

HILL-SMITH FAMILY ESTATES



2025 Modern Slavery Statement

Version: 1.0

23 December 2025

Hill-Smith Family Estates is committed to protecting human rights and preventing modern slavery in all its forms, including forced labour and human trafficking across its business activities and global supply chain.

Hill-Smith Family Estates' core values of Integrity, Knowledge, Friendship, Excellence, and Respect are what drives us to actively identify and overcome social and environmental challenges.

We endeavour to conduct business with honesty, integrity, and respect to human rights, and act safely, fairly, and transparently in all business dealings with respect for our customer and the people who work for and with us.

We make every effort to abide by all fair labour practices, ensuring that our activities do not directly or indirectly violate human rights. We act in ways that uphold the effective abolition of child labour and elimination of all forms of forced and compulsory labour. We uphold the freedom of association and the effective recognition of the right to collective bargaining and respect the right of all employers and workers to establish and join groups for the promotion and defence of their occupational interests freely and voluntarily.

Hill-Smith Family Estates' 2025 Statement provides further detail of the risks of modern slavery practices in the operations and supply chains of its entities. The Statement also describes the actions implemented by Hill-Smith Family Estates to assess and address the risks of modern slavery practices for the financial year 1 July 2024 to 30 June 2025 (FY25), including new work undertaken to strengthen supplier governance and risk profiling as well as staff training. Lastly the statement describes how the effectiveness of such actions is assessed.

This statement has been approved by Hill-Smith Family Estates' Board of Directors.

REPORTING ENTITIES

This Statement covers the following entities which are collectively referred to as Hill-Smith Family Estates or HSFE.

Samuel Smith & Son Pty. Ltd. (Group parent)
S. Smith & Son Pty. Limited
S. Smith & Son Processing Pty Ltd
Negociants International Pty. Limited
Free Run Juice Pty Ltd

The above entities are ultimately wholly owned by Samuel Smith & Son Pty. Ltd. and are governed by a single HSFE Board, Audit and Risk Committee and Executive Board Management Team. Accordingly, all policies, procedures, reports, oversight mechanisms and modern slavery risk-management processes apply consistently across the HSFE Group.



ABOUT

For more than 175 years, the Hill-Smith Family has been growing grapes and making wine. Each generation of pioneers and innovators has led Hill-Smith Family Estates to where it is today; a business integrated from vine cultivation, grape growing, winemaking and distributing fine wine.

Hill-Smith Family Estates has evolved from a single brand to a family of wine brands including but not limited to Yalumba, Jansz Tasmania, Oxford Landing, Winesmiths, Pewsey Vale Vineyard, Dalrymple Vineyards, Heggies Vineyard and Nautilus Estate.

The company’s operational structure comprises over 1000 hectares of vineyards, as well as five wineries, in South Australia, Tasmania and New Zealand; sales and distribution teams throughout Australia, New Zealand, Canada, USA, China and the UK; and a global network of distribution partners selling our wine in more than 52 international markets. In addition, the Yalumba nursery provides high quality planting material to the Australian wine industry.

Hill-Smith Family Estates prides itself on its family heritage and its connection to people, but above all, the desire to remain a sustainable and successful family-owned business for generations to come.

The three key business activities include:

1. **Grape growing and sourcing**
HSFE sources grapes from both company-owned and grower vineyards.
2. **Wine production and packaging**
HSFE produces wine at its own production facilities in Australia and New Zealand, as well as providing third-party contract processing and packaging services.
3. **Wine marketing, sales and distribution**
HSFE markets, sells and distributes its wines, and the wines of other producers, globally.

