

**LION**

**2024**

# **Modern Slavery Statement**

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Pictured: Toni Janke

## Acknowledgement of Country

We recognise the Traditional Custodians of lands across Australia and pay tribute to the enduring heritage and vibrant cultures of Aboriginal and Torres Strait Islander communities, both past and present. Inspired by their profound history and resilience, we are committed to nurturing an inclusive environment that respects and celebrates the unique contributions of all Australians. We honour the deep-rooted and continuing connection of Aboriginal and Torres Strait Islander peoples to their lands and waters, and we extend our respects to Elders from all generations. This commitment is a cornerstone of our dedication to respect Human Rights as fundamental to our values and practices.

**Dr Todd Phillips**, Indigenous Partnerships and Reconciliation Manager



# Message from Sam Fischer, CEO



**Sam Fischer**  
Chief Executive Officer

I am pleased to present Lion’s 2024 Modern Slavery Statement, the fifth under the Commonwealth Modern Slavery Act. The latest Statement reflects our continued commitment to respect human rights both in our own operations and our broader supply chain and to ensure Lion does not cause or contribute to Modern Slavery.

At Lion, we aspire to do one thing above all, elevate and enrich the moments in our consumers’ lives by *Making The Moment Mean More*. This vision extends to Lion being a force for good for people and our planet, thinking beyond the short-term and prioritising the needs of future generations.

As a large business with thousands of employees across the globe, and as the custodian of brands that hold a special place in the lives of millions more, what we say and do matters.

We are determined to use that force for good to produce immediate and lasting benefits for society and our environment which includes addressing Modern Slavery and respecting Human Rights more broadly.

This Statement outlines the work we have undertaken during 2024 to identify and address Modern Slavery in our own operations and our supply chain.

**Sam Fischer**  
Chief Executive Officer



Modern Slavery is a crime and a violation of human rights. It describes serious exploitation and takes various forms including human trafficking, forced marriage, forced labour, servitude, slavery, debt bondage and the worst forms of child labour. Although practices like substandard working conditions are not considered Modern Slavery, Lion recognises that such practices are also harmful and may be present in some situations of Modern Slavery.

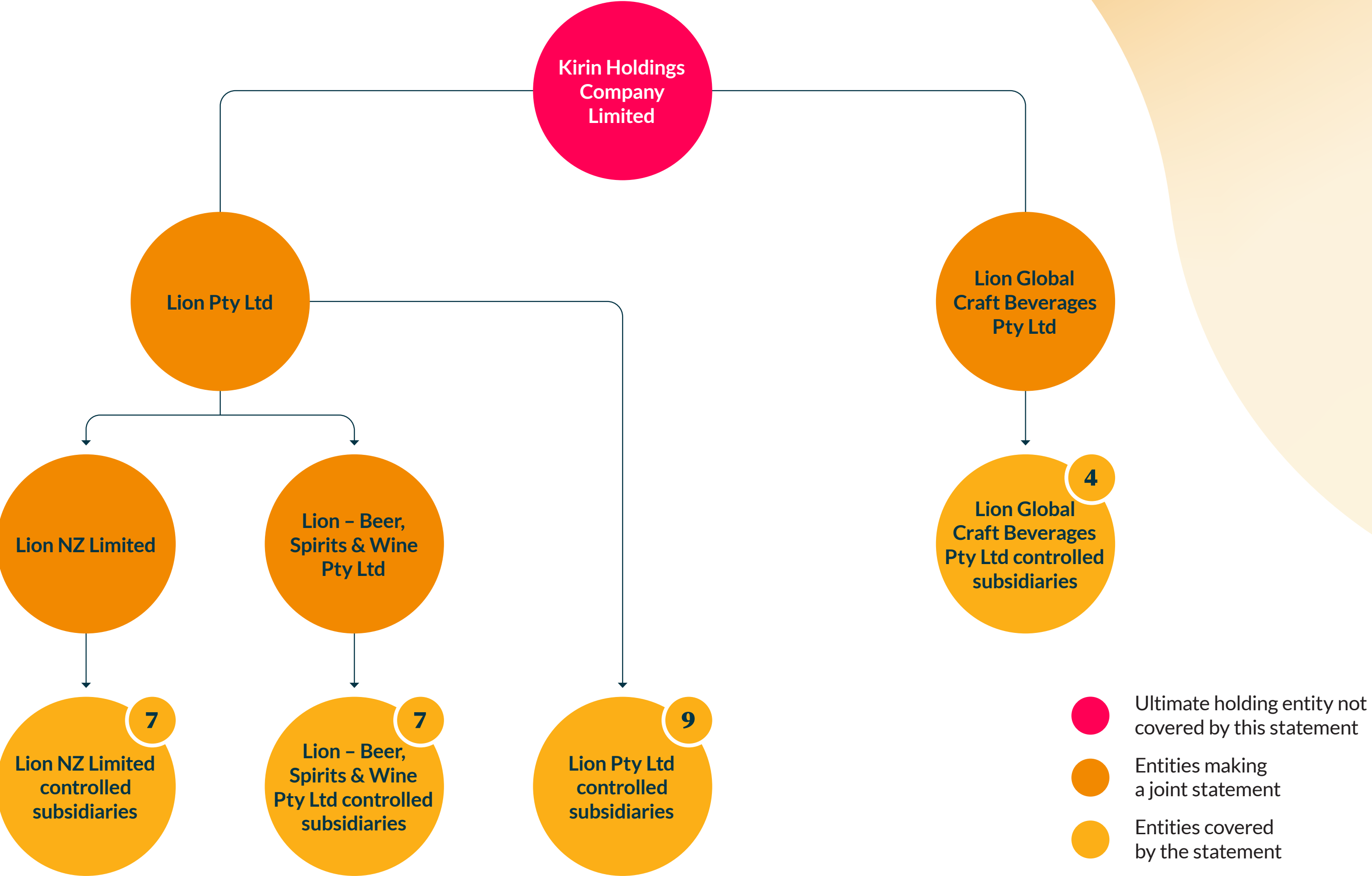
# Lion Group Structure

This statement is a joint statement made by Lion Pty Ltd (the ultimate parent company for Oceania and Lion’s US wine business), Lion Global Craft Beverages Pty Ltd (the ultimate parent company for Lion’s US craft business), Lion-Beer, Spirits & Wine Pty Ltd (the head operating Australian entity) and Lion NZ Limited (the head operating New Zealand entity). Other than these entities, no other Lion Group entity meets the reporting entity criteria under the Modern Slavery Act (Cth) 2018.

References to “we”, “our” and “Lion” are references to each of those entities unless otherwise specified and “Lion Group” is a reference to each controlled Lion entity.

As at 31 December 2024, the Lion Group comprised of 27 controlled entities spanning across Australia, New Zealand, the USA. A complete list of Lion Group entities as at 31 December 2024 is set out in Appendix 1. The Lion Group is part of the Kirin family of companies.

Simplified structure of the Lion Group reporting entities covered by this statement





# Our Business

Lion is a beverage company headquartered in Sydney, Australia and produces, markets, sells, and distributes alcoholic and non-alcoholic beverages and operates microbreweries and hospitality venues in Australia, New Zealand and the United States of America.

