



Respecting human rights

Modern Slavery Statement 2023

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Respecting human rights

Guided by our purpose and values, we're committed to respecting 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 don't have all the answers yet, and we know we have much more to do. But we are committed to doing the right thing, and leaving a positive imprint on the people we work with.

Endeavour Group Limited

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', '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 period of 1 July 2022 to 30 June 2023 (referred to as 'F23' or 'the reporting period' in this Statement), to assess and address modern slavery risks in our operations and supply chains. Information presented in this Statement is, unless stated otherwise, current as at 30 June 2023.

This report may contain forward-looking statements in relation to Endeavour Group, including statements regarding Endeavour Group's intent, belief, goals, objectives, initiatives, commitments or current expectations with respect to the Group's business and operations, market conditions, results of operations and financial conditions, and risk management practices. Forward-looking statements can generally be identified by the use of words such as 'forecast', 'estimate', 'plan', 'will', 'anticipate', 'may', 'believe', 'should', 'expect', 'intend', 'outlook', 'guidance' and similar expressions. These forward-looking statements are based on the Group's good faith assumptions as to the financial, market, risk, regulatory and other relevant environments that will exist and affect the Group's business and operations in the future. The Group does not give any assurance that the assumptions will prove to be correct. The forward-looking statements involve known and unknown risks, uncertainties and assumptions and other important factors, many of which are beyond the control of the Group, that could cause the actual results, performances or achievements of the Group to be materially different from future results, performances or achievements expressed or implied by the statements. Investors and prospective investors are cautioned not to place undue reliance on forward-looking statements. Except as required by applicable laws or regulations, the Group does not undertake any obligation to publicly update or revise any of the forward-looking statements or to advise of any change in assumptions on which any such statement is based. Past performance cannot be relied on as a guide to future performance.



Acknowledgement of Country

We acknowledge the First Peoples of the lands on which Endeavour operates across Australia and New Zealand. We acknowledge the Aboriginal and Torres Strait Islander peoples as Traditional Custodians and First Nations of Australia. We pay respects to their Elders past and present, and recognise their unique cultural and spiritual relationships to the land, waters and seas and their rich contribution to society. We acknowledge that their continuing care for Country and ancient soils since time immemorial has gifted us a uniquely Australian terroir. We also acknowledge and respect ngā iwi Māori and their unique role as tangata whenua of Aotearoa/New Zealand and as Treaty of Waitangi partners. We commit to listening to and learning from the voices, stories, and cultures of First Peoples where we operate our businesses.

Aboriginal and Torres Strait Islander people are respectfully advised that this document may contain images and/or names of Aboriginal and Torres Strait Islander people who may be deceased.



'Celebration Place' by Riki Salam (Mualgal, Kaurareg, Kuku Yalanji), our Reconciliation artwork.

We are deeply privileged to have Riki tell a story that is uniquely Endeavour, through a dynamic visual language and the timelessness and omniscience of the Dreaming. The artwork Riki created for us symbolises both occasion and belonging, time and space, and the process of coming together, as well as the outcome of being one through shared experiences and knowledge. The concept represents water and knowledge flowing throughout the country. From desert country to stone country, rainforest country. From freshwater to saltwater all water carries knowledge from upstream to downstream. This knowledge is passed down from generation to generation to keep Culture strong.

See Reconciliation Action Plan 2022 artwork 'Celebration Place' by Riki Salam (Mualgal, Kaurareg, Kuku Yalanji), www.endeavourgroup.com.au/sustainability

A message from our Chairman and CEO

Our commitment to human rights



We're committed to respecting the rights of every worker, in every business which helps us do what we do: bring millions of people together every day through our brands, products and places.

Endeavour is a people business. We exist to bring people together, through our products, places and experiences. And we wouldn't be able to do that without our team of 30,000 great people, and the hundreds of thousands more workers who support our business across our extended supply chain.

We're committed to doing the right thing: building our business sustainably, and acting responsibly, inclusively, and authentically. This extends to the way we treat people, and we expect the same respect and values from our suppliers, especially in the way they do business on our behalf.

These values underpin our approach to modern slavery. The behaviours and practices which constitute modern slavery are not only serious human rights violations, they go against everything we value.

We've seen the 2021 Global Estimates indicating more than 49.6 million people are living in situations of modern slavery on any given day, 10 million more than previous research indicated in 2017. We know that recent challenges, including COVID-19, climate change and cost of living pressures mean that no business, sector or industry is immune from the risks of modern slavery. As a large employer, producer and operator with a geographically complex supply chain, we understand the risks, and we take our responsibilities to respect human rights seriously.

Because it's so important to us, in F23 we have invested in our people and processes to evolve our Human Rights Program. We have a dedicated resource managing our Human Rights Program, we've extended the training on offer for relevant teams, and we've worked with external experts to improve our own understanding.

A key output of this work has been the development of a framework to map, mitigate and address modern slavery risks which you'll see on page 21. We've also strengthened and expanded the scope of our Responsible Sourcing Program, so that more of our direct and downstream suppliers are actively monitored. We've continued to prioritise the higher risk areas where we have the greatest leverage to effect change and make an impact, such as the viticulture, cleaning and security industries.

We're proud to share what we've been up to, and what we've learnt along the way in this, our second annual Modern Slavery Statement under the *Modern Slavery Act 2018* (Cth). Our Statement details the progress we've made against the key risk areas identified in F22, the additional measures we've taken over the past 12 months, as well as what we plan to do to mitigate risks of human rights offences occurring in our own operations, and across our diverse supply chain.

We don't have all the answers yet, and we know we have much more to do. We'll continue to review and adapt our approach as we understand more, working in partnership with our suppliers, and theirs.

With the Modern Slavery Act currently under statutory review, we welcome the implementation of legislative amendments to strengthen protections for workers.

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.

Peter R. Hearl
Chairman

Steve Donohue
CEO

About Endeavour Group



Endeavour Group is a collection of some of Australia’s best-known businesses and brands in liquor retail, drinks production, hotels and entertainment, united by one purpose:

Creating a more sociable future, together

Our values

We’re real
We’re inclusive
We’re responsible

Our ways of working

We work with spirit
We endeavour for better
We’re team players

We operate Australia’s largest retail drinks network under the much-loved Dan Murphy’s and BWS brands, and the largest portfolio of licensed hotels in communities across the country. These have the support of the digital capabilities of endeavourX, and the product and services capabilities of Pinnacle Drinks and other specialty drinks businesses.

Our 30,000-strong team are united by and passionate about our purpose: ‘creating a more sociable future, together’. Bringing people together is the best part of what we do, and we’re committed to doing that responsibly, inclusively and with care. It’s who we are.

Guided by the values and ways of working that connect every member of our team, we’re fiercely committed to doing the right thing. That is, building our business sustainably, acting responsibly, and working in partnership today to create a brighter tomorrow. Because a more sociable future can only be created together.

Our Imprint

We use the mark left by the base of a bottle of wine on a coaster as a constant reminder of our imprint.

We know the way we treat the people who help us bring our products, places and experiences to life matters. The respect we show our people, our suppliers and those in our extended supply chain drives better long-term outcomes for our business, and builds stronger, more sustainable and connected communities.

We act responsibly, with care, and in partnership because we want our imprint to be a lasting, positive one on all.



Modern Slavery Act

We’re committed to using our influence to prevent and mitigate all forms of modern slavery within our operations and supply chain. Not only is it the right thing to do, it supports our purpose, and our ambition to leave a positive imprint on the communities we’re part of, the people we connect with, and the world we all share.

In alignment with the Modern Slavery Act 2018 (Cth), the Criminal Code Act 1995 (Cth) and international laws and conventions, we understand modern slavery to include human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services.

While modern slavery is one of the worst forms of human rights abuse, in line with our values, we’re committed to advocating all human rights: ensuring people are safe at work, paid properly and treated fairly, and with respect.

Our structure and operations

We have more than 30,000 team members and a network of retail stores, hotels, specialty drinks businesses, bottling facilities, wineries and digital platforms in Australia. We also own and operate a winery in New Zealand.

Our structure

Endeavour is a publicly listed company, headquartered in Sydney, Australia. Endeavour owns and controls a number of reporting and non-reporting entities for the purpose of the Modern Slavery Act.

This joint statement covers the following reporting entities: **Endeavour Group Limited** (ABN 77 159 767 834), **Australian Leisure and Hospitality Group Limited** (ABN 37 067 391 511), and **ALH Group Pty Ltd** (ABN 68 098 212 134). The brands listed below contribute to the consolidated revenue of these reporting entities.

Our key brands

Endeavour is made up of many different brands with different stories, united in an ambition to be Australia's most responsible operator of hotels, alcohol and gaming facilities.