**HILL-SMITH
FAMILY ESTATES**



Vigneron		Distribution		
Australia		New Zealand	Domestic	International
<p>YALUMBA NURSERY <small>ESTABLISHED 1948</small></p>	<p>* <small>FAMILY WINEMAKERS SINCE 1848</small> <small>OXFORD LANDING</small> <small>JANZ TASMANIA</small> <small>DALRYMPLE VINEYARDS</small> <small>PEWSEY VALE VINEYARD</small> <small>HEGGIES VINEYARD EDEEN VALLEY</small> </p>	<p>* <small>ESTATE OF MARLBOROUGH</small> </p>	<p> <small>NEGOCIANTS AUSTRALIA</small> <small>First Wine Shipped Since 1848</small> <small>Hill-Smith & Son</small> </p>	<p> <small>NEGOCIANTS NEW ZEALAND</small> <small>First Wine Shipped Since 1848</small> <small>NEGOCIANTS INTERNATIONAL</small> <small>First Wine Shipped Since 1848</small> </p>

* Wine Estates

ASSESSING THE RISKS

Operational Risks

The majority of HSFE's workforce is employed directly on a permanent full time, part time, casual or fixed-term basis. Employment complies with all relevant legislation in the applicable jurisdiction including conditions such as minimum wages, hours of work and leave entitlements.

During FY25, HSFE estimates its workforce composition is as follows:

- › Permanent full-time/ part time: 78%
- › Casual: 7%
- › Seasonal/vintage workers: 10%
- › Labour hire workforce: 5%

Approximately 3% of the total workforce comprises migrants or workers on visas. Of this cohort two-thirds are engaged as seasonal / vintage workers. Less than 1% of the total workforce are migrants or workers on visas with ongoing employment.

Identified potential operational risks areas include:

- › Reliance on seasonal vineyard and vintage labour, including migrant workforce participation
- › The use of labour-hire providers

Vineyard labour

As noted in previous statements, forced labour and exploitation of seasonal and migrant workers in agricultural supply chains has been documented in Australia (Australian Government March 2019 Report of the Migrant Workers' Taskforce) and around the world.

HSFE utilises both permanent employees and third-party contractors for vineyard activities. While contractors can present higher inherent risk due to subcontracting arrangements and reduced transparency, HSFE has taken steps to strengthen oversight.

During FY25, HSFE audited a selection of vineyard contractors and provided education to Vineyard Managers on contracting risks. This included mandatory modern slavery training. Contractor audits focused on reviewing legal documentation such as registrations, labour-hire licensing (where applicable), insurance, business structure (and ABN's) and compliance with workplace laws.

Seasonal/Vintage Casuals

HSFE engages approximately 10% of its workforce on a seasonal basis to assist with the wine grape vintage period (typically January to April). This workforce is engaged directly on a casual basis and is comprised of approximately 85% Australian nationals, with the remainder being predominantly international working holiday makers engaged under visa arrangements. As these workers are engaged directly by HSFE, the business maintains strong visibility over employment conditions and modern slavery risks. HSFE ensures that all seasonal workers:

- › have the legal right to work in Australia,
- › are provided with written contracts of employment including information regarding their rights under Australian workplace laws,
- › are paid under the existing relevant HSFE Enterprise Agreement, at rates above award minimums
- › are paid superannuation; and
- › Are engaged on the same terms and conditions as Australian nationals performing comparable work.

HSFE does not endorse controlling, exploiting, holding legal documents or other practices that restrict workers or deny their freedoms.



Labour-Hire

In addition to having a large production and logistics workforce of its own, HSFE engages licenced labour hire providers to supplement up to around 5% of its own production and logistics workforce. In recent years HSFE has reviewed and centralised its labour hire provider arrangements, ensuring fewer labour hire providers are engaged to allow for improved oversight and audit frequency.

During FY25, HSFE conducted audits of its two largest labour hire providers, including reviews of induction, training records and compliance with employment laws. Recent re-contracting (in the second half of the 2025 calendar year) has also enabled HSFE to strengthen contractual protections, including requirements relating to:

- › Lawful right to work in Australia,
- › Prohibition on payments or benefits to secure work, compliance with the Fair Work Act, modern awards and enterprise agreements,
- › Safe working conditions; and
- › Audit co-operation and provision of compliance evidence.

