

**OVERVIEW**

- Bravo HoldCo Pty Ltd (**HWA**, or the **Group**) has prepared this Modern Slavery statement (**Statement**) as a joint statement in compliance with the *Modern Slavery Act 2018* (Cth) (the **Act**). This Statement sets out the actions and activities taken by HWA to address modern slavery risks in its organisation and supply chain during the reporting period 1 July 2021 to 30 June 2022 (**Reporting Period**). This Statement applies to HWA and all of its controlled entities, including: Bravo HoldCo Pty Ltd ACN 628 069 474 (parent holding company);
- Bravo BidCo Pty Ltd ACN 628 070 459 (holding company); and Hive and Wellness Australia Pty Ltd ACN 009 686 435 (operating company);
- majority-owned and/or controlled subsidiaries and managed joint venture operations of HWA that meet the definition of reporting entity under the Act.

HWA are committed to achieving the highest standards of corporate compliance and ethical conduct in all of its business activities, and are committed to identifying and mitigating modern slavery risks and human rights violations occurring within its business operations or supply chain.

**ABOUT HWA**

Proudly Australian owned and grown since 1953, HWA is one of the world’s largest honey companies and its products are sold across Australia and in more than thirty countries around the world.

HWA’s principal business activities are the packaging and marketing of honey and health and wellness products on a global basis, and it operates the following facilities within Australia:

- Head Office - located in Richlands (Queensland). Core functions of this facility include honey supply chain management, supply chain & planning management, marketing, domestic and export sales administration, accounting, payroll, IT and corporate administration;
- Packaging, Warehouse and Distribution facilities - located in Richlands (Queensland), Maryborough (Victoria) and Bayswater (Western Australia);
- Joint Venture Beekeeping Operations – located in New South Wales and Western Australia.

HWA acknowledges its responsibilities and obligations under the Act.

HWA is committed to safeguarding against slavery and human trafficking in its corporate activities and endeavours not to enter into any business relationship with any organisation, in Australia or abroad, which does not share HWA’s commitment to combatting slavery and human trafficking.

This Statement applies to all geographic locations in which HWA operate and to all functions within HWA.

**SUPPLY CHAIN OVERVIEW**

HWA has access to suppliers, distributors and customers located within Australia and worldwide. HWA has developed and invested in its internal teams and supply chain management, as set out in further detail below:

- The Honey Supply Chain Team sources raw honey, beeswax and other hive related products from Australian and New Zealand beekeepers.
- The Supply Chain & Planning Team:
  - enters into Supply Contracts for the sourcing of packaging material (cartons, bottles, caps, labels, etc) predominantly within Australia, though may also source material from international sources;
  - sources raw honey from accredited international suppliers;
  - assesses and approves contract packers, in conjunction with Quality Assurance Team; and
  - coordinates the distribution of finished products to local and international destinations via various transport arrangements.
- The Quality Assurance Team:
  - oversees the assessment and approval of suppliers, contractors, contract packers;
  - (where required) conducts physical audits of suppliers; and
  - implements, monitors and regularly reviews HWA’s accredited quality systems.
- The International Business Team (Export) enter into Finished Goods Distribution Agreements to sell HWA’s products in international markets (including China, Asia, Middle East, Europe, North America).
- The Domestic Sales Team enters into Finished Goods Supply Agreements with retailers, food service providers and industrial customers within Australia.
- The Product Development Team engages with local and international businesses to a) source a variety of items required for new product innovations including packaging concepts and ingredients; and b) investigate contract packing arrangements.
- The Marketing Team engages with local and international suppliers to supply marketing material, printing, graphic design services and public relations and may enter into marketing Agreements in conjunction with the distribution of finished goods.

**POTENTIAL EXPOSURE TO RISKS**

Due to the nature of HWA’s business model, although HWA maintains long term, good

working relationships with the majority of its suppliers and distributors, HWA recognises the potential risks of modern slavery and human trafficking occurring within its Australian and international supply chain.

