



**COOPERS BREWERY LTD  
MODERN SLAVERY STATEMENT 2021**

**Introduction**

This Modern Slavery Statement describes the steps taken by Coopers Brewery Ltd (ACN 007 871 409) (**Coopers**) and its wholly owned subsidiaries during its financial year, ending 30 June 2021, to address modern slavery risks in its business and supply chains.

Coopers make this statement in accordance with the *Modern Slavery Act 2018* (Cth).

**Our Company**

Coopers is the largest Australian-owned brewery and is based in Regency Park in South Australia. It is a sixth-generation, family-owned public company which has been in operation for 158 years. The company produced approximately 82 million litres of beer in the 2021 financial year, which equates to about 5 percent of the Australian beer market. Coopers is also the world's largest manufacturer of extracts used for home-brewing.

Coopers has operated its own on-site maltings since 2018, which produced in excess of 55,000 tonnes of malt during the 2021 financial year. Coopers uses approximately 16,000 tonnes of this malt in its beer and extract production, with the remainder being sold domestically and abroad.

**Our Commitment**

Coopers is socially committed to making a tangible contribution, not only to its employees, their families and its customers, but to the broader community.

The company operates under strong guiding principles of Passion, Respect, Responsibility, Consistency and Service. A fundamental value of Coopers is the promotion of human rights within its ethical business practices.

**Our Operations**

Coopers operates principally in Australia, with all manufacturing occurring at its headquarters in Adelaide, South Australia. Coopers has sales and marketing offices in Melbourne, Sydney, Brisbane and Perth. During the 2021 financial year, Coopers directly employed 217 people nationwide.

Coopers owns and operates the following subsidiaries:

- Premium Beverages Pty Ltd, which is responsible for sales of beer products in New Zealand and all Australian States and Territories outside of South Australia. This company employed 3 people in New Zealand during the 2021 financial year.
- Coopers USA Inc, which owns Coopers DIY LLC, trading as Mr Beer. Mr Beer manages the marketing, sales and distribution of home-brewing products in the United States of America and Canada. The office for that subsidiary is based in Tucson, Arizona. The company employed 9 people during the 2021 financial year.
- Espalier Pty Ltd, which owns Morgan's Brewing Company Pty Ltd. Morgan's Brewing Company manages the sale and distribution of some classes of home-brewing products in Australia. The company employed 6 people during the 2021 financial year.

## **Our Supply Chain**

Coopers preferences Australian-made products wherever commercially feasible and the majority of Coopers' suppliers are Australian based entities.

### *Grain and hops growing and sourcing*

Except for some specialty hops, hop oils and processing aids, all the raw materials in Coopers' brewed products are grown or produced within Australia. The specialty hops, hops oils and processing aids are sourced from France, Germany, the United States of America and the United Kingdom.

### *Beers and consumables (and beers brewed under license):*

Coopers produces beer at its own production facilities in Australia.

In relation to packaging materials, approximately 97.5% of spend is on packaging materials made in Australia, followed by approximately 1% in Thailand and the Philippines respectively and less than 0.5% in New Zealand.

Coopers sources some equipment and consumables required for the operation of its facilities from Germany and France. Further, some home-brewing equipment and consumables is sourced from China.

### *Marketing, sales and other services*

Coopers markets and sells its products via its own dedicated marketing and sales teams and through appointed agencies and distributors.

The vast majority of Coopers' required services are sourced from Australian entities. However, some production facility commissioning services are provided by overseas companies, primarily located in Germany.

Procurement of IT equipment and marketing material is primarily through Australian-owned entities, but Coopers acknowledges that many of these products would be sourced from companies based overseas.

Some freight and distribution services are sourced in the countries to which Coopers exports beer, malt and home-brew products, including New Zealand, the United Kingdom, the United States of America, Europe and parts of Asia.

## **Assessment of Modern Slavery Risks**

Coopers acknowledges the potential for modern slavery risk to be present within its supply chain. Coopers consider the risk of Coopers directly engaging in modern slavery practices is extremely low. Coopers complies with all applicable employment legislation and actively invests in the safety, health and wellbeing of its employees. All employees are engaged under employment contracts or Coopers Enterprise Agreement.

