



2023 STATEMENT ON HUMAN RIGHTS AND MODERN SLAVERY

1. Reporting Entity and consultation with its subsidiary

- (a) Joval Wines Pty Ltd (ACN 004 564 069) formerly known as Joval Wine Group Pty Ltd (**JW**) is a leading Australian wine distributor, operating two divisions known as “red+white” and “Mezzanine The Fine Wine Specialist”. Privately owned, and operating since 1963, JW represents approximately 200 Australian, New Zealand and international wine brands, selling them to all areas of the Australian wine retail and hospitality sector. JW prides itself on representing many of the most prestigious and reputable wine brands in the world.
- (b) Joval Wine Group (NZ) (**JWGNZ**) is a New Zealand based private company wholly owned by Joval Wines Pty Ltd. JWGNZ owns two vineyards in New Zealand (Marlborough and Central Otago). At the Central Otago vineyard JWGNZ operates a cellar door. At both vineyards JWGNZ grows grapes and sells them at industry pricing.

Collectively (**JOVAL**)

JWGNZ employees and its operations have been considered and employees consulted with during preparation of this statement. All JW policies cover JWGNZ and all actions are on behalf of both entities.

This is Joval’s third year of reporting under *the Modern Slavery Act 2018* (Cth) (the **Act**).

This Statement is published by Joval for the financial year 1 July 2022 to 30 June 2023 and:

- Describes the process of consultation with JWGNZ as it’s only owned subsidiary company (as per above)
- Includes an updated statement on our structure, operations, and supply chains.
- Includes an updated assessment of our risks of modern slavery practices in our operations and supply chains
- Describes the actions we have taken during the past reporting period to assess and address these risks
- Includes an assessment of the effectiveness of the actions taken
- Sets out further actions for the next reporting period



2. Joval's Structure, Operations and Supply Chains

Structure

- (a) JW is privately owned, and employs approximately 200 staff, all of whom are engaged under Employment Contracts which, at minimum, meet award conditions. All employees, regardless of the jurisdiction in which they reside, are employed by JW.

- (b) JWGNZ is a New Zealand based private company. This company employs 3 permanent staff plus casual staff on Employment Contracts which all meet minimum legal conditions.

Operations and Supply Chains

- (a) JW's head office is in Melbourne, Australia, with sales and marketing offices in all major Australian capital cities.

JW is a distributor of wine, purchasing bottled wine from around 200 Australian and international wine producers. JW enters into distribution agreements or letters of appointment with these wineries, giving it exclusive rights to sell their wines in some or all segments of the Australian liquor market.

JW outsources its international and domestic logistics operations to other parties.

- (b) JWGNZ owns two vineyards in New Zealand which are operated and managed by its own permanent and casual staff and one contract vineyard management company who is paid according to industry standards and who is insured for all its liability risks.

JWGNZ grows grapes and sells them at industry pricing.

JWGNZ suppliers are based in New Zealand. Labour hire for harvest is facilitated through the RSE scheme (Recognised Seasonal Employer) scheme which is overseen by the NZ Government. There is no risk of modern slavery practices for these seasonal workers. Other suppliers to JWGNZ are New Zealand based for example vines and vineyard equipment are purchased from local suppliers at industry pricing.

3. The risks of modern slavery practices at Joval

The risks of modern slavery in Joval's supply chain can be categorised into the following three categories:

(a) **Joval may cause modern slavery practices**

Joval believes that its risk of causing modern slavery is extremely low. Joval believes in fair remuneration and conditions for its employees. It complies with all relevant employment laws and awards, and none of its employees are paid below the relevant minimum wage. Joval invests in the health and safety of its employees, and this is overseen by the People and Culture department. All staff have access to a company-funded third party Employee Assistance Program.

(b) **Joval may contribute to modern slavery practices**

Joval considers the risk that it may contribute to modern slavery practices as being low. JW is a premium wine distributor, and while it attempts to enter into favourable commercial arrangements, price is never the only factor under consideration when negotiating with a potential supplier. JW sells very little wine that retails at under A\$10 per bottle, meaning that in most instances, if not all instances, suppliers earn more than enough to pay their employees fairly. JWGNZ is a vineyard owner and sells grapes at industry standard pricing and its seasonal labour is overseen by the New Zealand Government.

