



**SAN MIGUEL
YAMAMURA**

MODERN SLAVERY STATEMENT

2024

STATEMENT FROM OUR EXECUTIVE DIRECTOR AND MANAGING DIRECTOR

We are pleased to present SMYA's third Modern Slavery Statement as a reporting entity under the Modern Slavery Act 2018 (Cth). This Statement reflects our ongoing efforts to identify, prevent, and address modern slavery risks across our operations and supply chain. We acknowledge the critical importance of transparency and accountability in confronting this global issue, and we are committed to promoting ethical and responsible business practices both in Australia and internationally.

Our commitment to upholding human rights, supporting ethical labour practices, and eliminating modern slavery remains steadfast as we continue to strengthen our extended value chain. Our overarching objective is to ensure that all individuals involved in our operations are treated with fairness, dignity, and respect. We strive to embed the highest standards of ethical conduct into all aspects of our business, creating a foundation for a responsible and sustainable future.



Rene Cabrera
SMYA Executive Director
Rene Cabrera



Ross Sinclair
SMYA Managing Director
Ross Sinclair

ABOUT THIS STATEMENT

Modern slavery encompasses a range of severe human rights violations, including forced labour, slavery, debt bondage, the worst forms of child labour, forced marriage, deceptive recruitment, and human trafficking. These practices involve the use of coercion, threats, or deception to exploit individuals and deprive them of their freedom—often with devastating consequences for victims' health, safety, and wellbeing.

According to the International Labour Organization, an estimated 50 million people were living in modern slavery globally in 2021, with forced labour identified as the most widespread form. Vulnerable groups—such as children, undocumented migrants, and people experiencing poverty—are disproportionately affected.

This Joint Modern Slavery Statement of San Miguel Yamamura Australasia Pty Ltd ("SMYA") covers the 2024 financial year (January 1 – December 31, 2024). It sets out our position on modern slavery and outlines the actions we plan to take over the year ahead to identify and assess related risks within our operations and supply chains. To support this work, we have engaged Unchained Solutions Pty Ltd to help us establish a governance and risk management framework that will guide our efforts and promote continuous improvement.

San Miguel Yamamura Australasia Pty Ltd ("SMYA") ABN 49 099 994 162 is a wholly owned subsidiary of San Miguel Yamamura Packaging International Ltd ("SMYPIL") based in the Philippines. SMYPIL is owned by two packaging leaders: San Miguel Holdings Limited and Nihon Yamamura Glass Co, Ltd. The SMYA operations in Australia are registered at 1 Culverston Rd, Minto NSW 2566.

Starting with Cospak Pty Ltd (now SMYC Pty Ltd, ABN 75 099 742 784) more than 10 years ago, SMYA now offers packaging and beverage-filling solutions to over 10 industry sectors. We employ over 500 staff across 17 sites in Australia and internationally and service approximately 2,500 customers in 35 markets.

Our organisation consists of four integrated member partners:

- Cospak (SMYC Pty Ltd, ABN 75 009 742 784)
- Vinocor (SMYV Pty Ltd, ABN 80 603 621 834)
- JMP Retail (SMYJ Pty Ltd, ABN 12 625 744 729)
- Santector (SMYBB Pty Ltd, ABN 45 096 514 788)



SAN MIGUEL
YAMAMURA



OUR GOVERNANCE FRAMEWORK

SMYA is governed by a Board of Directors who are appointed in accordance with its Constitution. The Board is responsible for ensuring that SMYA has an appropriate corporate governance structure and continues to grow and develop for the advancement of the packing and beverage industry.

At SMYA, our Board, executives and employees are committed to upholding the highest standards of corporate governance. We view strong governance as essential not only to effective business strategy but also to the responsible management of modern slavery and broader human rights risks.

Our governance framework clearly defines the roles of our Board, management, and staff in identifying and engaging stakeholders impacted by our operations. It also ensures that communication with stakeholders is timely, transparent, accurate, and effective.

In line with our commitment to ethical and sustainable business practices, we have taken proactive steps to address modern slavery risks across our operations and supply chains.

Recognising the global significance of this issue, we have engaged leading experts in modern slavery and human rights to guide our approach, raise awareness, and build internal capability.

This collaboration enables SMYA to identify, assess, and mitigate potential modern slavery risks through robust policies, ongoing supplier assessments, and improved due diligence processes. By embedding these measures into our governance systems, we aim to foster a culture of ethical conduct, transparency, and accountability.

Through these efforts, we are building a more sustainable and socially responsible business—one that aligns with both national legislation and international best practices, while actively contributing to the elimination of modern slavery in our industry and beyond.



