

CAMPARI GROUP

AUSTRALIA

MODERN SLAVERY STATEMENT 2024



Campari Australia Pty Ltd
1st January - 31st December 2024 (Reporting Period)

TOASTING LIFE TOGETHER

CAMPARI

AUSTRALIA PTY LTD

ABN 72 137 554 726 of Level 21, 141 Walker Street, North Sydney NSW 2060, has carried on business in Australia during the reporting period with a consolidated revenue greater than AU\$100 million and publishes this Modern Slavery Statement as the appropriate reporting entity for the purposes of the Modern Slavery Act 2018. _____

STRUCTURE & OPERATIONS

Campari Australia is the local subsidiary of the Campari Group (the **Group**), owned by Davide Campari-Milano N.V., domiciled in the Netherlands and listed on the Italian stock exchange. Campari Group is a leading company in the global branded spirits industry and was founded in Milan in 1860 where Gaspare Campari created his now world famous eponymous red aperitif.

Campari Group owns, markets, and distributes a portfolio of more than 50 premium and super premium brands in over 190 countries worldwide, and holds market-leading positions with many of those brands in Europe and the Americas. In addition to Campari, the Group's major brands include Aperol, Appleton Estate, Grand Marnier, SKYY Vodka, Wild Turkey, Espolon, Courvoisier, and Wray and Nephew. As of 2024, Campari Group employs approximately 5,000 people.



27

DIRECT MARKETS

190

COUNTRIES IN WHICH
WE DISTRIBUTE OUR
PRODUCTS

25

MANUFACTURING
PLANTS GLOBALLY



- Campari Group Headquarters, Sesto San Giovanni.

The Group's corporate headquarters are in Sesto San Giovanni in Milan, Italy, and as at 31 December 2024, the Group owned 25 manufacturing plants and had a proprietary distribution network in 27 countries. Campari Group has a deep belief in strong corporate values, including, ***"Integrity"***, which is highlighted in its Sustainability Report for the year ended 2024:

“*We recruit, develop and reward employees that work with utmost integrity and transparency. Integrity means being a responsible corporate citizen and treating all of our stakeholders correctly and with respect. Most importantly, it means ensuring that fairness, honesty and consistency are the hallmarks of our business transactions and the guiding light for our employee's professional lives”.*

”

In addition, the Campari Group Behaviours guide the actions of Camparistas, including, ***“Respect others and the planet”***, which, as noted in our 2024 Sustainability Report, directs us to, “behave as proper members of our Company community and responsible citizens of this planet, and proactively commit to their development.”

These values are at the heart of Campari Group’s commitment to all forms of corporate social responsibility. This includes not knowingly participating in, causing, contributing to, or being linked to modern slavery practices in any of our operations and supply chains, and a further commitment that we will make efforts to mitigate the risks of modern slavery within those operations and supply chains.

Further, Campari Group supports the United Nations Universal Declaration of Human Rights and the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work.

Campari Australia was incorporated in 2009. The regional headquarters is in Singapore and Campari Australia is responsible for the distribution of its products in Australia, New Zealand, and the Pacific Islands.

Campari Australia runs its business from its headquarters in North Sydney, with three small state offices, one each in Brisbane, Melbourne, and Perth, a beverage manufacturing plant in Derrimut in the west of Melbourne and some remote workers in regional areas of Australia. Campari Australia employs 222 people in marketing, sales, administrative and professional, technical, and manufacturing roles in both casual, part-time capacities and full-time permanent employment.

During 2024, the local Campari business was quite complex comprising a range of activities in the alcoholic beverage business from importation, manufacturing, and marketing, to distribution of its products to Australian wholesalers and New Zealand and Pacific Island retailers.

During the Reporting Period, Campari Australia contract packed and manufactured finished goods, referred to as ready-to-drink beverages for its commercial business, and Campari New Zealand, as well as manufacturing finished goods for a number of third party beverage companies. The bulk of this manufacture took place at Campari Australia's Derrimut manufacturing plant. Ingredients and other inputs are sourced from a range of suppliers: some are Campari's own preferred suppliers, and some inputs are sourced at the instruction and selection of the relevant third party beverage owner.

