

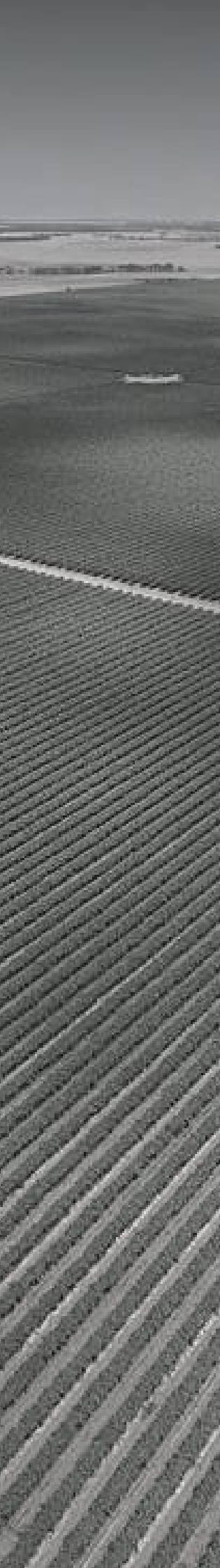


KINGSTON
- ESTATE -

KINGSTON ESTATE WINES MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT



2021



This statement covers the activities of Kingston Estate Wines Pty Limited. ABN 44 063 167 813 to understand and implement actions to minimise the risk of modern slavery and human trafficking in our operations and supply chain.

Kingston Estate Wines (KEW) is the trading name of Kingston Estate Wines Pty. Limited and will be referred to throughout the statement.

KEW is committed to acting responsibly throughout the organisation and the supply chain. Our corporate values are integral to creating an ethical workplace culture, both internally and externally across our actives with all stakeholders.

INTRODUCTION

This is the first Modern Slavery statement for KEW (the “statement”), prepared in response to the Australian Federal Government’s Modern Slavery Act 2018.

The purpose of this statement is to provide information pertaining to the processes adopted by KEW to address modern slavery and human trafficking risks in our business and across our supply chain in accordance with the Act.

One of KEW’s core values is “continuous improvement” and we will evolve our policies and performance in line with the requirements of the Australian Modern Slavery Act 2018.



ABOUT KINGSTON ESTATE WINES

KEW is led by Managing Director and Owner Bill Moularadellis. The KEW winery at Kingston-on-Murray in the Riverland, South Australia was established next to the Moularadellis family vineyard in 1985. From these beginnings KEW has grown to become one of Australia's most significant wine exporters, strongly focused on long-term relationships with customers around the world and building a reputation for quality, reliability, and commercial relevance.

KEW has been involved in externally audited international ethical trading codes and initiatives since 2009 and supports the philosophies of the International Labour Organisation (ILO).

OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

KEW's operations structure consists of a winery and both a warehouse and a separate corporate office located in Adelaide. The KEW direct operations are all located in Australia with no staff employed outside of the Australian jurisdiction.

KEW purchases grapes from growers and family-owned vineyards in Australia.

- KEW employs 150 people across its operational activities.
- KEW purchases goods and services from over 400 suppliers.

MAIN OPERATIONS

1) GRAPE SOURCING

- Purchasing grapes from a number of growers from various regions across South Eastern Australia.
- Purchase and receipt of Australian grapes, grape juice, and bulk wine.

2) WINE PRODUCTION

- Production of still red and white table wines.
- Packaging of owned wine using third party bottling facilities.
- Dispatch of bottled and bulk wines to domestic and export markets.

3) WINE DISTRIBUTION

- Export products are packed into shipping containers and transported by road to an Australian port for shipment by sea.
- Domestic product is distributed and delivered to their destination by road or collected for our customers from our winery or warehouse.

4) SALES and MARKETING

- A small sales team coordinating KEW wine distribution to importers, retailers, and consumers across the world.

5) PROCUREMENT

- A procurement and compliance team to ensure the ingredients that go into our wines meet food safety, authenticity, and other regulatory standards applicable.



SUPPLY CHAIN

The KEW supply chain includes goods and services from approximately 400 direct suppliers based in Australia, Asia, Europe, North America, and South America.

Typical types of goods and services include:

- Grapes
- Bulk grape juice and wine
- Wine additives
- Freight
- Glass
- Cartons and labels
- Packaging services
- Winery plant and equipment.

ASSESSING THE RISK OF MODERN SLAVERY

In line with the reporting guidelines, for this report, the KEW Modern Day Slavery Committee reviewed the *2018 Global Slavery Index* published by the Walk Free Foundation, to better understand the potential risks of modern slavery practices across our operations and supply chain, focusing on the following four key areas:

- 1) Identification of where in our supply chain vulnerable people are likely to be present.
- 2) Assessment of the supply categories that are most likely to involve vulnerable people.
- 3) Review of the suppliers to KEW that are likely to have business models that would allow for the practice of modern slavery.
- 4) Research on the global supply locations and countries that either manufacture or broker our materials that have been identified as high-risk locations.

KEW has identified the following areas as presenting the highest immediate risks based on origin of services/goods or the prevalence of vulnerable people in the supply chain:

- Predominance and reliance on material and equipment supplies out of the Asian region.
- Labour hire companies that either KEW engages directly or are engaged by KEW grower suppliers in Australia.
- Seasonal workers that KEW employs directly.



ADDRESSING THE RISK OF MODERN SLAVERY PRACTICES

KEW POLICIES AND PROCEDURES

As part of this first report KEW “Modern Day Slavery Committee” is responsible for the identification of possible areas and implementing process improvements and compliance.

The Committee is responsible for leading our ongoing commitment to prevent violations of human rights including modern forms of slavery.

The Committee’s remit includes reviewing and assessing policies and procedures and updating the Company’s Modern Slavery and Human Trafficking Statement.

KEW has a number of values, policies, and procedures that assist to mitigate our risk of Modern Slavery:

- 1) Employment and Human Resource Policies applicable within KEW
 - a. Anti-discrimination, harassment, and bullying policy
 - b. Equal Opportunity Employment
 - c. Code of Conduct
 - d. Workplace Grievance & Whistle Blowing Policies
 - e. Employee Assistance Program
 - f. Work Health and Safety reporting and committee
- 2) Supplier Approval Processes
- 3) Contractor and Service Provider Registration Policy
- 4) British Retail Consortium (GFSI) Quality Systems Certification
- 5) SEDEX Ethical Trading Code Membership

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

We will continue to develop and modify our policies and procedures to help reduce the risk of Modern Slavery and Human Trafficking in the KEW supply chain.

As our new actions are put in place we will review and measure the effectiveness of our actions and ensure we maintain our “continuous improvement” value.

FUTURE ACTIONS TO MITIGATE RISKS OF MODERN SLAVERY

KEW’s risk assessment has helped us identify a number of future actions that can be undertaken to ensure we are addressing the risk areas of our supply chain:


- Update to supplier Ethical Trading communication to include declaration of commitment to eradication of Modern Day Slavery.
- Changes to supplier agreements and KEW Supply Terms to include conditions targeting the reduction of Modern Slavery.
- Review of supplied materials protocol to include presence of Modern Slavery as a reason to refuse to purchase.

This statement has been approved by the Board of Directors of Kingston Estate Wines Pty Ltd



Bill Moularadellis

Director



David Crase

Director

25 February 2022