

# Moët Hennessy

AUSTRALIA

## Modern Slavery Act Statement Moët Hennessy Australia Pty Limited

### Introduction

This statement is made pursuant to the *Modern Slavery Act 2018* (Cth) (Modern Slavery Act) and sets out the steps Moët Hennessy Australia Pty Ltd (ACN 104 454 604) ("MHA") has taken during its reporting period ending 31 December 2023 to ensure that slavery, servitude, forced or compulsory labour, and human trafficking (collectively, "Modern Slavery") is not taking place in any part of its business or in its supply chains.

### Our Business, Structure and Supply Chains

MHA is a leading supplier of luxury champagnes, wines and spirits to on and off premise accounts in Australia, New Zealand and the Pacific Islands. MHA's registered office is located at Level 30, One International Towers Sydney, 100 Barangaroo Avenue, Sydney NSW 2000.

MHA is a subsidiary of Moët Hennessy (MH France), which is part of the global LVMH Moët Hennessy Louis Vuitton ("LVMH") group. MHA itself operates exclusively in Australia and New Zealand. For the Pacific Islands, MHA supply directly to established distributors only.



MHA employs 119 staff members in Australia and New Zealand including permanent and fixed term employees. MHA also outsources cleaning, customer service, warehousing and logistics support to established external providers in each of the jurisdictions that it operates.

MHA takes active steps to ensure all its employees' working conditions comply with workplace and safety laws. Employees are only hired if they have existing work rights, for example, by virtue of being citizens, permanent

# Moët Hennessy

## AUSTRALIA

residents or on a visa which allows them to work, meaning that all employment relationships are properly documented.

### **Supply Chain Relationships**

MHA's products and packaging purchases are mainly from related group entities.

MHA's products and packaging purchases are mainly from the following:

1. Finished Goods (champagne, wines and spirits) are purchased from Moët Hennessy Asia Pacific Singapore, Chandon Australia and Cloudy Bay Vineyards New Zealand and manufactured primarily in France, Australia, New Zealand, United Kingdom and Poland. Wines are also purchased from wineries in Australia and New Zealand that are part of the LVMH Group entities.
2. Packaging and point of sale materials are largely purchased from related group entities in France and suppliers located in Australia.

### **Risks of Modern Slavery Practices in MHA's Operations and Supply Chains**

Given that MHA's suppliers are largely members of the LVMH group and in France, a country with stringent labour laws and minimum wages, MHA considers that there is a relatively low risk of modern slavery occurring in its operations and supply chains.

Despite this low risk, MHA is conscious of ensuring it takes steps to prevent modern slavery from occurring across its supply chains, especially in circumstances where items are purchased from entities other than LVMH group entities. It is for this reason that MHA, as part of the LVMH group, has implemented a Suppliers' Code of Conduct.

The LVMH Group applies the Suppliers' Code of Conduct consistently throughout its regional operations across Asia Pacific with finished goods produced and subjected to regulations of the country of product origin. Incremental production elements may be managed locally in the respective market in which its distribution company operates in.

The risks of modern slavery arising in these jurisdictions vary according to the local regulation and enforcement of employment terms and conditions and human rights generally. MHA recognises modern slavery risks to be higher in its supply chains that have a connection with the Middle East and in the Asia and Pacific region and applies scrutiny to this issue in its operations.

The risks of modern slavery occurring within MHA's direct supply chains are relatively low. MHA outsources services in the cleaning, security and logistics industries, in which workforces are typically considered to be vulnerable. MHA is however confident that all external suppliers of services conform with the stringent laws and statutory entitlements in Australia as well as the aforementioned Supplier's Code of Conduct. MHA may also acquire external services for consultancy and IT services which is generally coordinated and managed by Moët Hennessy Asia Pacific Pte Ltd ("MHAP") which operates from Singapore. MHA does not consider that these arrangements give rise to a probable risk of modern slavery occurring.

MHA does engage services through offshore entities other than in France, namely, MHAP for in-house finance and supply chain services. Both the jurisdiction and nature of these services provided places modern slavery risks at a minimum.