SMYA OPERATIONS AND SUPPLY CHAIN

SMYA operates in Australia, New Zealand, and China. The registered office is in Sydney with offices, facilities, and plants in New Zealand, China, and all-mainland Australian states.



OPERATIONS

Map 1: Group Member Locations



AU - Melbourne



AU - Lonsdale
NZ - Auckland



COSPAK

China
AU - Brisbane
AU - Sydney
AU - Melbourne
(Manufacturing)

AU - Adelaide
AU - Hobart
AU - Perth
NZ - Auckland
(Manufacturing)



SANECTOR

FILLING AUSTRALIA'S BEVERAGE NEEDS

AU - Melbourne
AU - Midura
AU - Adelaide

AU - Barossa Valley
AU - Margaret River

Table 1: Plants & Facilities

Plants & Facilities
NSW
VIC
WA
SA
QLD
NZ
China

TEAMS AND LOCATIONS

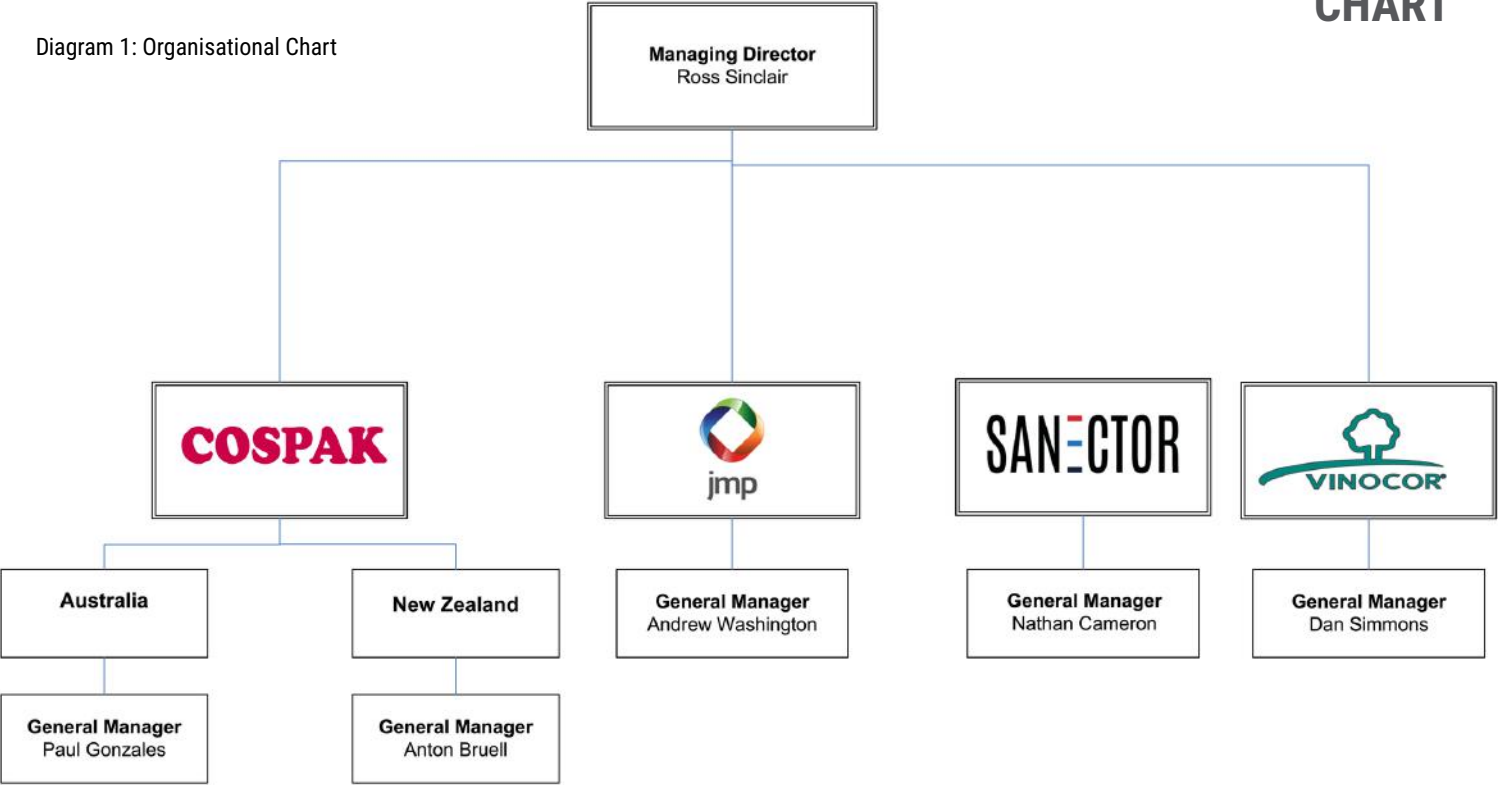
Table 2: Group Member Employees

Entity	No. of Permanent Staff
SMYA	50
Cospak	250
JMP retail	20
Vinocor	18
Sanector	200