Coopers has determined that there is a slightly higher risk of Coopers contributing indirectly to modern slavery practices through its supply chain. This is especially the case for its imports and exports. Coopers undertake to complete further risk assessment work to progress its understanding of these modern slavery risks in its supply chain.

## **Mitigation and Due Diligence**

During the 2021 financial year, Coopers continued use of its Safety, Environment and Ethical Management System (SEEMS), which is governed by the following company policies:

- SEEMS Accountabilities and Responsibilities Policy
- Work Health Safety & Injury Management Policy
- Environmental Policy



## - Human Rights & Ethical Practices Policy

Coopers have a Supplier Management & Purchasing Procedure and associated Supplier Code of Conduct. All new and renewing vendors are provided with a Supplier Code of Conduct to ensure that they are aware of Coopers' expectation of compliance with its human rights and ethical practices commitments.

Coopers continue to work with its existing suppliers to obtain their commitment to Coopers Supplier Code of Conduct.

During the 2021 financial year, Coopers continued to integrate modern slavery prohibition clauses within contracts of supply with its vendors. Coopers' standard supplier contract template contains such clauses, which include continuous disclosure obligations.

Coopers prefers to work collaboratively with suppliers to resolve any modern slavery risks that may arise. Coopers remains committed to working with suppliers on an ongoing basis to increase local production and limit reliance on overseas supply, especially from certain geographical locations where the manufacturing processes have an increased risk of modern slavery practices. Coopers continue to work with suppliers, to enable them to meet the expectations of its Supplier Code of Conduct.

Coopers is a member of Sedex, a collaborative platform used by companies to share responsible sourcing data on supply chains. Sedex also completes Sedex Members Ethical Trade Audits (SMETA) for member companies. Coopers was last audited in 2018, and has addressed all non-conformances from that audit and completed a self-assessment audit in 2020.

### **Grievance and Remediation Process**

Coopers openly encourages reporting of grievances and concerns by its stakeholders, including employees, contractors, suppliers, customers, or members of the general public. Coopers Human Rights & Ethical Practices Policy notes that the company will support the reporting of any human rights issues or concerns.

Employees have multiple options for reporting concerns, including informally via the company's anonymous HR survey platform, or formally in accordance with the company's Grievance Policy or Whistleblower Policy. Coopers engage an independent third-party service to receive whistleblower reports to ensure the anonymity of the discloser. The independent service is also available for suppliers to access and details of the same are provided in the Supplier Code of Conduct.

Other stakeholders are able to raise concerns by contacting Coopers on 08 8440 1800 or via <https://coopers.com.au/contact-us>.

Coopers have documented procedures for investigating complaints and these are set out in its Grievance Policy and Whistleblower Policy.

### **Measuring Effectiveness**

Coopers completed a Modern Slavery Benchmark self-assessment in order to determine the maturity of its approach in the 2020 Financial Year. The self-assessment provided Coopers with ratings on various elements, including commitment, management systems and control, grievance and remediation.

Coopers determined that its path to maturity would require the following additional actions:

- Undertaking a comprehensive materiality risk assessment of existing suppliers to identify the most salient human rights risks.
- Establishment of human rights risk criteria to explicitly assess suppliers during pre-qualification as a vendor.
- Introduction modern slavery awareness training for all employees.
- Introduction of ongoing monitoring through supplier engagement to ensure alignment with modern slavery related requirements.

- Appointment of a dedicated resource to assist in answering queries from employees and suppliers.
- Introduction of a specific grievance and remediation procedure for modern slavery practices.

Coopers continued to address the recommendations from this self-assessment in the 2021 Financial Year and Coopers' management are progressively moving towards these objectives. However the impacts of COVID-19 on operations has resulted in some delays and a number of activities have been deferred.

### **Approval**

This Statement has been approved by the Board of Directors of Coopers Brewery Ltd.



**Tim Cooper**  
**Managing Director, Coopers Brewery Ltd**

**Date:** 25 February 2021