- 

Dan Murphy's is a leading retail liquor brand with 266 stores nationally. Each store carries a range of products, including hundreds of spirits, beers and wines, with thousands more available to purchase online.
- 

BWS is a leading retail liquor brand with 1,435 stores in its portfolio. BWS offers a tailored range that meets the needs of the local communities it serves.
- 

ALH Hotels operates 354 licensed venues across Australia, offering a range of hospitality experiences including electronic gaming, sports bars, bistros, restaurants, cafés, accommodation, nightclubs, live sports and racing.
- 

Langton's is Australia's largest secondary (auction) market in Australia for fine and unique local and imported wines.
- 

Jimmy Brings is Australia's first on-demand alcohol delivery company, delivering a curated range of beer, wine and spirits to customers in minutes.
- 

Shorty's delivers liquor to corporate customers, offering an extensive range to cater for office functions, events, showcases and other celebrations.
- 

Pinnacle Drinks creates and manages our broad portfolio of Own Brand products, which are sold through Endeavour's hotels, stores and on-demand delivery services.
- 

Paragon Wine Estates encompasses our collection of award winning and premium heritage wineries and wine brands in growing regions around Australia and New Zealand.
- 

MixIn by Endeavour is our retail media arm, focused on supporting the growth of our supplier brands through highly contextualised advertising.
- 

endeavourX is our product-led innovation brand that enables the creation of personalised digital experiences.

Our key operations by sector



Example of our production operations

We own Chapel Hill, a winery with attached vineyards, in McLaren Vale, South Australia, producing 60+ tonnes of different grape varieties.

The winery is managed by a team of 14 directly employed people on the ground.

It also recruits seasonal workers through third party agencies in the vineyard for vintage and pruning seasons.

Example of our retail operations

We own Dan Murphy's Double Bay, a store in the inner suburbs of Sydney.

The store retails a range of alcohol and non-alcohol products.

Dan Murphy's Double Bay employs 41 people, including five full-time, 11 part-time and 25 casuals.

Example of our hospitality operations

We own Young & Jackson, a pub in the Melbourne CBD.

Young & Jackson has a dining room, bar and lounge and function spaces available for booking.

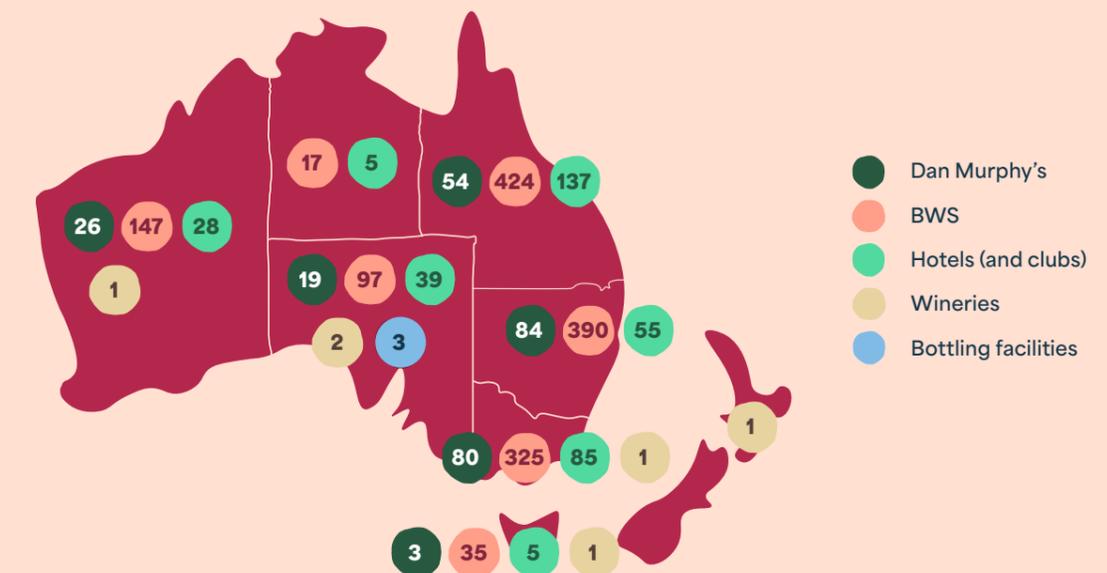
The pub directly employs 79 people, including 15 cooks and chefs, one of whom was recruited from overseas through the Australian Government's skilled labour scheme.

Example of our delivery operations

Dan Murphy's offers a two-hour delivery window for customers within metro regions in Australia.

We're able to fulfil this offering for customers through our own on-demand delivery network that includes 2,500+ Jimmy Brings contracted drivers.

Our operations by location¹



¹ Store numbers are correct as at the end of the retail calendar year, 25 June 2023.

Our team

Endeavour directly employs over 30,000 team members in 1,500+ communities across Australia and New Zealand. Our team includes people in our offices, stores, hotels and direct employees of our wineries and bottling facilities.

For the purpose of this report, we have defined our own operations as those which relate to direct employees of any Endeavour entity. We consider those employed through third parties, including labour hire provider employees working on Endeavour-owned and operated sites, to be supply chain workers.

Approximately 96% of our team members are covered by an award or enterprise bargaining agreement. We have dedicated Human Resources and Employee Relations teams who manage trade union negotiations and ensure proper procedure is followed so that our entities and brands comply with all relevant laws, regulations and awards relating to employee rights to work, pay and entitlements.



30,000+

Total number of employees



Our supply chain

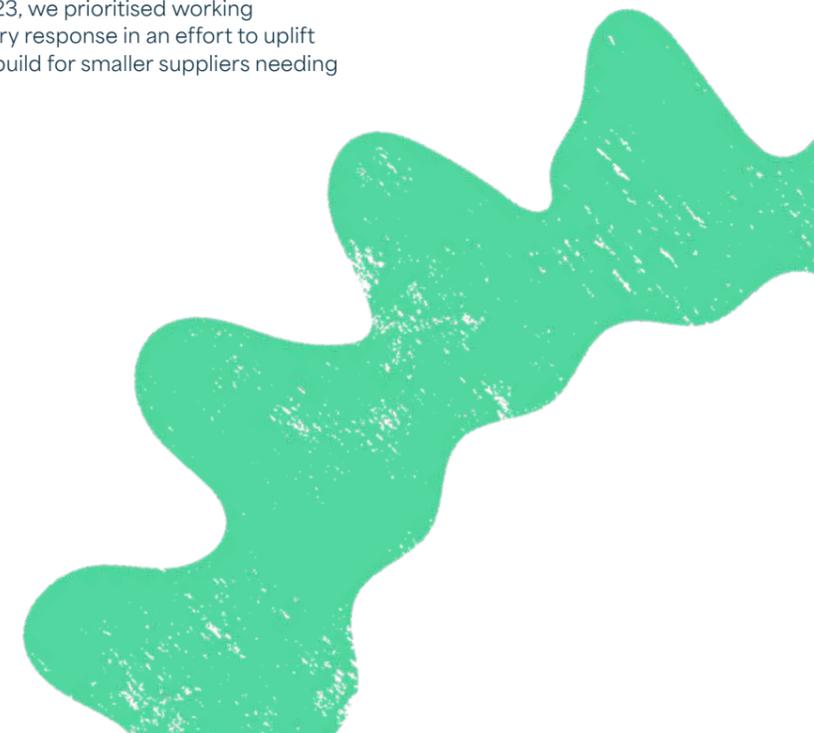
From the people who pick the grapes for our wines to our contracted cleaners and security guards, supply chain workers play an important role in our business. In line with our values, we take our responsibility to respect their human rights seriously.

Our supply base

The scale and diversity of our operations means our supply chain is large and geographically complex. It includes sole traders and small family businesses through to listed companies and multi-nationals. We're committed to respecting the rights of every worker, in every business which helps us do what we do.

In the reporting period, our tier 1 supply chain included 1,900+ direct retail suppliers and 7,000+ direct not-for-retail suppliers. Our total tier 1 supplier spend for the reporting period was \$8.6+ billion. Tier 1 suppliers are our suppliers who we have a contractual relationship with and are paid directly by Endeavour for their goods and services. We recognise the many thousands more suppliers in our supply chain below tier 1 (see page 13).

We believe in working transparently and collaboratively with our supply partners to uphold standards in respecting human rights. In F23, we prioritised working in partnership with our suppliers in our modern slavery response in an effort to uplift wider industry standards. This also helped capacity-build for smaller suppliers needing additional support in this space (see pages 23 to 29).



Retail supply chain

As Australia's largest liquor retailer, we have a large alcohol retail supply chain. We procure products that are ready to be sold in-store, as well as a range of products and materials procured for use in our retail products, like the grapes we source from our supply chain growers that we use to make wine. We also retail other products in our hotels and wineries.

Examples of our retail products include: food products used to make meals for customers in our hotels and wineries, such as fruit, vegetables and meat; and glass bottles and associated items like corks and bottletops used by our bottling facilities to package products.

Non-retail supply chain

To ensure we're equipped to serve our customers in our stores and hotels, and our business customers in our bottling facilities, we procure a range of goods and services that support our operations but are not for retail, such as store furnishings and marketing materials.

Our top categories by spend in our non-retail supply chain during the reporting period were marketing, professional services and IT.

Other examples include: uniforms for team members; water used to irrigate our vineyards; and security services to protect our team members, customers, stores and hotels.

