



endeavour  
group

# respect

2022  
MODERN  
SLAVERY  
STATEMENT

Acting  
responsibly  
in everything  
we do

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## About us

Endeavour Group Limited (ACN 159 767 843) is an Australian public company listed on the Australian Securities Exchange (ASX: EDV). The company's registered office address is 26 Waterloo Street, Surry Hills, NSW, Australia.

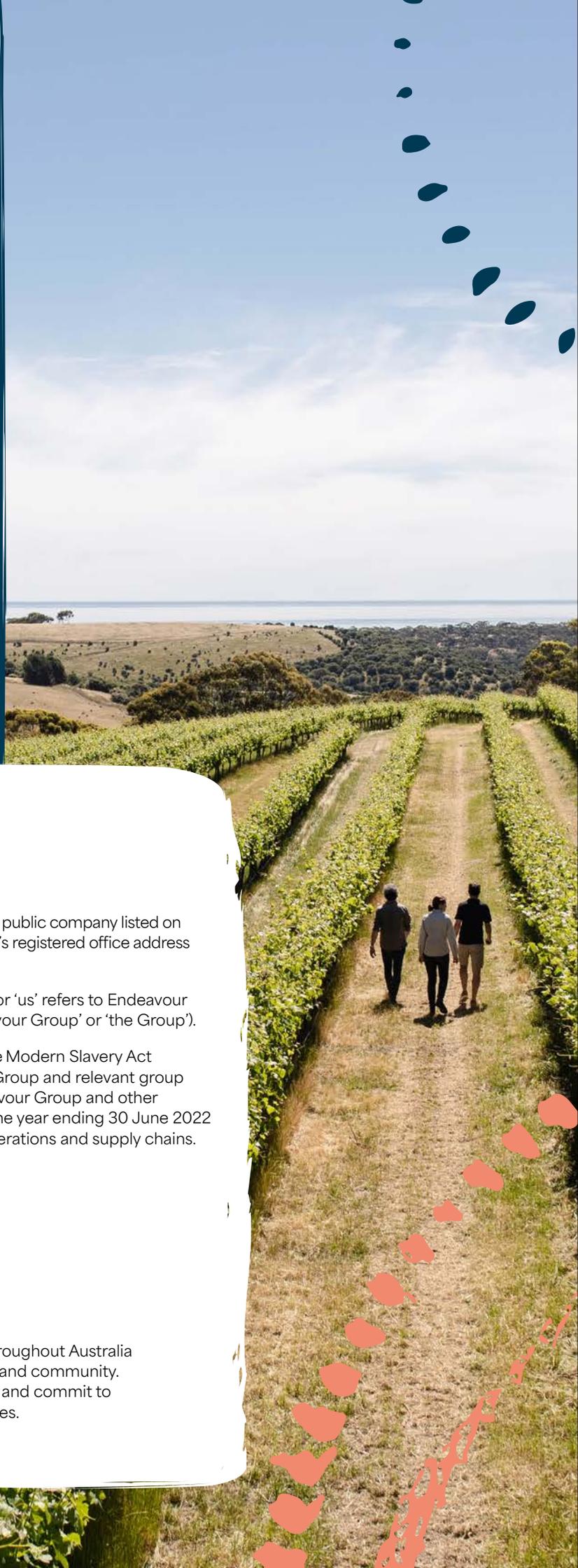
Any reference to Endeavour Group, Endeavour, 'we', 'our', or 'us' refers to Endeavour Group Limited and its controlled entities (together 'Endeavour Group' or 'the Group').

This Statement has been published in accordance with the Modern Slavery Act 2018 (Cth) (the Act). It identifies the steps that Endeavour Group and relevant group companies - including each wholly owned entity of Endeavour Group and other entities it controls for accounting purposes - took during the year ending 30 June 2022 (F22), to assess and address modern slavery risks in our operations and supply chains.



## Acknowledgement of Country

We acknowledge the Traditional Custodians of Country throughout Australia and recognise their continuing connection to land, waters and community. We pay our respects to Elders past, present and emerging and commit to continued listening to and learning from First Nations' voices.





# Respecting human rights

Our values set the standard: we're real, we're inclusive and we're responsible. That extends beyond how we treat our people to the care we have for others. We respect the rights of every worker, in every business which helps us do what we do: bring people together through our brands, products and places.

We've got work to do, and more to learn, but we're committed to doing what we can to make a positive imprint on the people we work with.



A letter from our  
Chairman and CEO

# Endeavour Group is a people business.



There are more than 28,000 team members and hundreds of thousands more workers across our extended supply chain helping us bring people together, creating a more sociable future through our products, places and experiences.

