

ESTD  1928

De BORTOLI

FAMILY WINEMAKERS

De Bortoli Wines Modern Slavery Statement

FY 2021

Introduction

This is the first Modern Slavery Statement made by De Bortoli Wines Pty Ltd and covers the 2021 Financial Year. This statement outlines the steps we have taken to identify, manage and mitigate the specific risks of modern slavery in our operations and supply chain.

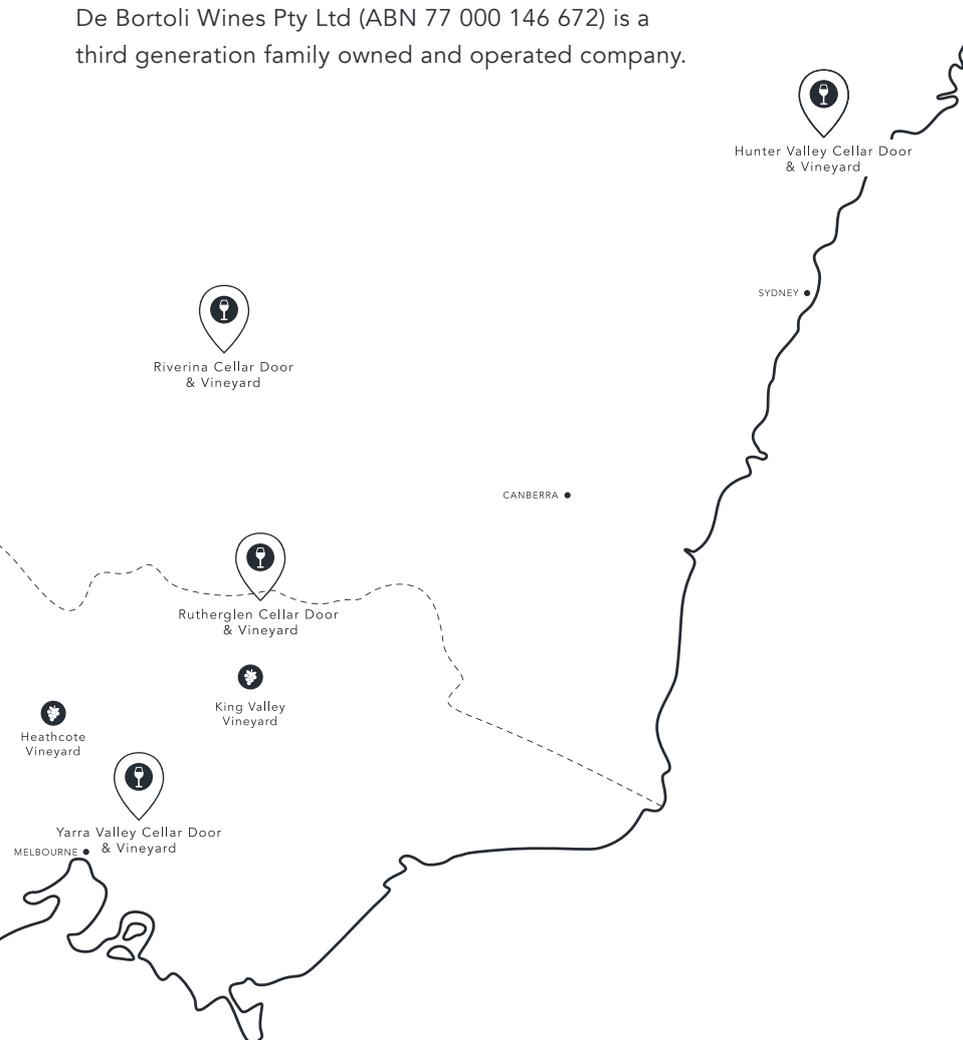
We recognise that slavery is a violation of fundamental human rights and are committed to doing business with integrity. We have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We have taken a number of steps to tackle modern slavery, as outlined in our statement.

This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during the 2022 Financial Year.



Our Business and Supply Chains

De Bortoli Wines Pty Ltd (ABN 77 000 146 672) is a third generation family owned and operated company.



The company locations are as follows:

Main production facility, head office, vineyards and broad acre irrigation farms located within the Riverina region of South West NSW.