ORGANISATIONAL CHART

Diagram 1: Organisational Chart



PRODUCTS AND SERVICES

SMYA specialises in packaging and beverage solutions, providing a wide range of integrated services to our customers, including:



Design



**Research &
Development**



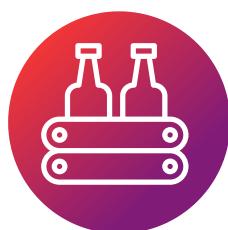
Manufacturing



**Quality
Assurance**



Sales



**Filling & Bottling
(Mobile and
Facility)**



**Warehousing
& Bulk Wine
Storage**



**Materials
Handling**



**Specialised
Services***

*Testing, Technical Support, Oenological Services

Cospak is a manufacturer, importer, and distributor of packaging products in glass, plastics, metal, paper, and flexibles. The company has offices, manufacturing plants, and warehouses in Australia, New Zealand, and China (Guangzhou), as well as a strategic supply base extending to Europe, the United Kingdom, the Middle East and Asia. Cospak's staff work in manufacturing, warehousing, design, sales and administration across Australia, New Zealand and China.

Vinocor is a supplier of corks, screwcaps, hoods and capsules to the wine industry with operations in South Australia. Vinocor provides specialised services to the wine sector including design, testing, manufacture and technical support.

JMP retail is a global supplier of packaging solutions specialising in retail and online packaging solutions, cargo protection, and materials handling. JMP retail has staff across two facilities in Queensland and Victoria.

Sanector is a beverage filling and packaging solutions business servicing the Australian wine sector. Key services include bulk wine storage, dry goods supply, labelling, wine bottling, oenological services, quality assurance, and wine warehousing. Sanector has staff across six facilities in Western Australia, South Australia, Victoria and New South Wales.

SUPPLY CHAIN

At a glance:

Total Spend: \$240.4M

Total Suppliers: 921

Total Categories: 37

Largest Single Category Spend:

Glass Packaging

No. of Supplier Countries: 16

Top Spend Category: Packaging *

* (incl. glass, fibre (paper and cardboard), metal, plastic and cork.)

PROCUREMENT

SMYA's total annual procurement spend is \$240.4 million with 921 direct (Tier 1) suppliers across 37 goods and services categories. We rely on a diverse set of goods and services to create high-quality products and deliver them to our clients in a timely and efficient manner.

Our top-spend categories include glass packaging, plastic, fibre (paper and card) packaging, metal, cork and 'Other' types of packaging. The main categories of goods and services we procure from our Tier 1 (direct suppliers) and percent spend across each category is included in Table 3.

Broad categories of goods and services that support the packaging sector are summarised in Table 4 on page 11.

Table 3: Key goods and services procured:

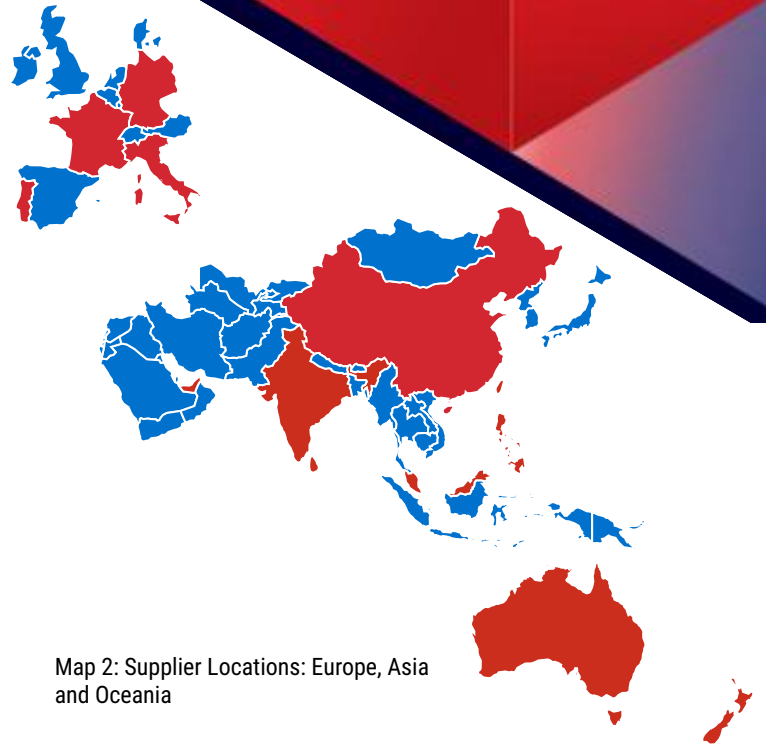
PROCUREMENT CATEGORY	PERCENT TOTAL SPEND
Packaging (all types)	73
Government fees	8
Warehousing, transport and logistics	5
Property Maintenance	3
Labour Hire	2
Plant and equipment	2
Corporate fees	2
Materials handling	1
Other categories	4