Suppliers by region (tier 1)



8,000+

Australia/NZ

Examples of products procured: beer, wine, craft spirits, packaging and consumables



260+

Europe

Examples of products procured: champagne, Scotch whisky, corporate services



70+

North America

Examples of products procured: American whiskey, tequila, marketing



10+

South America

Examples of products procured: wine - Malbec



50+

Asia

Examples of products procured: sake, soju, packaging and consumables



4+

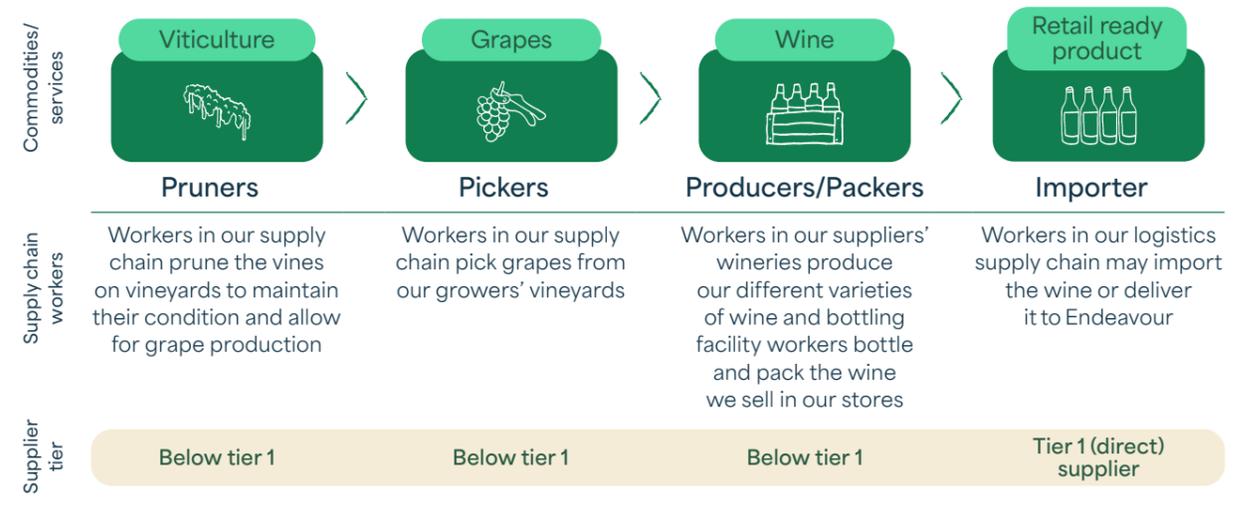
Africa

Examples of products procured: wine - Chenin

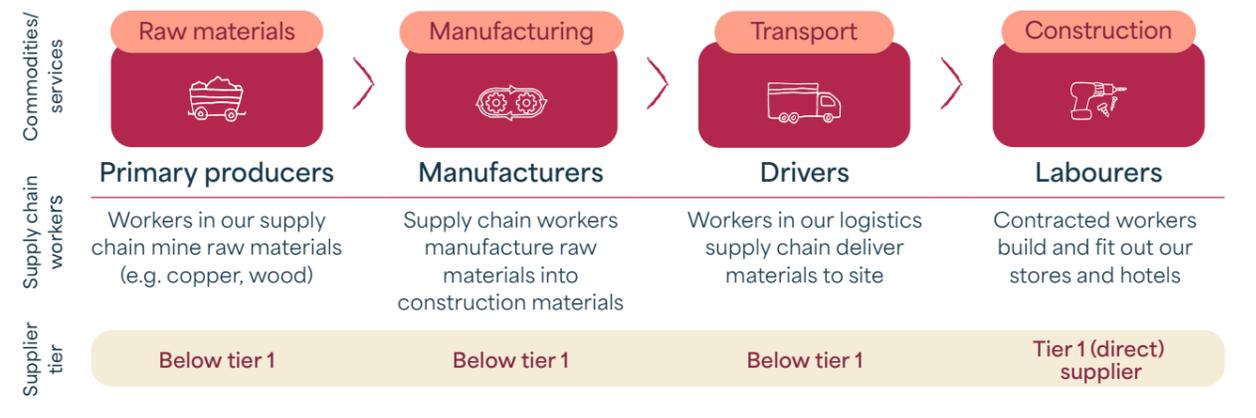
Our supply chain workers

There's a multitude of tiers in our supply chain and different categories of workers who may support us to develop our products (for retail and non-retail) or provide services that help us to operate our business. We know it's important to understand supply chains below tier 1. Modern slavery risks may be more likely to occur below tier 1 level, including because it is more difficult to monitor suppliers' activities further down the supply chain and suppliers at this level may be more likely to be engaged in production and other activities that involve base skilled labour and other risk factors.

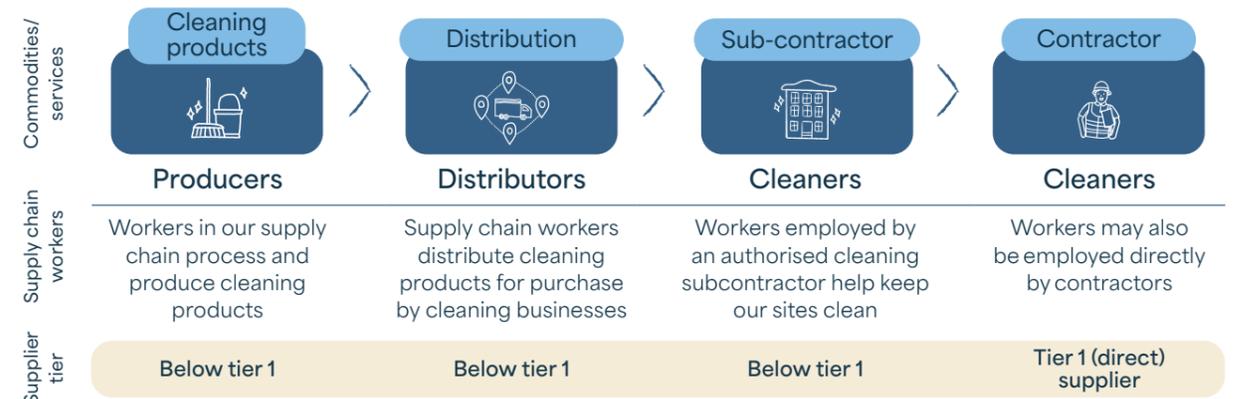
Supply chain - wine



Supply chain - store development



Supply chain - cleaning



Identifying our modern slavery risks

To effect change and make an impact, we need to identify and understand our key modern slavery risks, as well as monitor for new and emerging risks in our industries, and the industries of our suppliers. To do this, we look at modern slavery risk factors and then use the UNGPs to determine our relationship to the risk in each sector.

Business and human rights specialists have helped us to identify areas of inherent risk to Endeavour and to understand where risks to people may be most prevalent in our operations and our supply chain. We considered the below four risk factors and assessed them against the industries that we (and our suppliers) operate in to help us identify our modern slavery risk areas:

Risk factor	Presence of vulnerable populations	Business models structured around high-risk work practices	Product and service categories	Geography or country of origin
Risk details	Use of base-skilled labour, migrant labour or non-native language speakers can increase modern slavery risks, including where workers may not understand workplace protections available in Australia.	Using subcontractors, labour hire providers or other third parties reduces transparency and may limit visibility over working conditions.	We know that specific categories in the supply chain are more prone to labour-related risks, such as due to the way they are manufactured, use of certain raw materials, or reliance on vulnerable workers.	We recognise that modern slavery is more likely to occur in locations with conflict, weak rule of law, high levels of corruption or poor governance. We do, however, also recognise that this does not mean modern slavery cannot occur in Australia.
Examples of affected workers that may be relevant to Endeavour's supply chain	Workers in the horticulture or agriculture industries, and cleaning and security workers.	Cleaners, construction workers, logistics workers.	Workers manufacturing high risk products such as uniforms and solar panels, and workers in high risk service industries such as building maintenance.	Workers in regions such as Asia and South-East Asia.

Tools and partnerships we use to identify risks:



We utilise Sedex's RADAR tool to assess suppliers' overall labour and human rights risks according to their location, operations and business practices.