HWA sources products from suppliers that operate in high risk countries including China, Brazil and Thailand, but has undertaken due diligence on its suppliers and their supply chains and conducts periodic audits of those suppliers it has identified as high risk, and accordingly HWA considers its exposure to modern slavery and human trafficking to be relatively low.

**ACTIONS TAKEN TO CONTROL, ASSESS AND ADDRESS POTENTIAL RISKS**

HWA has taken the following steps to manage and safeguard against Modern Slavery and Human Trafficking risks (**MSHT Risks**) within its business and supply chain:

**Actions:**

**Human Resources:**

- (at least annually) review recruitment practices, employment conditions and employee relations;
- (at least annually) review payroll systems to ensure they are in line with relevant Government Awards / Enterprise Bargaining Agreements;
- Obtain accurate ‘right to work’ information at time of employment; and ensure ‘right to work’ information is on file.
- Undertake due diligence (as required) into the ‘right to work’ in relation to labour hire employees.

**Supply Chain:**

- identify any high-risk jurisdictions in its supply chain;
- evaluate the MSHT Risks of each new supplier / distributor prior to entering into a contractual relationship;
- obtain specific contractual commitment with respect to MSHT Risks from each of its suppliers and distributors via acceptance of HWA’s Global Business Partner Code of Conduct, inclusion of appropriate contractual terms with its supply and distribution agents.

Where MSHT Risks are identified:

- conduct additional audits or assessments, or further investigate the relevant supplier / distributor;
- if the supplier/ distributor is not compliant:
  - ~ advise the supplier / distributor that continued relations is dependent on compliance or undertaking to comply with HWA’s Global Business Partner Code of Conduct;
  - ~ (if amenable) work with supplier / distributor to gain an undertaking and action plan from them to implement appropriate practices to mitigate MSHT Risks within their organisation with 3-6 months;

~ (if not compliant or no undertaking given) invoke sanctions against any suppliers / distributors that fail to improve their performance in line with an action plan or for those who seriously violate HWA's Code of Conduct, terminate the business relationship.

**Corporate**

- uphold and promote HWA's Whistleblower Policy and Procedure to ensure all staff know they can report actual or suspected modern slavery and human trafficking issues without facing unfavourable treatment;
- uphold HWA's Code of Conduct Policy, which sets out the standards of behaviour expected of HWA's personnel and contractors;
- (at least biennially) review HWA's Modern Slavery Policy.

**Training / Awareness**

- train relevant staff on how to identify the signs of MHST Risks, how to assess the MSHT Risks in relation to various aspects of the business, the initial steps to be taken if slavery or human trafficking is suspected, and how to escalate to Senior Management.
- easy accessibility of HWA Modern Slavery Policy to all HWA staff and key personnel electronically, and provision of a hard copy upon request.

**DELEGATION OF RESPONSIBILITY:**

- Responsibility for:
  - a) the introduction, maintenance and review of relevant policies, contracts and agreements;
  - b) investigations and due diligence in relation to known or suspected instances of slavery and human trafficking; and
  - c) reporting issues, actions, and outcomes to the Company Secretary (as per internal reporting below);

relating to:

- **Employees** - sits with the GM People & Culture;
- **Supply Chain (raw materials / packing / distribution)** - sits predominantly with the Chief Operating Officer;
- **Supply Chain (finished goods - Domestic)** - sits predominantly with the General Manager Sales Australia;
- **Supply Chain (finished goods - International)** - sits predominantly with the General Manager International Sales;
- **Contractors** - sits with the Chief Operating Officer;
- **Cultural Value Policies (ie Modern Slavery / Whistleblower / Code of Conduct / Anti-Bribery & Anti-Corruption)** - sits with the Company Secretary.