SUPPLIER COUNTRIES

We source our goods and services from direct suppliers located in 16 countries (including Australia) with over two thirds (68%) of our total procurement spend with Australian-based suppliers.

Our top international supplier countries by spend are China (14%), Portugal (3%), France (2%), the Philippines (2%), Taiwan (2%), and Vietnam (2%).

Other countries we procure goods and services from include Germany, India, Italy, Malaysia, New Zealand, Singapore, Sri Lanka, Thailand, and the United Arab Emirates (UAE).



ACTIONS TAKEN TO IDENTIFY THE RISK OF MODERN SLAVERY

The Modern Slavery Act 2018 (Cth) (the “Act”) provides eight types of exploitation that meet the definition of modern slavery. They are:

- 1) Trafficking in persons;
- 2) Slavery;
- 3) Servitude;
- 4) Forced marriage;
- 5) Forced labour;
- 6) Debt bondage;
- 7) Deceptive recruiting for labour or services; and
- 8) The worst forms of child labour.

RISK IN SUPPLY CHAIN

In our first reporting year (2022), we focussed our efforts on understanding our direct supplier risks (Tier 1) and the operational processes in place to manage those risks. We engaged external expertise to help us document, assess, and prioritise our direct suppliers against 4 key modern slavery risk indicators (industry sector, commodity, geography and workforce profile).

In our first reporting year (2022), we focussed our efforts on understanding our direct supplier risks (Tier 1) and the operational processes in place to manage those risks. We engaged external expertise to help us document, assess, and prioritise our direct suppliers against 4 key modern slavery risk indicators (industry sector, commodity, geography and workforce profile).

We repeated the supplier prioritisation process in the 2023 reporting year and, as with findings in 2022, identified similar patterns of potential risk amongst our larger Tier 1 suppliers by spend. We acknowledge that there is a significant potential modern slavery risk associated with our suppliers in our manufacturing base among our indirect suppliers (Tier 2 and beyond).

This map provides an overview of our supply chain risk in countries that together account for 95% of our total spend, and an indication of modern slavery risks inherent in each country.