(c) **Joval may be directly linked to modern slavery practices**

Joval considers the risk that it might be directly linked to modern slavery practices is low to medium. JW and JWGNZ endeavours to discuss modern slavery with key suppliers and has improved its contractual processes. However, it acknowledges that further work can be undertaken in this area. While JW and JWGNZ carefully selects its suppliers and ensures they have a strong reputation, further investigation and assessment can be conducted to determine whether there are risks of modern slavery practices further down the supply chain.

4. Actions we have taken to assess and address these risks including due diligence and remediation processes and effectiveness of actions

(a) **Update and Development of Internal Policies and Company Strategies**

Existing

Joval has policies in place such as Joval's Whistle-blower policy and Discrimination, Harassment and Bullying policy. These policies aim to encourage the reporting of suspected wrongdoing, including activity which may breach the law or otherwise prejudice Joval's reputation. We support an environment in which staff and suppliers can report and raise any modern slavery-related concerns, and in which

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Joval will use our best endeavours to rectify any compliance concerns in a timely and appropriate way. Joval also has a publicly available set of detailed values and beliefs published online at

<https://www.jovalwines.com.au/#/workingwithus/#ourvaluesandbeliefs>

demonstrating Joval's commitment to a fair and equitable approach in everything the business does.

JW prides itself on its vision and strategic objectives which are proven prerequisites for business excellence. Our ESG journey and commitment to a zero tolerance approach to modern slavery is embedded in JW's strategic objectives.

Update from last statement

- We have rolled out our revised Environmental, Sustainability and Ethical Policy to our community
- We conduct twice annual "Health Check" company surveys where employees can raise grievances anonymously
- We conduct annual compulsory policy refresher sessions for all employees
- We engaged a consultant to work with us on our ESG journey in a way that leverages our existing initiatives, showcases the positive impact and contributions as our company continues to grow.

As part of this strategy, the 'social' pillar will be closely assessed and the importance of our company's commitment to a zero-tolerance approach to modern slavery.

Effectiveness of action/s

- The revised Environmental, Sustainability and Ethical Policy was a welcome reminder to all employees of Joval's stance on Modern Slavery and its aim to encourage all suppliers to investigate their own supply chain and address any risks.
- The investment of engaging with industry experts will be invaluable as we continually review, action, and measure the ESG strategies and objectives over the short, medium, and long term.

(b) **Supply Chain and Due Diligence**

Update from last statement

In our last statement Joval made a commitment to analyse responses to our supplier self-assessment questionnaire form.

Effectiveness of action/s

This analysis was concluded, and JW was pleased that no remediation was required.

Joval's aim is to continue to assess new suppliers and to encourage suppliers to investigate their own supply chain and address the risks that may allow modern slavery to thrive.

(c) **Employee Training**

Update from last statement

JW has provided a second roll out of Modern Slavery education to all employees using an external platform to educate personnel as to what modern slavery is, how to identify modern slavery and how to minimise the risks of modern slavery. It is mandatory for all Joval employees to complete this training with a pass rate of at least 80% by the end of January 2024.

Effectiveness of action/s

Joval is pleased so far with the number of employees who completed the training module and passed the test.

5. Further action for next reporting period

JW is committed to continuously improving our approach to human rights and modern slavery.

Looking ahead we plan to:

- Continue our work on developing our supplier due diligence process and remediation process
- Continue to build the expertise of our people through training and communication, especially those that work directly with third parties or those that rely on contractors in their workforce, so they can better identify and act on any indications of modern slavery

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Approval

This statement covers the period from 1 July 2022 to 30 June 2023 and has been approved by Joval Wine's Chief Executive Officer and Board of Directors on the 05/07/23.

Tim Menting

Chief Executive Officer

Joval Wines Pty Ltd

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Tim Menting
CEO






Modern Slavery Statement 2023

Final Audit Report

2024-05-01

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