SHAREHOLDINGS

During the Reporting Period, Campari Australia became the sole shareholder in Campari New Zealand Ltd (company number 8125964, formerly known as Thirsty Camel Ltd), a company with its registered office at 60 Parnell Road, Parnell, Auckland, 1052, New Zealand.

Campari Australia also remained the sole shareholder of Campari 612220 Ltd (company number 612220, formerly known as Campari New Zealand Ltd). In February 2024, the business of Campari 612220 Ltd was transferred to Campari New Zealand Ltd, such that from this time, Campari Group's operations in New Zealand were wholly undertaken by Campari New Zealand Ltd. This Modern Slavery Statement is also made on behalf of Campari New Zealand Ltd and Campari 612220 Ltd.

GOVERNANCE & VALUES

Campari Group is organised according to the Dutch corporate governance model. It has both a board, and a supervisory body which has been in place since 2001. One of the supervisory body's main roles is to ensure compliance with the Group's governance model and the law, focusing on preventing offences against administrative and corporate controls, as well as breaches of health and safety regulations. This ensures that matters relating to Modern Slavery are overseen and reported at the highest levels.

At Campari, compliance extends beyond adhering to local laws, it is about acting ethically and responsibly with all interest groups and maintaining integrity in our environmental and social interactions.

Employees, associates, suppliers, and customers, as well as anyone who has had dealings with the Group is able to report violations of the Code of Ethics or any other Campari Group policy or applicable law through the Campari Safe Line and pursuant to a whistleblower policy which enables a confidential report to be sent directly to the Chairman of the Group's Board and to the head of the Group's internal audit function.

The whistleblower is also protected against retaliation or any other consequences arising from the report.

Below is a summary of Campari Group's governance standards and policies which relate to dealing with suppliers:



Code Of Ethics

Sets out the Group's values and its fundamental expectations of conduct and dealing with shareholders, colleagues and associates, consumers and the community, as well as enforcement of its provisions.



Supplier Code

Issued in 2012 and revised in 2024, it sets out the Group's ethical values which suppliers and their employees undertake to sign, adhere to, and ensure compliance throughout their respective supply chains.

These ethical values are:

- o Integrity, loyalty, and honesty;
- o Objectivity and immediate communication of real or potential conflicts of interest;
- o Confidentiality;
- o Transparency and completeness of information;
- o Rejection and condemnation of any type of discrimination;
- o Ban on forced and child labour;
- o Health and safety in the workplace;
- o Compliance with environmental law and ecological standards;
- o Prevention and reduction of environmental pollution;
- o Ban on unfair competition; and
- o Compliance with the Group's Code of Ethics, and its Quality, Health, Safety & Environmental Policy.



Campari Group Global Procurement Policy

The objective of the Procurement Policy is to standardise and define the roles, responsibilities, and rules of conduct for the management of Procurement processes, in keeping with the fundamental principles of the decision-making process, including transparency, impartiality, fairness and traceability.



Quality, Health, Safety & Environment Policy

Since 2013, this Policy has governed and protected the environment, health and safety of the Group's employees and consumers as well as the quality and food safety of products. The Policy applies to all Group locations and divisions and is regularly reviewed to ensure it remains appropriate for the nature and size of the Group and its corporate objectives. The Policy is also shared with all suppliers, investors and employees.



Employees & Human Rights Policy

Issued in 2017, this Policy supports the UN Universal Declaration of Human Rights and the ILO's Declaration on Fundamental Principles and Rights at Work and requires legal compliance with national human rights legislation in every country in which the Group operates. Where differences arise between Group policies and national regulations, the Group applies the most stringent of the requirements. The Policy covers: non-discrimination, forced labour, child labour, harassment, diversity, working conditions (including hours and remuneration), freedom of association and the right to collective bargaining, training and personal development, community involvement and quality, health, safety & environment.