**CORRECTIVE ACTIONS / INTERNAL REPORTING:**

Should an occurrence or potential occurrence of modern slavery be identified, either internally related to employment practice or externally related to working conditions within the supply chain, then appropriate corrective action shall be taken in line with HWA's Non-Conformance procedures.

- all non-conformities to be recorded by the relevant division via CAR Form SP1.01.2 and reported to the Quality Assurance Manager, if applicable, the Quality Manager will notify the Company Secretary;
- investigations of known or suspected breaches to be conducted by an appointed delegate from the relevant division and required actions closed out within 30 days of discovery;
- summary of 'Actions and Outcome of Non-Conformities' to be forwarded to the Company Secretary and Quality Assurance Manager within 5 days of conclusion of investigation.

**ASSESSMENT OF EFFECTIVENESS OF ACTIONS**

No incidents of modern slavery were identified in our operations or supply chain during the Reporting Period.

HWA has set the following key performance indicators to mitigate any MSHT Risks and measure its effectiveness in ensuring modern slavery and human trafficking is not taking place in HWA's business or in any of its supply chains.

- Use of HWA's Whistleblower Policy in relation to reporting of modern slavery and human trafficking issues.
  - *As at the date of this statement there have been zero (0) instances.*
- Review of HWA's recruitment and payroll systems to ensure our recruitment practices comply with all applicable laws.
  - *As at the date of this Statement, no non-conformances identified in the review of our recruitment and payroll systems.*
- Regular reviews with HWA's direct suppliers and distributors to ensure they understand, HWA's expectations in relation to modern slavery and human trafficking.
  - *As at the date of this Statement, no non-conformances identified in the ongoing review of our existing supply base.*

Review of current agreements with HWA's partners to ensure all entities and affiliated companies have never been convicted of offenses relating to modern slavery and comply with their legal and ethical obligations in this regard.

- *As at the date of this Statement, no non-conformances identified in the ongoing review of our Vendor Assurance Program.*
- *HWA has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery or human trafficking.*

In addition to SEDEX 4 Pillar audits conducted every 3 years, HWA also undergoes various annual audits, including Global Food Standard Initiative audits, Woolworths Supplier Excellence Program audits and Australian Certified Organic audits that include compliance with the IFOAMS Norms that address Labour Standards, Health & Safety, Environment and Business Ethics Collective.

**IMPACTS OF COVID-19**

COVID-19 has had a limited impact on HWA's ability to manage risks relating to modern slavery. Travel restrictions locally and abroad have resulted in a reduction of physical audits of HWA's suppliers. However, HWA's Quality Assurance team has continued monitoring supplier certifications to ensure these are up to date.

**CONSULTATION WITH OUR ENTITIES**

A process of internal consultation across HWA informed the drafting of this statement. This included engagement with a modern slavery working group, consisting of HWAS Senior Leadership Team, Quality Assurance Team, Supply Chain Team and a Director from each entity which was formed in FY20 as part of HWA's commitment to help manage human rights and modern slavery risks across its operations and supply chains. The entities include, Bravo HoldCo Pty Ltd, Bravo BidCo Pty Ltd, Hive & Wellness Australia Pty Ltd, Capilano Apiaries Pty Ltd, Honey Corporation of Australia Pty Ltd, Capilano Honey Pty Ltd, Barnes Naturals Pty Ltd, Wescobee Pty Ltd, Medibee Apiaries Pty Ltd and Western Honey Supplies Pty Ltd.

**ONGOING COMMITMENT**

HWA is committed to ongoing review and constant improvement of our practices to safeguard against modern slavery and human trafficking risk, both within HWA's business and within its supply chains.

**APPROVAL**

This modern slavery statement is made by HWA for the financial year ending 30 June 2022. This statement has been developed by HWA, in consultation with each of its controlled entities, and was approved by the board of HWA on 2 November 2022.



Albert Tse, Director  
Bravo HoldCo Pty Ltd (on behalf of HWA)

02/11/2022