



Pernod Ricard Winemakers
Modern Slavery Statement

For the 2022 Financial Year

“People are at the heart of everything we do”
Bryan Fry, CEO

Pernod Ricard Winemakers Pty Ltd

ABN 75 007 870 046

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Pernod Ricard Winemakers Pty Ltd is a world-renowned premium wine business with iconic brands across Australia, New Zealand, Spain and the US. This statement has been published in accordance with the *Modern Slavery Act 2018* (Cth) (MSA or Act). It identifies the steps the Australian operations has completed to address and mitigate modern slavery risk during the 2021-22 financial year.

We acknowledge the Kaurna people and their traditional lands and waters. They are the traditional Custodians of this ancient and beautiful land and so we pay our respects to Elders past and present and extend this respect to all Aboriginal & Torres Strait Islander peoples.



CEO STATEMENT

Modern slavery is a violation of fundamental human rights and we are committed to upholding respect for human rights and continue to take steps to ensure modern slavery is identified and addressed. As part of that commitment, this is Pernod Ricard Winemakers' third Modern Slavery Statement, which reports on our progress to identify, manage, and mitigate risks of modern slavery in our operations and supply chain.

People are at the heart of everything we do. Our responsibility is to respect and support those partners that we work with in line with the Pernod Ricard Code of Conduct. We are committed to sharing our knowledge and to working with our partners to create shared values in our supply chain, ensuring our activities are safe, respectful and responsible. It's an approach that is driven by our Sustainability and Responsibility (S&R) 2030 Roadmap, Good Times from a Good Place, and aligned to the United Nations Sustainable Development Goals. Our 'Valuing People' pillar focuses on the respect for all those we work with, fostering a diverse and inclusive work environment and vigilant to ways we can reduce risks in our operations and supply chain. We are embedding sustainability in all procurement and business processes including risk management, sourcing, supplier performance management and costing.

Over the past year we have remained committed to making progress in this area. As such, we have:

- Delivered specific modern slavery e-learning to educate our employees on risks around hiring, underpayment, the importance of transparency when working with third parties and the definition of modern slavery in today's age.
- Communicated our third-party alert system (Speak Up) to suppliers to report on any violation of the Pernod Ricard Code of Conduct, or another concern they may have about ethics and compliance.

- Continued to improve our responsible procurement process (Blue Source) that aims to engage our suppliers to the Group's 2030 S&R Roadmap and encourage them to improve their direct impact on people and our environment across five themes: Labour & Human Rights, Health & Safety, Environmental Impact, Integrity & Fair Business Practices and Responsible Drinking

Following internal reporting, we can confirm that no specific instances of modern slavery have been identified for the financial year 2022-2023. However, this does not mean our job is done and we remain committed to continuously improve our ability to identify and remedy risks.

This statement was approved by the Pernod Ricard Winemakers Pty Ltd Board of Directors on 22nd December 2023


Bryan Fry
Chairman & CEO



STRUCTURE | Global Company

Pernod Ricard Winemakers is the global winemaking business of Pernod Ricard, a convivial, responsible and leading global spirits, champagne and wine business. With iconic brands across Australia, New Zealand, Spain and the USA, Pernod Ricard Winemakers grows, crafts and markets award winning products to consumers in every continent. Pernod Ricard Winemakers also imports, markets, and sells champagne, wine, and spirits from the individual affiliates of the global Pernod Ricard group for the Australian Domestic Market. Under the authority of Pernod Ricard, Pernod Ricard Winemakers directs business activities and ensures that global policies are applied. Our strategy towards modern slavery applies to all persons working for Pernod Ricard Winemakers or in any way related to its operations or acting on its behalf in any capacity, including employees, directors, contractors, external consultants and business partners.



Pernod Ricard
Headquarters

Headquarters defines and coordinates the overall company strategy, ensuring affiliates comply with corporate policies. Responsibilities include governance (strategy, mergers & acquisitions, sustainability, and responsibility, etc.), dissemination of best practices and cross-functional initiatives with high added value (digital marketing, luxury, innovation, etc.), and support functions (supply chain, IT, etc.).

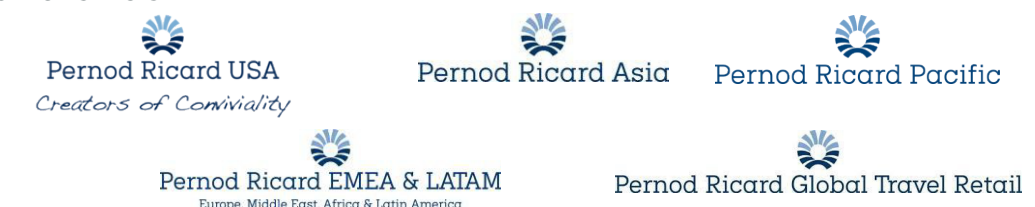
Brand Companies

Based in the home country of each brand, the Brand Companies are Responsible for developing the overall strategy for their respective brands, as well as activations that can be implemented at the local level by the Market Companies. They are also responsible for the production and management of their products and industrial facilities.



Market Companies

Each linked to a region, i.e., Pernod Ricard North America, Pernod Ricard Asia etc., and tasked with implementing the Group's strategy and key policies in their respective markets. Their role is to activate the Group's international strategies at the local level and manage local and regional brands.



OUR WORLD OF WINES

Pernod Ricard Winemakers is comprised of four major origins: Australia, New Zealand, Spain and the USA, manufacturing and distributing their own products and brands, as well as distributing the brands from other origins.

Business direction and decisions are made by the Pernod Ricard Winemakers management committee, which is comprised of the Chairman & CEO and Directors of each key organisational department. The purpose of the committee is to define Pernod Ricard Winemakers' strategy and direct businesses activities to ensure collaboration among the four origins and alignment with Headquarters' policies, values and culture.

Each origin is managed by the country's own leadership teams, which provide leadership and engagement. Day-to-day operations are organised by the regions operational teams with consultation from the Pernod Ricard Winemakers Chief Operations Officer (COO).

The operations in Australia are managed by the Australian Operations Leadership Team (AOLT) and report to the COO. The AOLT is made up of department leads of our main operational business functions including Procurement, Supply Chain, Manufacturing, Sustainability and Winemaking.