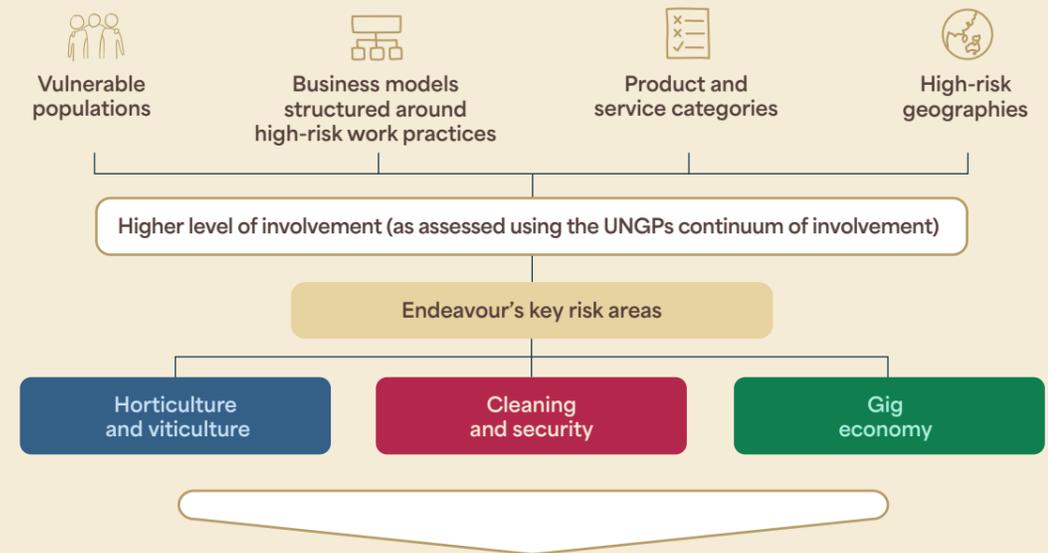


We're a member of the United Nations Global Compact Network Australia, where we attend industry events to hear from human rights experts about topics such as existing and emerging risks.



We have partnered with Fair Farms, which offers a self-assessment questionnaire and third party audit to identify any pockets of risk relating to horticulture/viticulture suppliers.

To identify our key areas of modern slavery risks, we use the continuum of involvement in the United Nations Guiding Principles on Business and Human Rights (UNGPs)



The UNGPs continuum of involvement helps to assess how a business may cause, contribute to or be directly linked to modern slavery, depending on its relationship to the risk.

Relationship to risk	Description	Example	Assessment in our key risk areas
Cause	A business may cause modern slavery when its activities (including omissions) directly result in modern slavery occurring.	A business could cause modern slavery by, for example, requiring its migrant employees to hand over their passports to their manager to retain, resulting in potential forced labour.	Due to the policies, procedures and practices in place that govern our own operations, we consider the likelihood of Endeavour causing modern slavery in our key risk areas and any other areas as very low.
Contribute to	A business may contribute to modern slavery where its actions (or omissions) increase the likelihood of modern slavery occurring, even if the business did not engage in modern slavery practices itself.	A business could contribute to modern slavery through its commercial practices. For example, by imposing time and cost pressures so severe that suppliers cannot deliver their orders without engaging in worker exploitation.	While we are committed to taking steps to ensure our practices do not contribute to modern slavery, we recognise we have a close and often direct relationship with suppliers in our key risk areas, meaning we have a greater potential to contribute to modern slavery in these high risk sectors than in others listed on page 17.
Directly linked	A business could be directly linked to modern slavery where it has a business relationship with an entity that causes or contributes to modern slavery.	A business may be directly linked to modern slavery where, for example, they have suppliers using debt bondage as part of their operations.	Endeavour may be directly linked to modern slavery through potential exploitative practices in the supply chains of these industries.

Key risk areas

As outlined on the previous page, Endeavour used the UNGPs to establish three key risk areas of high priority:

Key risk area	Present risk factors	F23 assessment
Horticulture and viticulture workers See page 23	 Vulnerable populations: largely migrant workforce	This remains a key risk area for Endeavour, as we own and operate our own vineyards and have many more in our supply chain. This means our potential to contribute to or be directly linked to modern slavery in these sectors may be higher than in other areas.
	 High risk work practices: seasonal nature of work leads farms/vineyards to rely heavily on contracted and subcontracted labour	
	 High risk product category: commodities are seasonal, work occurs in regional and remote locations with limited visibility, large population of migrant workers	
Cleaning and security workers See page 27	 Vulnerable populations: high presence of migrant workers in these industries, work requires a base level of skill	Remains a key risk area. We engage cleaning contractors and security providers to service our stores and hotels. As with horticulture and viticulture, we often have direct relationships with suppliers in these sectors, which may give rise to a higher potential to contribute to or be directly linked to modern slavery.
	 High risk work practices: high levels of subcontracting are known to occur, opaque recruitment practices	
	 High risk services category: external reporting on known industry labour risks in both the cleaning and security industries	
Gig economy workers See page 29	 Vulnerable populations: largely migrant workforce	We are anticipating increased regulations in this industry to strengthen worker protections. We have treated this as a key risk area in F23, but appreciate pending potential legislation that may in future reduce our relationship to this risk.
	 High risk work practices: industry relies heavily on independent contracting, which reduces our oversight and influence over working conditions	
	 High risk services category: increased regulatory focus on this industry due to known industry risks	

Emerging risk factors

We constantly monitor the changing landscape for new and emerging risks – both in the industries we operate in, and those of our suppliers. Two key emerging risks in F23 are labour shortages and cost of living pressures.

Emerging risk	Risk details	Actions taken to assess and address risk on page:
Cost of living	The global rising cost of living has increased costs for our suppliers and their workers. Sustainable price modelling is important to ensure we are paying our vendors enough to cover their costs and living wages for their workers.	29
Labour shortages	Labour shortages can perpetuate poor human rights practices. In industries or regions where sourcing labour is difficult, suppliers have increased leverage and it can be challenging to compel compliance.	25

Other risks

We also made assessments against other risk areas we have identified to determine any changes in our involvement and relationship to these risks using the UNGPs continuum.

Other risk category	Present risk factors	F23 assessment
Office products, gaming machines, solar panels, rubber gloves, packaging and uniforms	Products commonly rely on raw materials produced or processed by base-skilled workers in high risk geographies.	Remains an inherently high risk category which will be prioritised under our Responsible Sourcing Program in the next two years. We have the potential to contribute to or be directly linked to modern slavery risks in this category.
Outsourced IT helpdesk service	Inherently high risk due to potential presence of subcontracting arrangements in high risk geographies.	Remains inherently high risk and we may be directly linked to modern slavery in this area. However, our key risk services areas of focus are cleaning and security due to the potential higher level of involvement using the continuum.
Raw materials from high risk geographies (e.g. alcohol and tobacco)	Production relies on the use of temporary, migrant and seasonal labour, particularly in harvesting crops and growing tobacco, with limited oversight of working conditions.	Remains an inherently high risk area where we may be directly linked to modern slavery risks, however Endeavour currently has limited leverage due to the nature of these supply chains. We will consider options to manage these risks going forward, including possible opportunities to build leverage.
Transport and logistics (including shipping)	High risk category due to the known high levels of subcontracting and reliance on indirect labour, as well as working conditions due to the use of heavy machinery. We also recognise the heightened risks of modern slavery to seafarers that have been reported.	Remains a high risk category. We require these suppliers to comply with our Responsible Sourcing Policy, which prohibits practices that could cause, contribute to or directly link these suppliers to modern slavery.
Shop/hotel development and refurbishment	The construction industry carries human rights risks due to the levels of known subcontracting, use of hazardous materials and machinery, and materials sourced from potentially high risk geographies.	As we add additional sites to our brands' portfolios, or develop/refurbish existing sites, we continue to monitor this risk. As above, suppliers are required to comply with our Responsible Sourcing Policy.
Mergers and acquisitions	By purchasing existing businesses to bring them into one of our Group brands, we inherit any potential existing risk factors those businesses may carry.	This remains a risk to Endeavour. During the reporting period, the Human Rights team was engaged to ensure potential modern slavery risk considerations were taken into account during the discovery phase of a new winery acquisition.
Overseas recruitment	Through ALH, we engage recruitment firms to bring cooks and chefs from overseas through Australian Government visa schemes to fill labour shortages in our hotels. We recognise the modern slavery risks with overseas recruitment, including potential excessive fees or deceptive recruitment.	In F24, we will consider how we engage with workers in our hotels brought in through these schemes to hear about their lived experiences. We will seek to use direct worker voice to determine levels of risks to people, and any opportunities for Endeavour to strengthen its frameworks in this category.

Our Responsible Sourcing Program

We're team players. We work collaboratively with all our suppliers to uphold transparent, leading standards in the protection of human rights and responsible sourcing. The Responsible Sourcing Program is the way we monitor compliance with our Responsible Sourcing Policy. Suppliers falling in scope of the program have additional compliance requirements, designed to demonstrate to Endeavour that the supplier effectively manages human rights risks in their own operations.

Different types of suppliers carry varying levels of risk and have different requirements under our Responsible Sourcing Program.

Our Own Brand suppliers include those who supply product that is trademarked or registered to Endeavour, where we are licensed by the brand owner to use the brand on the product we are developing, or where we have directed the design or development of the product composition, ingredients or packaging. Own Brand suppliers are direct suppliers to Endeavour, making products for our Own Brands, so we have a close relationship to the risk and our level of influence is high.

Requirements for our Own Brand program suppliers:



Expanding our Responsible Sourcing Program

During the reporting period, we expanded the scope of our Responsible Sourcing Program and began to include Exclusive branded suppliers. These are suppliers with branded products that are sold exclusively by Endeavour. Under our program, these suppliers are now required to register with Sedex and complete the Self-Assessment Questionnaire.