With a history of over 180 years, our Lion businesses span beer, cider, wine, seltzers, spirits and other drink categories including coffee.

We’re one of the largest brewers in Australia with brands including XXXX, Hahn and Tooheys as well as craft brands such as Stone & Wood and Little Creatures. While we’re best known for our beer, we also have a range of adult beverages in other categories. This includes Vanguard Luxury Brands, importer, marketer, and distributor of premium spirits and Four Pillars, a craft spirit brand. Lion has a growing portfolio of Ready To Drink (RTD) products that it makes and sells.

Lion is New Zealand’s largest alcoholic beverage company which includes brands like Steinlager, Speight’s, Mac’s, Emerson’s and Panhead.

Lion also has a portfolio of wine brands, including still and sparkling wines from around the country and the world, and from our own Wither Hills vineyard. Our range of non-alcoholic products cater to our increasingly diverse social occasions and tastes including coffee and sodas.

Lion Global Craft Beverages is the parent company for most of our entities operating in the United States including New Belgium Brewing and Bell’s Brewery. Together, New Belgium Brewing & Bell’s Brewery’s portfolio of brands includes Voodoo Ranger, Fat Tire, Two Hearted Ale and Oberon Ale.

Lion also has a premium fine wine business in North America including brands such as Argyle, Markham, MacRostie and Textbook.

More information regarding our Australian, New Zealand, and International Brands is provided on our website [www.lionco.com](http://www.lionco.com).

## Key brands



## Australia



## New Zealand



## United States of America

# 1. Risk Management at Lion

During the reporting period there have been no significant changes in the risk management framework at Lion. The basis of our risk management framework is the cross operational governance structure to support Lion to identify, address and mitigate or remedy Modern Slavery risk across our own operations and our supply chain.

## Governance at Lion

### The Board

Oversees and evaluates Lion's risk management system.

### Sustainability Team

Leads the ESG Strategy for Lion, managing various climate related and social risks on behalf of Lion.

### Operating Unit MD's

Manage risk and compliance in their business units and implement business-level sustainability initiatives.

### Group Leadership Team

Responsible for design and implementation of policies and systems to ensure financial and business risk management and regulatory compliance.

### Audit, Finance and Risk Committee

Board committee responsible for independent review of financial and business risk management and regulatory compliance.

### Lion Risk Assurance

A function, independent of Lion's operating units, that comprises a risk and resilience team (supports the business in identifying, assessing and managing risk) and audit and assurance team (provides an objective opinion of Lion's internal control environment). Meets quarterly with the Audit, Finance and Risk Committee.

### External audit

External Auditors conduct an independent assessment of Lion's annual financial reports and express an opinion as to their accordance with the Corporations Act 2001 and relevant accounting standards.

Conduct limited assurance on Lion's sustainability report and the process, systems and assumptions that lay behind it.



Risk Management at Lion (continued)

Modern Slavery Risk Management Framework

In addition to our overarching corporate governance structure, our Modern Slavery Management Framework provides a systematic approach to identify and address Modern Slavery risks at Lion.



Risk Management at Lion (continued)

The key elements of Lion’s Modern Slavery Management Framework include:

The Modern Slavery Working Group

Comprises representatives from Lion core function and from the territories in which Lion operates including Australia, New Zealand and the United States. This Group oversees the identification, monitoring, and management of Modern Slavery risk at Lion as well as continuous improvement opportunities. In 2024 the group met bi-yearly and included representation from People & Culture, Procurement, Risk, Sales and Marketing, Hospitality, Quality, and our US operations.

Lion Policies

We understand policies which support the human rights, freedom, and health and wellbeing of our employees, promote ethical business and environmental practices are essential to prevent Modern Slavery practices across our business and in our supply chain.

Below is a full list of current relevant policies:

Policy	Purpose
Human Rights Policy	The Lion Human Rights Policy sets out Lion’s commitment to respecting human rights across all our business activities.
Lion Code of Conduct / New Belgium Code of Conduct	Respect and Conduct Policy outlines our expectations in relation to the fair treatment of people at work, including the prohibition of discrimination, harassment, and bullying.
Lion Sexual Harassment Policy	The Lion Sexual Harassment Policy is a standalone policy outlining Lion’s commitment to proactively preventing sexual harassment in the workplace.
Lion Whistleblower Policy	The Lion Whistleblower Policy provides a mechanism for the reporting of conduct involving the Lion Group’s business which the reporting individual or individuals reasonably believe to be a Reportable Conduct. Concerns relating to modern slavery or other adverse human rights impacts are considered Reportable Conduct.
Lion Procurement Policy	The Lion Procurement Policy provide key principles and guidance for anyone buying goods and services on behalf of Lion. Lion’s Procurement Policy captures our commitment through three core principles: <ul style="list-style-type: none"><li>1. Building strong commercial outcomes &amp; productive partnerships</li><li>2. Promoting Human Rights and Ethical Sourcing</li><li>3. Promoting sustainable (environmental, social and inclusive) sourcing practices</li></ul>
Lion Supplier Responsible Sourcing Code	Lion’s Supplier Responsible Sourcing Code outlines expectations of all our suppliers when it comes to sustainable sourcing practices spanning human rights, the environment and business ethics. It outlines the guiding principles for our suppliers, assists Procurement in supplier selection and its compliance is required within Lions’ contractual terms.
New Belgium Supplier Responsible Sourcing Code	Outlines minimum expectations of suppliers in promoting decent working conditions in their supply chain.
Lion Risk Management Framework	Our Risk Management Framework establishes strong governance systems that support effective risk processes and ensure we are using our resources efficiently. Risks surrounding ethical sourcing and human rights are owned by senior executives at Lion.



Risk Management at Lion (continued)

Lion’s Grievance Mechanism

Lion understands that one of the most effective ways to identify Modern Slavery both within its own operations and its supply base is having a trusted and accessible grievance mechanism where employees and related parties, including suppliers, can report breaches of human rights. The ability to do so anonymously if desired, with the protections available and the transparency of the investigation process contribute to this being a trusted channel for disclosures globally.

Our grievance mechanism, designed in collaboration legal, external consultants, and our auditor is operated by an independent, third party.

The available channels include:

- 24/7 phone service with dedicated local numbers for AU, NZ, and US.
- Web portal.
- Email.
- Mail.
- Whistleblower Committee.
- Group Leadership Team members.
- Audit, Finance and Risk Committee Chair.

The program is communicated internally via emails from our CEO, posters at all sites, desktop wallpaper and is promoted in the Modern Slavery training module. It is featured both on the internal intranet home page and on all pages of our Lion Corporate website. It is also promoted to all contractors who complete our site induction process.

When a grievance is raised and substantiated through the investigation, we aim to remediate any impacts we may have caused or contributed to.

In 2024 there were no Modern Slavery related grievances raised via our Whistleblower Hotline across all Lion entities.

Training and awareness

Lion is committed to increasing awareness and building the capability of Lion employees and external parties including suppliers to recognise Modern Slavery and other breaches of human rights. We understand that it is through increasing awareness and understanding that employees are better placed to identify breaches of human rights and know what to do about it.

In 2022 a training module was developed that describes what Modern Slavery is, how we identify Modern Slavery, how it is relevant to Lion and what we are doing about it. This is available to all Lion employees to complete.