CAMPARI GROUP & SUPPLY CHAINS

The Supply Chain function for the Company as part of the Campari Group is centralised and most materials and supplies are procured centrally for the Company. The Procurement Team manages suppliers classified according to the following categories: :

(PR) Product Related

Materials that go into the final product, they are part of the Bill of Materials (BOM), such as packaging materials (e.g. glass bottles), raw materials (e.g. sugar) and semi-finished materials (e.g. distillates);

(NPR) Non Product Related

Goods and services that do not go into the final product; they are purchased to enable or support the business and its operations, such as: Media & Marketing, Logistics, Capital Expenditure, etc.

Categories are mapped in a Portfolio Matrix, managed by Procurement, based on their supply risk and business impact. The Category Portfolio Matrix is updated from time to time, to reflect changes in external and internal environments.

Campari Group looks for local sourcing options to fulfil its aim of reducing its environmental impact along the supply chain, and continues to do so, all other commercial parameters being equal (such as competitiveness, quality, and availability of materials).



MANUFACTURING PLANTS

Of the 25 plants worldwide which Campari Group owns, the plant in Derrimut, Victoria was the only local supplier to Campari Australia. The Derrimut plant manufactured Wild Turkey, American Honey, Espolon and Howler Head RTDs. As previously noted, the Derrimut plant also manufactures products for third parties under contract for distribution in Australia, New Zealand, and some other parts of Asia.

Campari Australia purchases many of its products as finished goods from the international plants in Italy, Jamaica, Mexico, United States of America, Brazil, Canada, United Kingdom and France.

Some of these products may be manufactured in Australia using local and imported ingredients.

The situation is similar for Campari Group products which are sold through Campari New Zealand, except that Campari New Zealand does not have a local Campari-owned manufacturing facility like the Derrimut plant. Coruba rum is shipped in bulk from Jamaica to New Zealand where it is made into ready-to-drink beverages by a third party manufacturer. In addition, Campari New Zealand sources products for distribution from third parties.

COMPLIANCE & RISK MITIGATION



Campari Group is committed to developing good business practices for its suppliers and distributors as well as its own activities and business units. Responsible and transparent sourcing from commercial partners with similar values is, in fact, a prerequisite for ensuring high-quality and safe products.



Campari Group drives sustainability compliance through its implementation of the Group's Supplier Code in all geographies. The Group sees responsible and transparent sourcing from commercial partners with similar values as a prerequisite for ensuring high-quality and safe products that create value in local economies.

Campari Group has a risk management system in place for its own operations which is managed by its Internal Audit function and aimed at identifying, assessing, managing and monitoring potential events or situations that could impact Campari Group's activities and the achievement of its objectives.

The risk management system also captures and monitors compliance, and personnel management, in terms of both health and safety, guaranteeing workers' rights and identifying environmental risk. Campari Group reserves the right to verify suppliers' compliance with this Code, to monitor their performance and operations in this regard, and to terminate any agreements in the event of violations of the Supplier Code, if considered necessary.

In addition, Campari Group has been a member of Sedex (Supplier Ethical Data Exchange) for many years, demonstrating its commitment to managing its supply chain responsibly and transparently. Sedex is the world's largest shared platform through which member users can report and share their commercial practices in the key areas of labour law, health and safety, environment, and business ethics. Campari Group uses Sedex to inform its risk assessments and mitigation. Campari Group encourages its suppliers to join Sedex to assist with due diligence assessment.

RISKS OF MODERN SLAVERY PRACTICES

Campari Australia continues to remain vigilant about modern slavery risks in its supply chain and operations.

For the Reporting Period, Campari Australia has identified minimal risks of modern slavery in its supply chain and operations. However, Campari Australia has identified that it has further risk mitigation work to do in respect of suppliers of goods to its tier 1 agencies.

ACTIONS TAKEN BY CAMPARI AUSTRALIA,

CAMPARI NEW ZEALAND AND CAMPARI 612220 DURING 2024 TO REDUCE MODERN SLAVERY RISKS

Further to the ongoing risk mitigation measures noted and implemented in Campari Australia's prior three reporting periods, during the Reporting Period, Campari Australia has consulted with other related entities to understand the further steps it can take to address modern slavery risks.