This will give Endeavour a range of data to assess in F24, including the Sedex risk ratings of these suppliers, audit data from any suppliers who have undertaken social compliance audits, and the details of any trends in non-conformances. We'll use this data to determine if there are any pockets of particular risk in our Exclusive supply chain, to request audits where required, or to offer targeted training to improve practices.



Our Responsible Sourcing Program action plan

	F23	F24	F25
Trade suppliers	In F23, Exclusive branded suppliers were brought in scope of Endeavour's Responsible Sourcing Program.	We'll continue to focus on ensuring that the additional 400+ Exclusive suppliers brought into the program comply with their new requirements.	We will assess the results of the grower Fair Farms pilot program (see page 24) to be completed by end-F24 to determine if Endeavour's growers should be brought in scope in F25.
Non-trade suppliers	Cleaning and security service providers and temporary labour service suppliers were brought in scope of the Responsible Sourcing Program.	Cleaning and security service providers will be assessed by the High Risk Services Due Diligence Project in F24 (see page 28 for details).	By F25, high risk non-trade product suppliers will be in scope of our program. This will include suppliers of uniforms and other Endeavour-branded products, as well as other non-trade products manufactured in high risk regions such as China.
Responsible Sourcing Program status	In F23, our Responsible Sourcing Program is expanding .	In F24, our Responsible Sourcing Program is embedding .	In F25 and beyond, our Responsible Sourcing Program will keep evolving .

Assessing and addressing modern slavery risks

In F22, Endeavour’s first year as an independent listed company, we were focused on identifying our key modern slavery risks and setting up the systems and processes to effectively manage them. This year, we’ve been working on further developing our governance structures to mitigate risks, and embedding these management frameworks into our ways of working.

Key actions taken during the reporting period include:

- Finalising our Modern Slavery Risk Management Framework;
- Conducting internal training on modern slavery and risk management;
- Updating our Board-approved Responsible Sourcing Policy;
- Expanding our Responsible Sourcing Program to include more suppliers actively monitored for their modern slavery risk management practices;
- Engagement with industry;
- Increasing our headcount to include a dedicated human rights resource, responsible for managing our modern slavery response; and
- Working with suppliers on modern slavery indicators in their industries.

Our governance structure

Endeavour’s CEO is accountable for implementing our human rights commitments, and the Board is responsible for legal compliance with the Modern Slavery Act. Our Board reviews and approves our Responsible Sourcing Policy and annual Modern Slavery Statement.

Operationally, our responsibility for modern slavery risk management sits with the Director of Corporate Affairs and Sustainability, whose team develops our modern slavery risk management frameworks and strategies. The team works closely with relevant business units to implement these frameworks and strategies and embed them into our ways of working. To demonstrate our commitment to respecting

human rights, we have increased our headcount and onboarded a Human Rights Manager to help strengthen our modern slavery response.

During the reporting period, a Committee of the Board received a Human Rights Program update, which included actions taken during the year to mitigate and manage modern slavery risks. The Committee engaged with the update and provided feedback into future plans to evolve Endeavour’s modern slavery response. Management will continue to provide periodic updates to the Board and seek input on our Modern Slavery Risk Management Framework and actions taken to identify, assess and address risks.



Our Modern Slavery Risk Management Framework

During the reporting period, we finalised our Modern Slavery Risk Management Framework, which was a key commitment made in our F22 Modern Slavery Statement.

Our Responsible Sourcing Policy outlines our requirements for suppliers to uphold and respect the human rights of workers in their own operations and supply chain. This policy was updated during the reporting period and approved by the Endeavour Board in May 2023. We also introduced Responsible Sourcing Program Supplier Guidelines to help our suppliers understand their obligations and demonstrate compliance with our policy.

We strengthened our internal governance for managing risks by introducing a Modern Slavery Questionnaire into the tender process for high risk services suppliers (see page 27), and implemented a Labour Hire Provider Management Framework to manage risks for contracted workers on our vineyards (see page 26).

External framework documents
(applies to suppliers):



Internal governance

For the management of external policy:



We communicate changes and updates to policies for suppliers through our regular supplier communications, such as our quarterly supplier magazine, Distilled. Our supplier facing policies are also available on our website. We also directly engage suppliers by email or in person to implement framework changes that affect them. For example, during the reporting period, we reached out to our Exclusive suppliers to let them know about new compliance requirements, and we engaged with our viticulture labour hire providers on audit requirements.

Our key risk areas

By identifying and prioritising our key risk areas, we've focused our efforts and resources on assessing and addressing risks in the areas we have influence and can make a positive impact.



Key risk area 1

Horticulture and viticulture workers



In the horticulture and viticulture industries, the work is seasonal; the workforce is transient and often consists largely of migrant workers. These factors, coupled with high levels of subcontracting, have led to known human rights risks in these industries. We've undertaken a number of actions during the reporting period to assess and address these risks.

Modern slavery risks in the horticulture and viticulture industries are relevant to both Endeavour's own operations and supply chain. We own and operate our own vineyards and also source grapes and wines from third parties.

Known industry risks in horticulture and viticulture include: poor record keeping by contractors (payslips, timesheets, employee contracts); inadequate systems to ensure employees have valid working rights; cash-in-hand payments; unlawful deductions; unsafe working conditions; and excessive working hours. While these are not examples of actual modern slavery, they can be indicators of modern slavery and highlight vulnerabilities in the workforce.

Pinnacle audits

In August 2019, one of our South Australian vineyards underwent a social compliance audit that found issues regarding a labour hire provider used by our direct contractor. Among a range of record keeping concerns, issues also included underpayments against the Wine Industry Award due to misclassification of workers' grading under the award, and pay deductions from workers that did not comply with the Australian Fair Work Ombudsman (FWO) requirements.

We worked closely with the contractor and one of their labour hire providers to remediate the issues and ensure back-payments were made to workers. We also reported these findings to the FWO.

Unfortunately, due to COVID-19 travel restrictions, we were not able to arrange another audit until F23. In the current reporting period, we re-audited the site and the same contractor was reassessed. The auditor found no major issues, and all record keeping, pay and deductions were correct. We were therefore satisfied with the remediation efforts put in place by the contractor following the previous audit, and no instances of modern slavery were identified.

During the reporting period, we also conducted third party social compliance audits on our other Endeavour-owned Australian vineyards.

These audits produced varying degrees of success, highlighting a need for Endeavour to continue focus on the known industry risks in viticulture in relation to contract labour.

In two instances, we encountered pushback from labour hire providers who were unwilling to work with us to supply requested evidence of labour compliance (payslips, timesheets, employee contracts, and rights to work of employees). We were therefore unable to establish compliance or non-compliance. Despite efforts to work with them and offers of support to improve record keeping practices if this was a concern, these providers opted to cease doing business with Endeavour and to source business elsewhere. We have since transitioned to new labour hire providers on these sites who were willing to provide us with the required documentation. This gave rise to one of our key lessons in this risk area, which is that industry labour shortages appear to be capable of increasing modern slavery risks, including by limiting companies' leverage to work with suppliers to improve practices (see page 25).

Audit limitations

We recognise the potential limitations of audits in assessing and addressing modern slavery risks, including that they are a point-in-time check of practices. However, they remain a helpful tool for us to identify areas of opportunity and improvement, and, when used in conjunction with other activities, form part of our ongoing risk management.

Horticulture and viticulture workers (continued)

Grower education session

We believe in working collaboratively with suppliers to build trust and capacity. In February 2023, we hosted a grower engagement session in collaboration with Fair Farms in the Barossa in South Australia, a key growing region for our supply base. 19 grower representatives attended the session.

Fair Farms is an industry-led initiative that offers a certification scheme for fair and ethical employment practices on farms. To become Fair Farms certified, farms sign up to the Fair Farms platform, complete an online self-assessment questionnaire, undertake training to address any gaps identified in the questionnaire, and then participate in a social compliance audit. Fair Farms audits are similar to the audits that our own sites underwent in F23, but are specific to the Australian horticulture industry.

We're currently considering if and how we incorporate Fair Farms certification into our Responsible Sourcing Program for growers. The session was an early engagement opportunity for growers to hear about the Fair Farms certification scheme, and for us to pose the possibility of certification becoming a mandatory requirement for supply in the future.

Fair Farms pilot program

Following the engagement session, six individual growers have volunteered to be part of a Fair Farms pilot program in F24. We collaborated with Fair Farms again in June 2023 to host a learning session for these growers on requirements. We'll continue to support these suppliers to get registered on Fair Farms, complete their individual training, and undertake their audits in the next reporting period.

Before deciding whether to make Fair Farms certification mandatory, Endeavour will seek feedback from growers participating in the pilot program. We understand, based on the feedback provided during the engagement session, that the cost of an additional compliance requirement is a concern if growers are in the future required to fund certification themselves. We've taken on board this feedback and will consider a fair and equitable solution should this certification become compliance in the future.

We explained the industry modern slavery risks, and the benefits of an external assessment (such as a Fair Farms audit) for growers to be satisfied that their practices comply with all relevant laws and regulations, as well as our own Responsible Sourcing Policy. We invited feedback on the Fair Farms scheme and facilitated a productive and engaging discussion. Growers were then invited to be part of a Fair Farms pilot program in F24, fully funded by Endeavour.