As people, we value acting responsibly, inclusively, with authenticity and care. That extends beyond how we treat each other. We want to do the right thing by every worker, in every business which helps us do what we do. And we expect the same respect and values from our suppliers, especially in the way they do business on our behalf.

These values form our approach to modern slavery. Put simply, the behaviours and practices which constitute modern slavery are not only serious human rights violations, they go against everything we value as people, and as a business. That said, we know that no business, sector or industry is immune, and as a large employer, producer and operator, we take our responsibilities seriously.

We have been evolving our modern slavery risk management approach this year in line with our sustainability commitment to make a positive imprint on the people we work with. This includes respecting and protecting human rights and ethics across our operations and global supply chain. We've taken time to understand the many types of behaviours which constitute modern slavery, assess and prioritise our risk areas, as well as determine the areas we can make the most significant impact.

Our first Modern Slavery Statement outlines our commitments and obligations, our understanding of the risks within our complex and geographically diverse supply chain, and the controls and actions we currently have and plan to put in place. This includes evolving our responsible sourcing program, which applies to every one of our direct suppliers, and is to be shared with any downstream suppliers and contractors working on our behalf. We've also begun work internally to help our teams understand the many nuances and risks of human rights, so they can assess and address modern slavery risks in their day to day interactions.

This is just the start, and we know there's much more to do. We'll review and adapt our approach as we understand more, working in partnership with our suppliers, and theirs.

Guided by our values, we'll continue to act responsibly, doing what we can to make a positive imprint on the people we work with, and sharing what we learn along the way.

**The Endeavour Group Board approved this Statement.**

**Peter R. Hearl**  
Chairman

**Steve Donohue**  
Managing Director and CEO

23 August 2022

# Where we source and operate

## Our Structure and Operations

Endeavour Group is Australia's leading retail drinks and hotels business, with 28,000 team members sharing a common purpose: 'Creating a more sociable future together.'

Our operations are primarily in Australia, and we also operate a winery in New Zealand.

  
**1,675**  
stores

  
**344**  
hotels

  
**3**  
bottling  
facilities

  
**5**  
wineries

Our operations are defined as Endeavour Group owned and operated locations, or where Endeavour Group directly employs people.

Endeavour Group consists of Australia's leading retail drinks and hotels businesses, supported by endeavourX's digital capabilities, Pinnacle Drinks' product and services capabilities, and specialty businesses providing unique customer value propositions and insights.

Endeavour Group's Retail business includes 1,675 local stores across two key national brands - Dan Murphy's and BWS.

Endeavour Group's Hotels business includes 344 distinct licensed venues - including hotels, clubs and accommodation - in cities, urban locations and regional centres.

endeavourX focuses on developing digital platforms that support our Retail, Hotel and drinks brands. It builds and scales digital capabilities and continues to improve our web and app experiences to drive customer engagement.

Pinnacle Drinks creates, builds and manages a portfolio of drinks brands, which it sells through the Group's channels and to key strategic partners. Pinnacle Drinks' production and services assets include wineries, vineyards, wine brands and wine services:

- Paragon Wine Estates manages a collection of wineries and wine brands in Australia and New Zealand, including Krondorf Wines, Oakridge Wines, Chapel Hill Winery, Isabel Estate (NZ), Riddoch Wines and Josef Chromy
- Dorrien Estate, a James Halliday five-star rated winery in the Barossa Valley in South Australia
- Vinpac provides contract bottling services and supplies packaging goods to Paragon Estate Wines, Dorrien Estate and third parties via three packaging facilities in the Barossa Valley, McLaren Vale and Gawler Belt (SA).

Endeavour Group's specialty businesses offer curated customer value propositions in drinks:

- Langton's is Australia's leading fine wine platform, providing premium wine expertise
- Jimmy Brings provides on-demand capabilities, delivering a curated range of wine, beer and spirits
- Shorty's Liquor provides business-to-business capabilities and expertise, supplying drinks to corporate businesses.



- Dan Murphy's
- BWS
- Hotels (and clubs)
- Wineries
- Bottling facilities

## Our Supply Chain

We recognise our responsibility to uphold, respect and protect the human rights of every worker in every business that helps us fulfil our strategic ambition and purpose.

Our supply chain is defined as any business with which we have a direct relationship or any supplier that provides input into the goods and services supplied by our direct suppliers. Our supply chain is complex and geographically diverse. It includes sole traders and small family businesses through to listed companies and global multinationals.