In December we conducted an internal refresher training course to all procurement team members. The Lion Board received its annual briefing on Modern Slavery in April 2024 as part of its approval of the Modern Slavery Statement.

## 2. Own Operations:

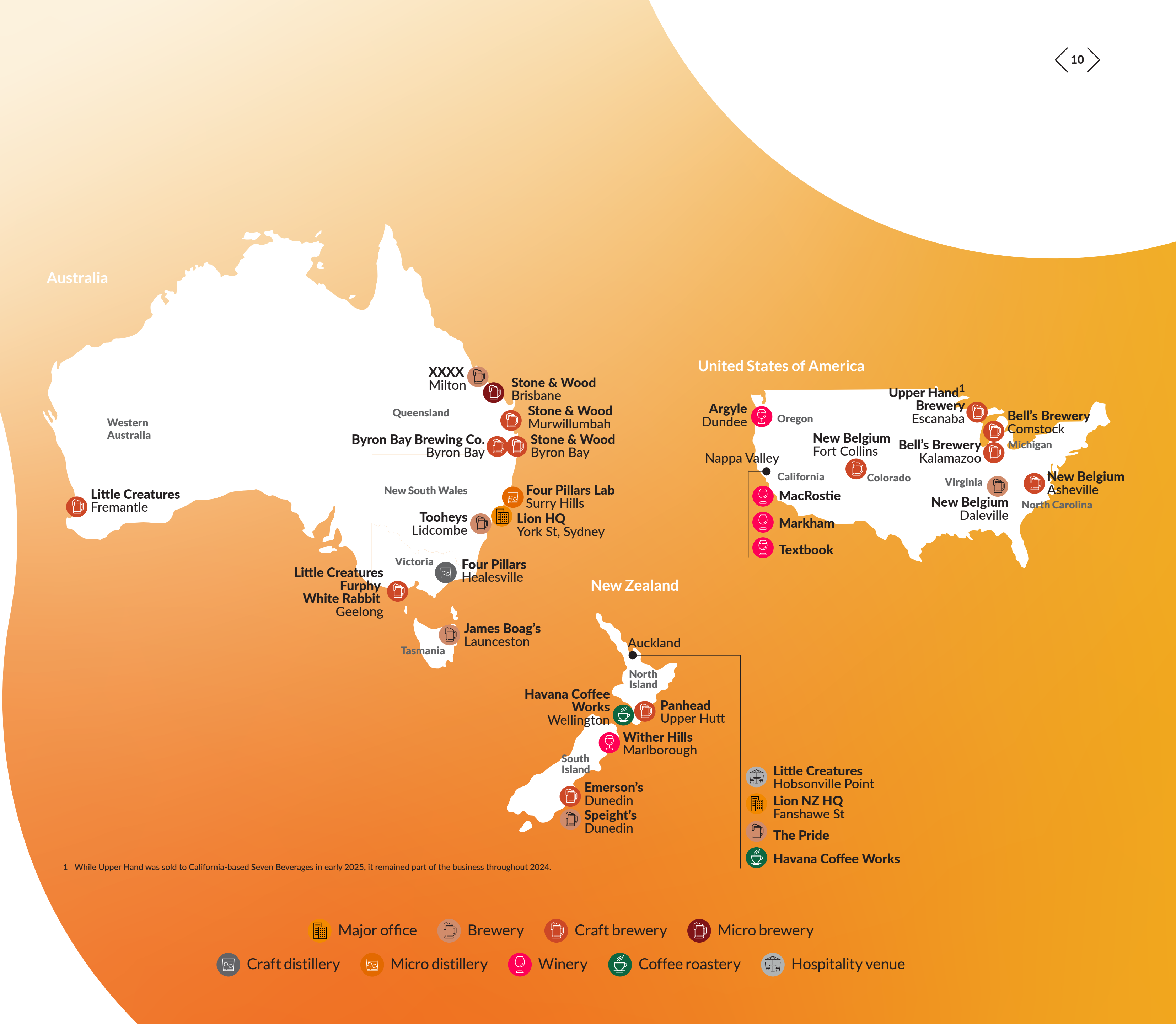
### Minimising the risk of Modern Slavery in Lion operations

Lion, headquartered in Sydney, is a beverages company in Australasia, with a global footprint including operations in the United States. Lion’s manufacturing footprint extends beyond 30 sites and employs over 3,000 people globally.

We acknowledge that our business activities, including our operations and our supply chain could cause, contribute, or be directly linked to Modern Slavery.

Despite the inherent risk of modern slavery existing in our operations being low, we have control mechanisms in place to mitigate potential risk and ensure Lion is a fair, safe and inclusive place to work.

The inherent risk of Modern Slavery within our own operations in Australia, New Zealand and the United States is low according to the [Global Slavery Index](#).





Own Operations: Minimising the risk of Modern Slavery in Lion operations (continued)

Our employees in Australia and New Zealand

All Lion Group employees in Australia and New Zealand are employed directly through individual employment contracts, enterprise/collective agreements or under relevant industry/occupation-based awards. These instruments are underpinned by Australian and New Zealand employment laws.

Overlaying these agreements, Lion has a number of workplace policies which set out the expectations and obligations of Lion and its employees. Some of these policies also extend to agents, contractors, interns, volunteers, job applicants, leaders, managers, and Board members of Lion.

In 2023 Lion implemented a new Code of Conduct for all Australian and New Zealand employees. This Code applies to all Lion team members who work in a range of different settings - from breweries, distilleries and vineyards, to pubs, restaurants and corporate offices. The Code of Conduct sets the tone for lawful and collaborative business relationships with customers and suppliers. A copy of the Code of Conduct is available on our Corporate website – [Code of Conduct](#).

Aligned with the [ETI Base Code](#), Lion recognises the rights of employees to negotiate collectively with or without the involvement of third parties (including industrial associations/unions). Our [Lion Code of Conduct](#) and associated policies specifically reference an individual's freedom to be a member of a trade union (or other freedom of association rights) across our worksites. Lion enjoys a collaborative and positive relationship with the union stakeholders represented across our breweries. Codes of Conduct and expectations regarding respectful treatment of all participants are established at the commencement of enterprise agreement negotiations and agreed to by all parties.

In our hospitality business, team members who are engaged under a casual contract of employment where the hours are fluctuating depending upon the seasonality and needs of the business, are engaged directly by Lion rather than through a third-party labour provider. Team members under these arrangements are paid in accordance with the industrial instrument relevant to that business, for example, the Hospitality and Associated Industries and

Occupations Award in Australia and in New Zealand under the minimum wage provisions.

During the reporting period, some employees at the Stone & Wood Brewery were identified as not receiving an additional week of annual leave (i.e. shift workers) and/or not receiving the correct pay if they worked through their meal break. These employees were remediated between approximately \$42- \$11,000. Future proofing has been implemented through a rostered meal break system and regular roster auditing to ensure that employees who fall within the classification of a shift worker receive 5 weeks of annual leave per year.

Additionally, a program has been established to audit employees earning less than \$100,000 p.a. at the Stone & Wood and Four Pillar's businesses to ensure they receive their legal entitlements under applicable modern awards. This program remains ongoing into 2025.