We also used the opportunity to discuss Endeavour's Responsible Sourcing Program. We outlined the existing requirements under our policy that suppliers conduct reasonable human rights due diligence on their own sites, particularly in relation to labour hire providers. Growers raised concerns about access to labour if they are perceived as imposing additional compliance requirements on their contractors. This supported issues we found on our own sites and further highlighted the risks to workers of the industry-wide labour shortage.

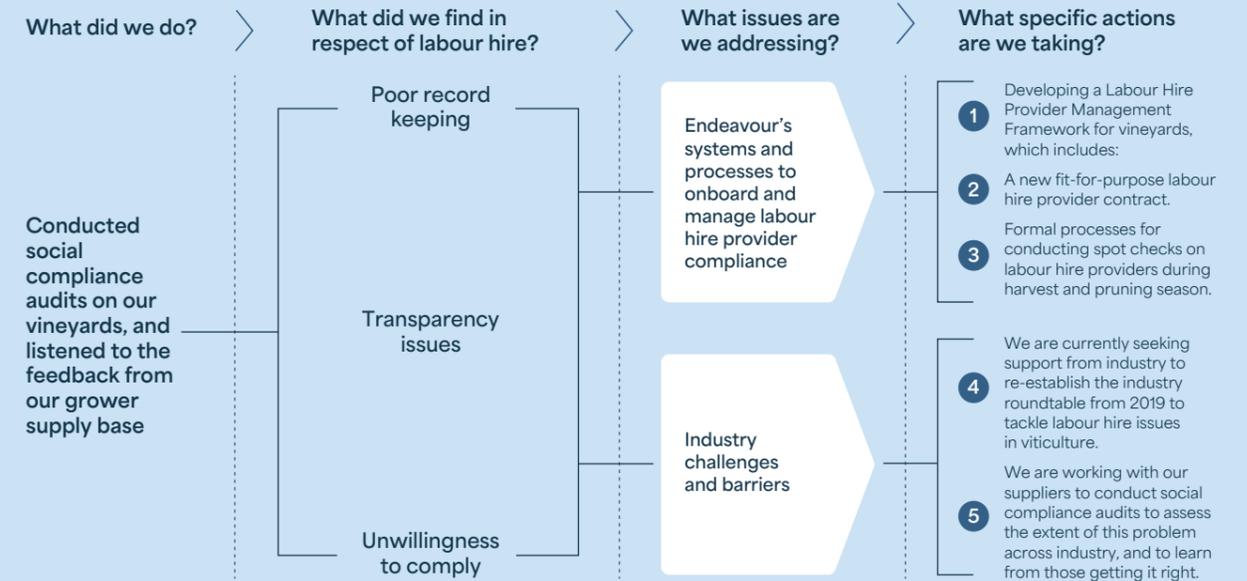
Supplier audits

During the reporting period, we partnered with two of our suppliers to fund and conduct social compliance audits on their vineyards. One of these suppliers is a smaller grower and the other a bulk wine supplier. In total, the audits covered eight vineyards. The purpose of this activity was to compare and contrast the findings and learnings of our suppliers with those of our own, and to collaborate and understand how we can work together where challenges faced might be similar. We also wanted to give our supply partners a chance to learn and improve their own operations to help lift standards across industry.

Our smaller grower, with vineyards of comparable size to our own, encountered similar challenges with obtaining some labour hire provider records on the day of their audit. As discussed in more detail on the next page, there is generally little oversight over agency labour practices in the viticulture industry. Labour hire providers are often contracted for short periods of time to cover vintage and pruning seasons. Access to their employee records such as timesheets and evidence of rights to work can be difficult to obtain. This is a complex issue that is challenging to navigate for the reasons outlined on the next page.

Key insights

Through our audits, engagement with industry, and by working collaboratively with our suppliers, we've learned that labour shortages appear to be perpetuating the contract labour issues occurring on vineyards. A collaborative, whole-of-industry approach is needed to set expectations for contract labour providers. Without the rest of the industry requiring compliance, labour hire providers may opt to cease working with those that do - which would mean little impact is made to affected workers.



Our two key takeaways:

- 1. Industry-wide labour shortages can perpetuate malpractice:**
 - In our experience, access to labour in the horticulture and viticulture industries has traditionally been and continues to be a challenge for most sites operating in regional or remote locations. Sites are often competing with other local businesses for the same limited contract labour providers. Services are also often only required for defined periods of time such as vintage season, and these time constraints may limit scope to find alternative providers.
 - Requiring labour hire providers to provide evidence of compliance in terms of worker payslips and entitlements, contracts of employment and rights to work documentation do not appear to be standard industry practice. This means it can be challenging to obtain this information from providers who are not accustomed to these requests. However, this information is important to satisfy businesses that their labour hire providers are operating in accordance with all relevant laws, regulations and awards, including those relevant to the management of modern slavery risks.
- 2. We need industry on board to uplift standards:**
 - Due to labour shortage issues, vineyards may lose access to labour if labour hire providers are satisfied they can seek work elsewhere rather than comply with our requests to demonstrate compliance.
 - As we experienced, labour hire providers may opt to cease doing business with companies who they perceive as having 'over and above' requirements. Labour hire providers can instead look to provide services to alternative sites without these requirements.
 - In F23, we have reached out to a number of peers and industry bodies, with a view to establish an industry roundtable on this issue in F24.

Labour Hire Provider Management Framework

To strengthen our own practices to manage contract labour risks on our vineyards, during the reporting period we developed and introduced a new Labour Hire Provider Management Framework. The framework includes:

- Instructions for vineyard managers on the implementation of the framework.
- A letter to be provided to contractors outlining our expectations of compliance. This is to be given to potential suppliers prior to supply. It clearly states the expectation of transparency and details the random spot checks that Endeavour (and auditors conducting social compliance audits on our behalf) will perform on the supplier's paperwork at any time throughout the period of supply.
- A short form contract between Endeavour and the contractor, which must be signed prior to supply commencing. This was developed because, on review, we determined that our existing temporary labour services contract was not fit for purpose for smaller vineyard labour hire providers. The previous contract was long and sophisticated and providers may not have adequately understood its requirements. It also included extensive corporate clauses that are not necessarily relevant to this supply base.
- An internal checklist for viticulturalists/vineyard managers. It requires vineyards to conduct spot checks to assess payslips, record keeping and rights to work compliance of their contractors. These records relate to modern slavery risks because they can help establish if workers are paid correctly, have rights to work in Australia, and are not subject to unlawful deductions. Completed checklists are sent to the Human Rights team for review.



Key risk area 2

Cleaning and security



We engage third party cleaning and security providers across our stores, hotels and other sites. High levels of subcontracting, use of migrant labour and a base-skilled workforce present risks to people in these industries. We've worked to take action to reduce these risks and protect workers in our cleaning and security supply chains.

Current approach to contract management

Endeavour outsources its cleaning and security services to contractors and labour hire providers across its retail stores, hotels and other sites. These contracts are not all managed centrally and carry different levels of potential modern slavery risk.

Retail

Some of our retail contracts for these sectors are managed by Woolworths Group under our partnership agreement with others managed by our central Non-Trade Procurement team. All cleaning and security contracts for retail will be managed by Endeavour at the end of the partnership agreement.

Hotels

Hotel contracts are currently managed by ALH Hotels. We consider these contracts as priority high risk due to the number of individual contracts, levels of subcontracting, number of jurisdictions and their requirements, and the decentralised nature of ALH Hotels operations.

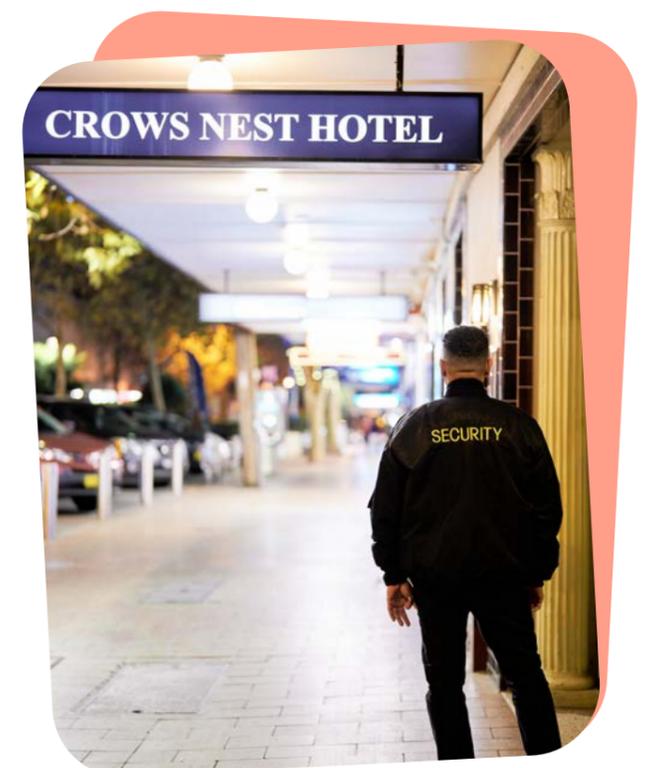
Other

Service contracts may also be managed on individual site bases, such as for wineries and bottling facilities. We consider these as priority high risk for the same reasons as ALH Hotels contracts, being that they are managed by individual sites and we may not have central visibility over these suppliers and contracts.