The Pernod Ricard Winemakers head office is based in Sydney, Australia with another major office in Adelaide, as well as sales offices in each major state. The main manufacturing, winemaking and production facilities are based in the Barossa Valley, South Australia.

Pernod Ricard Winemakers has approximately 1,700 employees worldwide. In Australia, there is approximately 800 permanent full time, part time, casual and contracted employees.



MAJOR AUSTRALIAN SITES

Head Office:

- Gadigal Country, Barangaroo, New South Wales

Key Offices:

- Kurna Country, Dulwich, South Australia

Production Facility:

- Peramangk Country, Rowland Flat South

Sales Offices:

- Wurundjery Country, Cremorne, Victoria
- Turrbal Country, Fortitude Valley Queensland
- Whadjuk Country, Subiaco, WA 6008
- Larrakia Country, Darwin, Northern Territory

SUPPLY CHAIN & LOGISTICS

Our supply chain activities incorporate all processes to plan, produce and distribute our finished goods both locally and globally, and to distribute imported products from other affiliates within the Pernod Ricard Group to customers locally within Australia and New Zealand. To uphold our excellence in customer service, it is vital all our supply chain partners and activities are aligned in terms of planning and execution.

GRAPE GROWING & SOURCING

Within the Pernod Ricard Group, Pernod Ricard Winemakers are the largest landholders, directly owning and managing vineyards, wineries and packaging facilities across Australia, New Zealand, Spain and the US. In Australia, we source our grapes from a combination of company owned and leased vineyards, grower vineyards and the bulk wine market. In FY22 we harvested approximately 7,898 tonnes of grapes from owned vineyards and 37,324 tonnes from grower vineyards.

WINE PRODUCTION & PACKAGING

Pernod Ricard Winemakers owns wine production and packaging facilities based in Barossa Valley, South Australia, over two main sites. We produce and package award winning wines under our wholly owned and operated brands; including Jacob's Creek, St Hugo, Orlando in Australia; Brancott Estate, Stoneleigh, Mumm Marlborough and Church Road in New Zealand, Mumm Napa and Kenwood in USA and Campo Viejo and Ysios in Spain, as well as providing third party packaging services to external beverage organisations.

MARKETING, SALES & DISTRIBUTION

We market, sell and distribute our products and brands globally, exporting to more than 70 countries. In the Australian domestic market, we distribute and market our affiliate brands.

PROCUREMENT

We procure both direct and indirect goods from our suppliers. Direct goods represent the inputs of our production including dry goods (cartons, corks etc.) and wet goods (ingredients, grapes etc.). In addition, we procure supplies of indirect goods and services including marketing, IT, logistics, corporate and consulting.

STRUCTURE | Operations

SUPPLY CHAIN | Operations

Grape Supply

We source our Australian grapes from 75 main grape suppliers, from wine regions across South Australia, Victoria and Tasmania. Our grape supply department is responsible for all grape grower contracts, with grower liaison officers inspecting and vetting growers prior to contract agreement. All grape suppliers no matter the spend are required to enter into an agreement and sign our supplier standards, which outlines our commitment to environmental and social responsibility. In-line with our S&R 2030 Roadmap all grape suppliers are required to be sustainably certified by a third-party auditor by 2030. In Australia the Sustainable Winegrowing Australia certification is the selected accreditation.

Procurement

The Pernod Ricard Winemakers procurement department is responsible for the procurement of all goods and services, except grape supply. The purpose of the procurement department is to maximise commercial benefit to the business; manage potential supply risks; maximise supplier performance and reliability of supply; fulfil sustainability and responsibility objectives; and optimise flexibility and adapt to evolving business needs. It is mandatory to involve procurement if the goods come into contact with consumer products; and/or if there is potential risk of the supply of goods and/or services to diminish product quality and supply. The procurement department takes care and completes thorough due diligence when selecting vendors to ensure long-term collaborative partnerships to share our commitment to socially responsible and sustainable business practices. Our Legal Services Policy requires that all arrangements with third parties must have a contract.

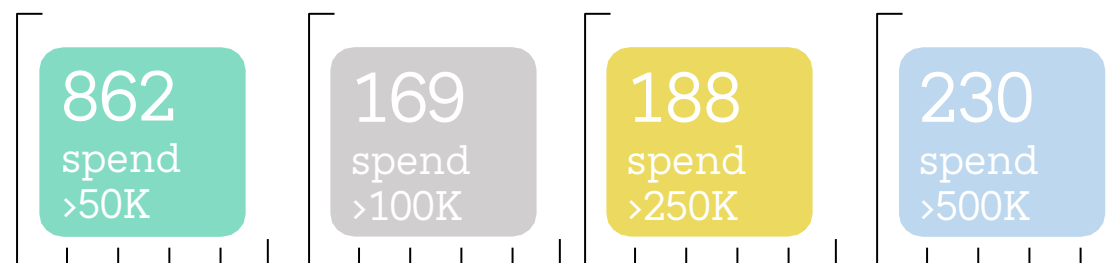
Contract Agreements

All arrangements involving third parties require a written contract. In many cases this will involve a pro-forma document approved by the Pernod Ricard Winemakers legal department; e.g. standard terms of trade or standard terms and conditions of purchase (attached to a purchase order) and in others a purpose-written document will be required. Contracts are required to go through a Contract Review Process with the Legal department if the value of the contract is over \$50,000AUD across its lifetime. Certain terms and exclusions are detailed in our legal services policy and managers handling contracts are responsible for executing contracts in line with the policy.

SUPPLY CHAIN | Australian Overview

AUSTRALIAN SUPPLIERS

Vendors supplying Australian operations with spend in FY22.