Winery, cellar door, restaurant and vineyards located at Dixons Creek Victoria.

Winery, cellar door, restaurant, accommodation and vineyards located at Rutherglen in Northern Victoria.

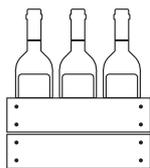
Winery, cellar door and vineyards in the Hunter Valley, NSW.

Vineyards in selected wine growing/viticultural areas in Victoria.

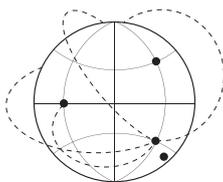
Distribution centres and sales operations in Melbourne, Sydney and Brisbane.

Sales operations in Adelaide servicing South Australia and in Perth servicing Western Australia.

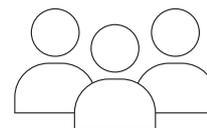
De Bortoli Wines produces and interacts with the following:



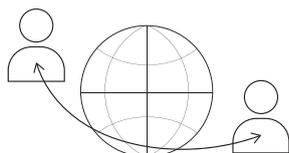
De Bortoli Wines produces approximately 4.5 million cases (nine-litre equivalent) per year.



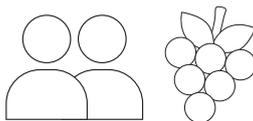
Exports to 60 countries.



Employs over 500 people.



Collaborates with over 1,500 domestic and international suppliers.



Sources raw materials from over 100 grower families.



Imports selected wines from reputable wine producers world wide.

Company Operations

The business includes the following activities across our global supply chain.

- Growing grapes on company owned vineyards.
- Sourcing grapes from a network of growers across Australia.
- Receiving of grape juice and bulk wine.
- Growing cotton, rice and other cereal crops.



Grape Growing and Sourcing

- De Bortoli Wines has a number of vineyards located in NSW and Victoria.
- Vineyards are directly managed by our own employees.
- Vineyard staff are a blend of employees and registered contractors.
- Grapes are sourced from a number of local and interstate growers.
- Growers are supplied with terms and conditions for supply to De Bortoli Wines.
- De Bortoli Wines proactively liaises with growers to ensure they operate ethically and responsibly.

Wine Production

- The production of still, sparkling and flavoured wine.
- The packaging of company owned brands of still, sparkling, organic and flavoured wines under its own master brand.
- Despatch of packaged still, organic, sparkling & flavoured wines to domestic and export markets.
- The despatch of grape juice and wine in bulk.
- The packaging of beverage products under customers' own brands.
- De Bortoli Wines produces and packages award winning wines under our wholly owned and operated brands including De Bortoli, Sacred Hill, La Bossa, Deen, Noble One, DBFS, Windy Peak, La Boheme, Villages, Rutherglen Estate, 17 Trees and Emeri. The number of wholly owned brands is 160.
- De Bortoli Wines also provides third party packaging services to a number of external beverage organisations.



Wine Distribution

- Export products are packed into shipping containers and transported by road and rail to the port for shipment by sea.
- Domestic products are delivered to their destinations by road and rail.
- Wine is purchased from reputable wine companies world wide. These wines are sold and distributed on the Australian market.

Sales and Marketing

- A dedicated sales and marketing team ensures our wines are distributed to importers, retailers and consumers across the globe.

Procurement

- Purchasing is carried out by responsible departments.
- The De Bortoli Wines Quality Department is responsible for vetting suppliers and contractors ensuring they meet De Bortoli's specifications and requirements.

Broad Acre Farming

- De Bortoli Wines has extensive broad acre irrigation cropping activities.
- Predominant cropping is cotton and cereal crops.



Supply Chain

Our supply chain is geographically diverse and encompasses small businesses through to global multi-nationals. In any given year, De Bortoli Wines procures goods and services from approximately 1,500 direct and indirect suppliers based in regions including; Australia and New Zealand (ANZ), Americas, Asia and Europe, Middle East and Africa (EMEA).

Direct suppliers include those from whom the De Bortoli Wines buys grapes, bulk wine, glass, card, labels, packaging, other dry goods and machinery. Indirect suppliers include those from whom the De Bortoli Wines procures services, including marketing, legal, consultancy and technology based services.

De Bortoli Wines Policies and Procedures.