This Reporting Period is the second year in which Campari New Zealand is included in this Modern Slavery Statement, as a subsidiary body of Campari Australia.

During the Reporting Period, Campari Australia investigated modern slavery and ethical sourcing risks in its tier 1 supply chain, requiring the completion of a questionnaire by third party product suppliers to Campari New Zealand, as this assessment had not previously been undertaken.

Campari Australia also established contracts that include modern slavery compliance clauses to address a prior gap identified with point-of-sale printing suppliers who source printing plates from overseas.

The further steps which Campari Australia has identified to be undertaken over the next 12 months are:

1.	Continue working with suppliers and available SEDEX data to understand the level of modern slavery risks across location and function.
2.	Investigate mandating SEDEX registration and compliance for suppliers engaged by higher-risk functions identified in step 1, in order to address risks associated beyond tier 1 operations.
3.	Develop and deliver Modern Slavery education to key staff in identified higher-risk functions with the intention to train individuals to effectively recognise and manage human rights and ethical sourcing risks.
4.	Continue to establish contracts that include modern slavery compliance clauses across all point-of-sale printing and merchandise suppliers.

ACTIONS TAKEN BY CAMPARI GROUP DURING 2024 TO REDUCE MODERN SLAVERY RISKS

In May 2024, Campari Group also joined the UN Global Compact: a call to companies to conduct their operations and strategies according to ten universal principles in human rights, labour, environment and anti-corruption. In alignment with the UN Global Compact, Campari Group continues to take action in support of the sustainable development goals and operating responsibly to create a brighter future and a better society.

In addition, during the Reporting Period, Campari Group updated its Supplier Code of Conduct in order to bolster requirements to comply with human rights and labour standards. Additionally, Campari Group enhanced the business compliance, integrity and ethics requirements to require a higher standard of compliance with laws.

In addition, during the Reporting Period, in terms of risk mitigation and due diligence, Campari Group has established a dedicated Sustainable

Procurement and Human Rights team responsible for the implementation of ethical procurement practices, as laid down in the Supplier Code. The team works closely with regional procurement teams to ensure compliance with the Supplier Code and related policies. Campari Group also introduced the Human Rights Due Diligence process in 2024 which is led by the Sustainable Procurement Human Rights team and under this process, attention is placed on engaging regional buyers and operational teams within Campari Group. This will enable proactive identification of potential risks in human rights compliance and proactively work at mitigating those risks to ensure that ethical standards are maintained throughout the value chain. On an ongoing basis, Campari Group's Sustainable Procurement and Human Rights team will conduct risk assessments to outline potential and existing risks to workers in the supply chain with the purpose of prioritizing suppliers by evaluating ethical and labour standards to identify any potential risk areas where compliance might not be adequate. The aim is to complete these risk assessments by 2027.

As part of its due diligence process, Campari Group uses Sedex to inform its risk assessments and mitigation and by using tools like the SEDEX platform and SAQ (Self-Assessment Questionnaire), it has been possible to analyse country-specific, sector-specific, and demographic-specific data in order to identify hotspots. Other risks involving child labour, forced labour, poor working conditions, or wage-related issues are prioritised according to their severity and likelihood. No remediation plan was required to be implemented in 2024. The next risk assessment is scheduled for 2025. Once the assessment is complete, specific action plans will be developed and tailored if needed, to address any identified risks, ensuring that corrective measures are appropriately aligned with the findings. High-risk suppliers are selected for on-site audits, such as SMETA (SEDEX Members Ethical Trade Audit) audits, to further evaluate the working conditions and potential

impacts on workers. These audits involve physical inspections, document reviews and interviews with workers to achieve a full understanding of the local working environment. This enables Campari Group to identify all cases of non-compliance with labour standards or areas where potential improvements might be made.

