



AUSTRALIAN FAMILY OWNED SINCE 1968

BUNDABERG BREWED DRINKS GROUP MODERN SLAVERY STATEMENT 2025

INTRODUCTION

This Modern Slavery Statement (**Statement**) has been prepared by Bundaberg Brewed Drinks Pty Ltd (ABN: 40 009 781 953) (**Reporting Entity**) and all entities owned or controlled by the Reporting Entity (together, the **Group**) during the Reporting Period pursuant to the *Modern Slavery Act 2018* (Cth) and the *Modern Slavery Act 2015* (UK) (collectively, the **Acts**).

The Acts establish modern slavery reporting requirements for reporting entities and require the submission of an annual modern slavery statement. The Group is required to comply with the Acts and, where applicable, other similar legislation or requirements, including, but not limited to, the *California Transparency in Supply Chains Act of 2010* and *Dutch Child Labour Due Diligence Law (Wet Zorgplicht Kinderarbeid)* (collectively, **Other Regulations**).

This Statement has been prepared to satisfy the requirements of reporting entities under the Acts and may satisfy requirements of Other Regulations, by setting out the actions the Group takes to assess and address modern slavery risks in its global operations and supply chains during the financial year reporting period commencing 1 July 2024 and ending 30 June 2025 (**Reporting Period**).

The Group recognises that modern slavery occurs in many forms, such as slavery, servitude, trafficking in persons, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services.

The Group is fully committed to operating responsibly and establishing and adhering to the highest ethical standards. The Group will not tolerate any forms of modern slavery in its business.

WHO WE ARE

The Group is made up of Australian family-owned companies known for their premium drinks, including Ginger Beer and other non-alcoholic beverages. For four generations, we've kept tradition at heart, brewing to traditional recipes, using time-honoured brewing methods and the best quality ingredients. Guided by the rule, "If it's worth brewing; it's worth brewing well", the Group craft brews their drinks for up to seven days to capture the refreshing taste of real ingredients inside every brew.

The Group distributes and supplies its premium drinks to over 60 countries and employs over 240 employees worldwide.

OUR OPERATIONS AND SUPPLY CHAIN

The Group has a significant supply chain and sources significant quantities of goods and services, including ginger, agricultural raw ingredients and materials, glass, aluminium, cardboard, and major machinery.

The Group recognises that the risk of modern slavery is influenced by factors such as vulnerable populations, goods and service categories, industry, and geographic location.

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A comprehensive supply chain map has been developed to better demonstrate the geographic location and nature of goods and services sourced. In FY25, the Group worked with over 200 suppliers globally, with most of its annual supplier spend occurring with Tier One suppliers primarily located in Australia, followed by the United Kingdom and New Zealand. The Group has assessed its risk to modern slavery as low, taking into account the nature of the goods and services and the regions and industries the goods and services are sourced from. Based on the Group's due diligence investigation, including supplier questionnaires, supply chain mapping, and review of sourcing regions, the Group has determined that there is no reasonable suspicion that goods or services supplied to end-users have been produced using child labour as defined by ILO Convention 138 and ILO Convention 182. However, the Group acknowledges that risks may exist in lower tiers of the supply chain, particularly in regions where raw materials such as ginger and other agricultural products are sourced, and the Group remains vigilant in monitoring these risks.

Although the Group's risk of modern slavery is low, the Group recognises that the risk of modern slavery may be higher further down the supply chain as a result of the countries where raw materials are sourced from or equipment is manufactured by its suppliers.

The Group acknowledges that its systematic approach, procurement processes, practices, and dealings with suppliers are essential elements of progressing the eradication of modern slavery and improving human rights globally.

ASSESSMENT AND MITIGATION OF MODERN SLAVERY RISK

The Group's management of modern slavery risk in its operation and supply chain, is guided by the Ethical Sourcing and Modern Slavery Policy, as endorsed by the Group's Board (**ESMS Policy**).

The ESMS Policy outlines the steps that the Group has taken to assess and mitigate the risk of modern slavery in its supply chain including the due diligence process and remediation process.

DUE DILIGENCE

The ESMS Policy sets out the following due diligence process for the Group:

- establishment and implementation of a due diligence process for suppliers that consists of:
 - issuing a questionnaire to the top 50 suppliers to ascertain their level of risk of modern slavery, and the steps taken by suppliers to manage their risk of modern slavery, including providing supporting documents (with the Group conducting this verification process internally);
 - ensuring due diligence is carried out with new suppliers by issuing new suppliers with a questionnaire to ascertain their level of risk of modern slavery, and the steps taken by supplier to manage their risk of modern slavery, including providing supporting documents (with the Group conducting this verification process internally);
 - annually issuing updated detailed questionnaires to targeted suppliers to continue to ascertain their level of risk of modern slavery, to identify any developments in managing their risk of modern slavery, and to identify if they or their suppliers have experienced any breaches of the Acts;

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- embedding an agenda item and topic of conversation in relation to modern slavery in regular account management meeting cycles with suppliers in an attempt to strengthen supplier's policies and procedures to reduce the risk of modern slavery including, but not limited to, workers' labour and payroll conditions, supplier risk, and best practice due diligence;
- ensuring all new or renewed supplier agreements contain a clause requiring suppliers to comply with the Act/s, to provide warranties that they have not been convicted of any offence involving modern slavery, to implement due diligence procedures for its own suppliers, to notify the Group if it becomes aware of any actual or suspected modern slavery concerns within its business operations, and allow for termination of the agreement if there are any breaches of the relevant clause;
- providing specific training and support to team members who manage and interact with suppliers;
- providing training to all team members and building awareness of the risk of modern slavery within the Group.