Lion does not tolerate harassment, sexual harassment, discrimination, and bullying. To support this commitment, in 2023 Lion expanded the channels for employees to report inappropriate behaviour or related concerns through the Respect the Line portal.

This can include reporting on bullying, discrimination, harassment, or any other conduct that doesn't adhere to Lion's standards of respect and inclusion. Reports can be anonymous. This is an additional channel to the confidential Whistleblower Hotline, Draw the Line, which includes full statutory protections for the whistleblower. Lion understands the importance of these channels as a primary way of respecting the human rights of people in our organisation and our supply chain.

A current copy of the Code of Conduct is available [here](#).

Our employees in the US

In our US operations (New Belgium), we provide an internal minimum wage for all entry level, non-tipped coworkers. Our internal minimum wage is determined by an annual minimum living wage assessment. Internal minimum wage recommendations are established through the review and analysis of data provided by external resources such as, [MIT Living Wage Calculator](#), [Living Wage for US](#), and [US Department of Housing and Urban Development Fair Market Value Rent \(40th percentile\)](#). MIT living wage calculator is widely recognised in the US and by [B Lab](#) as the preferred living wage calculator as it's based on basic needs in food, childcare, healthcare, housing, transportation and other necessities.

All coworkers are eligible for paid time off including Sick, Paid Caregiver, Bereavement, and voting leave. All coworkers are also eligible to plan for their retirement through contributions to their 401(k) account that is set up automatically upon hire and will receive matching contributions as outlined in the company plan.

To support financial wellness and education, New Belgium offers complimentary appointments with 3rd party financial advisors.

Fulltime coworkers are eligible for health insurance and wellness plans to support physical and mental health along with generous paid disability leave benefits to support coworkers when they are required to be away from work due to serious illness or injury.

Tipped hospitality coworkers are guaranteed a state minimum wage in locations where base rate for tipped coworker is lower than state minimum wage for all hours worked. Tipped coworkers are paid at the internal minimum wage for all company paid time off taken to account for loss of tips while taking time off.

Our New Belgium businesses also have relevant Codes of Conduct establishing expectations regarding the respectful treatment of workers as well as mandatory Sexual Harassment, and Diversity, Equity and Inclusion (DEI) training. New Belgium completes an annual audit program for equity and inclusion and has scored a 100% rating with the [Human Rights Campaign Corporate Equality Index](#).

Own Operations: minimising the risk of Modern Slavery in Lion operations (continued)

Increasing transparency of operations

To further enhance the transparency of our own operations, Lion sites are required to complete an annual self-assessment questionnaire (SAQ) in [Sedex](#). This allows Lion to share with its customers and suppliers the policies and processes related to business ethics, health & safety, human rights and labour standards and the environment. In 2024 our Tooheys Brewery completed a SMETA audit for which no non-conformances were found. By sharing this information, Lion seeks to increase transparency in our end-to-end supply chain.

Indirect Labour and Operations Services

In addition to its own employees, Lion also uses indirect labour services including labour hire and operations services.

Lion engages third party labour at our breweries to help manage peak volume periods and to supplement labour in times of unplanned leave or to backfill when unexpected events necessitate a short-term increase in labour resources (e.g. floods). Across our enterprise agreements, workers from third party labour providers who undertake the same job requirements at Lion sites as Lion employees are generally paid the same base rate of pay as Lion employees with the same skill level.

It is contractually the responsibility of the labour hire agency to manage all pay and employment related matters of their employees engaged at Lion sites. Our contractual agreements with labour hire agencies and operations services providers include clauses related to Modern Slavery and our expectation is that they will adhere to the minimum standards established by legislation and outlined in Lion’s Responsible Sourcing Code.

The Responsible Sourcing Code forms part of all Supply Agreements and associated Terms and Conditions and is available on our Corporate website [here](#).

Despite the inherent risk of modern slavery existing in our operations being low, we have identified an area of heightened risk to certain groups of people in our operations services. Operations services include the outsourcing of various operational tasks performed at the Lion sites including cleaning and security. The service provider is responsible for delivering the service and pays workers either directly or through subcontractors. Lion recognises that operations services is an area of higher risk for Modern Slavery since the workforce is characterised by a higher portion of migrant or unskilled workers who may be less familiar with their rights and available protections. They may also be subjected to less regulation of labour standards including excessive work hours and an absence of a complaints and escalation process.

To mitigate this risk, Lion conducts a supplier evaluation and onboarding process to ensure that all relevant policies and procedures are in place to protect workers responsible for delivering the services at our sites. As with temporary labour, all contractual agreements include clauses related to Modern Slavery and our expectation is that they will adhere to the minimum standards established by legislation and outlined in Lion’s Responsible Sourcing Code. In addition to these contractual arrangements, all contractors have access to the Whistleblower Hotline where they can report any breaches of labour relations or human rights, including underpayment or other forms of mistreatment. Details of the Whistleblower Hotline and how to access are included in the onsite induction process.



### 3. Supply Chain:

#### Minimising the risk of Modern Slavery in our supply chain

Globally, Lion relies on thousands of suppliers providing us with raw materials and other goods and services to keep our business operating all year round. In turn, our suppliers engage other suppliers to support the delivery of these products and services to Lion.