During F22, our direct supply chain included more than 12,000 suppliers of goods for resale and more than 900 suppliers of goods not for resale.

We commit to working transparently and collaboratively with all our supply partners to build mutually beneficial relationships, upholding robust standards in respecting and protecting human rights.

### Suppliers by region:



**12,500+**  
Australia/  
NZ



**500+**  
Europe



**100+**  
North  
America



**20+**  
South  
America



**60+**  
Asia



**5+**  
Africa

# Understanding our modern slavery risk areas

## Our Approach

In alignment with the Act, we understand modern slavery to include human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour, and deceptive recruiting for labour or services. We are committed to using our influence to prevent and mitigate all forms of modern slavery within our operations and supply chain. This supports our purpose - 'Creating a more sociable future together' - and our sustainability ambition - 'To leave a positive imprint on the communities we are part of, the people we connect with, and the world we all share'.

Modern slavery risk is a business's potential adverse impact on individual or community labour rights. We recognise that the level of modern slavery risk in our operations and supply chain will depend on many factors. These include: our business activities and labour force structures; demographics; and the social, political and environmental conditions in the countries where we, and our suppliers, operate.

We worked with business and human rights specialists to identify areas of inherent slavery risk in our operations and supply chain. We considered four risk factors:



### Presence of vulnerable populations

Using base skill labour, migrant labour or non-native language speakers can increase modern slavery risk.



### Business models structured around high-risk work practices

Using sub-contractors, labour hire agencies and other third parties reduces transparency.



### Product and service categories

We know that specific categories in the value chain are more prone to labour-related risks.



### Geography or country of origin

We recognise that modern slavery is more likely in locations with conflict, a weak rule of law, high levels of corruption or poor governance.



We prioritised the risk areas to focus on those we determined we have either a level of influence or direct relationship to the risk.