TIER 1 SUPPLY CHAIN

Map 3: Supplier Modern Slavery Risk by Country

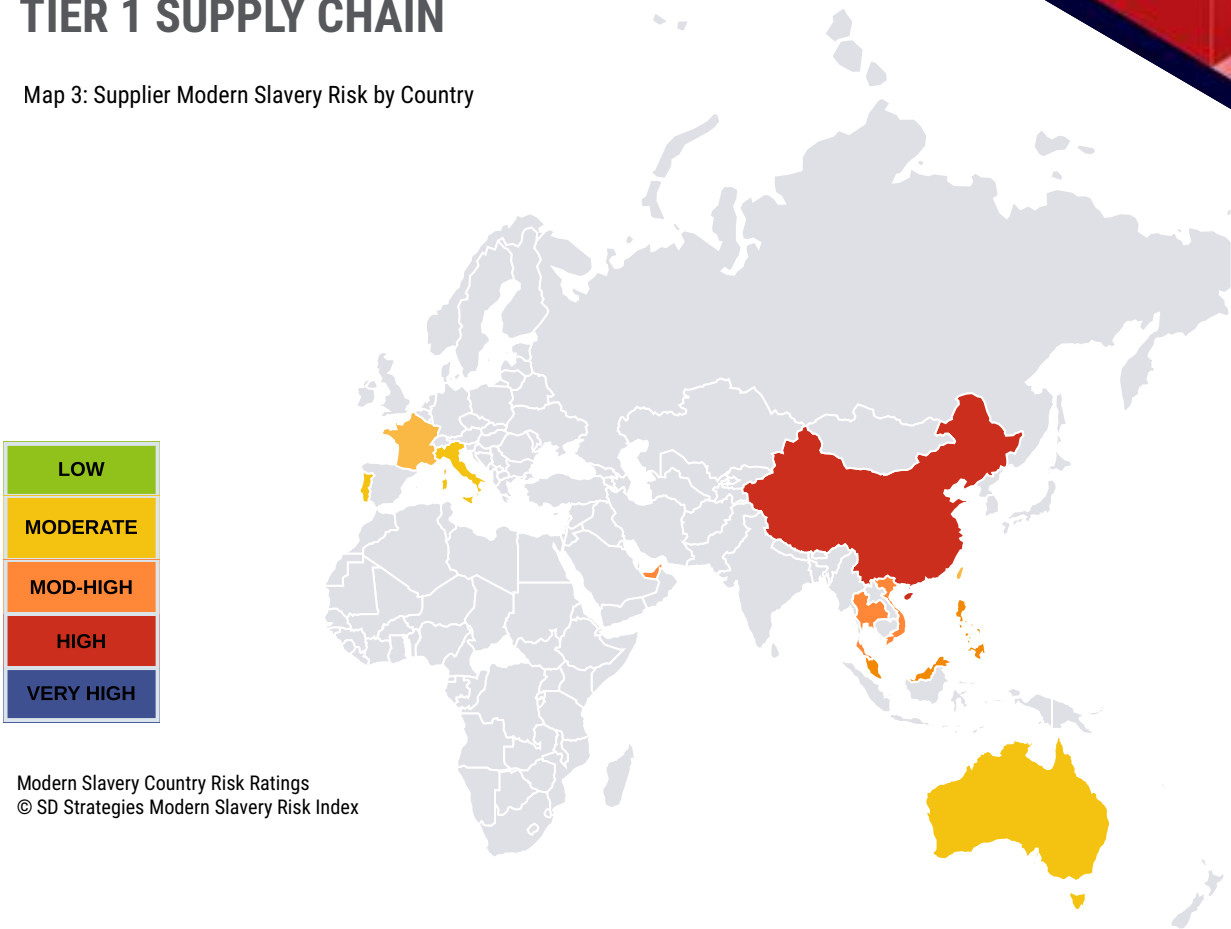
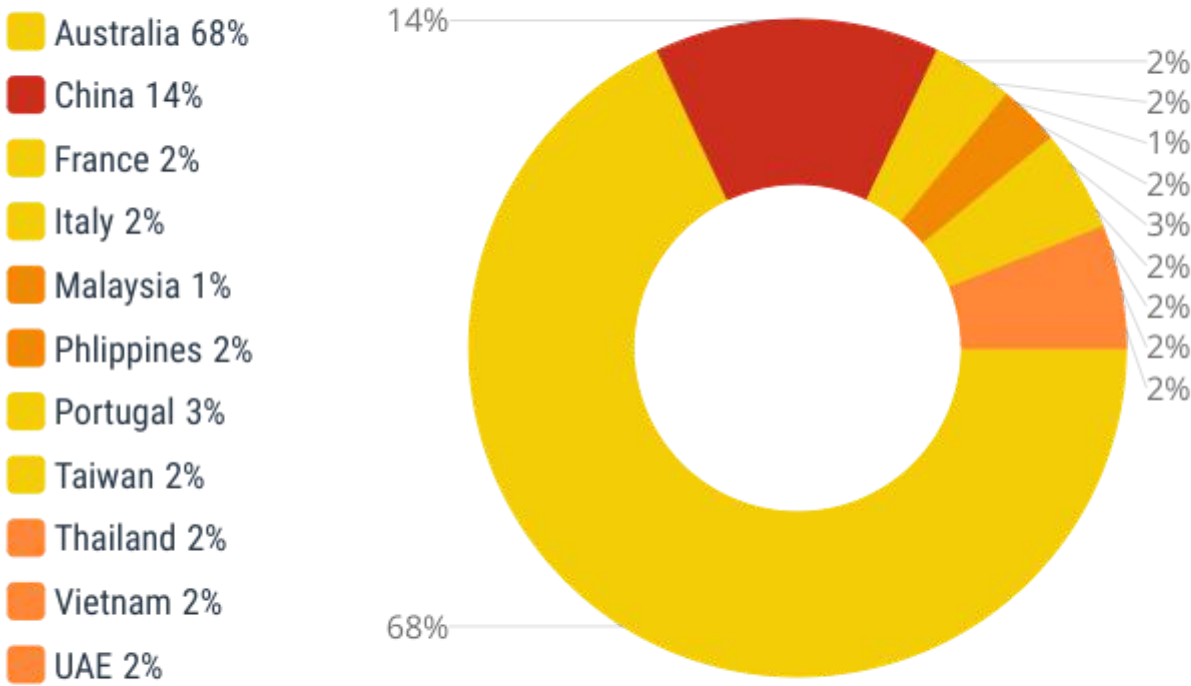


Diagram 2: Supplier Modern Slavery Risk by Country



Our relationship to modern slavery risk within our operations and supply chains ('cause', 'contribute' or 'directly linked') is defined in the UN Guiding Principles on Business and Human Rights ('UNGPs') and referenced in the Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities.

