

This statement relates to actions and activities during the financial year 30 June 2020.

OVERVIEW

Hive and Wellness Australia Pty Ltd (ABN 55 009 686 435), and its ultimate parent company, **Bravo HoldCo Pty Ltd** (ABN 22 628 069 474), together with their related bodies corporate (collectively **HWA**) are committed to achieving the highest standards of corporate compliance and ethical conduct in all of its business activities.

Proudly Australian owned and grown since 1953, Hive and Wellness Australia is one of the world's largest honey companies and its products are sold across Australia and in more than thirty countries around the world.

HWA's principle business activities are the packaging and marketing of honey and health & wellness products on a global basis, and it operates the following facilities:

- Head Office - located in Richlands (Queensland). Core functions of this facility include honey supply chain management, supply chain & planning management, marketing, domestic and export sales administration, accounting, payroll, IT and corporate administration;
- Packaging, Warehouse and Distribution facilities - located in Richlands (Queensland), Maryborough (Victoria) and Bayswater (Western Australia);
- Joint Venture Beekeeping Operations – located in New South Wales and Western Australia.

HWA acknowledges its responsibilities and obligations under the Modern Slavery Act 2018.

HWA is committed to safeguarding against slavery and human trafficking in its corporate activities and endeavours not to enter into any business relationship with any organisation, in Australia or abroad, which does not share HWA's commitment to combatting slavery and human trafficking.

This policy applies to all geographic locations and functions within HWA; all subsidiary companies, branches and offices, including any joint ventures; all contractors, subcontractors, suppliers, partners, consultants, agents, distributors, and any other person associated with HWA no matter where they are located or what they do.

SUPPLY CHAIN OVERVIEW

- The Honey Supply Chain Team sources raw honey, beeswax and other hive related products predominantly from Australian beekeepers, and as required from New Zealand beekeepers.

- The Supply Chain & Planning Team:
 - enters into Supply Contracts for the sourcing of packaging material (cartons, bottles, caps, labels, etc) predominantly within Australia, though may also source material from international sources;
 - sources raw honey from accredited international suppliers;
 - assesses and approves contract packers, in conjunction with Quality Assurance Team;
 - coordinates the distribution of finished product to local and international destinations via various transport arrangements.
- The Quality Assurance Team:
 - oversees the assessment and approval of suppliers, contractors, contract packers;
 - (where required) conducts physical audits of suppliers;
 - implements, monitors and regularly reviews HWA's accredited quality systems.
- The International Business Team (Export) enter into Finished Goods Distribution Agreements for its products in international markets (including China, Asia, Middle East, Europe, North America).
- The Domestic Sales Team enters into Finished Goods Supply Agreements with Retailers, Food Service and Industrial Customers within Australia.
- The Product Development Team may engage with local and international businesses to a) source a variety of items required for new product innovations ie: packaging concepts, ingredients; and b) investigate contract packing arrangements.
- The Marketing Team may engage with local and international suppliers of marketing material, printing, graphic design services and public relations, etc; and may enter into Marketing Agreements in conjunction with finished goods distribution.

POTENTIAL EXPOSURE TO RISKS

Though HWA maintains long term, good working relationships with the majority of our suppliers and distributors, HWA has identified that the risk of modern slavery and human trafficking may occur via its suppliers or distributors within its supply chain, where they involve the use of labour in a country where protection against modern slavery and human trafficking is limited.

In general, HWA considers its exposure to modern slavery and human trafficking to be relatively low. Nonetheless, it has taken appropriate steps to safeguard that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

ACTIONS TAKEN TO CONTROL, ASSESS AND ADDRESS POTENTIAL RISKS

HWA has taken the following steps to safeguard against Modern Slavery and Human Trafficking risks (**MSHT Risks**) within its business and supply chain:

Actions:

Human Resources:

- (at least annually) review recruitment practices, employment conditions and employee relations;
- (at least annually) review payroll systems to ensure they are in line with relevant Government Awards / Enterprise Bargaining Agreements;
- Obtain accurate 'right to work' information at time of employment; and (at least annually) review all employee files to ensure 'right to work' information is on file.

Supply Chain:

- identify any high-risk jurisdictions;
- evaluate the MSHT Risks of each new supplier / distributor;
- obtain specific contractual commitment from suppliers via HWA's Global Business Partner Code of Conduct or Supplier or Distributor Agreements, relevant contracts, etc.