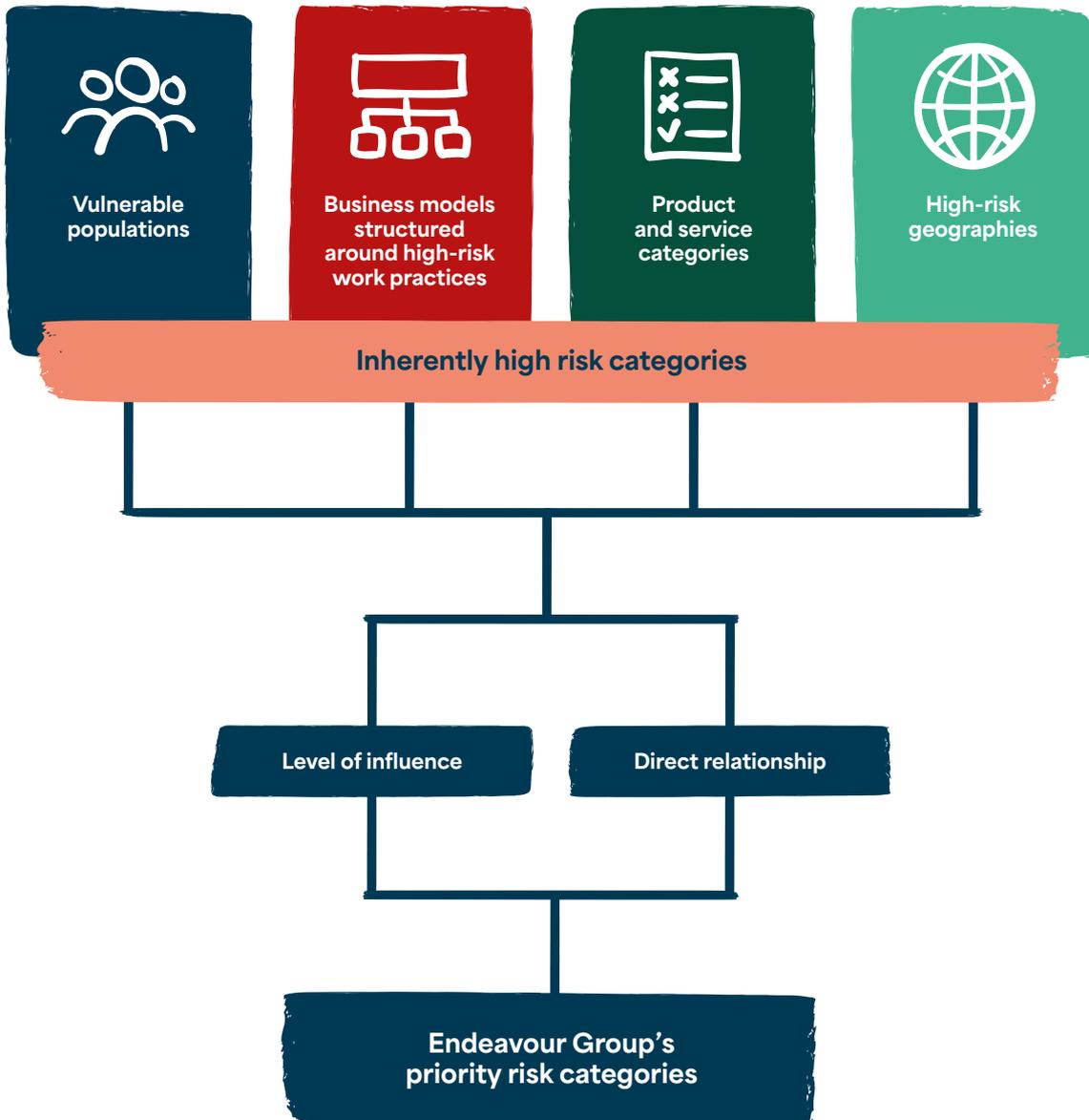


Diagram One: Endeavour Group risk prioritisation

# Key modern slavery risk areas

We did not identify any actual instances of modern slavery within our business this financial year. However, we did identify several areas of inherently high risk. These are where we perceived, or saw the potential for, modern slavery risk factors.

We are taking a phased, risk-based approach to maturing our modern slavery response. Priority risk categories have been identified based on our level of influence and relationship to the risk. This has helped us focus our risk mitigation efforts and commitments for improvement.

We determined the priority of these categories through internal and external stakeholder engagement. This engagement helped us understand how much direct control and influence we had over each category.

As a result of this assessment, we identified two high-risk categories to focus on for the F22 reporting period: horticulture and viticulture workers; and property and maintenance services.

We further recognised that we have varying degrees of influence over gig economy workers in our operations and supply chain. We are committed to using our influence, where we can, to help prevent modern slavery within this category.

## Emerging risks

We constantly monitor the landscape for emerging risks. A current emerging modern slavery risk is inflation, increased costs of living and their impact on our suppliers and their workforces. We will continue to monitor this risk and other emerging risks carefully, understand potential impacts and make adjustments to our mitigations as required.

## Priority risk categories

### Horticulture and viticulture workers



Pinnacle Drinks supplies Endeavour Group's retail and hotel operations with beer, cider, spirits and wine. It owns and partners with winemakers, growers, brewers and distillers to produce drinks products across Australia and New Zealand. It also directly procures wine and other drinks. The viticulture sector is known for a higher risk of modern slavery due to its reliance on seasonal labour and contracted labour for harvesting grapes. Due to limited resources, smaller vineyards in Australia are especially at risk of poor practices that could constitute modern slavery, given their rural and remote locations and limited visibility over labour practices.

### Property and building maintenance (including cleaning and security)



We procure property and maintenance services, including security and cleaning. These usually require a base level of skill and are often filled by workers from migrant backgrounds. Service providers are known to use subcontracting arrangements and opaque recruitment practices. These practices can impact vulnerable workers and create a higher risk of exploitative labour conditions. Additionally, some of our operations are in rural and remote locations, where we may have limited visibility of labour conditions.

### Gig economy workers



We utilise gig economy workers to support our retail brands' delivery services. Many of these are migrant workers who may have visa-based restrictions on their ability to work. We acknowledge that migrant workers are at a higher risk of modern slavery. They tend to be from lower socioeconomic backgrounds and are not always aware of their rights and available grievance mechanisms. The gig economy also heavily relies on independent contracting, which reduces the visibility of, and our influence over, labour standards, including whether drivers are paid fairly for their services. We are aware of the increased focus by regulators and others on worker conditions in this area, and we will collaborate to support improved outcomes for gig economy workers.

## Other risk categories

The following are additional areas where the risk factors for modern slavery may exist within our operations and supply chain.

**Office products, gaming machines, energy supply, merchandise, packaging and uniforms**



We procure office products for all our entities. We also procure uniforms for all our trading entities, gaming machines for ALH Hotels, and use renewable energy in our operations. These are inherently high-risk categories for modern slavery. They are commonly manufactured, or rely on raw materials mined or processed by low- and base-skilled staff, in high-risk regions such as Asia and South-East Asia.

**Outsourced IT helpdesk service**



Endeavour Group's corporate offices outsource some IT helpdesk services. These services are inherently high risk by being outsourced, sometimes through subcontracting arrangements in high-risk geographies.