Table 4 outlines:

- 1) The good or service category used within our sector;
- 2) The associated material or purpose;
- 3) Stages of production potentially at-risk of modern slavery with each good or service;
- 4) Reported forms of modern slavery and/or labour exploitation associated with the good or service;
- 5) Modern Slavery Risk Indices that determine potential risk (see Reporting Criterion 3 for definitions); and
- 6) Potential relationship with SMYA and partner member's operations or supply chains.

Table 4: Risk Categories, Indicators and Relationship

Goods and Services Category	Material and Use or Purpose	Stage(s) of production potentially at risk	Reported forms of exploitation/ modern slavery	Modern slavery risk indicators ¹				Relationship with SMYA Operations and Supply Chain ²		
				Country	Sector	Commodity	Workforce	Cause	Contribute	Directly Linked
Raw Materials	Raw materials, such as glass, fibre (paper), plastic, aluminium, and other materials in packaging	Growing, harvesting, processing, refining or raw materials	Labour exploitation, child labour, bonded/forced labour, state-sponsored modern slavery and underpayment of wages including mandatory overtime	High	High	High	High	Low	High	High
Manufacturing / Filling Equipment	Box machines; forming press and blow moulding, filling wrapping, sealing, labelling, packing and palletising etc.	Manufacturing; transport and maintenance of plant and equipment	Bonded/forced labour, deceptive recruitment and unsafe working conditions	High	High	High	High	Low	Medium	High
Maintenance and repair services	To keep production lines running and upgrade machinery or equipment where required	Commodities, spares and transport of parts. Higher potential risk with some repair service providers	Bonded/forced labour, deceptive recruitment and unsafe working conditions	High	Medium	High	Low	Low	Medium	Medium
Packing Suppliers	Tape, labels, strapping, pallets, wrap, containers, IBCs and related packing materials	Use of raw materials, manufacturing of goods, transport of products	Labour exploitation, child labour, bonded/forced labour, state-sponsored modern slavery and underpayment of wages including mandatory overtime	High	High	High	High	Low	High	High
Shipping warehousing, material handling and logistics	Store, handle, bulk transport and deliver finished products to customers	Sea freight, warehousing and logistics associated with the transport of goods	Bonded/forced labour, deceptive recruitment and unsafe working conditions especially for seafarers	Medium	High	Low	Medium	Low	Medium	Medium
Marketing and advertising	Specialists in campaign design, copywriting, photography, print and online ads	Low for office-based operations. High for risk associated with conferences and events through accommodation and catering	Bonded/forced labour, deceptive recruitment and unsafe working conditions especially in the hospitality sector	Low	Low	Medium	Low	Low	Low	Medium
Labour	Permanent, casual and seasonal labour to support business activities, especially during peak times	Recruitment of staff through onshore or offshore labour-hire companies	Bonded/forced labour, deceptive recruitment and unsafe working conditions	Medium	High	Medium	High	Low	High	High
Specialised services	QA, Design, research and development testing, testing and technical support	Low for office-based operations. Potential risk through purchases of equipment or suppliers via Tier 2 and beyond		Low	Low	Low	Low	Low	Low	Medium

1. Refer to Reporting Criterion 3 for definitions; 2. Definitions as per the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the Commonwealth Guidance for Reporting Entities.

RISK IN OPERATIONS



SMYA staff comprise a mix of directly employed or contracted professional, technical, and base skilled workers in Australia and New Zealand and we consider the risk of modern slavery to be relatively low within our direct business operations. However, some of our Australian sites use casual workers recruited through labour-hire companies during the peak season for beverage filling and bottling of wine.

We acknowledge that the use of temporary migrant and seasonal labour is widespread in the horticulture, agriculture and food processing sectors, and that under payment of wages, conditions and labour exploitation have been documented.

Importantly, our Board and leadership teams responsible for our Australia and New Zealand operations are committed to identifying and addressing modern slavery risks in our operations and extended supply chain and have committed resources to this process.