### **Actions MHA Takes to Assess and Address Modern Slavery Risks**

MHA's commitment is to act with integrity in all its business dealings and to promote ethical conduct, to enhance compliance with applicable laws and to provide guidance with respect to business conduct. It has a

# Moët Hennessy

## AUSTRALIA

number of policies that are relevant to this commitment, which set out what MHA expects from both its internal business and its external suppliers.

Relevant policies include:

1. MHA Suppliers' Code of Conduct ("Suppliers' Code of Conduct") (available upon request).

MHA expects its suppliers to share its commitments and act in full compliance with the law, including all national, local and international laws relating to the management of their businesses.

MHA's main suppliers being related party group entities, are all part of the LVMH Group and are therefore cognisant of and bound by both the LVMH Code of Conduct and MHA Suppliers' Code of Conduct (which is identical in terms to the LVMH Suppliers' Code of Conduct imposed on all LVMH group entities).

For the small number of external suppliers who provide product packaging and point of sale, they are provided with a copy of the Suppliers' Code of Conduct when they first sign on as a supplier for MHA as well as when the code of conduct is amended. It is made clear that suppliers are expected to comply with the Suppliers' Code of Conduct and that MHA reserves the right to terminate a supplier relationship in the event that any non-compliance is discovered.

The Suppliers' Code of Conduct sets out a number of labour standards and social responsibilities which it requires its suppliers to exhibit. These include the prohibition of child labour, forced labour and human trafficking, illegal, clandestine and undeclared employment, harassment and abuse and discrimination. Suppliers are also required to guarantee the payment of at least minimum wages, compliance with legal requirements around working hours, respect for freedom of association and providing a safe and healthy workplace environment.

The Suppliers' Code of Conduct puts suppliers on notice that if MHA becomes aware of any breach of the Suppliers' Code of Conduct, MHA reserves the right to terminate its relationship with that supplier. Additionally, the Suppliers' Code of Conduct provides an avenue to raise issues of concern, violations or anticipated violations of the standards and requirements set by the Suppliers' Code of Conduct or suspected breaches of legislation, via the LVMH Alert Line without risk of reprisal.

2. LVMH Code of Conduct (available upon request).

The LVMH Code of Conduct reiterates the commitment of each of the group companies to act to the highest standards of integrity, respect and engagement in their behaviours and in the way that they conduct business every day, everywhere.

This code further states that the group companies, including MHA, will inform all of its commercial partners of its ethical principles and expectations and will ask its suppliers to comply with the principles set out in the Suppliers' Code of Conduct. Consistent with this, employees who are involved in external supplier engagement and contracts management are required to provide the Suppliers' Code of Conduct as part of the standard external procurement processes. This code also specifies compliance with social issues under the following relevant sections "Implementing and promoting a responsible approach" and "Acting as a socially aware company" in particular when it comes to respecting and supporting human rights.

MHA employees are provided with and inducted into the LVMH Code of Conduct prior to their commencement with MHA. Employees are asked to familiarise themselves with the document and sign a declaration confirming they have read and understood the code and their obligations. In addition, as part of the onboarding process, the Purchasing Manager provides an overview of the MHA Supplier's Code of Conduct and the associated procedures to new employees. Both Codes are available at all times on MHA's Sharepoint site and are recirculated to the entire workforce on an annual basis.

# Moët Hennessy

## AUSTRALIA

### 3. LVMH Alert Line

The LVMH Group, which includes MHA, recognises the importance of transparency and accountability throughout all of its business operations. The LVMH 'Alert Line' is a whistle blowing platform which provides a fully confidential and secure way of reporting in good faith violations of laws, regulations or principles of internal conduct. It is clearly communicated to employees and stakeholders that if they become aware of violations of the LVMH Code of Conduct, internal guidelines, policies and law or regulations that the LVMH Alert Line is an openly available channel to report such issues.

In addition to an online interface, employees are encouraged to contact their manager, their human resources manager, or any other relevant part of the LVMH Group if they feel more comfortable instead of using the Alert Line.