**Raw materials from high-risk geographies**



We stock alcohol and tobacco products across our retail brands and ALH Hotels. Alcohol and tobacco production extensively use temporary, migrant and seasonal labour, particularly in harvesting crops (wheat and barley) and growing tobacco. Alcohol and tobacco are often produced on small, family-run farms with limited oversight of workers' labour conditions.

## Team member underpayments

In 2020, underpayments were identified for our salaried retail award-covered team members. This prompted a review that further identified underpayments for salaried hospitality award-covered team members.

We take these matters very seriously. We have and continue to remediate these underpayments, and we have introduced additional measures to improve future compliance.

These measures include rostering and time and attendance guidelines, and reporting to enable us to identify and address any discrepancies.

We recognise that underpayments, when present with other factors, may be a potential indicator of modern slavery. However, due to absence of other indicators of modern slavery and improved processes and systems across Endeavour Group, we consider the likelihood of modern slavery remains low.





# Our actions to assess and address modern slavery risks

We recognise we are at the beginning of our modern slavery risk management journey as an independent business.

Our focus to date has been on establishing foundational processes to identify and manage modern slavery risks within our operations and supply chain to help build an effective response. We have engaged external business and human rights specialists to help us identify gaps and prioritise our commitments and guide our next steps. We commit to further strengthening our approach over time.

## F22 Actions

### Policy commitment

When we launched our [Sustainability Strategy](#) in October 2021, we committed to respecting and promoting human rights and ethics while combatting modern slavery throughout our business operations and supply chains. Core to implementing this commitment is our Responsible Sourcing Program, which currently consists of our [Responsible Sourcing Policy](#) and [Standards](#). These two documents require that all products and services are ethically produced and sourced while ensuring our operations and supply chains are free from modern slavery. These requirements apply to all our direct suppliers. Further, we expect our suppliers to share them with their suppliers and contractors.

# Modern slavery risk management

## Accountabilities and governance

Endeavour Group's CEO is responsible for implementing our modern slavery commitments. Our Board is responsible for compliance with the Act. Operational responsibility rests with the Corporate Affairs and Sustainability Director, who oversees Endeavour's Modern Slavery Working Group. The Modern Slavery Working Group's responsibilities include oversight of the Modern Slavery Toolkit's implementation (page 14) and reporting and monitoring modern slavery due diligence efforts. Due diligence includes social audit outcomes and corrective action plans.

### Modern slavery governance structure



## Risk assessment and supplier management

To manage modern slavery risks within our supply chain, we have completed the following actions:

- **Internal stakeholder engagement**

The Modern Slavery Working Group met with stakeholders across the business, including our Retail, Pinnacle, ALH Hotels delivery teams as well as senior leadership and Endeavour Group's Board. This engagement raised awareness of modern slavery, discussed areas of potential risk and explained our approach to meeting our reporting obligations.

- **Contracting**

Our core suite of template trade and non-trade supplier contracts require suppliers to take reasonable steps to mitigate modern slavery within their own supply chains and are expected to adhere to our Responsible Sourcing Standard and Policy.

- **Supplier engagement**

We have written to priority high-risk suppliers to make them aware of our modern slavery commitments.

- **Supplier due diligence**

We have scheduled auditing of our vineyards, based on previous audits which had identified areas of focus, such as improved record keeping, in 2019 and 2020. Corrective action plans were put in place following these audits to address the incidents and have been closed out in F22. Earlier audits were unable to be scheduled due to COVID-19 restrictions on our vineyards. All audits have been scheduled and will be completed by March 2023 (see [page 13](#)).

We are committed to enhancing and extending these efforts as we mature our approach to managing modern slavery risks.



## Pinnacle Drinks

Through Pinnacle Drinks we have prioritised modern slavery risk management in our touchpoints with the high-risk viticulture sector. Through this reporting period we closed out past social audit findings for Dorrien Estate and Chapel Hill, which were initially audited in F19 and F20. COVID-19 restrictions delayed closing out these audits.

We are also rolling out SEDEX, an ethical trade membership organisation that offers a collaborative platform for sharing supply chain information, across all our owned wineries, bottling sites and own-brand third-party suppliers. Through this scheme, our sites will be required to complete the SEDEX Supplier Assessment Questionnaire (SAQ), and primary users will undergo specific training.

Our first-party vineyard and bottling sites will be required to complete audits using the SEDEX Members Ethical Trade Audit (SMETA) standards. Vineyard and bottling site audits are currently mapped to pruning and harvest schedules and will take place by March 2023.