In implementing the ESMS Policy, the Group has integrated the due diligence process for suppliers in its Threat Assessment Critical Control Point (TACCP) and Vulnerability Assessment Critical Control Point (VACCP) review process within its Brand Reputation Compliance Global Standards (BRCGS) Quality Assurance System.

GRIEVANCES AND REMEDIATION PROCESS

The Group is committed to the protection and respect of human rights across its business and supply chain. In cases where the Group identify impacts that it may have caused, or to which it may have contributed to or be directly linked, the Group will seek to address this in line with the guidance provided under the Acts.

The ESMS Policy sets out the framework for grievances and remediation of modern slavery risks.

The Group has established reporting procedures and mechanisms where employees and third parties can report any concerns regarding unethical or illegal conduct, including concerns relating to risks of modern slavery. Employees can report concerns to their manager or nominated persons identified in the Policy and Procedure for Protection of Whistleblowers (**Whistleblower Policy**), or, if they wish to remain anonymous, employees and third parties can report concerns through the Group's independently operated Whistleblower system, via phone, email, or an online portal. The ESMS Policy and the Whistleblower Policy have been communicated throughout the Group.

The Group will investigate concerns reported and if substantiated, the Group will take appropriate action.

If a risk of modern slavery is identified within a supplier, the Group will work with the supplier to resolve or substantially mitigate the risk of modern slavery, rather than immediately ending the relationship with the supplier due to the potential adverse effects on the livelihood of the supplier's employees and supply chain and in taking steps to help eradicate modern slavery. The Group acknowledges that its suppliers may take time to comply with and implement policies and procedure to comply with the Acts, however the Group is committed to working with its suppliers and supporting its suppliers to eradicate modern slavery from its supply chain.



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MEASURING EFFECTIVENESS AND NEXT STEPS

The Group reviews the ESMS Policy and this Statement annually. As part of the review process, the Group:

- assesses how effective its actions are;
- reviews the actions taken by other industry leaders in complying with the Acts;
- compares its risk of modern slavery to previous years; and
- updates or amends the ESMS Policy or implements new policies and procedures to address any concerns or gaps it may find resulting from the review.

As part of its continued commitment to operate responsibly and establish and adhere to the highest ethical standards, the Group's next steps are:

- continue to embed the ESMS Policy into procedures within the Group;
- issuing updated detailed questionnaires to existing suppliers to continue to ascertain their level of risk of modern slavery or whether they, or their suppliers, have experienced any breaches of the Acts;
- carry out a review of its due diligence process to identify opportunities to improve its due diligence process;
- establish a supplier Code of Conduct;
- offer assistance to any suppliers who may appreciate assistance to comply with the Acts;
- consider how the proposed amendments to the Acts will affect the Group and how best to ensure ongoing compliance.

The Group will publish this Statement on its website and intranet site.

OTHER RELEVANT INFORMATION

In addition to the matters outlined above, the Group considers the following information relevant to this Statement:

The Group maintains a strong commitment to ethical business practices and has established internal governance structures to oversee compliance with the Acts and Other Regulations. The Group's leadership team meets quarterly to review modern slavery risk management activities, discuss supplier engagement outcomes, and monitor the effectiveness of due diligence processes.

The Group recognises that addressing modern slavery is an ongoing journey requiring continuous improvement. The Group is committed to transparency in its reporting and welcomes feedback from stakeholders, including employees, suppliers, customers, and the broader community, on how it can strengthen its approach to combating modern slavery.

The Group acknowledges that collaboration across industries and with government agencies, non-governmental organisations, and other stakeholders is essential to effectively address modern slavery



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risks. The Group remains open to participating in industry initiatives and sharing learnings that may contribute to the collective effort to eradicate modern slavery from global supply chains.

For questions or concerns regarding this Statement or the Group's approach to modern slavery, stakeholders may contact the Group at the details provided on the Group's website.

CONSULTATION

During the Reporting Period, members of the executive of the Group consulted with Bundaberg Brewed Drinks Pty Ltd and all associated entities owned or controlled by the Group in the development and implementation of this Statement through the following process:

- (a) representatives of the executive distributed draft materials, including risk assessments, policy documents, and preliminary statement drafts to senior management of all associated entities;
- (b) representatives of the executive conducted consultation meetings with representatives from each associated entity to review the requirements of the Acts, discuss modern slavery risks specific to each entity's operations, and gather input on the actions taken to address those risks;
- (c) feedback and information provided by the associated entities was incorporated into the development of the ESMS Policy and this Statement;
- (d) the Company Secretary of Bundaberg Brewed Drinks Pty Ltd reviewed the consolidated information, including the reporting requirements under the Acts and the collective actions taken across the Group; and
- (e) the Company Secretary of Bundaberg Brewed Drinks Pty Ltd updated the Board on the consultation process, the information gathered, and the content of this Statement.

The Board then reviewed and approved this Statement. This consultation process ensured that the perspectives and experiences of all entities within the Group informed the content and commitments outlined in this Statement.

This Statement was approved by the Board of the Group and is signed by a responsible member of the Group (the Chairman).

Signed,

A handwritten signature in black ink that reads "Terry O'Brien".

Terry O'Brien
Chairman

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