Outlined below are existing policies and procedures that provide the framework for the mitigation of human rights and modern slavery risks for our employees. De Bortoli Wines has a process where employees report any concerns regarding unethical or illegal conduct in relation to modern slavery or human trafficking. Employees can report to their manager, or report through a dedicated De Bortoli Wines confidential feedback system via email or phone.

De Bortoli Wines's policies and procedures reflect our values, and set the expectations of our employees to ensure a fair and ethical workplace. These include:

Code of Conduct

De Bortoli Wines expects all employees to observe the highest standards of ethics, integrity and behaviour during their time with the company. This expectation extends to how we interact with suppliers, customers and the general public.

Anti-discrimination and Harassment

Each employee has the absolute right to work in an environment free from harassment and discrimination due to their race, gender, religious beliefs, sexual persuasion or personal activities.

Equal Employment Opportunity

De Bortoli Wines is committed to ensuring that all employees enjoy equal employment opportunity (EEO). This means that employees are treated fairly and equally when employment decisions are made and that unlawful discrimination does not take place.

Workplace Bullying

De Bortoli Wines has a zero tolerance policy for any form of workplace bullying and provides numerous avenues to raise concerns pertaining to inappropriate behaviour.

Procurement Policy

De Bortoli Wines is committed to work collaboratively with suppliers that have similar values and operate with integrity.

Supplier Requirements

De Bortoli Wines has a comprehensive policy that outlines the standards and expectations it requires from all suppliers.

Whistle Blowing Policy

All De Bortoli Wines employees, contractors and suppliers are required to operate within the ethical and legal guidelines of their respective jurisdictions. A range of confidential avenues are provided to employees and managers to report any actions and behaviours that contravene the policy. Additionally a range of measures are also available to protect individuals raising concerns.

Workplace Health & Safety

De Bortoli Wines is committed to proactively minimising incidents and injuries within the workplace through our systems and behaviours.

Employee Assistance Program

EAP provides confidential consultation services for all employees that require help with issues at work or home.



Assessing The Risks Of Modern Slavery Practices

Employment Risk

Our success is strongly linked to the way we do business, and this includes acting responsibly throughout our operations. The De Bortoli Wines workforce is employed directly through a number of legally sound employee contract types; these include provision for casual, fixed term, permanent and international assignment arrangements.

We operate within an ethical and legislative employment framework that complies with local laws and covers core employment conditions such as minimum wages, hours of work and leave entitlements. We have a component of indirect labour hire through third party labour providers, including third party agricultural labour services. For such services, commercial contracts are put in place which expressly state our requirement that any contractor provided is engaged in accordance with relevant statutory employment requirements. Furthermore, such arrangements and compliance thereof are regularly reviewed and audited as part of our third-party contracting arrangements.