Our third-party sites will only require SMETA audits where their individual SAQ responses flag the presence of modern slavery risks. We are also currently in discussions with Fairfarms to develop a pilot vineyard auditing program focused on improving the ethical practices across the viticultural industry.

In all cases, we look to partner with proprietary suppliers to better understand what support larger businesses can offer the growing community to establish a far-reaching ethical program.

## Capability building

### Modern Slavery Toolkit

We have developed an internal Modern Slavery Toolkit that outlines our approach to modern slavery. The Toolkit guides our team members on their roles and responsibilities concerning modern slavery. The Toolkit outlines what modern slavery is, why it is relevant to the business and ways to identify, respond to and manage modern slavery risks. It also identifies our key commitments. The Toolkit has been shared with all 28,000 Endeavour Group team members.

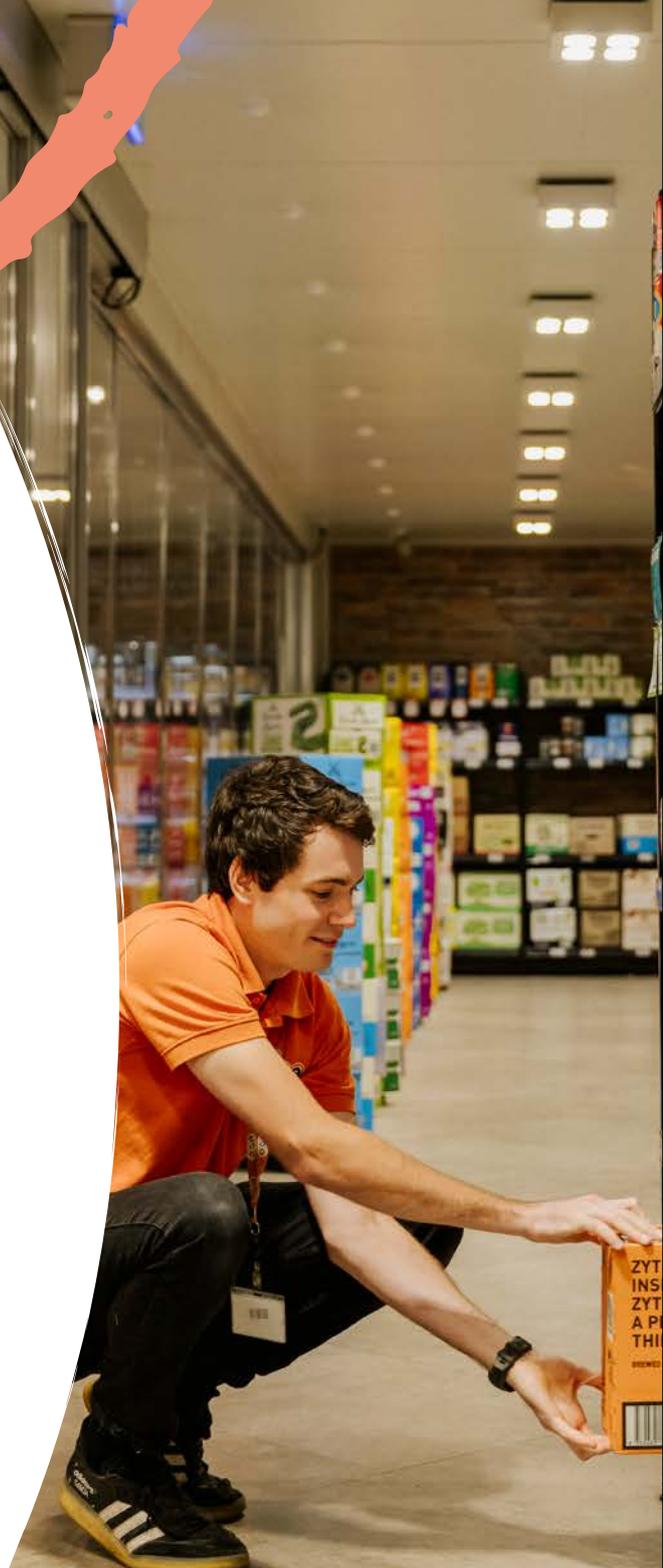
### Awareness raising

We are committed to implementing robust training programs that deepen our understanding of modern slavery and how to respond to it. Currently, we encourage all team members to complete modern slavery training provided by Anti-Slavery Australia. Our Modern Slavery Working Group has met with stakeholders across the business, including senior leadership and the Board, to raise awareness of modern slavery, discuss potential risk areas and explain our approach to meeting reporting obligations.

