

ESTD  1928

DeBORTOLI

FAMILY WINEMAKERS

# De Bortoli Wines Modern Slavery Statement

FY 2024

# Introduction

This Modern Slavery Statement made by De Bortoli Wines Pty Ltd covers the 2024 Financial Year. This statement outlines the steps De Bortoli Wines has 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 potential modern slavery risks related to our business, and to implement further steps to prevent slavery and human trafficking during the 2025 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. De Bortoli Wines does not own or control any other entities therefore Criteria Six is not applicable.



The companies geographical 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.

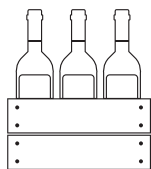
Winery, cellar door and vineyards in the Hunter Valley, NSW.

Vineyards in selected wine growing/ viticultural areas in Victoria.

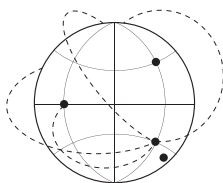
Distribution centres and sales operations in Melbourne, Sydney and Brisbane.

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

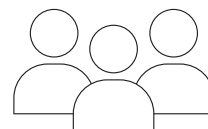
De Bortoli Wines produces and interacts with the following:



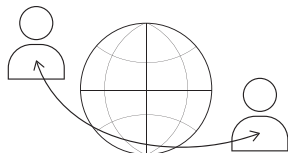
De Bortoli Wines produces approximately 4.5 million cases (nine-litre equivalent) per year.



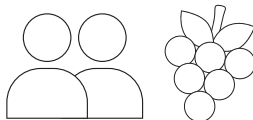
Exports to 60 countries.



Employs over 500 people.



Collaborates with over 4,500 domestic and international suppliers.



Sources grapes 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.

### 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, Deen, Noble One, DBFS, Windy Peak, La Bohème, Villages, Rutherglen Estate, 17 Trees and Emeri. The number of wholly owned brands is approximately 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.
- The De Bortoli Quality Department is also responsible for reviewing supplier questionnaires to ensure suppliers meet De Bortoli Standards.

## 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 4,500 direct and indirect suppliers based in regions including; Australia and New Zealand (ANZ), Americas, Asia and Europe, Middle East and Africa.

Direct suppliers include those from whom De Bortoli Wines buys grapes, bulk wine, glass, card, labels, packaging, other dry goods and machinery. Indirect suppliers include those from whom 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 can report any concerns regarding unethical or illegal conduct in relation to modern slavery or human trafficking. Employees can report concerns to their manager, or report through a dedicated De Bortoli Wines confidential feedback system via mail, 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.

## Personal Grievance

Ensuring that all employees have access to processes for the resolution of genuine personal grievances related to the workplace.

## Workplace Bullying

De Bortoli 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.

The risk of Modern slavery practices within the operations of De Bortoli Wines have been assessed and regulated in the following way:

- All employees are employed through a written contract that outlines the expectations of the company as well as rates of pay, enterprise bargaining instruments or any awards that are relevant.
- Employees are inducted to the company and are made aware of the policies and procedures outlined below.
- All employees are supplied with wages statement that outlines the rate of pay, deductions and net pay banked.
- De Bortoli Wines has undergone several Corporate Social Responsibility (CSR) audits both announced and unannounced. The above practices are audited to ensure they meet the CSR criteria.

We have a component of indirect labour hire through third party labour providers, including within third party agricultural labour services. The risk of modern slavery practices have been assessed and regulated as follows:

- Where legislated, only registered suppliers are engaged.
- In other jurisdictions third party suppliers are audited to ensure compliance.
- De Bortoli has a signed agreement with third party suppliers. The agreement states working conditions, pay rates and employment details.
- Contract labour hire employees are inducted to site.

## Supplier Risk

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



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.

A component of the compliance management plan has been the initial 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.

The questionnaire includes the following:

- Supply of food grade 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.

Of particular note, De Bortoli Wines have identified a number of suppliers providing raw materials that are supplied by companies in geographic areas that may be associated with greater risk of Modern Slavery. De Bortoli Wines approach to minimising/eliminating risk is contingent on carefully and systematically monitoring information gathered through De Bortoli's supply chain questionnaire as well as validation through audits if required.

## 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.

Through this commitment 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 an ongoing commitment to assessing the risk of modern slavery, particularly with higher risk suppliers within the supply chain 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:
  - a. Modern Slavery
  - b. Whistle Blowing
  - c. Food Fraud
  - d. Food Safety
3. The online training and quiz is now a component of an annual refresher for all staff.
4. Successfully completed comprehensive SEDEX Corporate Social Responsibility Audit 2024.
5. As a result of consultation during the SEDEX audit process, the company undertook the development of two additional policies specifically relating to Humans Rights and Child Labour to strengthen the company's commitment to mitigating human rights and modern slavery risks for current and prospective employees. These policies have subsequently been included in all employee induction processes.

6. De Bortoli has introduced a confidential third party whistleblowing procedure. This is through anonymous disclosure to a third party and investigation by the Chief Whistleblowing Officer.

7. During FY24 De Bortoli received no whistleblower reports.

8. Suppliers are reviewed on a regular basis utilising a supplier questionnaire. For FY24, 246 suppliers were evaluated.

9. A comprehensive review has been undertaken to evaluate the effectiveness of the Company's current Integrated Risk Management System. As part of this review a range of alternative systems available on the market were considered.

### Actions FY25:

1. Delivery of information to Board, Senior Executive and Middle Management by external provider covering recent changes to workplace legislation specifically:

- Positive Duty to eliminate unlawful discrimination
- Right to Disconnect
- Psychosocial Hazards

2. Select and implement a Quality Management System to streamline supplier evaluation. The outcome should be a clearer understanding of suppliers and their supply chains.

3. Ongoing review and risk assessment of suppliers based on possible risk of/ exposure to Modern Slavery and Food Fraud practices.

### Assessment of the effectiveness of measures and action:

De Bortoli Wines has expended considerable effort to ensure that employees, contracted labour hire and contractors are employed under conditions that meet the current legislation and best practice.

We have identified that the major risk of modern slavery in our supply chain lies with the procurement of raw materials that are sourced overseas. Our aim is to continue to utilise responses from our extensive supplier questionnaire. This will allow our Corporate governance team to assess raw material suppliers and, if required, seek further information on the risk of modern slavery in their supply chains.

Based on the information received we will endeavour to identify future evolving risk and strengthen our actions to continually improve our recognition and response to modern slavery.

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: 18 December 2024