internationally recognised human rights and principles, including as set out in the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights and the United Nations Global Compact.	We publish this policy on our internal and external websites. All team members are required to read the Code of Ethics on commencement of employment as part of completing the employee onboarding experience.
Responsible Sourcing Policy	The Responsible Sourcing Policy sets out our expectations of our suppliers with respect to responsible business practices, including compliance with applicable legislation in the regions where they operate and taking steps to meet international standards for working conditions and minimum working age requirements. The policy sets out minimum standards designed to ensure that our suppliers operate responsibly in all aspects of their business operations.	We publish this policy on our internal and external websites. We seek to include the supplier's compliance with the minimum standards of the policy as an obligation in any relevant supply contract. Suppliers are expected to notify a2MC (or the relevant member of the a2MC Group with which they have the relationship) where they become aware of incidents involving them or a member of the supplier's group or supply chain that are inconsistent with the standards set out under the Responsible Sourcing Policy. Where suppliers do not feel comfortable with notifying a2MC directly, they can do so anonymously through an external third-party whistleblower channel. Suspected breaches of this policy will be investigated. Where breaches are identified, the general approach is to work with suppliers towards ensuring full compliance with the minimum standards. However, the Company may seek to terminate contractual arrangements or seek alternative supply sources if suppliers are unable or unwilling to work towards full compliance with the minimum standards, or where the noncompliance is of such a nature that ceasing association with the supplier is the most appropriate course of action.

Appendix (continued)

POLICY TITLE	RELEVANCE TO MODERN SLAVERY	HOW WE IMPLEMENT THIS POLICY
Global Whistleblower Policy	The Global Whistleblower Policy sets out protections and support available to those who raise concerns about any suspected misconduct or an improper state of affairs relating to the a2MC Group anywhere in the world, including within our supply chain (which includes our strategic partners, suppliers, distributors, and brand ambassadors in China). A whistleblower may be a current or former Director, officer, employee, contractor or supplier, any other person who has or has had business dealings with us and relatives or dependents of any of those persons or dependents of that person's spouse. We have internal and independent external channels through which a whistleblower can report information, and they can do so anonymously.	We publish this policy on our internal and external websites. The Company is committed to investigating suspected breaches of our policies or misconduct and where breaches or misconduct are identified, our general approach will be to work with our suppliers towards ensuring full compliance with our relevant standards. We may seek to terminate our contractual arrangements or seek alternative supply sources if our suppliers are unable or unwilling to work towards full compliance with the standards, or where the non-compliance is of such a nature that we decide ceasing our association with the supplier is the most appropriate course of action. All team members are required to read the Global Whistleblower Policy on commencement of employment.
Equal Employment Opportunity, Unlawful Discrimination, Harassment, Bullying and Victimisation Policy and Grievance Handling Policy	The Equal Employment Opportunity, Unlawful Discrimination, Harassment, Bullying and Victimisation Policy and the Grievance Handling Policy make clear our expectation that our workplace is free from unlawful discrimination, harassment, bullying and victimisation.	We publish these policies on our internal website. All team members are required to read the policies as part of their onboarding.
Diversity and Inclusion Policy	The Company's Diversity and Inclusion Policy empowers and equips its people to foster a diverse, inclusive and competent workplace. The Company is global in its thinking, behaviours and people and passionately believes in fostering an inclusive culture because it is essential for diversity to thrive, and to enable its people to realise their potential. The Company recognises that diversity encompasses but is not limited to gender, age, ethnicity and cultural background and aims to embed and maintain a strong diversity and inclusion framework within its systems and cultures including one which encourages and supports a workplace that embraces individual differences.	We publish this policy on our internal and external websites. All team members are required to read the policy on commencement of employment.

Appendix (continued)

POLICY TITLE	RELEVANCE TO MODERN SLAVERY	HOW WE IMPLEMENT THIS POLICY
Global Anti-Bribery & Anti-Corruption Policy	The Company does not tolerate any form of bribery or corruption and is committed to ensuring that business is conducted according to ethical, professional and legal standards in a fair, honest and open manner. This Policy identifies the principles and certain specific rules regarding bribery, corruption and facilitation payments in all the jurisdictions in which the Company operates.	We publish this policy on our internal and external websites.
Risk Management Policy	The Company is committed to meeting high standards in the ways we manage our business. Our risk management approach is centred on a series of processes, structures and guidelines which assist the Company to identify, assess, monitor and manage its business risks, including modern slavery risks.	We publish this policy on our internal and external websites.
Work Health and Safety (WHS) Policy	The Company is committed to the health, safety and wellbeing of all team members. The policy identifies the Company's commitments and how these commitments will be achieved. The Audit and Risk Management Committee is accountable for monitoring compliance with the WHS management system.	We publish this policy on our internal website.
Remuneration Practice Guide	The guide sets out the principles of our global remuneration framework, with a key principle being to ensure transparent, fair and equitable pay outcomes and processes.	We publish this guide on our internal website.





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