

**2021 Disclosure Statement**  
Australian Modern Slavery Act 2018



Beam Suntory Australia Pty Ltd. (“Beam Suntory Australia”) is pleased to provide the following statement under the **Australian Modern Slavery Act 2018**. This statement sets forth the steps that the reporting entity, Beam Suntory Australia, has taken and is continuing to take to ensure that human rights abuses and modern slavery are not taking place within our operations or our supply chains.

**Introduction**

As a responsible corporate citizen committed to doing business the right way, Beam Suntory Australia seeks to ensure that quality and safety standards are maintained by well-treated, fairly compensated workers in accordance with all applicable laws. Accordingly, Beam Suntory Australia has established robust policies, processes, and procedures to promote respect for human rights and to prevent modern slavery practices.

Beam Suntory Australia and its employees respect human rights, workplace safety and protection of the environment in every community where Beam Suntory Australia operates. Beam Suntory Australia expects the same of our company’s suppliers and contractors so that we demonstrate our leadership within the business community together.

Beam Suntory Australia does not allow the use of forced, bonded or involuntary prison labor.

**Our Business Structure, Operations and Supply Chains**

Beam Suntory Inc. is the parent company of Beam Suntory Australia and both entities are wholly owned subsidiaries of Suntory Holdings Limited. Beam Suntory Inc. is a global business headquartered in Chicago, with more than 5,000 employees. Beam Suntory Inc. together with our affiliates and partners (including Beam Suntory Australia) produce and distribute premium spirits including bourbon, whiskey, tequila, cognac, vodka, gin, rum, cordials, liqueurs, and ready-to-drink cocktails under various brands, including Jim Beam, Maker’s Mark and Courvoisier.

Beam Suntory Inc. has facilities around the world. Most of the commercial offices are located in major metropolitan areas, while our operating units are located in North America (USA, Mexico, Canada), Asia (Japan & India), and Europe (UK, Spain, France, Ireland).

Beam Suntory Australia has a commercial office in Australia but does not own any manufacturing or logistics operations in Australia. Beam Suntory Australia works with a contract-manufacturer (Coca-Cola Amatil) to process and bottle brands including Canadian Club, Jim Beam, Midori, & -196 at the sites marked on the following map.



- **Richlands** Brisbane, Queensland
- **Moorabbin** Melbourne, Victoria
- **Kewdale** Perth, Western Australia

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Beam Suntory Australia is involved in the procurement of ingredients, containers, labels, closures, and cases as well as contacted services related to marketing, co-manufacturing, transportation, and logistics. Beam Suntory Australia sources materials from various regions around the world, including Spain (Segovia), the United Kingdom, France (Jarnac), USA (Frankfort, Clermont and Loretto), Japan and Canada.

**Governance**

The Beam Suntory Inc. Global Citizenship Committee provides Global Citizenship Policy oversight and governance. Members of the Beam Suntory Inc. Global Citizenship Committee include representatives from sustainability, legal, compliance, human resources, supply chain and communications. This committee meets on a routine basis throughout the year to review status of open action items and recommend additional actions (as needed) to ensure conformance to the Global Citizenship Policy.

The Beam Suntory Inc. Global Citizenship Committee reports to the Beam Suntory Inc. Corporate Responsibility Committee of the Board of Directors.

**Modern Slavery Risks in Our Operations and Supply Chain**

It is important to Beam Suntory Australia that we understand our supply chain and operations and properly mitigate risks related to human rights issues and modern slavery. Beam Suntory Australia is involved in marketing activation and coordination of the commercial relationship with contract-manufacturer and distributor (Coca-Cola Amatil). Beam Suntory Australia has a range of relationships with our suppliers and business partners depending on the risk profile and spend.

In 2021, Beam Suntory Inc., in partnership with a risk management consultant, conducted an evaluation of its supply chain and operations to determine the potential for it to cause, contribute to, or be directly linked to modern slavery and human rights risks. Such evaluation was a global evaluation and including Beam Suntory Australia supply chain and operations. The framework for this evaluation was based on the United Nations Guiding Principles on Business and Human Rights (UNGPs).

This evaluation indicated that potential risk categories for Beam Suntory Inc. based on its operations and major ingredients purchased through its supply chain are as follows: Child Labor, Forced Labor, Working Hours, Fair Wages & Welfare, Discrimination, Harassment, Freedom of Association and Right to Collective Bargaining, Access to Remedy, Health, & Safety. The potential risk categories were separated by risk level (low, medium and high) and we developed an action plan on a risk adjusted basis to address the risks.