We are committed to expanding our capability building in the future through offering mandatory awareness raising training and targeted training for operational and procurement team members on identifying modern slavery risks.

## Grievance mechanism

We understand that having robust grievance mechanisms and remediation processes is essential for stakeholders to raise concerns, provide feedback and make complaints relating to modern slavery. Currently, team members across our businesses and brands can raise concerns informally with their managers. We also offer team members and suppliers the opportunity to confidentially report issues relating to human rights and modern slavery via a 24/7, externally managed whistleblowing service using either an online form or a 'hotline' phone service.





# Assessing the effectiveness of our actions

We are designing a framework to measure and evaluate the effectiveness of our modern slavery systems and controls. As collaboration is key, we are currently consulting with a range of stakeholders to help inform and benchmark our approach to assessment and evaluation. We plan to draw on our deployment of social audits in high-risk categories, such as viticulture, to build a feedback loop to measure and report effectiveness.

## Consultation and collaboration

### Consultation with associated entities

We have engaged with Woolworths Group to understand its approach to managing modern slavery risks in our respective supply chains. Woolworths Group monitors its risk environment through third-party risk assessments and advice, audit outcomes and trends, raised grievances, team member insights, industry commentary and media and civil society reports.

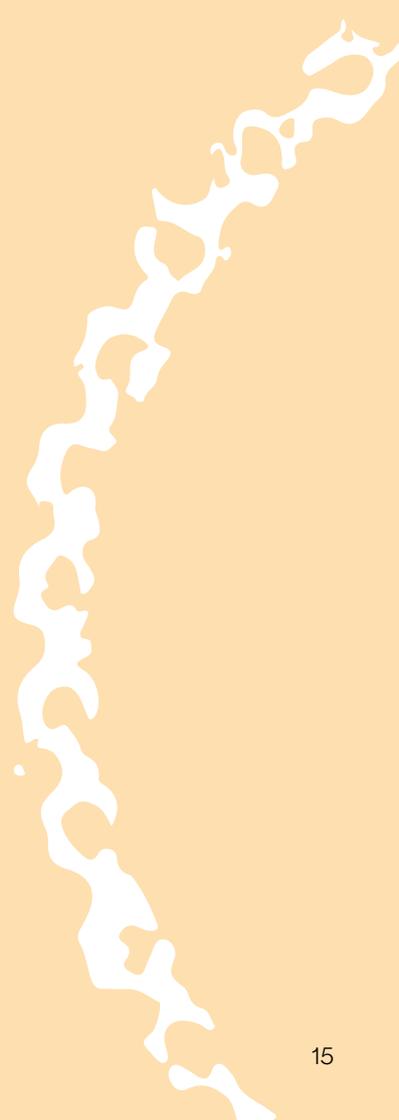
Woolworths Group provides services to Endeavour through more than 20 partnership agreements. Endeavour Group and Woolworths Group consult periodically to share high level information on their modern slavery approaches, particularly insofar as they relate to the partnership agreements. Each will inform the other if they identify a serious human rights violation relating to suppliers that they reasonably consider may be a supplier to the other. Areas of particular focus include labour in warehouses, property and building maintenance, and procuring renewable energy supply. We have also sought to understand Woolworths Group's general approach to managing modern slavery risks in outsourcing IT helpdesk services and delivery drivers.

We are Shorty's Liquor's majority owners and have engaged with its senior management and other subject matter experts to understand its approach to modern slavery risk management.

### Industry engagement

We are currently members of the United Global Compact and intend to join its Community Practice on Modern Slavery in early F23.

We participated in the 2022 Australian Wine Industry Technical Conference, where we presented our learnings from the vineyard audit discoveries conducted by Pinnacle Drinks in 2019. We continue to prioritise engaging with the wine industry to drive a more collaborative approach to address known labour risks.



# Continuous improvement and commitments

As part of our commitment to a phased, risk-based approach to enhancing our modern slavery response, we will undertake the following actions in F23:

1

## Modern Slavery Risk Management Framework

Formalise our Modern Slavery Risk Management Framework to bring together and enhance Endeavour Group's current approach to managing real and emerging modern slavery risks.

2

## Social compliance audits

Conduct social compliance audits to strengthen our understanding and management of modern slavery risks for selected suppliers within identified, priority high-risk categories, including the viticulture sector.

3

## Supplier modern slavery engagement

Develop a supplier modern slavery engagement and capability-building approach, aligned with identified priority high-risk categories across proprietary and non-proprietary suppliers via our regular supplier forums and communications.