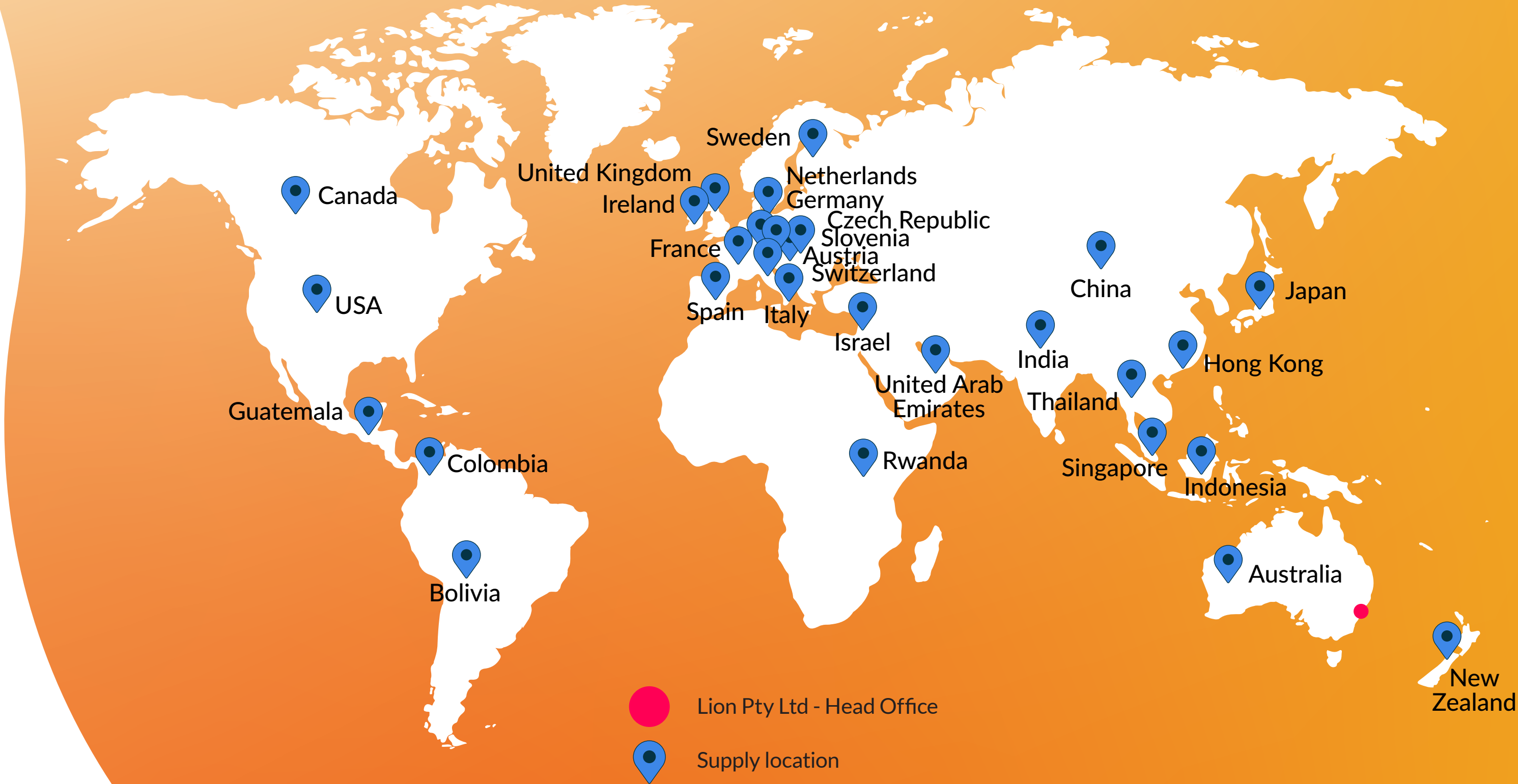
We seek to promote responsible sourcing practices across our global organisation and to build long-term productive relationships with our suppliers and encourage our suppliers to do the same across their own supply chain.

#### Supply Chain overview

Our global supply chain arrangements remained largely the same to the previous Reporting Period. In 2024:



Countries we source goods and services from



Supply Chain: Minimising the risk of Modern Slavery in our supply chain (continued)

Lion spend by category

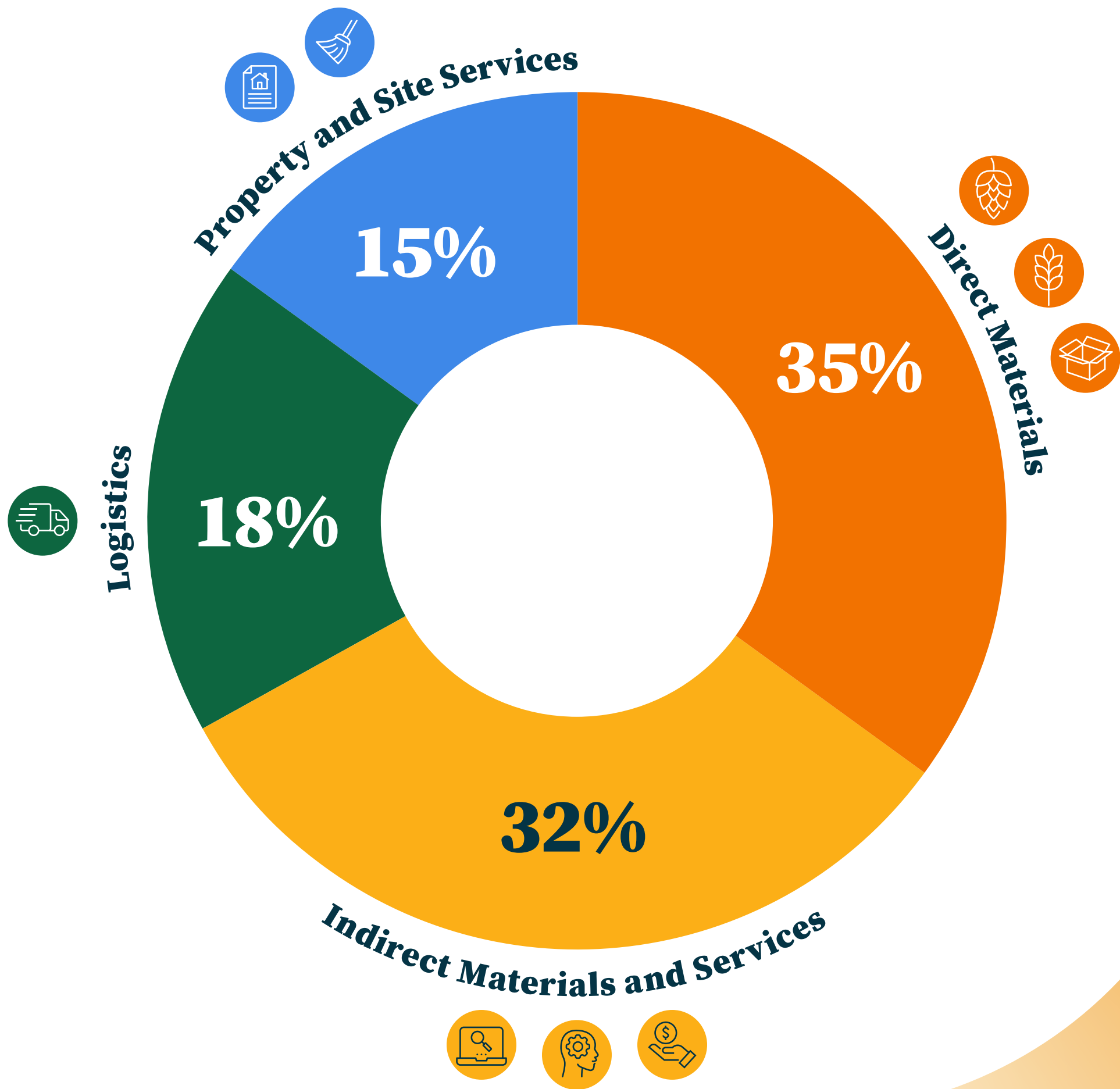
Lion’s largest global category of spend is **Direct Materials**. Direct Materials are those which are incorporated into the production of our final product and include ingredients such as hops and malted barley as well as packaging materials including glass bottles, aluminium cans, corrugate and paperboard cartons.

Our second largest global category of spend is **Indirect Materials and Services** and services which are those that do not feature in the final product but are necessary to carry out the production, marketing, sales and support functions including Information Technology (IT), Human Resources and Finance. Examples include media buying, creative agencies, consulting, contingent labour, IT hardware & software/ licenses.

The **Logistics** category includes all freight and distribution services required to get product to the end customer.

The **Property and Site Services** category includes all property leases, maintenance repair and operations, engineering services and site related services like cleaning and security services.

Globally, Lion mostly purchases from established and trusted suppliers with advanced systems and processes to reduce the risk of Modern Slavery and human rights violations. For example, 96% of Australian and New Zealand spend is with well-established suppliers based in Australia and New Zealand.












