



Brambles

Modern Slavery Statement

Financial Year Ending 30 June 2022

Brambles Limited (ABN 89 118 896 021)

Financial Year Ending 30 June 2022

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At Brambles, we believe our role as a global leader in sustainability is to respect and promote human rights around the world, both in our operations and in our supply chains. This work requires resilience and continuous enhancement, consistent with our purpose of connecting people with life's essentials every day in a manner consistent with our shared values.

Both the UK *Modern Slavery Act 2015 (UK Act)* and the Australia *Modern Slavery Act 2018 (Cth) (Australian Act)* require that businesses disclose information relating to their efforts to address the risks of Modern Slavery¹ in their operations and their supply chains. Brambles makes this Modern Slavery Statement (**Statement**) on behalf of Brambles Limited (ABN 89 118 896 021) and its subsidiaries. For purposes of the UK Act, this Statement is made by Brambles on behalf of the Brambles UK entities set out in Annexure A and, for purposes of the Australian Act, this Statement is made by the reporting entities Brambles Limited, CHEP Australia Limited, Brambles Industries Limited, Brambles Holdings International Pty Ltd, Brambles Finance Australia Pty Ltd, Brambles Spain Pty Ltd and CHEP Technology Pty Ltd.²

This Statement is set out in the following 9 parts:

1. Introduction
2. Business and Organizational Structure
3. Brambles' Policy Framework
4. Brambles' Workforce
5. Brambles' Supply Chain
6. Risks of Modern Slavery in Brambles Operations' and Supply Chains
7. Actions to Assess and Address the Risks of Modern Slavery
8. Assessing the Effectiveness of Our Actions
9. Looking Forward
10. Consultation with Our Group Entities

¹ Modern Slavery is based on the definition set out in the Australian Act and includes trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour where children are subjected to slavery or similar practices or engaged in hazardous work.

² A list of Brambles' principal subsidiaries is set out on page 134 of Brambles' [2022 Annual Report](#).

1. INTRODUCTION

This is our seventh Statement in response to the UK Act and our third Statement in response to the Australian Act. In the past year we have continued to improve upon our work on Modern Slavery, deepening our understanding of the risks in our operations and supply chains and ensuring we have in place the most effective responses to those risks. This Statement sets out the steps we have taken throughout the financial year ended 30 June 2022 (**Financial Year 2022**), steps we will continue to take and future actions.

Key Areas of Focus Since Our Last Consolidated Modern Slavery Statement:

- Updated Brambles' Speak Up Policy.
- Provided Code of Conduct on-line training to all office based employees globally and live training at all service centres globally. This training included a chapter on human rights.
- Completed enhanced due diligence on all of Brambles' existing third-party plant operators (235) and labour suppliers (49) worldwide.
- Commenced our SMETA audit program, carrying out audits of some of our highest risk suppliers.
- Updated and launched a bespoke human rights questionnaire used to evaluate our highest risk suppliers, including our timber suppliers and our third-party plant operators.
- Launched our first Annual Supplier Certification.

2. BUSINESS AND ORGANISATIONAL STRUCTURE

As a pioneer of the sharing economy, Brambles is one of the world's most sustainable logistics businesses. Our circular business model facilitates the "share and reuse" of the world's largest pool of reusable pallets and containers. This allows Brambles to serve its customers while minimizing the impact on the environment and improving the efficiency and safety of supply chains around the world.