### **How MHA Assesses the Effectiveness of Actions Being Taken to Assess and Address these Risks**

MHA continues to monitor the effectiveness of the policies to address modern slavery risks in all aspects of the business and its business relationships. This monitoring occurs by engaging in due diligence processes including senior management review of MHA's modern slavery action plan and engagement with relevant areas of MHA including procurement, human resources and legal/compliance. Through our monitoring, we assess the effectiveness of our policies and actions in identifying and managing modern slavery. MHA uses the issues and findings arising from this monitoring to strengthen and adapt our policies and actions to ensure we are effectively improving our response to the risks of modern slavery.

MHA sets annual timeline targets by which it reviews and assesses the strengths of its policies and the actions it takes to identify and address modern slavery risks in its operations and supply chains. By these targets, it commits to enhancing its approach each reporting period when required.

### **Supplier Due Diligence**

Prior to engaging any new contractual relationship with a supplier, MHA requires the prospective supplier to acknowledge that it will comply with the Suppliers' Code of Conduct. This Code of Conduct seeks to ensure that its suppliers (including, but not limited to service providers, distributors, manufacturers, landlords, as well as any third party which has a relationship with any entity within the LVMH Group) and their subcontractors share a set of common rules, practices, and principles with the LVMH Group with respect to labour standards and social responsibility, protection of the environment, and ethics and business integrity.

Under the Supplier's Code of Conduct, which is binding on suppliers that MHA engages, MHA reserves the right to check the adherence of its suppliers to the principles set out in the Suppliers' Code of Conduct and to conduct compliance audits at any time without notice. Upon reasonable request, MHA suppliers shall supply the necessary information and grant access to MHA representatives to verify compliance with the requirements of this code. Suppliers shall further keep proper records to prove compliance with this code and provide access to complete, original and accurate files to MHA representatives.

Upon reasonable request, MHA suppliers must undertake remediation processes to improve and correct any deficiency discovered during any such audits.

MHA uses its best endeavours to ensure that all MHA supplier template contracts contain clauses requiring MHA suppliers to adopt similar anti-slavery standards and practices. An annual performance review is conducted to monitor suppliers' conduct, and any amendments made to our Supplier's Code of Conduct results in asking suppliers to sign and reconfirm their commitment.

# Moët Hennessy

AUSTRALIA

MHA conducts regular training for its employees to ensure legal and human resources compliance across MHA. The training enables MHA to reduce business risk of non-compliance through efficient processes and reliable data and reporting.

It is mandatory for all MHA employees engaged in the supply chain or purchasing activities (i.e. working in operations or closely with suppliers) to familiarise themselves with the Modern Slavery Statement when it is distributed. The Modern Slavery Statement, the Suppliers' Code of Conduct and LVMH Code of Conduct form part of the induction process for new employees and are available in English.

MHA's aim is to eliminate any risk of Modern Slavery in its business operations and in its supply chains.

## **Consultation with Controlled Entities**

Before lodging this statement, MHA consulted and took guidance from MHAP. The input of MHAP was taken into account in preparing this statement, noting that MHA is a subsidiary and controlled entity of MHA France. MHA does not own or control any other entities.

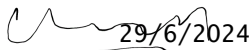
MHA strives to take a consultative approach to modern slavery risks and plans to continue its discussions with related entities throughout the next reporting period and into the future in the interests of encouraging dialogue within its supply chains in relation to modern slavery risks. This dialogue also enables greater visibility over the supply chains so that MHA can readily continue to identify new and evolving modern slavery risks.

## **Approval**

This statement is made pursuant to the Modern Slavery Act and constitutes MHA's modern slavery statement for the reporting period ending 31 December 2023.

This statement was approved on 28 June 2024 by the Board of Moët Hennessy Australia Pty Ltd.

Signed,



29/6/2024

Director: Jean Marc Lacave



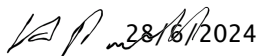
29/6/2024

Director: Laurent Boidevezi



28/6/2024

Director: Jean Baptiste Danvin



28/6/2024

Director: Ashley Alastair Powell



28/6/2024

Director: Nicolas Herve Gabriel Pierre Mouren



28/6/2024

Company Secretary: Nicolas Herve Gabriel Pierre Mouren