ACTIONS TAKEN TO ADDRESS THE RISK OF MODERN SLAVERY

In 2022, SMYA formed a working group with four objectives:

- 1) assessing the potential for SMYA to cause, contribute to, or be directly linked to modern slavery through its operations and supply chains;
- 2) developing a roadmap for establishing meaningful actions to combat the issue;
- 3) assessing the risk in the first-tier supply chain; and
- 4) managing the consultation process among SMYA member entities.

Over the past two reporting periods, we have worked to strengthen our modern slavery policy framework and assessment of risk among our Tier 1 suppliers.

EXECUTIVE TRAINING

In 2023, the Board representatives and key members of our Executive Leadership Team completed online training to enhance their understanding of modern slavery issues related to our business operations and supply chain. The course covered the forms of modern slavery, legislative reporting requirements, and Board responsibilities and accountabilities under the Act. It also provided an overview of actions companies can take to address modern slavery risks, outlined how to respond to instances of modern slavery, and posed practical questions for the Board to consider.

POLICY FRAMEWORK

We have several policies and codes of conduct to manage modern slavery and human rights risks at the group level. However, because our company is diverse, some of our partners have their own in-house policies, many of which were developed prior to joining SMYA.

Collectively, our policy framework commits us to ethical sourcing, protection, of human rights and ensures zero tolerance to child labour. Our policies guide us in our work to identify, assess and address modern slavery risks across our operations and extended supply chain.



POLICY FRAMEWORK

Group Level Policies and Codes:

Internal Code of Conduct
Human Trafficking and Forced
Labour Policy
Child Labour Policy
Anti-Discrimination and Employee
Equal Opportunity Policy
Whistleblower Policy
Human Rights Commitment

We are committed to reviewing and updating these policies regularly and integrating them into our training modules to ensure new and emerging risks and issues are addressed and understood by all employees across the Group.



Group Member Policies and Codes:

Supplier Code of Conduct
(Cospak)

Core Labour Requirements
(JMP Retail)

Business Ethical Statement
(Sanector)

SUPPLIER RISK ASSESSMENT

In 2023, SMYA conducted a review of modern slavery risks across its operations and supply chains, focusing on activities and procurement data from 2022. The risk assessment was based on four key indicators: industry sector, commodity/product, geographic location, and workforce profile.

High-risk sectors included those involving labour-hire, outsourcing, seasonality, franchising, and aggressive pricing practices.

Commodities such as packaging materials, identified by international bodies like the U.S. Department of Labor and the Global Slavery Index, were closely monitored.

Geographic risks were assessed using the 2023 Global Slavery Index and SD Strategies' country risk matrix, particularly for countries with weak governance and elevated modern slavery prevalence.

Workforce risks were identified where vulnerable, low-skilled, or migrant labour was likely involved. SMYA also began to expand its focus beyond Tier 1 suppliers to recognise emerging risks deeper in the supply chain.

The analysis of 2022 procurement spend found that 81% of SMYA's expenditure was potentially high-risk for modern slavery, mainly due to the extensive use of various packaging materials. Another 9% was classified as medium risk, and 10% as lower risk. A detailed review of SMYA's Tier 1 supplier base revealed that 63% of 489 direct suppliers were potentially high-risk, consistent with patterns identified in the 2022 reporting cycle.

Twenty-four out of thirty-seven goods and services categories were assessed as high-risk, predominantly packaging materials such as glass, fibre, metal, plastic, and cork. SMYA's international sourcing also highlighted significant risks, with suppliers based in China, Malaysia, Vietnam, and other moderate-to-high-risk countries, reflecting ongoing vulnerabilities in key product categories.

Going forward, SMYA is committed to building on these insights by enhancing data collection on supply chain risks and strengthening its supplier engagement efforts. Future assessments will prioritise a deeper understanding of modern slavery risks across both high-spend and lower-spend suppliers, ensuring more comprehensive mitigation strategies throughout its extended supply chain.



IMPROVEMENT ROAD MAP

In 2025, we have committed to:

Review and develop a policy portfolio and risk management framework documentation across the Group

Conduct enterprise-wide awareness training on the issue of modern slavery and SMYA's approach to managing risk including key policies and codes

Develop SMYA's 2025 Modern Slavery Statement

OUR FRAMEWORK TO ASSESS THE EFFECTIVENESS OF ACTIONS TAKEN

Our effectiveness review process includes measures taken to develop internal capabilities and iteratively improve our systems and processes on a continuous basis. As we implement our Modern Slavery Action Plan, we will assess the effectiveness of our actions against quantitative and qualitative indicators based on these core activities:

Table 5: Measuring Effectiveness Framework

Area of Focus	Activity	Qualitative Indicators	Quantitative Indicators
	2024	2025	2026
Governance & due diligence	- Engage our Board, ELT and business units to implement priority modern slavery risk management actions - Review governance and policy framework - Include modern slavery reporting / updates on SLT meeting agendas	- Establish formal governance framework for managing and mitigating risk - Review and update relevant policies to reflect new and emerging human rights and modern slavery risks - Research leading practice models to manage risk in our industry sector	Review outcomes and effectiveness of our actions and update our Modern Slavery Action Plan and Roadmap
Risk management	- Integrate modern slavery into our corporate risk management systems and processes - Include modern slavery into corporate board risk appetite statement	Develop capability of risk management team to assess and implement mitigation actions within the risk framework	Review and report on integration of modern slavery risk management across Group systems and processes
Procurement & supply chain	- Update supplier risk identification and prioritisation (based on annual data) - Develop and communicate risk dashboard and supplier risk prioritisation findings - Identify priority shared high risk suppliers and spend categories across Group business units	- Undertake enhanced due diligence of priority suppliers shared across business units - Harmonise risk management requirements in business unit supplier contracts - Provide modern slavery training to selected high risk suppliers	Start mapping Tier 2 suppliers across major high-risk contracts
Human resources, training & recruitment	- Roll out refresher training for Board and ELT on legislative changes and enhanced accountabilities - Undertake modern slavery training needs analysis for employees and contractors - Review and identify risks associated with labour hire companies across our industry sector	- Implement broad modern slavery training for management and staff - Include modern slavery risk management responsibilities in key position descriptions	Assess management and employee awareness, understanding and skills to identify and manage modern slavery risk
Grievance & reporting	Review and update Whistleblower Policy to better reflect the UNGPs and communicate internally and externally	- Identify opportunities to enhance grievance mechanisms - Develop documented remedy framework and communicate to all stakeholders	- Review outcomes and effectiveness of whistleblower / grievance and remedy systems and process - Identify opportunities to implement worker voice mechanism in high-risk operations

CONSULTATION PROCESS

The SMYA works closely with our 4 partner members and internal teams to ensure a harmonised approach to managing modern slavery risk across the organisation and identify opportunities to share learnings from our program. The current focus with our consultation process is to create a policy portfolio and risk management framework that applies across the Group.

SUSTAINABILITY COMMITMENTS

At SMYA, we recognise the urgent environmental challenges facing our planet and embrace our responsibility to contribute to its protection and preservation. We view sustainability not only as a business imperative but as one of our most meaningful contributions to society.

Our Sustainability Promise reflects this commitment, driving positive change across six key focus areas:

Our People and Communities
Our Customers
Energy and Emissions
Management
Sustainable Supply Chains
Compliance

We are committed to supporting the transition to a more sustainable, equitable, and liveable future—for both humanity and the planet. Through our operations and partnerships, we aim to foster resilient communities and healthier ecosystems.

We are proud to maintain a range of certifications across our businesses, reflecting our ongoing pursuit of high standards in sustainability and ethical practices.



ISO 9001:2015 QUALITY MANAGEMENT



AUS QUAL ORGANIC



ISO17025 STANDARD



OU KOSHER CERTIFICATION



GOOD ENVIRONMENTAL CHOICE AUSTRALIA CERTIFIED



DQS IFS STANDARD



BRC GLOBAL STANDARD



AFIC AUTHORITY AUSTRALIA



AUS QUAL HACCP



FOOD SAFETY ISO 22000



AUSTRALIAN CERTIFIED ORGANIC USDA ORGANIC

CONCLUSION

This third annual Modern Slavery Statement 2024 marks the continuation of our organisation's approach to assess, engage, address and monitor modern slavery risks and to positive actions against violation of human rights.

MODERN SLAVERY ACT 2018 (CTH) - STATEMENT ANNEXURE

Principal Governing Body Approval

This modern slavery statement was approved by the SMYA Board of Directors and Executive Leadership Team on 13/06/2025.

Signature of Responsible Member

This modern slavery statement is signed by a responsible member of SMYA as defined by the Act:



Rene Cabrera, Executive Director



Ross Sinclair, Managing Director

MANDATORY CRITERIA

Below table outlines the page number/s of our statement that addresses each of the mandatory criteria in section 16 of the Act.

Mandatory Criteria	Page Number/s
a) Identify the reporting entity	2 - 3
b) Describe the reporting entity's structure, operations and supply chains.	5 - 9
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	9 - 12
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	13 - 15
e) Describe how the reporting entity assesses the effectiveness of these actions.	16
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultations with the entity covered by the statement)	17
g) Any other information that the reporting entity, or the entity giving the statement, consider relevant.	17