**Actions taken and controls implemented to address modern slavery risks**

To help prevent risks related to modern slavery and human rights we have taken the following key actions:

- In 2020, Beam Suntory Inc. and its affiliates, including Beam Suntory Australia, joined the Supplier Ethical Data Exchange (Sedex) and started requiring that suppliers making up 80% of our direct spend become members of Sedex. Since that time, Beam Suntory Inc. has been engaging our suppliers to share information about the actions taken to prevent human rights and modern slavery risks. This engagement includes the use of the Sedex Supplier Audit Questions (SAQ<sup>\*</sup>) and

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the 4-Pillar Sedex Member Ethical Trade Audits (SMETA\*) to evaluate the potential social risks in the supply chain by focusing on child labor, forced labor and other human rights issues as well as considerations toward the work environment and occupational safety. This engagement also includes the implementation of action plans to promote corrective actions, when needed.

- Beam Suntory Inc. created two new Supplier Sustainability Manager roles in 2021 to continue to enhance our work in this area. One position is based in Chicago and the other position is based in Madrid.
- Beam Suntory Inc. updated the global citizenship process to identify when and how to use Sedex, SAQs and SMETAs.
- Beam Suntory Inc. transitioned 3<sup>rd</sup> Party Audits to SMETA format allowing us to do a deeper dive into key areas, including around environment and business ethics.

### **Assessing the Effectiveness of Actions Taken**

Beam Suntory Australia considers several key performance indicators in the assessment of the effectiveness of actions taken to mitigate modern slavery and human trafficking risks, including % of suppliers that are Sedex members along with number and type of risk findings and status of corrective action plans.

As part of our commitment to tackling modern slavery and human trafficking, we will continue to look for ways to improve upon our existing policies, procedures, ways of working and in promoting awareness with our employees and our suppliers. We will continue to expect that our suppliers and our partners share our commitment to tackling modern slavery and human rights issues.

### **Relevant Policies**

Beam Suntory Inc. has policies, procedures, and controls in place to prevent and reduce the risk of modern slavery practices and to promote respect for human rights. All of such policies apply to Beam Suntory Australia. The primary policies include:

- [Beam Suntory Global Citizenship Policy](#)
- [Beam Suntory Code of Conduct and Ethics](#)
- [Beam Suntory Supplier Code of Conduct and Ethics](#)

The Global Citizenship Policy provides guidelines to ensure that Beam Suntory Australia and its employees respect human rights, workplace safety and protection of the environment in every community where Beam Suntory Australia is located and expects the same of Beam Suntory Australia suppliers and contractors. Global Citizenship Policy elements include:

- Working Conditions / Health & Safety
- Child Labor
- Forced Labor
- Discrimination
- Working Hours
- Wages & Benefits
- Environmental
- Management Systems

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- **Contractors & Suppliers**

Beam Suntory Australia's suppliers and contractors are contractually obligated to comply with all applicable laws, including laws related to modern slavery and human trafficking. Beam Suntory Australia periodically evaluates select suppliers and contractors on their ability to demonstrate evidence of substantial conformance with the Beam Suntory Australia policies, subject to local rules. Beam Suntory Australia engages and consults with third parties to assist in these evaluations as the circumstances dictate. In addition, Beam Suntory maintains appropriate evidence that the Beam Suntory Australia Policies are substantially being met by suppliers and contractors that have been evaluated, subject to local rules. This evidence may include certification forms, written questionnaires, inspections or other appropriate documentation.

Beam Suntory Australia's employees who have direct responsibility for supply chain management receive training in all aspects of supply chain risk mitigation, which is intended to identify, among other things, circumstances that suggest a high risk of noncompliance with Beam Suntory Australia's policies and applicable laws. Any concerns relating to potential noncompliance to our policies are investigated promptly. Suppliers that fail to meet Beam Suntory Australia's expectations will be terminated. In addition, employees who violate the policies are subject to discipline up to and including termination.


**Other Information**

Beam Suntory Australia is committed to continual improvement. Beam Suntory Australia will continue to assess the potential risks in our supply chain and increase the awareness across key stakeholders in our business to ensure that our policies, processes, and procedures are understood and being implemented. Beam Suntory Australia will monitor and report our progress annually.

Anyone interested in additional information may contact Beam Suntory directly.

This disclosure statement was approved by the Board of Directors of Beam Suntory Australia on 28<sup>th</sup> June 2022 as applicable to Beam Suntory Australia during fiscal year 2021.

**SIGNATURE**

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Andrea Parker  
General Manager