Updates to our onboarding framework

During the reporting period, we made amendments to our supplier selection process for cleaning and security tenders. As part of these changes:

- Suppliers offering these services are required to complete a human rights questionnaire as part of their tender. This questionnaire asks targeted questions to determine the adequacy of the supplier's management controls in place to mitigate human rights risks. This includes their human rights policies, procedures for managing their own contractors and labour hire providers, systems for staying up to date with regulatory changes, etc.
- When it comes time to complete a preferred supplier request form, the category manager sends the completed questionnaire for each preferred supplier to the Human Rights team. The team reviews to determine if they are: sufficient; require additional information from the supplier; or pose an unacceptable human rights risk to Endeavour.
- Approval from the Human Rights team is now required as part of the contract approval form and prior to business award for these suppliers.



Due Diligence Project

While the updates to the supplier selection process help assure we're not awarding business to new suppliers posing risks of modern slavery, we recognise the need to conduct due diligence into the risks posed by our existing suppliers.

In F23, we engaged a business and human rights expert firm to help us conduct a due diligence exercise into our current cleaning and security service providers. This exercise will be carried out in F24.

As part of the scope of this project, we are seeking to understand:

- The level of supplier compliance in these service areas. This includes wage compliance, record

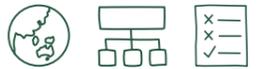
keeping, effective systems to manage rights to work of employees, compliance with labour hire licensing regulations, and others.

- Any ways in which we can improve supplier compliance, as well as any other recommendations the third party can make that would support us to meet our external commitments to uphold human rights.
- How our practices compare to other companies in this space.
- The processes and procedures we can put in place to carry out this due diligence exercise internally and continually.



Key risk area 3

Gig economy workers



The gig economy relies on high levels of subcontracting, with workers often working for multiple delivery companies making oversight into their working conditions, hours, safety and pay limited. We've been looking at ways we can better support workers in this sector.

We understand that the on-demand delivery industry is under legislative and regulatory review by the Australian Government and we will collaborate with industry and regulators to support improved outcomes for gig economy workers.

Reducing subcontracting layers

The gig economy is considered high risk for potential human rights offences in part due to common industry practice relying on multiple subcontracting layers. We're currently working to reduce these layers in our own on-demand delivery space. Traditionally, through Jimmy Brings, we have engaged squads (contractors) who provide drivers (subcontractors). Jimmy Brings has been moving away from this subcontracting model to engage directly with drivers. By doing this, we are helping to ensure we have better oversight into driver working conditions (including earnings) as we hold the direct relationship with these drivers. As at the end of the reporting period, Jimmy Brings' subcontracting model has been removed.

Renegotiating rates

Recognising Endeavour's potential to contribute to modern slavery risks in the gig economy as discussed on previous pages, during the reporting period we sought to factor in the rising costs of fuel in our third party contracts. Through mutual agreement we renegotiated our contract with one of our on-demand delivery partners to include a fuel levy, paid directly to the driver. We have also been working towards increasing base rates of pay (with a portion paid to the third party and a portion to the driver) to help ensure sustainable price modelling and consideration of the rising cost of living for drivers.

On-demand delivery driver research project

During the reporting period, we engaged a specialist agency to conduct three focus groups with on-demand drivers. 22 total drivers were included in this research, with a majority being migrant workers.

The central aim of this study was to provide insights needed to support our Human Rights Program as the regulatory environment evolves. We also wanted to ensure that the workers whose rights we aim to uphold through our program are heard and included in the design of the program.

The driver audience was highly varied. It included both drivers engaged directly by Jimmy Brings, and drivers engaged through third party platforms. Our agency noted that many were highly educated, while others possessed more basic education and skillsets.

It was found that income could be relatively consistent in terms of earnings per day but driver perception of their quality of life and income varied considerably. Through these focus groups, our agency determined this could be driven by a number of individual situational factors. For example, those who relied on delivery driving as their sole source of income; who were located in metro areas; paid per delivery; and/or single felt under greater stress. This is compared to those who used delivery driving as a means to top up other income; were located in more regional locations; had contracted days with an hourly rate; and/or had family to rely on. Drivers with situational factors closer aligned to this second category had a more positive outlook about working in the gig economy.

Workers noted that income from driving had reduced in recent years, which they attributed to an increased number of people working in the on-demand delivery industry and more competition for jobs. Drivers suggested that monitoring wages and capping driver numbers would support their income-earning potential.

One of the biggest challenges in on-demand delivery is that a vast majority of people drive for multiple delivery companies. This is supported by our research which found that drivers will 'follow the work' and 'follow the money', meaning they will prioritise the busier platforms (which varied depending on the time of day) and the shorter deliveries offering the best monetary return. While this gives drivers flexibility to choose their work, it makes it difficult for us to monitor hours worked, take-home earnings and number of people working in the gig economy industry. Because a driver may switch between platforms multiple times per shift or perform work for multiple platforms simultaneously (a key benefit for drivers), we cannot easily identify how much money they are earning per hour or day, nor hours worked. We can only monitor their activity when completing deliveries for Jimmy Brings.

This research was conducted at the end of the reporting period, so we are now considering how we implement and apply learnings as we continue to evolve our Human Rights Program. We'll report more on this in our next statement.

Other actions to assess and address modern slavery risks

Grievance channels

Endeavour has a Whistleblowing Policy, which allows potentially affected workers, including team members, suppliers and their workers, to raise grievances. Grievances can be raised by email or by phone with details provided in the policy.

The channel is run by a third party specialised in handling whistleblower complaints. The channel is available to report a range of issues such as breaches of the law, bullying, harassment or discrimination, and human rights and modern slavery issues.

While the Whistleblowing Policy sets out report handling, investigation process and governance, we also have an internal Modern Slavery Toolkit which prescribes the process for dealing specifically with modern slavery grievances.

As part of our actions to assess and address risks this reporting period, we ensured our Whistleblower Hotline was displayed at all of our vineyards and bottling facilities in places that labour hire workers could access.

During the reporting period, we did not receive any modern slavery related complaints through our hotline. Further information on actions taken to assess the effectiveness of our Whistleblower Hotline for modern slavery grievances is outlined on page 33.

While we did not receive any modern slavery complaints through our official Whistleblower channel, we did receive one related complaint through unofficial channels.

Through our store team, we were made aware of a potential issue with a security services provider, where it is believed security guards may be receiving cash-in-hand payments. While this, of itself, is not modern slavery, it may indicate more serious issues with the supplier's practices, which require investigation. This issue was reported at the very end of the reporting period and is currently under investigation. It has highlighted a need to ensure modern slavery indicator training is provided to teams who may have relationships with workers in our supply chain. Further information will be provided in our next statement.

Modern slavery response in the broader sustainability framework

Endeavour's modern slavery response forms part of our broader sustainability framework, including our Sustainability Strategy. Our strategy includes goal seven: to respect and promote human rights in our operations and supply chain. Within this goal is a commitment to maintain an effective Responsible Sourcing Program to ensure our products and services are ethically produced and sourced, and that our supply chains are free of modern slavery, forced labour and child exploitation. It also includes building strong, mutually beneficial relationships with our suppliers by fostering trust, being transparent and engaging with them fairly and equitably.

During the reporting period, we partnered with a specialist sustainability firm to conduct a sustainability materiality assessment. The results of the assessment reflected that human rights in the supply chain is and should remain a material issue to Endeavour. It was ranked highly by both internal and external stakeholders. Promoting the rights of supply chain workers and modern slavery risk management will therefore be an ongoing priority for our business through our sustainability framework. Further information about our work can be found in our F23 Sustainability Report.



Training and industry engagement

As we learn and work towards continuous improvement, we're open to feedback, new ideas, and understanding a range of experiences and perspectives in our industry.

We're committed to working collaboratively with our suppliers and industry partners to raise standards in respect of modern slavery risk. We continue to learn from the insights and experiences of those in our industry, including our peers, leaders in the field and those on the ground with workers. We're also extending training and learning sessions to relevant teams in our own business.

Training and industry events (F23)

October 2022

Endeavour attended the United Nations Global Compact (UNGC) Dialogue on Business and Human Rights.

Endeavour attended the South Australian Modern Slavery Working Group.

November 2022

Human rights and modern slavery risk indicator training was provided to Pinnacle Drinks operations team members.

Endeavour attended the UNGC Modern Slavery Community of Practice.

February 2023

Endeavour hosted a grower engagement session in the Barossa with Fair Farms.

Endeavour's central Non-Trade team was trained on supplier modern slavery risks.