Supply Chain Risks

HSFE's supply chain spans multiple risk categories and geographies. It comprises:

- › Wine suppliers (finished products) from Australia and around the world (including Argentina, Chile, France, Italy, New Zealand, Portugal, South Africa, Spain, and USA)
- › Grape purchases (from Australia)
- › Packaging materials and dry goods (glass, closures, cartons)
- › Plant and equipment from Australia, Europe and China
- › Indirect service suppliers (marketing, legal, corporate and consulting services).

Supplier Risk Categorisation

During FY25, HSFE commenced structured work to identify and classify the supply chain according to areas of major input and expenditure and the inherent modern slavery risks associated with these groups.

Management sought to identify the inherent risk of HSFE's major supplier categories by considering factors such as labour intensity, workforce vulnerability, global industry exposure to modern slavery practices, governance maturity within the industry sector and typical countries of origin. It is important to note that inherent risk reflects the level of exposure based on industry and structural characteristics before considering supplier specific attributes, controls, risk mitigation strategies or due diligence.

Key supplier categories and their inherent risk classifications have been assessed as higher, medium and lower risk. Key supplier categories include: grape supply, vineyard services, Principal's products, labour hire, IT hardware and software, logistics and packaging (including glass, cartons, labels and closures), chemicals and plant and equipment.

The categorisation undertaken will assist in informing HSFE's prioritisation model for supplier engagement in FY26. FY26 work will include the identification of residual supplier-specific risks via a due-diligence questionnaire and analysis of supplier-specific data (such as workforce structure, certifications, audit results, country of origin and subcontracting). HSFE will then use the combined inherent risk and residual supplier risk ratings to produce a modern slavery supplier scoring matrix for use in ongoing supplier assessment, engagement and monitoring.



RISK MITIGATION AND REMEDIATION

Policy framework

HSFE maintains a comprehensive policy framework supporting ethical conduct and human rights, including:

- › The Hill-Smith Family Estates Charter
- › Code of Conduct
- › Respect in the Workplace program
- › Diversity Policy
- › Health, Safety and Wellbeing Policy

The business also maintains an Employee Assistance Program, and a Raising Concerns Program to ensure that people can raise concerns regarding actual or suspected contraventions of ethical standards or the law without fear of reprisal or feeling threatened by doing so. The program utilises a third-party confidential service, which receives confidential information, objectively reports to the organisation and ensures the correct processes are followed to ensure all disclosures remain anonymous. Matters reported via the Raising Concerns Program are reported to the Board through the Risk and Audit Committee. In addition, the Board is informed of any material incidents raised for the purposes of maintaining good corporate governance. All issues are resolved by way of investigation and action as required.

In December 2025, HSFE expanded and updated its Corporate Social Responsibility Policy to a broader Business Ethics & Responsibility Policy, which outlines expectations for suppliers, contractors and business partners. The policy was distributed to HSFE's largest suppliers, grape growers and principals in the second half of the 2025 calendar year and will be progressively referenced in supplier agreements. The policy can be found at <https://image.s7.sfm-content.com/lib/fe9a13727664047e73/m/1/6cbf33f8-36c6-4f1f-9484-aa9d6e37fdb9.pdf>.

Training and Communication

In FY25 HSFE's Risk & Compliance function provided modern-slavery awareness training to employees responsible for the procurement of goods and services across the Group, in order to assist employees in identifying risks of modern slavery in HSFE's supply chain.

This training was provided to employees from the Human Resources, Winery and Vineyard Operations, Sales and Distribution, Commercial and Marketing Functions.

Training is also available on-demand for all employees in the business.