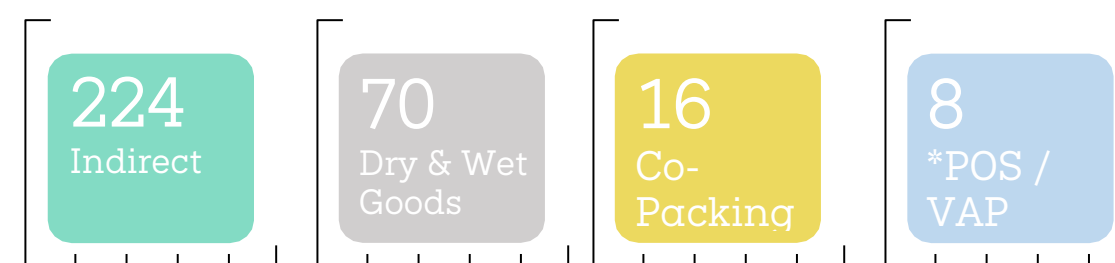


Majority of our 1,449 active contracts are below \$50,000 AUD spend and for suppliers above \$50,000 the procurement department no matter the category is required to be involved. In FY22 majority of suppliers were based in Australia and New Zealand, with a long-term relationship with Pernod Ricard Winemakers.

**Only included suppliers with spend over \$1500 AUD*

PROCUREMENT SUPPLIERS

The procurement department is responsible for 319 suppliers.



The procurement department is split between Australia and New Zealand, with both regions responsible for a mix of Australia and New Zealand suppliers no matter the location, rather than divide suppliers by country they are divided by category. Point of Sale (POS) and Value Added Pack (VAP) are terms referenced throughout this report and are concerned with marketing and advertising promotional materials.

10 HIGHEST SPEND SUPPLIERS

Australia's highest spend suppliers by category.



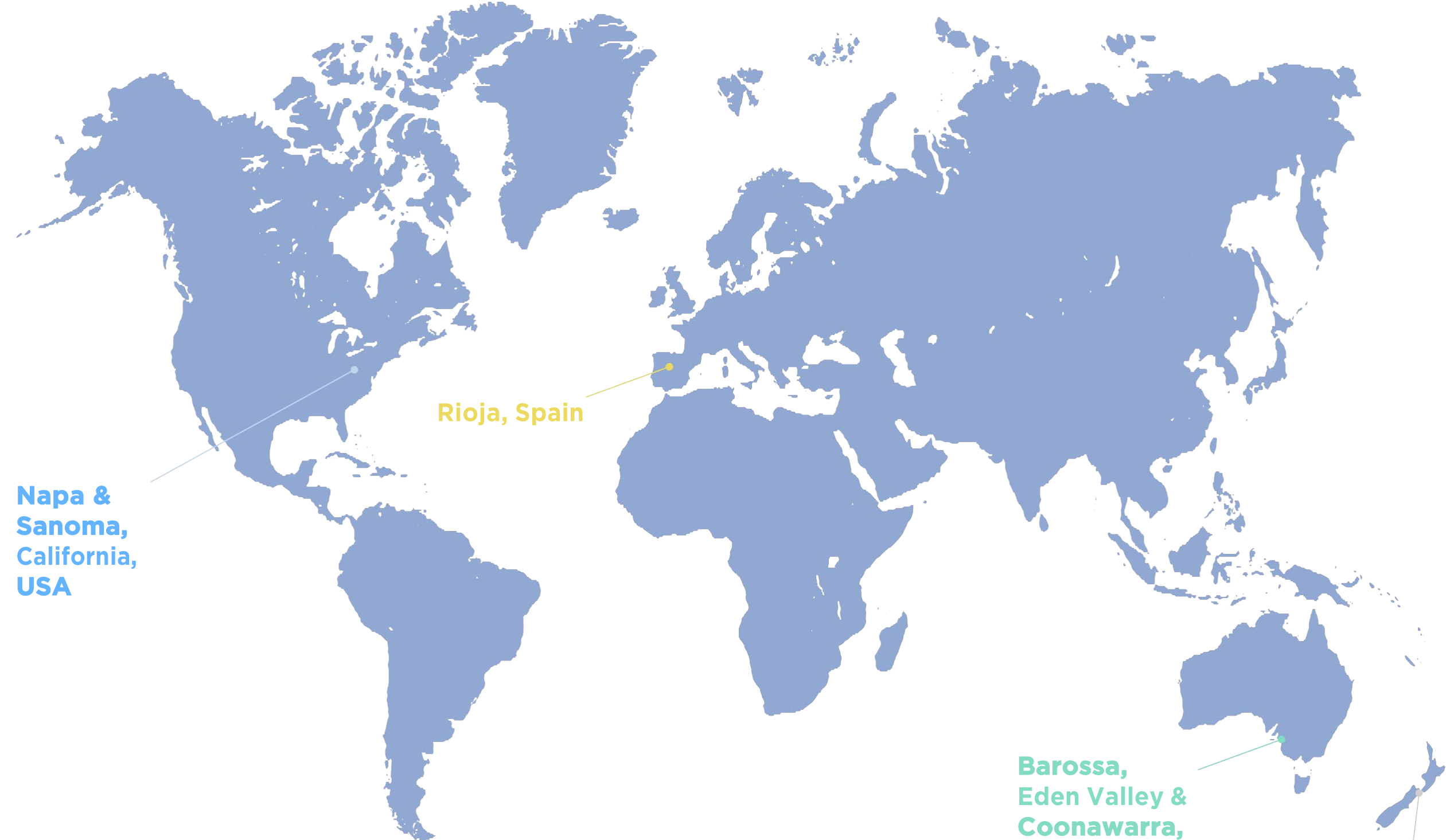
The bubble chart indicates the two largest categories within Pernod Ricard Winemakers are Dry Goods, which are the goods required for packaging our products and freight, the services for transporting our products worldwide. These two categories, with grape growing are the essential in our operations.

GRAPE SUPPLY | Global

Pernod Ricard Winemakers sources grapes from four countries of origin, where we manage vineyards and work with grape growers to produce quality wine, and package it ready for distribution around the world. In Australia our main sourcing regions are Barossa, Eden Valley and Coonawarra.

Readers notes:

The information provided in this document is relevant to Pernod Ricard Winemakers operational terroirs and key strategic brands, listed above. Beyond Pernod Ricard Winemakers' portfolio, Pernod Ricard directly operates a number of wine and Champagne brands in different terroirs including France, Argentina and China. The information in this document is relevant to Pernod Ricard Winemakers operations only.