Supply Chain: Minimising the risk of Modern Slavery in our supply chain (continued)

Mitigating risk in our supply chain

Although the inherent risk for modern slavery in our supply is deemed to be low, we have identified the following commodities to be of higher risk for Lion globally.

We continue to identify and manage Modern Slavery risk in our supply chain through our Responsible Sourcing program, robust contracting and procurement processes and supplier training.

High risk commodity	Modern Slavery inherent risk factors (indicative, not exhaustive)
 <b>Coffee</b>	Links to high-risk geographies (jurisdictions with insufficient/weak legal protections for workers)
	Reliance on low-skilled and/or migrant labour
	Use of child-labour
	Excessive work hours
	Absence of complaints and escalation process
 <b>Fruit and grape picking (for wineries)</b>	Reliance on low-skilled and/or migrant labour
	Use of child-labour
	Excessive work hours
 <b>Contracted labour hire services including horticultural labour, cleaners and security</b>	Reliance on low-skilled and/or migrant labour
	High levels of sub-contracting
	Excessive work hours
	Absence of complaints and escalation process
 <b>Branded apparel/uniforms</b>	Links to high-risk geographies (jurisdictions with insufficient/weak legal protections for workers)
	Use of child-labour in the production of raw materials such as cotton or minerals
 <b>Promotional items</b>	Links to high-risk geographies (jurisdictions with insufficient/weak legal protections for workers)
	Use of child-labour in the production of raw materials such as cotton or minerals
 <b>Personal Protective Equipment (PPE)</b>	Links to high-risk geographies (jurisdictions with insufficient/weak legal protections for workers)
	Use of child-labour in the production of raw materials such as cotton or minerals
 <b>ICT equipment (eg. laptops, phones, accessories)</b>	Links to high-risk geographies (jurisdictions with insufficient/weak legal protections for workers)
	Use of child-labour in the production of raw materials such as minerals used in production of components

Supply Chain: Minimising the risk of Modern Slavery in our supply chain (continued)

Responsible Sourcing Program

The basis for the responsible sourcing program is our [Procurement Policy](#), our [Human Rights Policy](#) and our [Supplier Responsible Sourcing Code](#) (the Code) or New Belgium Supplier Responsible Sourcing Code. The expectation is that our suppliers and their suppliers will comply to the minimum standards outlined in the Code to protect the human rights of all people participating in our supply chain.

If a supplier fails to comply with any aspect of the Code or has been found in breach (through regulator enforcement action or media reports), Lion will seek to understand the cause and actions taken to remedy the breach. Lion reserves the right to terminate a relationship with any supplier that repeatedly fails to comply with our Code or does not provide adequate remedy to any breach.

We have not uncovered any incidence of modern slavery in our supply chain, and we have not been required to terminate any relationships to date.

Underpinning the program is our supplier risk segmentation. The segmentation determines the level of modern slavery risk attributed to each supplier in tier one of our supply chain and is conducted annually. In 2024 it incorporated over 3,500 Australian, New Zealand and US suppliers across our tier one supply base. Tier one suppliers are those we have direct contractual relationships with.

Our risk assessment methodology

The risk assessment consisted of:

- Likelihood
- Consequence

Methodology

Likelihood factors (labour relations and human rights)

- Category of goods and services
- Country of Origin

Consequence factors (impact to Lion’s Supply Chain)

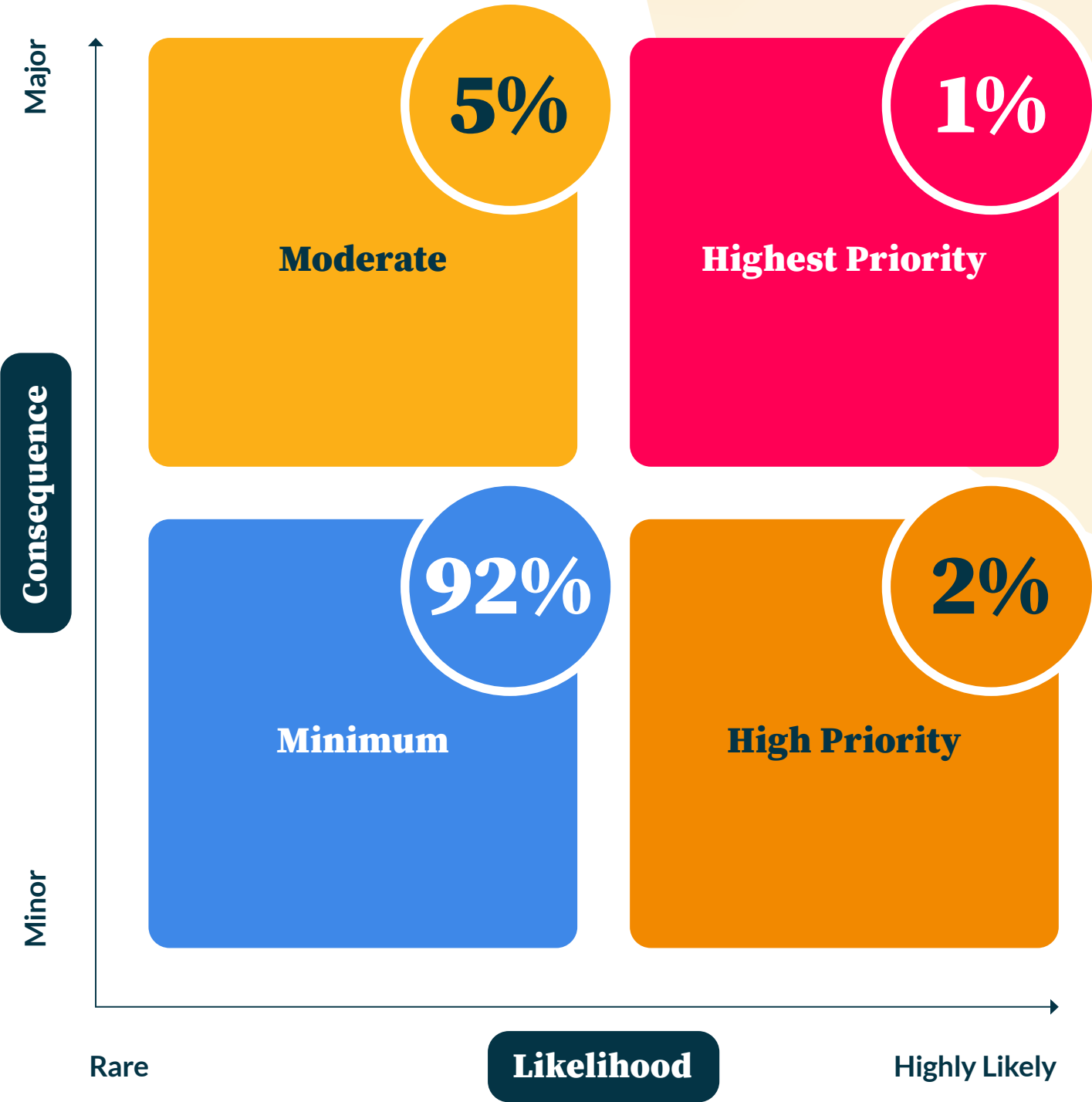
- Spend
- Relationship/strategic supplier
- Brand exposure

Our model utilises external benchmarking data to assess the level of Modern Slavery risk associated with each supplier. Sources of data used in segmentation included:

- List of Goods Produced using Child Labour or Forced Labour (TVPPRA),
- Trafficking in Persons Report (TIPR),
- Research in 43 Commodities Worldwide,
- Global Slavery Index,
- Global Estimates of Modern Slavery (ILO),
- Atlas Method Rankings (LSE and LMIE),
- ITUC Global Rights Index.