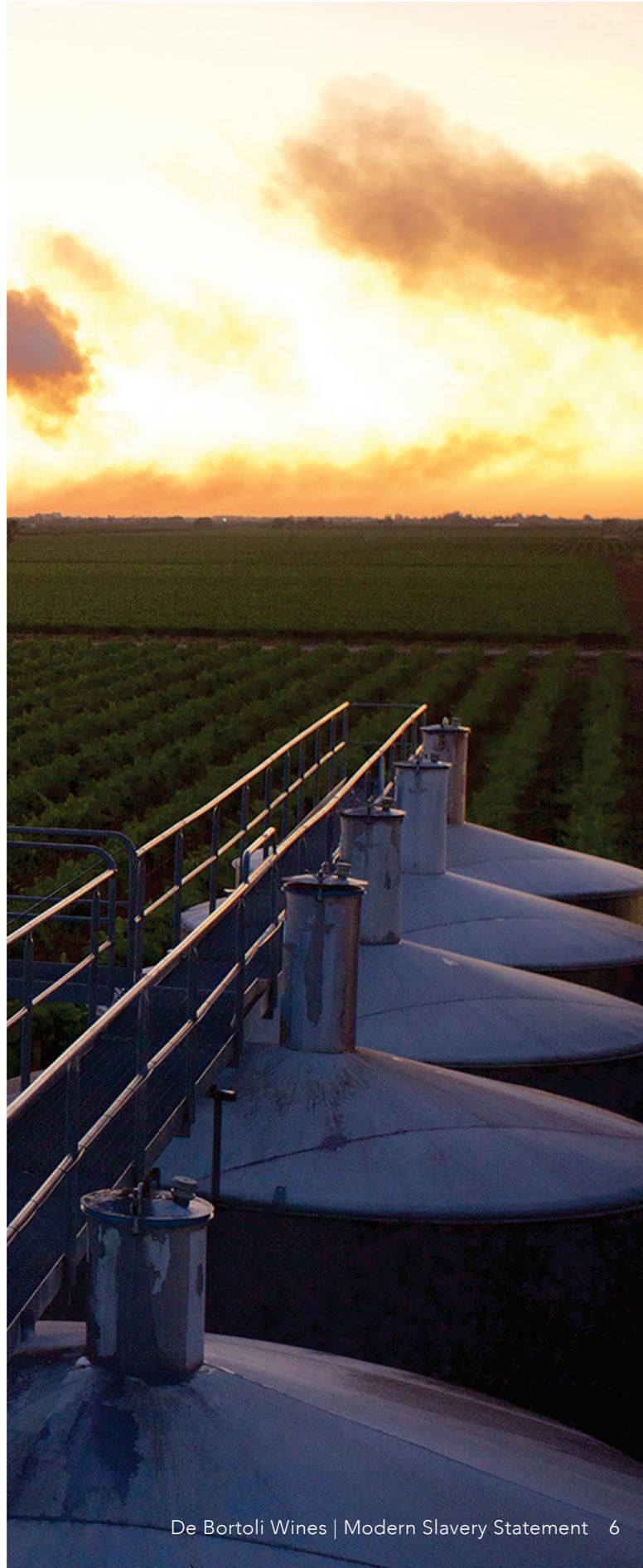
Supplier Risk

De Bortoli Wines over the last several years has introduced an extensive compliance management plan, which has been subject to rigorous and regular third party audit processes.

A component of the compliance management plan has been the approval of suppliers of goods and services to our operations. This is through a high level questionnaire and random audits that gives assurance as to the practices and integrity of our suppliers and, in turn, their suppliers. This scope has included the following:

- Supply of Food Safe and unadulterated raw materials.
- Ethical/Fair trade accreditation and/or practices.
- Policies that allow protection to staff.
- Child labour policies and protections.
- Environmental accreditation and/or practices.
- Health and Safety accreditation and/or practices.

We have established a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, and compliance with health, safety and environmental standards.



Addressing the risk of Modern Slavery Practices

De Bortoli Wines supports the United Nations Sustainable Development Goals, including Goal 8: Decent work and Economic Growth. We strongly support this goal with an ongoing commitment to help address all forms of modern slavery.

By default, we have confidence that our systems and processes, and more specifically our compliance management plan, provides us with the assurance that we are minimising the risk of modern slavery practices directly within the business and also through our extensive supply chain.

De Bortoli Wines also acknowledges that it has not yet fully and completely assessed the risk of modern slavery, therefore the business is committed to a continuous improvement process that proactively addresses modern slavery issues, both current and emerging.

Actions Taken:

The following key actions have been undertaken by De Bortoli Wines:

1. In 2021 De Bortoli Wines Executive Management Team endorsed the company's Modern Slavery Policy. The policy has been communicated and distributed to all Department Managers for implementation and staff awareness.

2. De Bortoli has developed an online training package and quiz that includes the following:

- Modern Slavery
- Whistle Blowing
- Food Fraud
- Food Safety

3. All Staff located at the Head Office and Production Facility have been trained and are required to complete on-line refresher training annually.

Next Steps:

De Bortoli Wines plans to carry out and report on the following actions over the next reporting period:

- Develop and roll out a national modern slavery training package. This will be through online training as well as face to face as appropriate.
- Review the current annual supplier questionnaire to gain a better understanding of our supply chain with respect to modern slavery practices.
- Review, update and communicate all relevant policies.
- Incorporate modern slavery actions and reporting into the current compliance management team.
- Ensure all third party labour providers are complying with current legislation.

This statement has been approved by the Board and Directors of De Bortoli Wines Pty Ltd.



Darren De Bortoli
Managing Director



Leanne Webber
Director

Date: 29 November 2021