Review and Reinforcement of the requirement for lawful employment practices among labour hire providers

As noted above, two separate audits were conducted during FY25 on HSFE's largest labour hire suppliers; audits focussed on ensuring the existence of documented contracts and appropriate registrations, licencing and insurance (as applicable).

Recent re-contracting in the second half of the 2025 calendar year has enabled HSFE to emphasise:

- › Ensuring workers have the legal right to work in Australia;
- › Ensuring suppliers comply with the Fair Work Act, modern awards and enterprise agreements; and
- › Ensuring suppliers meet obligations for safe working conditions.

In addition to this, a review was conducted on a selection of third-party vineyard contractors to ensure they had the appropriate licencing and insurance (as applicable).



Assessing Effectiveness

In FY22, HSFE underwent its first Sedex Members Ethical Trading audit (two pillar) of work health safety and labour practices. Some non-conformances were identified with improvements made to HSFE's labour hire review processes as well as the recommunication of the disciplinary policy with all employees.

In FY25, HSFE participated in its first four pillar Sedex Members Ethical Trading audit. The successful completion of this audit demonstrated HSFE's strong adherence to the comprehensive set of ethical, labour, environmental, and safety standards. These audits are a valuable opportunity to identify areas for improvement to enhance our business practices and processes.

HSFE conducts regular reviews and assessments of the effectiveness of policies and processes as part of its risk management framework. For example, during FY24, HSFE undertook a safety climate survey to obtain feedback from employees on the business's policies and procedures relating to their safety and wellbeing (and by extension the Corporate Social Responsibility policy) at work. A detailed Safety Plan has been developed and endorsed by the Executive and Board.

In FY25, HSFE continued to assess the effectiveness of its controls through policy reviews, incident reporting processes and the Raising Concerns Program.

Work completed in FY25, including supplier risk categorisation, policy updates and employee training, provides a stronger baseline for measuring effectiveness in FY26.

To enhance the group's ability to assess the effectiveness of its modern slavery risk-mitigation strategies, HSFE is developing performance indicators for FY26. It is envisaged these will include metrics similar to the following:

- › % suppliers completing the due-diligence questionnaire
- › % high-risk suppliers with Tier 2 visibility
- › Training completion rates
- › Number and outcomes of modern slavery related grievances raised using the whistleblower platform

Consultation and approval process

The HSFE Board and the Risk and Audit Committee retain oversight of human rights and modern slavery risks for all subsidiaries. Because all reporting entities share the same Board and Executive Management Team, consultation and approval is integrated into HSFE's centralised governance, risk and procurement processes.

Next Steps

HSFE is committed to continuously improving the practices, procedures and relevant education related to human rights and modern slavery to support its prevention.

During FY26 and beyond, HSFE will:

- › Expand the supplier risk categorisation undertaken in FY25 to include detailed supplier-specific risk analysis, via the dissemination of a supplier due-diligence questionnaire
- › Increase Tier 2 supplier visibility in high-risk categories
- › Continue to regularly review and audit labour hire and monitor the engagement of vineyard services
- › Provide regular internal reporting regarding compliance with Sedex Members Ethical Trading audit requirements
- › Continue to incorporate the Business Ethics and Responsibility Policy into contracts and disseminate with our supply chain.
- › Formalise key performance indicators to measure the effectiveness of actions implemented



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- › Continue to update core policies and processes to reflect the commitment to upholding human rights and will reaffirm our Raising Concerns Program as a confidential reporting mechanism via a reminder to the business.
 - › Continue to build expertise of its people especially those that work directly with third parties and rely on contractors in their workforce, to better identify, and act, on indications of modern slavery.
 - › Action the findings of audits and surveys undertaken during FY25 to continue to enhance HSFE's ethics and safety programs.

This statement was approved by the Board of Directors of Hill-Smith Family Estates on 23 December 2025.

A handwritten signature in black ink, appearing to read 'Karl Martin', is positioned above the printed name.

Karl Martin

Chief Executive Officer
Hill-Smith Family Estates