Over **4,300ha** of own vineyard managed



100% own vineyards and wineries **certified to international and local standards**

- AU** Sustainable Winegrowing Australia
- NZ** Sustainable Winegrowing New Zealand
- SP** D.O.Ca.Rioja or D.O.Ribera del Duero
- US** California Sustainable Winegrowing

GRAPE SUPPLY |

Australia

We source our Australian grapes from 75 main grape suppliers, from wine regions across South Australia, Victoria and Tasmania. All grape suppliers are inspected and vetted prior to contract by our Grape Supply team. Each grape supplier is required to enter in a contract, complete our due diligence corruption surveys and sign our supplier standards.

Wine regions we source our grapes from include:

- Barossa Valley, Barossa
- Eden Valley, Barossa
- Langhorne Creek, Fleurieu Peninsula
- McLaren Vale, Fleurieu Peninsula
- Wrattenbully, Limestone Coast
- Padthaway, Limestone Coast
- Coonawarra, Limestone Coast
- Riverland, Lower Murray
- Clare Valley, Clare
- Adelaide Hills, Mount Lofty Ranges
- Piccadilly Valley, Mount Lofty Ranges
- Murray Darling, Northwest Victoria
- Swan Hill, Northwest Victoria
- Northern Tasmania, Tasmania



Building long standing partnerships with our growers. As of 2022, our longest grower relationship is 100 years.



Working with 750+ grape growers globally



Sharing knowledge and learnings with 650+ growers and farmers in 2021



MANAGING RISK

| Risk Assessment

MANAGING RISK

Our success is strongly linked to the way we do business and this includes acting responsibly throughout the supply chain and our operations. We rely on many suppliers, from farming and manufacturing through to distribution and merchandising, and view our suppliers as an extension of our business. We acknowledge that, together, we have an impact on society and the environment. We continue to monitor our risk through a combination of internal and third-party risk assessments, audit trends, grievances raised, team member insights, industry commentary and other due diligence methods. A combination of these due diligence methods helps with identifying and assessing the most prominent human rights risks, including modern slavery. The term 'modern slavery' is used in the Modern Slavery Act 2018 (Cth) to describe situations where coercion, threats or deception are used to seriously exploit victims and undermine or deprive them of their freedom. The Modern Slavery Act defines the term as including eight types of serious human exploitation, including, trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; the worst forms of child labour; and deceptive recruiting for labour or services.

PARTNER UP

Pernod Ricard HQ developed a digital platform, Partner Up, that conducts online evaluations of a third-party supplier and their reputation before Pernod Ricard enters a contract with them. The assessment requires the completion of an internal and external questionnaire, rating the supplier low, medium or high risk. For direct and tier one suppliers a further risk management assessment, otherwise known as the Risk Mapping Tool (RMT) questionnaire, is mandatory and identifies if a further audit, completed by a preferred third party, is required. Partner Up is a global web-based tool, creating a shared database of third parties for Pernod Ricard users around the world to conduct due diligence to check that no compliance red flags specifically relating to fraud and corruption.

SUSTAINABLE WINEGROWING AUSTRALIA (SWA)

As consumers, retailers and business partners look for, and are seeking sustainable wines, auditing and certification from SWA provides an opportunity create a socially, environmentally and economically resilient industry. The auditing process reviews management of the business, environmental and social impacts It verifies that industry recognised best practice is followed, and sustainable outcomes are achieved. Certification to this standard is achieved through independent third-party auditing by approved auditors.

ECOVADIS

An internationally recognised standard, EcoVadis provides global benchmarks, which are essential for measuring and improving performance of our global value chain. The EcoVadis rating is based on an evidence-based assessment which has been adapted to hundreds of business categories and considers relevant industry labels and certifications as well as local laws in 160 countries. EcoVadis is aligned with global standards such as the UN Global Compact, the UN Guiding Principles on Business and Human Rights and relies upon international corporate social responsibility standards based on 21 criteria, divided into 4 categories: environment, labour and human rights, ethics and sustainable procurement.

SEDEX

The Supplier Ethical Data Exchange (Sedex) is a not-for-profit membership organisation for businesses committed to the continuous improvement of ethical performance within their supply chains. The Sedex Members Ethical Trade Audit (SMETA) was developed through multi-stakeholder consultation by the Sedex Associate Auditor Group (AAG), to provide a best practice reference framework for social auditing and reporting. It draws from practices defined by Sedex members and by the Global Social Compliance Programme (GSCP).

MANAGING RISK | Risk Assessment

RESPONSIBLE PROCUREMENT

Responsible Procurement is of extremely important globally at Pernod Ricard and is embedded in our 2030 S&R Roadmap. We are practicing responsible procurement for many reasons, most notably:

- Mitigate and prevent sustainability and responsibility risks of our business on strategic sources of supply,
- Help improve lives and working conditions of people we work with,
- Reduce our impact on the environment,
- Comply with international and local laws and regulations and
- Meet the expectations of all Pernod Ricard stakeholders.

During the reporting period we reviewed all our direct and POS and VAP suppliers, including local and global dry goods, wet goods and merchandising suppliers via our responsible procurement process, Blue Source.

The Blue Source process involved entering suppliers in Partner Up for an online assessment, requiring two internal questionnaires to evaluate corruption, and S&R risks, as well as an external questionnaire completed by the supplier.

Those suppliers deemed a potential risk were referred to our chosen certification partners EcoVadis for online evaluation, Sedex for an in-person audit and SWA for our grape growers.

Upon completion of the audit, suppliers receive feedback and a corrective action plan. Pernod Ricard Winemakers will continue working and collaborating with these suppliers to assist with implementing the corrective action plan and in improving performance.