Endeavour presented to the Wine Industry Sustainable Packaging Alliance on industry modern slavery risks including contract labour issues on vineyards.

May 2023

Endeavour attended a Business and UN Special Rapporteur panel.

June 2023

Endeavour attended the Australian Government's 2023 Modern Slavery Conference.

Endeavour hosted a learning session with Fair Farms for growers participating in the Fair Farms pilot program.

Assessing the effectiveness of our actions

Guided by our purpose and values, we want to improve the lives and working conditions of the people working in our operations and supply chain. To do that, we continue to monitor and assess the impact of our actions.

We consider the outcomes and impact of our actions using internationally recognised human rights standards. We're always learning, and we're committed to keep improving and evolving as our modern slavery response matures.

Measures of effectiveness

We believe an effective modern slavery response is one that achieves its goals of successfully identifying risks, and putting in place the right actions to combat them. This includes responding to any potential modern slavery incidents and, where appropriate, providing for or co-operating in remediation.

Risk identification

We measure the effectiveness of our actions to identify risk through:

- (1) **Prevention:** whether and how many suppliers were assessed for modern slavery risks prior to business award.
- (2) **Risk assessment:** number of suppliers with a completed risk assessment that considers modern slavery risks.
- (3) **Social audit outcomes:** assessing whether audits picked up known issues, such as contract labour issues on vineyards.
- (4) **Direct worker voice:** number of rights-holders engaged and given the opportunity to highlight risks.

Actions to combat risk

We measure the effectiveness of our actions to address risks by considering:

- (1) **Prevention:** number of team members trained on modern slavery risks and risk indicators, and number of supply partners engaged in capacity-building activities to raise awareness of risks in their own operations and supply chains.
- (2) **Governance:** number of suppliers with modern slavery related clauses in their contracts, and number of suppliers monitored for compliance through our Responsible Sourcing Program. We also consider senior management and Board engagement as pivotal to performance.
- (3) **Reported issues:** number of issues reported through grievance channels, and number of issues reported through unofficial channels.

Remediation

We measure the effectiveness of our actions to remediate modern slavery risks by assessing whether the conditions of workers have improved as a result of our actions.

In the case of actual identified risks, we assess whether our actions have resulted in improved outcomes for workers, (for example, secure employment, or remediation of any underpayments).

Case study

As outlined on page 23, during the reporting period we re-audited one of our vineyard sites that was subject to contract labour issues in 2019. Our work with the contractor at the time resulted in back-payments made to workers. The re-audit established that the contractor had implemented effective controls to manage risk, as no issues were identified with their labour hire providers and it was found that all workers were receiving their correct entitlements.

Grievance channels

In line with the UNGPs Effectiveness Criteria, we understand that grievance channels should be:

- legitimate;
- accessible;
- predictable;
- equitable;
- transparent;
- rights-compatible;
- a source of continuous learning; and
- based on engagement and dialogue.

In assessing the effectiveness of our actions, we recognise that it is important to continue to work to ensure our grievance mechanisms are trusted and accessible.

Zero official complaints received through our Whistleblower Hotline pertaining to modern slavery in F23 has given us cause to re-examine our channels. As a key activity for F24, we're committed to conducting a deep dive into our grievance mechanisms and using the UNGPs Effectiveness Criteria to understand how we can promote and encourage use of our channels to report human rights issues (see page 37).

Alignment to international standards and benchmarks

Our Responsible Sourcing Policy and modern slavery response is informed by leading international standards including:

- International Labour Organisation (ILO)'s core conventions
- United Nations Universal Declaration of Human Rights (UDHR)
- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- Ethical Trading Initiative (ETI)'s Base Code
- United Nations Global Compact's (UNGC) core values on human rights, labour standards, the environment and anti-corruption
- Emerging best practices from global peer programs in various industry sectors

Our engagement with industry helps us to ensure we are aligned to these standards.

We review the Corporate Human Rights Benchmark (CHRB) and Know The Chain (KTC) benchmarks to ensure our actions to identify, assess and address risk consider best practice, even when we are not actively assessed by these bodies.

Assessing the effectiveness of our actions in our key risk areas

We continue to focus on the outcomes from work in our key risk areas to determine impact and effectiveness.

Key risk area	Effectiveness assessment	Future actions
Viticulture and horticulture workers	We examined the outcomes from the third party social compliance audits conducted on our vineyards and bottling facilities. The contract labour complexities identified on vineyards satisfied us that we are prioritising the right industries. The identified contract labour issues on vineyards supported our risk identification actions, whereas our bottling facilities did not have the same labour hire concerns.	We will continue to implement our new Labour Hire Provider Management Framework and perform ongoing random spot checks on contractors. From F24, we'll have data from these spot checks to understand if the presence of these issues is reducing. This will help us to assess the effectiveness of actions taken to reduce risks in the horticulture and viticulture sector.
Cleaning and security workers	We have engaged a third party to help us assess the effectiveness of actions taken in these sectors.	We'll review the outcome of the cleaning and security due diligence project conducted by the third party specialist firm (see page 28) to determine the effectiveness of our actions to mitigate modern slavery risks in these industries, as well as any additional measures we should impose to better assess and address any risks identified.
Gig economy workers	We engaged a third party agency to conduct focus groups to understand direct from workers whether the actions we've taken to protect them have been effective and any ways we can improve (see page 29).	In addition to the feedback from the focus groups, we will consider any additional legislation or regulations introduced in F24 that may affect the human rights risks in the gig economy industry.



Consultation with associated entities

Endeavour owns and controls a number of entities, including the reporting entities listed on page 8. All reporting and non-reporting entities share the same external policies, as well as the same Company Secretary and Board.

During the reporting period, Endeavour consulted with its reporting and non-reporting entities in the development of its Modern Slavery Risk Management Framework. Through meetings, information sharing, engagement with senior leaders and on-the-ground teams, we worked collaboratively to ensure we understood the modern slavery risks across our whole business, and that each entity understood its requirements under our modern slavery response. Our Modern Slavery Risk Management Framework encompasses all of our brands and entities, and our Responsible Sourcing Policy applies to all suppliers.

This statement was prepared by Endeavour's central Sustainability team, with input from Legal, Risk, Non-Trade, Pinnacle Drinks, Culture and People, and our brands. This statement and an earlier draft were shared with the Company Secretary and Board, ensuring consultation across all reporting and non-reporting entities in its development. This statement has been approved by the Endeavour Board.

Endeavour was previously a subsidiary of the Woolworths Group, and we still share some systems and partnership agreements for managing shared suppliers. We have agreed ways of working with Woolworths' Human Rights team. Each party is required to notify the other if they receive any allegations of a serious human rights violation in relation to a supplier it reasonably considers may be a supplier of the other. We met with the Woolworths team twice during the reporting period to discuss and consult on high level actions taken to identify, mitigate and address modern slavery risks as they might be relevant to the other party's operations.



Progress against our commitments

We've made strong progress against the seven commitments made in our F22 Modern Slavery Statement. We'll continue to prioritise our actions in these areas as we endeavour for better:

Commitment	Description	Progress	Page reference
Modern Slavery Risk Management Framework	Formalise our Modern Slavery Risk Management Framework to bring together and enhance Endeavour's current approach to managing real and emerging modern slavery risks.	Achieved ✔	21
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.	Achieved ✔	24
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.	Ongoing ○●●●	24, 31
Modern slavery training	Develop an approach to modern slavery training for Endeavour 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.	Ongoing ○●●●	31, 37
Pinnacle Drinks review	Review the effectiveness of Pinnacle Drinks' approach to modern slavery due diligence to inform our business-wide approach.	Achieved ✔	23-26
Formal grievance mechanisms	Establish measures so Endeavour's direct suppliers and their employees are aware of and have access to formal grievance mechanisms.	Ongoing ○●●●	30, 37
Collaborate with industry	Continue to work strategically with industry peers to deepen collaborative efforts to mitigate modern slavery risks within priority high risk categories.	Ongoing ○●●●	24-25, 31

Key
 ○●●● Ongoing We have progressed with this commitment, and it is ongoing in the next reporting period.
 ✔ Achieved This commitment has been achieved, and we will continue to evolve and make improvements.

Future commitments

We have more to do as we mature our approach to identify, assess and address modern slavery risks in our operations and supply chain. We're working towards the following commitments in F24:

Human Rights Policy

Build and finalise an Endeavour Human Rights Policy detailing our Group-wide commitment to human rights.

Enhance access to grievance channels

Continue to work with suppliers and engage in direct worker voice projects to ensure that our grievance channels align to best practice and the UNGPs.

Governance framework for high risk services suppliers

Build a robust compliance framework for monitoring the human rights practices of high risk services suppliers.

Continue to grow our Responsible Sourcing Program

Work closely with our Exclusive branded suppliers to have them onboard our Responsible Sourcing Program with completed risk assessments.

Collaborate with growers on a Fair Farms trial

Partner with and fund Fair Farms certification for some of our growers to help capacity build and improve human rights practices in viticulture.

Modern slavery awareness training

Continue to grow and develop our modern slavery training for our team members.

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