Where MSHT Risks are identified:

- conduct additional audits or assessments, or further investigate supplier / distributor;
- if not compliant:
 - ~ advise supplier / distributor that continued relations is dependent on compliance or undertaking to comply with HWA's Global Business Partner Code of Conduct;
 - ~ (if amenable) work with supplier / distributor to gain an undertaking and action plan from them to implement appropriate practices within their organisation with 3-6 months;
 - ~ (if not compliant or no undertaking given) invoke sanctions against suppliers / distributors that fail to improve their performance in line with an action plan or seriously violate HWA's Code of Conduct, including the termination of the business relationship.

Corporate

- uphold HWA's Whistleblower Policy and Procedure to ensure all staff know they can report actual or suspected modern slavery and human trafficking issues without facing unfavourable treatment;
- uphold HWA's Code of Conduct Policy;
- (at least biennially) review Modern Slavery Policy.

Training / Awareness

- train relevant staff on how to identify the signs / how to assess the risks in relation to various aspects of the business / initial steps to be taken if slavery or human trafficking is suspected / how to escalate to Senior Management.
- easy accessibility of Modern Slavery Policy to all staff electronically, and provision of a hard copy upon request.

Delegation of Responsibility:

- Responsibility for:
 - a) the introduction, maintenance and review of relevant policies, contracts and agreements;
 - b) investigations and due diligence in relation to known or suspected instances of slavery and human trafficking; and
 - c) reporting issues / actions / outcomes to the Company Secretary (as per internal reporting below);

relating to:

- **Employees** - sits with the GM People & Culture;
- **Supply Chain (raw materials / packing / distribution)** - sits predominantly with the Chief Operating Officer;
- **Supply Chain (finished goods - Domestic)** - sits predominantly with the General Manager Sales & Marketing Australia;
- **Supply Chain (finished goods - International)** - sits predominantly with the General Manager Sales & Marketing International;
- **Contractors** - sits with the Chief Operating Officer;
- **Cultural Value Policies (ie Modern Slavery / Whistleblower / Code of Conduct / Anti-Bribery & Anti-Corruption)** - sits with the Company Secretary.

Corrective Actions / Internal Reporting:

Should an occurrence or potential occurrence of modern slavery be identified, either internally related to employment practice or externally related to working conditions within the supply chain, then appropriate corrective action shall be taken in line with the company's *Non-Conformance procedures*.

- all non-conformities to be recorded by the relevant division via CAR Form SP1.01.2 and reported to the Quality Assurance Manager, if applicable, the Quality Manager will notify the Company Secretary;
- investigations of known or suspected breaches to be conducted by an appointed delegate from the relevant division and required actions closed out within 30 days of discovery;
- summary of 'Actions and Outcome of Non-Conformities' to be forwarded to the Company Secretary and Quality Assurance Manager within 5 days of conclusion of investigation.

ASSESSMENT OF EFFECTIVENESS OF ACTIONS

HWA has set the following key performance indicators to measure its effectiveness in ensuring modern slavery and human trafficking is not taking place in HWA's business or in any of its supply chains.

- Use of the Whistleblower Policy in relation to reporting of modern slavery and human trafficking issues.
 - *As at the date of this statement there have been zero (0) instances.*
- Review of our recruitment and payroll systems to ensure our recruitment practices comply with all applicable laws.
 - *No non-conformances identified in the review of our recruitment and payroll systems.*
- Reviews with our direct suppliers and distributors to understand the level of communication and personal contact with the next link in the supply chain and their understanding of, and compliance with, HWA's expectations in relation to modern slavery and human trafficking.
 - *No non-conformances identified in the ongoing review of our existing supply base.*

Review of current agreements with our partners to ensure a statement confirming all entities and affiliated companies have never been convicted of offenses relating to

modern slavery and comply with their legal and ethical obligations in this regard.

- *No non-conformances identified in the ongoing review of our Vendor Assurance Program.*
- *HWA has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery or human trafficking.*

HWA also undergoes various audits throughout the year, including the SEDEX 4 Pillar Audit, that comprises Labour Standards, Health & Safety, Environmental and Business Ethics.

ONGOING COMMITMENT

HWA is committed to ongoing review and constant improvement of our practices to safeguard against modern slavery and human trafficking, both within our business and within our supply chains.

We recognise the important role we play and positive influence we can have across our supply chains.

APPROVAL

This modern slavery statement is made by Hive and Wellness Australia Pty Ltd (ABN 55 009 686 435), and Bravo HoldCo Pty Ltd (ABN 22 628 069 474) for the financial year ending 30 June 2020. This statement was approved by each of the Boards of Directors for the named organisations in the paragraph above on 24 September 2020.



Albert Tse, Director
Bravo HoldCo Pty Ltd

31/12/2020