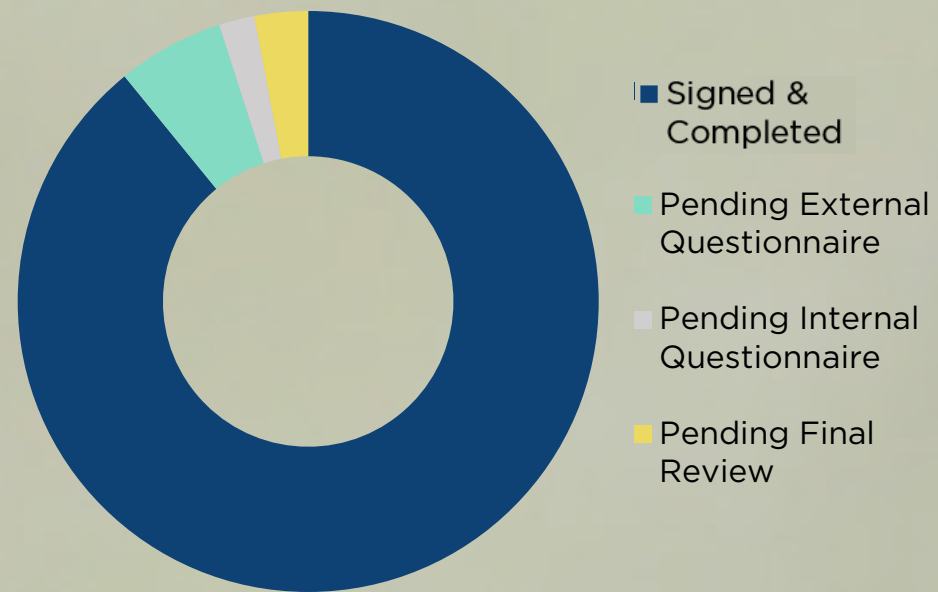


MANAGING RISK |

Risk Assessment

PARTNER UP

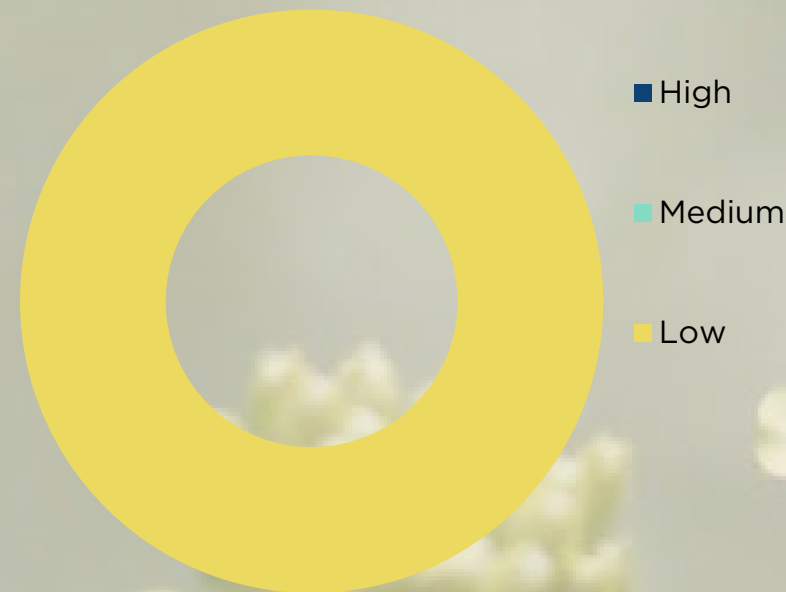
FY22 supplier questionnaire/survey completion rate.



In FY22 we entered 485 tier 1 suppliers, all direct suppliers and indirect suppliers with spend over \$120K (AUD) into Partner Up to review fraud and corruption risk. At time of reporting 92% had been completed and committed to our global supplier standards and governance standards, with the remaining suppliers pending the completion of questionnaires and final review.

CORRUPTION RISK

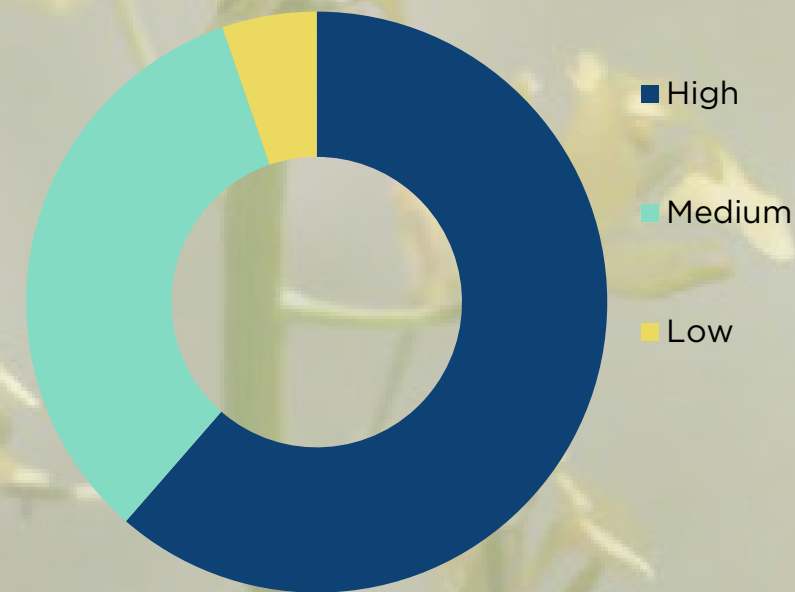
In FY22 there was only low corruption risk for our AU suppliers.



The corruption questionnaire within Partner Up aims to identify potential risk through examining several criteria. If a supplier is identified as medium - high risk or flagged by the tool it is required to be reviewed by a local compliance officer, in Australia that falls under the legal department. In FY22 100% of our tier 1 suppliers were deemed low corruption risk.

RISK MAPPING (ESG)

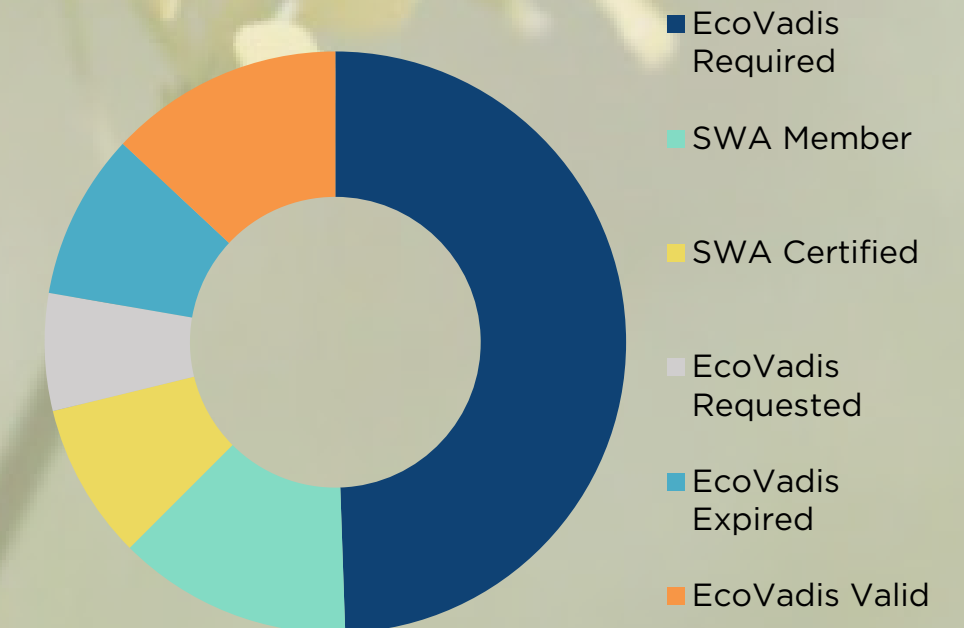
Our global ESG questionnaire for Direct & POS VAPS suppliers.