4

## Modern slavery training

Develop an approach to modern slavery training for Endeavour Group team members. This approach will include developing mandatory modern slavery awareness-raising training for all teams and targeted training on identifying modern slavery risks for operational and procurement teams.

5

## Pinnacle Drinks review

Review the effectiveness of Pinnacle Drinks' approach to modern slavery due diligence to inform our business-wide approach.

6

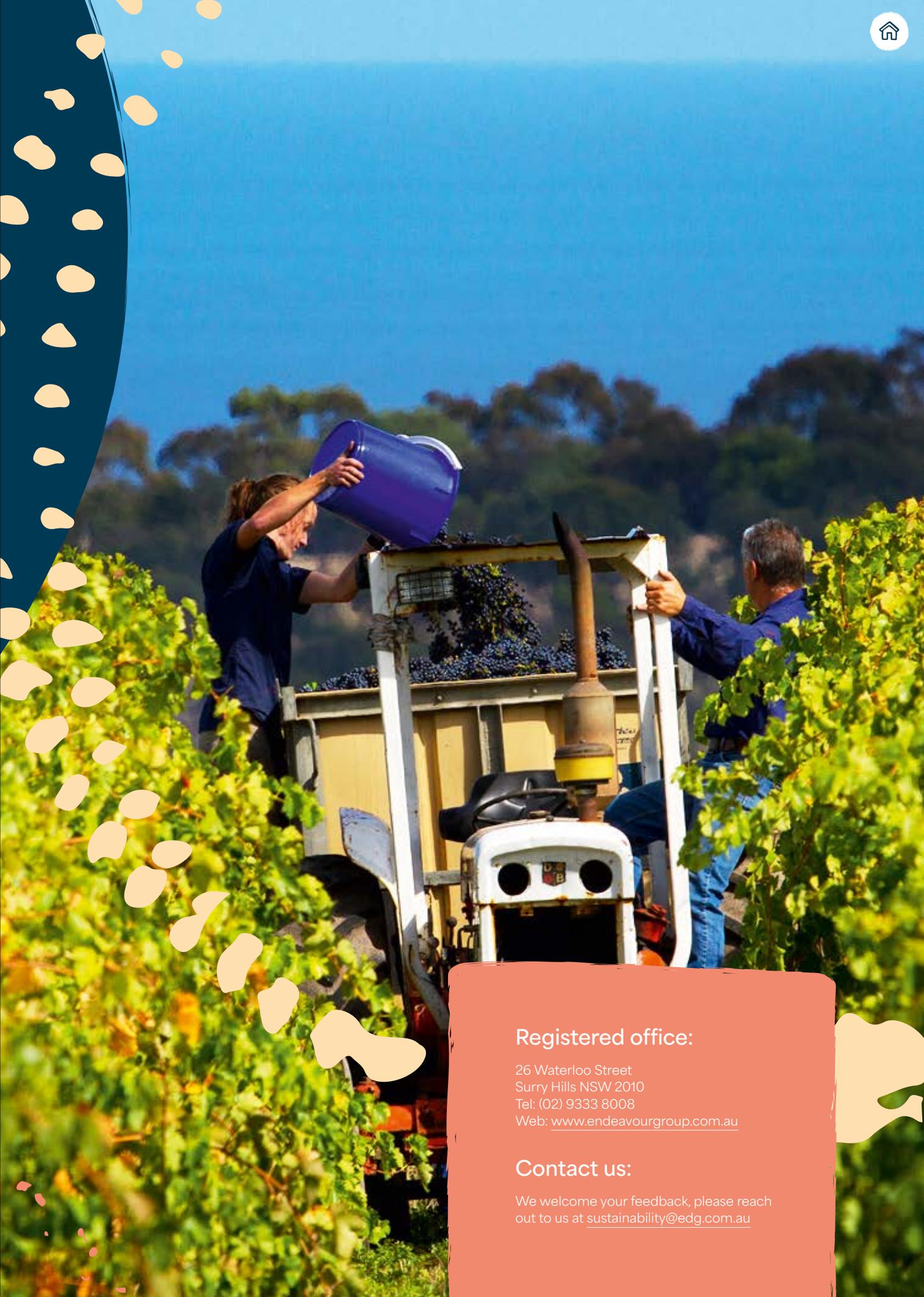
## Formal grievance mechanisms

Establish measures so Endeavour Group's direct suppliers and their employees are aware of and have access to formal grievance mechanisms.

7

## Collaborate with industry peers

Continue to work strategically with industry peers to deepen collaborative efforts to mitigate modern slavery risks within priority high-risk categories.



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