An overview of the new segmentation and methodology is found right. The percentage of total suppliers in each quadrant are also highlighted.

Supplier Segmentation resulting from risk assessment





Supply Chain: Minimising the risk of Modern Slavery in our supply chain (continued)

To operationalise the segmentation, the supplier management framework dictates associated supplier treatments based on risk identified in the assessment process. The greater the risk, the more transparency is required.

At a minimum, all suppliers to the Lion Group must accept the Lion Responsible Sourcing Code or the New Belgium Responsible Sourcing Code through the onboarding process or acceptance of a purchase order. For those suppliers identified as having higher risk factors, they may be required to complete a Sedex Self-Assessment Questionnaire (SAQ) and undergo a social audit.

In 2024 we reviewed 11 supplier audits, in the Sedex database conducted by other parties, which revealed 39 non-compliances across all audits. The primary category of non-compliance identified was “Working Conditions Are Safe and Hygienic”, followed by “Management Systems and Code Implementation.” Common findings included blocked or unmarked emergency exits, inadequate noise and electrical safety

risk assessments, and incomplete or unavailable material safety data sheets. These issues reflect the need for strengthened safety protocols and more robust implementation of management systems at the facility level.

Importantly, all non-compliances are being addressed within the required timeframes, demonstrating a proactive approach to remediation. To date, no major human rights violations have been identified through the disclosures submitted via the Sedex platform, indicating overall alignment with core human rights expectations.

Supplier Management Framework

	All	Minimum	Moderate	High Priority	Highest Priority
Conduct Social Audits with associated Corrective Action Plans OR Mutual Recognition Audit Schemes / sharing of existing audit reports					✓
Onboard to Sedex (or equivalent) and complete annual SAQ				✓	✓
Training and Education			✓	✓	✓
Accept Supplier Responsible Sourcing Code	✓	✓	✓	✓	✓

Where a supplier is assessed to have a greater Modern Slavery risk, the more transparent they are required to be. This may include additional training, the completion of a self assessment questionnaire or a social audit.

Supply Chain: Minimising the risk of Modern Slavery in our supply chain (continued)

Procurement Processes

Our Procurement processes, tools, and sourcing and contracting templates support the procurement team to identify Modern Slavery risk. This includes a pre-screening questionnaire in our tender documentation which enables category managers to identify risk prior to contracting a supplier. If required, subsequent mitigation plans can be built into the contract to ensure compliance to our Supplier Responsible Sourcing Codes.

Supplier Training and Collaboration

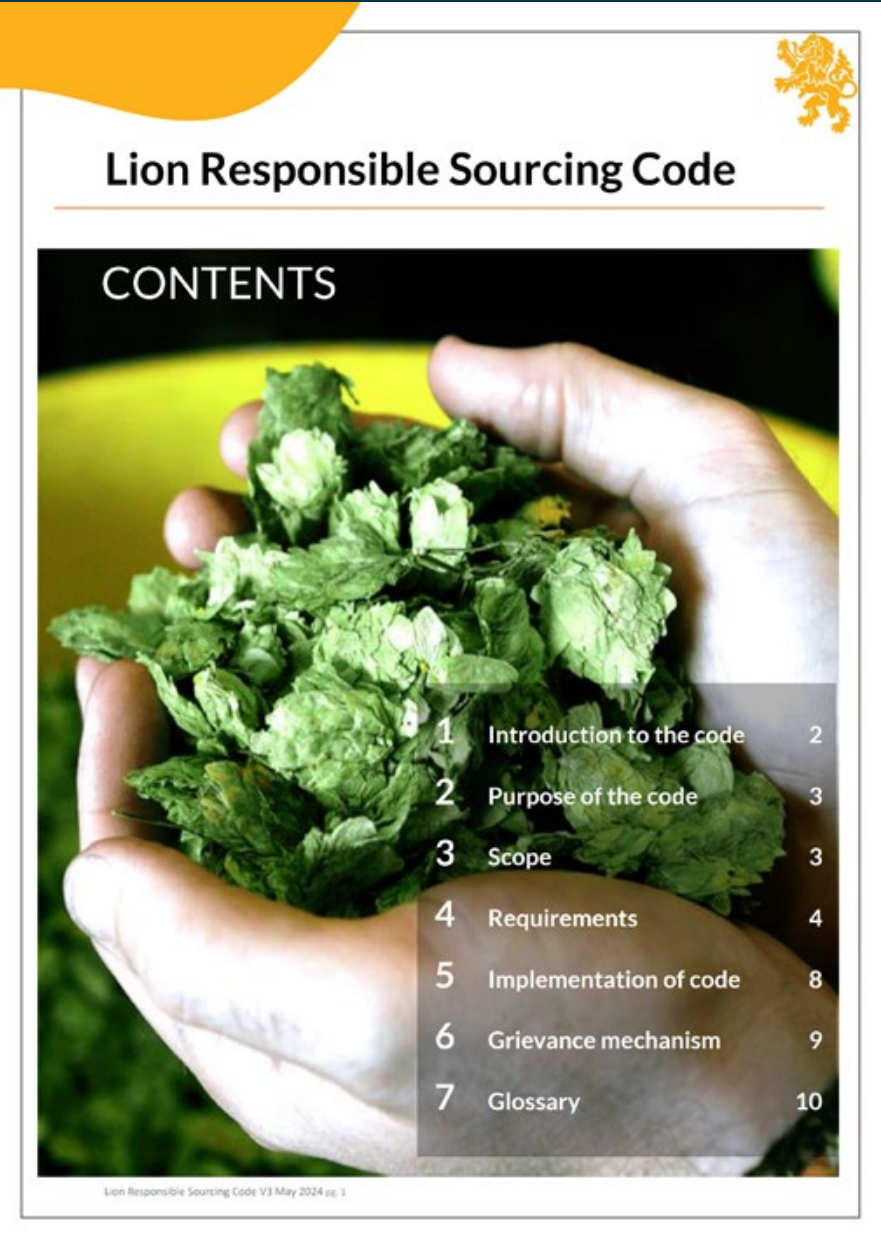
We recognise that collaborating with our suppliers can advance the eradication of Modern Slavery in our supply chain.

In 2024 we continued our supplier training program targeted at our highest priority suppliers and strategic suppliers. The training material covers Lion’s minimum expectations in terms of business ethics, health and safety of workers, human rights and labour relations and provided Lion’s Whistleblower hotline details. The training material also re-emphasises Lion’s requirement for the suppliers to comply with our Responsible Sourcing Code. The training material was sent to approximately 200 suppliers (high risk and strategic suppliers).

We also shared the publicly available UN Global Compact Modern Slavery Risk Management – A Playbook for Australian SMEs which has five practical steps to identify, manage and mitigate modern slavery risk.