In FY22 only our key supplier categories, including packaging, raw materials, POS and VAPs, were required to complete the RMT (ESG) questionnaire, returning 62% high and 33% medium ESG risk. This was due to the weight on specific questions, including category of purchase, size of supplier, location, buyer, and product dependency and annual spend i.e. all grape suppliers are deemed high due to raw material dependency.

THIRD PARTY AUDITING

EcoVadis & SWA



Direct suppliers that were rated medium to high ESG risk are required to complete a third-party audit. Grape growers being our largest direct category had majority of suppliers evaluated externally, with 56% membership and 22% of those fully certified under SWA. Due to the onboarding process of Partner Up, we have approx. 50% of medium and high risk suppliers requiring an audit. Our goal is to have 100% of medium to high risk suppliers audited by 2030.

MANAGING RISK | Our Operations

DIRECT

The majority of Pernod Ricard Winemakers workforce are employed directly over several employee contract types, including casual, fixed-term, permanent and international assignment contracts. Employment terms and conditions are set out in employment contracts governed by the Australian employment laws and relevant industrial bodies. Our employment framework complies with local laws and covers core employment conditions such as minimum wages, hours of work and leave entitlements.

CONTINUOUS IMPROVEMENT

We reduce risks of modern slavery in our own operations through our comprehensive Modern Slavery Policy, Whistle-blower Policy, monitoring and extensive grievance tools (including our internal confidential and anonymous reporting tool, Speak Up). Educating our new team members is a major component of our continuous improvement approach. We deliver a host of online induction courses for our new direct employees within the first month of joining. The courses include numerous topics including, but not limited to:

- Modern Slavery Compliance Training
- Code of Business Conduct
- Alcohol and Responsible Drinking
- Quality, Safety and Environment
- Inappropriate Behaviour
- Gift, Hospitality and Anti-bribery

INDIRECT

We acknowledge that indirect labour potentially carries a higher risk of modern slavery. Indirect labour presents higher risk due to a workforce that is often characterised by a higher proportion of migrant and unskilled workers who may be less aware of applicable rights, laws, and available protections. There is less visibility and control over how workers are engaged and higher prevalence of subcontracting and independent contracting, which make these categories more susceptible to modern slavery.

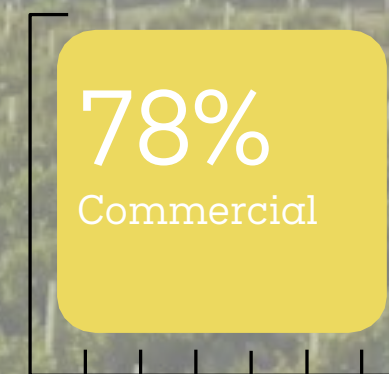
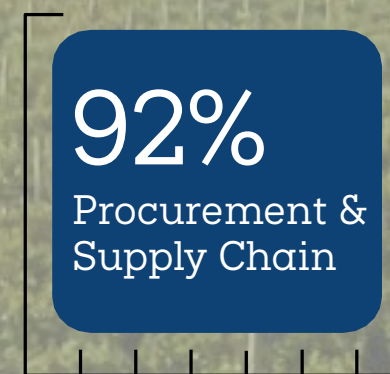
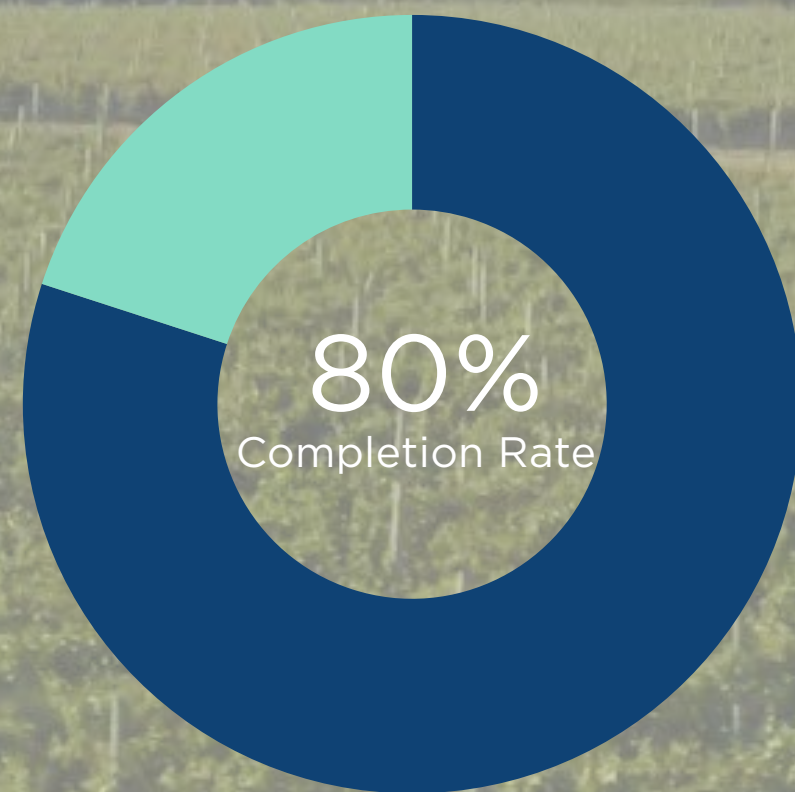
At Pernod Ricard Winemakers we have a small component of indirect labour in Australia that is employed through third-party labour hire. Our indirect labour consists of outsourced operational services and indirect labour hire including facilities, information technology, agricultural labour and administration. For such services, commercial contracts are put in place which expressly state our requirements that any contractor provided is engaged in accordance with local statutory employment requirements. Furthermore, such arrangements and compliance thereof are regularly reviewed as part of our third-party contracting arrangements. Our Indirect Labour agreements contain these explicit conditions relating to modern slavery:

“The Service Provider must ensure that its obligations under this Agreement are performed in accordance with the Modern Slavery Act 2018 (Cth) and must notify Pernod Ricard Winemakers as soon as it becomes aware of any breach or potential breach of the Modern Slavery Act 2018 (Cth) by the Service Provider

MANAGING RISK | Due Diligence

In FY21 we developed a modern slavery e-learning module intended to raise awareness on issues of modern slavery and train employees in our approach and commitment to eradicating risk within the business. During FY22 we rolled the training out to key departments including all management, HR, Legal, Commercial, Procurement and Grower Relations, overall, **80% of employees** in these departments completed the training. Although our goal is for a 100% completion rate, this statistic is a successful start to our onboarding journey.

The e-learning module has been completed by all existing employees in key departments in Australia and is provided to new employees as part of their induction. These departments were chosen specifically due to their employee, customer and supplier involvement, and were deemed the most likely to be faced with modern slavery risks. From 2023 we look to extend the training module to other departments and employees based in New Zealand, we look to review the module to make sure it is up to date with government and our own policies.



*Please note that results include employees on extended leave.

GOVERNANCE MEASURES

At Pernod Ricard Winemakers we evaluate modern slavery and forced labour risk through 7 main tiers of governance to ensure we are complying with the legal and ethical obligations. Pernod Ricard HQ is responsible for design and implementation of the groups global policies and systems to ensure business risk and regulatory compliance, as well as our S&R 2030 Roadmap.

Pernod Ricard Winemakers CEO & Chairman, Bryan Fry, is responsible for articulating HQ’s ESG vision and forced labour obligations in Australia.

Pernod Ricard Winemakers’ Management Committee is responsible for ensuring that both the [Modern Slavery Policy](#) and our business comply with legal and ethical obligations. The Management Committee comprising Directors of each key organisational department is also responsible for approving Pernod Ricard Winemakers’ annual Modern Slavery Statement and ensuring compliance with the disclosure obligations under the Modern Slavery Act.

The Procurement Lead (Modern Slavery Compliance Manager) has primary and day-to-day responsibility for implementing the Modern Slavery Policy, monitoring its use and effectiveness, and dealing with any queries about it.

The Procurement Lead is supported by a cross-functional modern slavery compliance committee with representatives from procurement, legal, wine & grape supply and human resources. The committee meets quarterly to review commitments and implement actions throughout the year and to guide the implementation of modern slavery due diligence across our operations and supply chain.

The local compliance officer is responsible for facilitating the committees’ quarterly meetings and managing actions throughout the year, as well as investigating future implementations.

Lastly, Pernod Ricard Winemakers management is responsible at all levels for ensuring those reporting to them understand and comply with our Modern Slavery Policy. They are responsible for giving adequate and regular communications on the issue of forced labour and Modern Slavery in our supply chains, including discussion on identified risky areas within our business and supply chains.

BRYAN FRY | Chairman and Chief Executive. Accountable for managing human rights risks.

MODERN SLAVERY COMPLIANCE MANAGER | Primary responsibility for implementing the Modern Slavery Policy and monitoring effectiveness.

LOCAL COMPLIANCE OFFICER | Responsible for facilitating and manage the modern slavery committee and investigating future actions.

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PERNOD RICARD HEADQUARTERS | Responsible for providing oversight and approval of the Groups’ sustainability strategy including human rights.

MANAGEMENT COMMITTEE | Managing directors of each organisational department. Aligns the business with legal and ethical obligations.

MODERN SLAVERY COMMITTEE | Responsible for creation of Modern Slavery Statements and embedding Modern Slavery compliance in the business.

MANAGEMENT | Responsible for ensuring those reporting to them understand and comply with our Modern Slavery Policy.

MANAGING RISK | Governance

GRIEVANCE MECHANISM

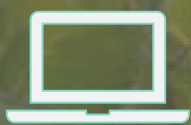
We are aware that one of the most effective ways to identify concerns about business conduct, within our own operations and our supply base is by having an accessible grievance mechanism where employees, contractors and related parties, including suppliers, can report breaches and grievances. Our globally adopted process to report ethical matters including compliance issues, breach of conduct, legal, regulatory or ethical matters, including forced labour and modern slavery, is called Speak Up. A report will be forwarded to the HQ's internal global Integrity Committee who will review the report, assess its significance and credibility and determine the action to be taken. The Integrity Committee will then hand over the investigation to an appropriate person at regional or affiliate level. The team involved in the investigation will only receive data and information necessary to perform their tasks.

General principles:

- Grievances can be reported anonymously, by internal employees as well as external parties including suppliers, customers and business partners.
- Identities and the information contained in the alert are confidential.
- All reports must be done in good faith and not for personal interest.
- Speak Up is in addition/alternate to other local ways of reporting, such as directly to your Supervisor, Manager, HR, Union, Government Agency etc.
- The protection of personal data is assured and data protection rights are guaranteed.



- Call the Speak Up hotline on 1800 565 773
- The operator will ask you introductory questions.
- The operator will read you a short data privacy statement
- You will then be asked a series of standard questions to help to understand the exact nature of the concern or issue reported.



- You can also report your concern via an online form available under www.pernodricardspeakup.ethicspoint.com
- The questions asked by the form are the same as the questions asked by the operator for phone alerts.

MANAGING RISK | Governance



Pre & Post Vintage Meeting

After the completion of vintage 2022, our Grape Supply Lead held a presentation to all our grape growers on modern slavery. The meeting defined modern slavery and discussed how to identify and reduce risks within the vineyard and winery. It also touched on the grower's responsibility and compliance laws and regulations.



South Australia Modern Slavery Workshop

Early June 2022 we joined other businesses and academics to discuss modern slavery in South Australia and to establish a multistakeholder research and practitioner network. The event was hosted by the University of South Australia (UniSA) and the Centre for Enterprise Dynamics in Global Economics.