Further, suppliers who register on SEDEX need to complete the SAQ, which provides risk scoring based on ethical and labour practices. In cases where material impact and/or risks will be identified, whether through DMA, SEDEX risk scores, audits, or direct reports, Campari Group will engage with the supplier in creating a corrective action plan. The corrective action plan will have to detail the exact violations or risks, stating clearly the objectives of the improvement, and defining timelines for delivering the required changes. Campari Group will conduct follow-up audits to ensure that corrective actions are thoroughly implemented and effective in addressing the identified issues. For instance, if non-compliance with labour standards is found, corrective actions may involve adjusting wages, improving safety protocols, or establishing fair working hours. Such corrective measures are scheduled to start in 2025.

Campari Group aims for compliance with the Supplier Code and eradicating incidents of labour violations within the supply chain for 95% of Tier 1 Product related suppliers, and 60% of Tier 1 Non product related suppliers both by 2028.

Finally, Campari Group checks for the compliance of all its operating units with its human rights commitments by monitoring and analysing its grievance mechanisms as appropriate. During the Reporting Period, there were no reports of human rights violations as reported in Campari Group Sustainability Report.

EFFECTIVENESS ASSESSMENT

The supplier questionnaires returned in respect of the Campari New Zealand business varied in terms of proactive reporting on modern slavery risks at a supplier level. All returned questionnaires denied negative impact on indigenous peoples, ESG, and human rights. No returned questionnaires identified any instances of modern slavery in the past three years. However, not all suppliers had formally assessed modern slavery risk in their supply chains and therefore future investigation is required to confirm the level of risk of modern slavery in these third parties' global supply chain.

In addition, Campari Group checks the compliance of all its operating units against its human rights commitments by monitoring and analysing its grievance mechanisms as appropriate.

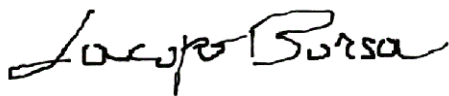
As reported in Campari Group's 2024 Sustainability Statement, there were no reports of human rights violations.

CONSULTATIONS WITH SUBSIDIARIES

Campari Australia contacted and consulted with relevant employees who work on the Campari New Zealand business, to gauge areas of concern of modern slavery risks. In addition, the leadership team in New Zealand was reminded of the requirement to report and asked for feedback on potential areas of risk.

APPROVAL & SIGNATURE

This **Modern Slavery Statement** has been approved by the board of **Campari Australia Pty Ltd** (ABN 72 137 554 726, the reporting entity) on 19TH June 2025 and is signed below for and on behalf of both Campari Australia Pty Ltd, and **Campari New Zealand Ltd and Campari 612220 Ltd** to indicate that approval:



Jacopo Borsa
Managing Director
Australia
19.06.2025

APPENDIX

MANDATORY REPORTING CRITERIA

Criterion	Disclosure Reference
1. Identify the reporting entity	Campari Australia Pty Ltd (ABN 72 137 554 726), per the first paragraph of the Statement Campari New Zealand Limited (company number 8125964) on page 5, in the 11th paragraph of section Structure and Operations Campari 612220 Ltd (company number 612220) on page 5, in the 12th paragraph of section Structure and Operations
2. Describe the reporting entity's structure operations and supply chains	Structure and Operations section, and Campari Group Supply Chain section
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Risks of Modern Slavery practices section
4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks including due diligence and remediation processes	Actions taken by Campari Australia and Campari New Zealand to reduce Modern Slavery risks section
5. Describe how the reporting entity assesses the effectiveness of these actions	Effectiveness Assessment section
6. Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Consultations with Subsidiary section
7. Provide any other relevant information	None required



Note:

Please note that this **Modern Slavery Statement** has been prepared and published in compliance with the requirements of the Modern Slavery Act 2018 and is accurate and correct as at 19.06.2025, the date of publication. The purpose of the statement is to provide general non-financial information only with the aim to illustrate to Campari Australia's stakeholders steps taken in the 2024 calendar year to address Modern Slavery concerns. Interested stakeholders may choose to review the Campari Group's **Sustainability Report**, available on the Campari.com website, to review the Campari Group's global strategy and direction in this and other sustainability matters.

CAMPARI GROUP

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