Lion’s Responsible Sourcing Code

All Lion suppliers are required to abide to Lion’s Responsible Sourcing code. The Code can be found [here](#).





# 4. Assessing the effectiveness of our actions

We continue to be diligent in identifying, addressing, and mitigating modern slavery risk in our operations and our broader supply chain.

Defining metrics that measure success in uncovering, identifying and managing modern slavery risk is challenging, but we look at quantitative and qualitative measures to track our progress, inform improvements to our approach and measure our effectiveness across our modern slavery program of work.

Key to measuring the effectiveness of our actions in 2024 was an external review of our human rights approach, a gap analysis, by Pillar Two. This review was undertaken to identify and recommended actions for improvement in how we are managing our salient human rights issues, including modern slavery.

Focus area	2024 Progress
Governance & Reporting	<ul style="list-style-type: none"><li>• The Modern Slavery working group met twice during 2024 with an emphasis on building broader human rights awareness.</li><li>• Lion engaged management consultant, Pillar Two, to undertake a gap analysis of our existing human rights approach, to identify recommended actions for continuous improvement in how we are managing our salient human rights issues.</li><li>• The Lion Board was briefed on global and local legislative trends</li></ul>
Capability & training	<ul style="list-style-type: none"><li>• Modern Slavery training offered to all Lion employees and high-risk suppliers</li></ul>
Supplier engagement	<ul style="list-style-type: none"><li>• Lion provided training to 200+ high risk or strategic suppliers on Modern Slavery</li><li>• Provided Spanish version of Supplier Responsible Sourcing Code to coffee suppliers</li></ul>
Due Diligence	<ul style="list-style-type: none"><li>• Sedex (or equivalent) for high priority suppliers &gt;95%</li><li>• 11 audits reviewed with no outstanding non-conformances.</li></ul>
Grievance mechanism	<ul style="list-style-type: none"><li>• Zero human rights related grievances were raised through our Whistleblower Hotline</li></ul>

# 5. Consultation

The formal consultation process with Entities relevant to this statement is embedded through the operation of the Modern Slavery working group.

This cross-functional, cross-company, global working group ensures specific representatives of the reporting entities covered by this statement are directly consulted during the writing and approval of this statement, including those reported voluntarily.

The working group meets as required to oversee the identification, monitoring and management of Modern Slavery risk at Lion. It also reviews the ongoing status of continuous improvement opportunities to ensure we are improving the effectiveness of our program over time.

Below is a list of associated roles and responsibilities of those on the working group.

Board/Global Leadership team	Overall accountability for Modern Slavery at Lion
Legal/Corporate Affairs (AU/NZ/US)	Ensures legal compliance; protects against litigation; protects brand and reputation
People and Culture (AU/NZ/US)	Responsible for identifying and managing risk to employees which includes hiring practices; developing relevant codes of conduct; training of employees Identifies health and safety risks and develops appropriate policies and processes to protect workers health and safety
Procurement (AU/NZ/US)	Responsible for developing relevant policies and codes of conduct establishing supplier expectations; seek out new suppliers and manage day-to-day supplier relationships
Supply Chain (AU/NZ/US)	Manufactures product; engages with suppliers
Health and Safety	Identifies health and safety risk; develops policies and process to protect workers safety
Group Sustainability	Identifies and manages social risk
Group Risk	Integrates Modern Slavery and broader Human Rights risks into the Lion risk management framework; responsible for the development of an independent grievance mechanism



# 6. Review and approval

- This statement is made pursuant the Modern Slavery Act (Cth) 2018 and with respect to the calendar year ending 31 December 2024 (the ‘Reporting Period’).
- The statement was reviewed and approved by the Lion Pty Ltd Board on 1st April 2025
- An index has been provided to guide readers to information related to each mandatory reporting criteria (see Appendix 2).

Signed by



**Sam Fischer**  
Chief Executive Officer  
Date: 2nd April 2025

# 7. Appendix 1: Subsidiaries and Investments

(as at 31st December 2023)

Name of Subsidiary	ACN/Company Number/ file number/entity ID	Lion % Shareholding (direct or indirect)
Lion Pty Ltd 128 004 268 (direct and indirect)		
Kirin Foods Australia Holdings Pty Ltd	112 009 917	100%
Lion - Beer, Spirits & Wine Pty Ltd	008 596 370	100%
Lion Liquor Retail Ltd	102294	100%
Lion Nathan Finance (New Zealand) Ltd	527808	100%
Lion Nathan USA (Holdings), Inc	760139-87	100%
Lion Nathan USA, Inc	740078-82	100%
Lion NZ Ltd	33986	100%
Marine Stores Pty Ltd	007 512 647	75%
Morelli Vineyards LLC	201405910192	100%

Name of Subsidiary	ACN/Company Number/ file number/entity ID	Lion % Shareholding (direct or indirect)
Lion – Beer, Spirits & Wine's Pty Ltd's Investments (direct and indirect)		
A.C.N. 669 970 147 Pty Ltd	669 970 147	100%
Brewlife People Pty Ltd	607 143 153	100%
Fermentum Pty Ltd	124 373 324	100%
Healesville Distilling Pty Ltd	606 461 367	100%
Healesville NewCo Pty Ltd	631 810 430	100%
Ingrained Foundation Pty Ltd	623 241 529	100%
Vanguard Luxury Brands Pty Ltd	128 867 176	100%

Name of Subsidiary	ACN/Company Number/ file number/entity ID	Lion % Shareholding (direct or indirect)
Lion NZ Ltd's Investments (direct and indirect)		
Coffee Imports Ltd	1266090	100%
Coffee U Feel Ltd	5780067	100%
Deluxe Coffee Roasters Ltd	2321109	100%
Havana Coffee Works Ltd	1256288	100%
Lion NZ Remote Sales Ltd	8191925	100%
Panhead Custom Ales Ltd	5983429	100%
The Emerson Brewing Company Ltd	558187	100%

Name of Subsidiary	ACN/Company Number/ file number/entity ID	Lion % Shareholding (direct or indirect)
Lion Global Craft Beverages Pty Ltd (631 805 402)		
Little World Beverages, Inc	7371231	100%
New Belgium Brewing Company, Inc	84-1225570	100%
Oxbow Properties, LLC	20041355103	100%
Ripple by the Bay, LLC	82-2540685	100%



# Appendix 2:

## Index

Mandatory Criteria	Australian MSA	Location in document
Identify the reporting entity	X	p4
The reporting entity’s structure, operations and supply chains	X	p4-5, p10, p13-14
The risks of Modern Slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	X	p11-12, p15-18
The actions taken by the reporting entities and the entities it owns or controls to assess and address these risks, including due diligence and remediation processes	X	p6-9, p11-12, p16-18
How the reporting entities assesses the effectiveness of these actions	X	p19
The process of consultation with any entities the reporting entities owns or controls	X	p20
Approval and signature of the statement	X	p21



**Lion Pty Limited**

ABN 50 128 004 268

Registered Office

Level 7, 68 York Street, Sydney NSW 2000

Telephone: +61 2 9320 2200

Website: [lionco.com](https://lionco.com)

If you have any queries specific to this  
Sustainability Report, please contact Lion's  
sustainability team at [sustainability.au@lionco.com](mailto:sustainability.au@lionco.com)