South Australia Modern Slavery Network

At the closure of the workshop, we were invited to join the UniSA modern slavery network, to engage with subject matter experts, have cross-sector collaboration and educate and build awareness around modern slavery.

ADDRESSING RISK |

Actions

Continuous Improvement to Minimise Risks FY22 Actions

- Rolled out and completed modern slavery e-learning module to specific departments with an 80% completion rate among targeted departments.
- Asked participants of e-learning module to provide feedback on modern slavery risk in our business.
- Participated in UniSA's modern slavery workshop with other South Australian businesses and academics.
- Completed an extensive training/meeting with our grape suppliers on modern slavery risk at the beginning and end of vintage 2022.
- Continued analysing corruption risk in our supply chain with Partner Up.
- Onboarded Australian grape suppliers in third party ESG auditing, with 100% certification rate by vintage 2024.

ASSESS & IDENTIFY

● Completed
 ● On-going
 ● Incomplete/ Not Started

MEASURING EFFECTIVENESS | Actions

Use of Partner Up to identify high risk suppliers.	●	This year the procurement and wine supply team focused on getting all direct and POS & VAP suppliers onboarded in Partner Up. As of 30 June, we successfully onboarded 95%.
ESG assessment of suppliers by EcoVadis & Freshcare.	●	Due to delays with onboarding suppliers in Partner Up, EcoVadis auditing was delayed. However, SWA auditing was at a high rate, but due to auditor shortage a delay has been noted. Our goal is to have all grape growers and direct suppliers audited by FY25.
Corrective action plans issued and supported by PRW.	●	For suppliers that have been onboarded in Partner Up and completed an EcoVadis audit, a corrective action plan has been issued with discussion on improvement at each business review. FY23 will see a focus on EcoVadis audits and reviews.

ACTION

Train key staff in identifying and notifying the risk of modern slavery practices and on MS Act compliance.	●	Our main goal for FY22 was to train key staff with an e-learning module, this process was completed with an 80% rate. We have placed yearly procedures to train new employees and a 2 year review course.
Participate in information sessions for suppliers involved in labour hire.	●	This FY we participated in a pre and post vintage meeting with our grape suppliers. At our post vintage meeting we discussed human rights, our responsible procurement process and commitment to be SWA audited by 2025.
Participate in information & development opportunities to increase modern slavery awareness.	●	Participating in modern slavery information sessions and increasing awareness is a continuous goal at Pernod Ricard Winemakers. Joining the SA Modern Slavery Network will establish further opportunities to collaborate and progress in the coming years.
Addition of Compliance Officer dedicated to actioning & managing the responsible procurement process.	●	The compliance officer has continued to facilitate quarterly meetings with the Modern Slavery Committee, research, communicate and action new ESG developments, and include modern slavery considerations in the procurement process.
Development of Modern Slavery Policy; Review of Supplier Standards.	●	In consultation with Pernod Ricard Winemakers legal department the Modern Slavery Policy, Supplier Standards and the other relevant policies are reviewed annually in accordance with the legal departments processes and procedures.
Incorporation of PRW's Whistle-blower Policy and Speak Up grievance mechanism.	●	Throughout the year Speak Up was communicated internally and to some suppliers during annual business reviews. This FY we had 0 grievances raised. Our goal in the future is to communicate Speak Up to a wider audience ensure grievances are captured.
Implementation of Modern Slavery Committee with quarterly meetings to discuss issues and actions.	●	A cross-functional team, made up of procurement, human resources, legal, communications and grape supply to discuss modern slavery issues, actions and plans. We held quarterly meetings and throughout the year shared stories and developments.

REVIEW

Development of KPIs & review against actions made within the reporting period.	●	The Modern Slavery Committee prioritised training key staff, implementing quarterly meetings, and participate in information sessions with "risky" suppliers (pre & post vintage meetings) as the key KPIs to focus on during the reporting period.
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MEASURING EFFECTIVENESS |

Commitments

Continue training staff in identifying the risk of modern slavery practices in our supply chain & the MS policy.	On-going	Review progress and distribute e-learning to new employees in April 2023. Creating a feedback and evaluation tool to improve e-learning module and provide opportunity for employees to identify modern slavery risks within our direct supply chain.
Industry expert to present & assist with analysing modern slavery risk within AU wine/agriculture industry.	Incomplete/Not Started	Consultation with a subject matter expert on modern slavery risk specifically within the wine and agricultural industry, providing feedback and highlighting any improvements to our current process.
Review indirect labour hire agreements and suppliers for corporate, site services & trade labour.	Incomplete/Not Started	Partially completed review of labour agreements, with inclusion of modern slavery clause. Audit labour companies to identify compliance and collaborate with improvements and mitigation measures.
Continue to attend modern slavery information sessions & be an active member of the SA Modern Slavery Network.	On-going	Participate in session with the network, specifically in relation to state sanctioned forced labour in China, forced labour in Uyghur region and South Australian businesses initiatives and actions towards modern slavery.
Companywide communication piece on modern slavery definitions, policy and compliance processes.	Incomplete/Not Started	During our e-learning review and roll out (April) we will organise information sessions on identifying modern slavery, reporting grievances on Speak Up (grievance tool) and the responsible sourcing and procurement process.
Further incorporation of modern slavery specific questions in supplier tender documents.	Incomplete/Not Started	Review supplier questions in request for tender documents and templates, updating to include modern slavery and responsible procurement mandatory questions, identifying tier 2 country of origins.
Review Partner Up questionnaires and responsible procurement process with HQ.	On-going	Review the responsible procurement process with HQ, identifying improvements and suggestions.

● Completed
 ● On-going
 ● Incomplete/Not Started

INDEX

Page 1	identify the reporting entity
Page 3-9	describe the structure, operations and supply chains of the reporting entity.
Page 10-11	describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes
Page 12	describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.
Page 13-18	describe how the reporting entity assesses the effectiveness of such actions
Page 14	describe the process of consultation with: <ul style="list-style-type: none">• any entities that the reporting entity owns or controls; and• in the case of a reporting entity covered by a statement under section 14—the entity giving the statement.



Pernod Ricard Winemakers