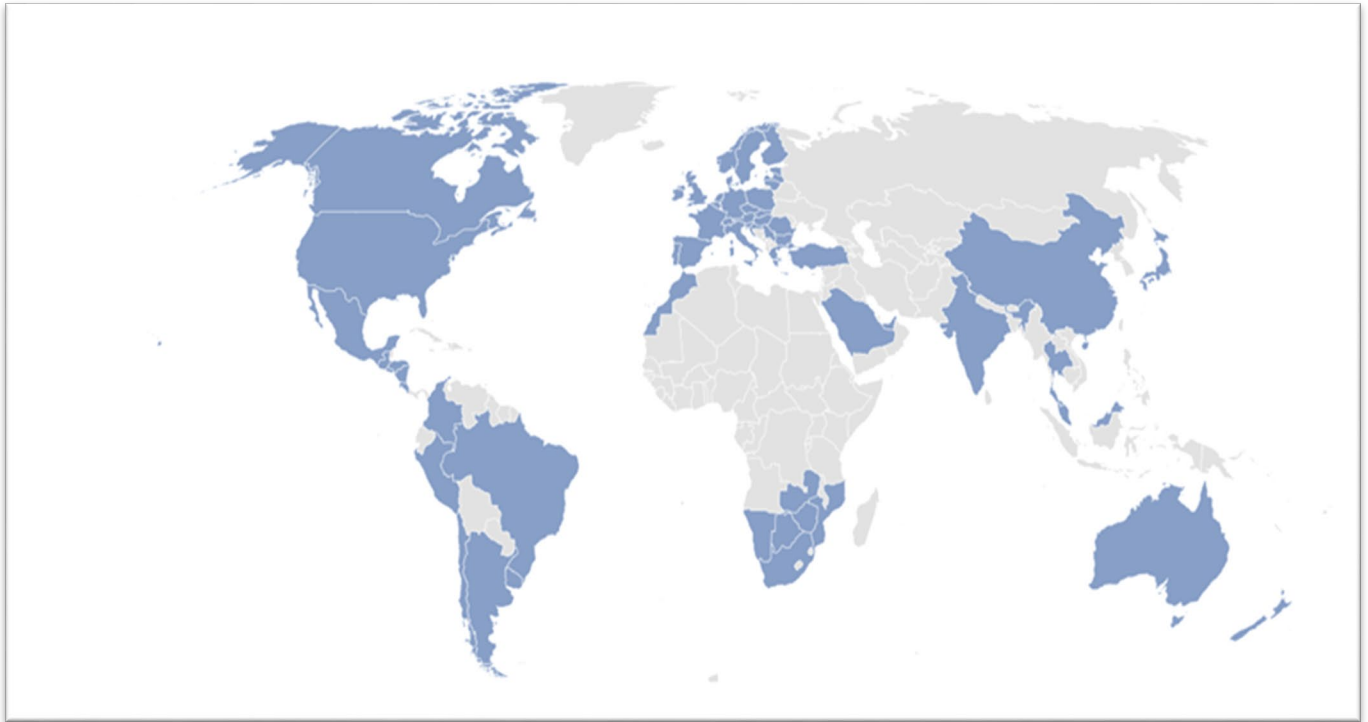
Brambles primarily serves customers in the fast-moving consumer goods (e.g., dry food, grocery, and health and personal care), fresh produce, beverage, retail, automotive and general manufacturing industries, counting many of the world's best-known brands among its customers. Brambles provides supply-chain logistics services to these customers, based upon its longstanding expertise in the management of reusable pallets, crates and containers.

Overview of Brambles' Organizational Structure

Brambles carries out a supply-chain logistics business operating primarily through the CHEP brand. Brambles Limited, the ultimate holding company of the Brambles Group, is listed on the Australian Securities Exchange, and its registered office is in Sydney, Australia. Brambles also has a corporate office in London, UK.

Brambles operates in more than 60 countries³ as of 30 June 2022, with its largest operations by headcount in Australia, the UK, the USA and South Africa as set out below:

³ Although Brambles had operations located in Russia at the start of Financial Year 2022, it ceased those operations in response to the Russian/Ukrainian conflict.



Overview of Brambles' Operations

Brambles operates primarily through the CHEP brand, providing supply chain logistics and associated services, focusing on the outsourced management of reusable pallets, crates and containers to customers globally.

CHEP's circular business model is based on the concept of "share and reuse," also known as pooling. With the CHEP pooling system, customers rent pallets from CHEP and transfer them to the next user, without the need to return them to CHEP first. This share and reuse model makes CHEP's customers' supply chains more efficient and more sustainable.

CHEP manages the administrative procedure, conditioning and quality assurance of its equipment, and in some cases the logistics of delivery and collection of equipment, allowing customers to focus on their core business.

Brambles' operations are located worldwide, and it manages its businesses within the following operating segments:

CHEP Americas: The pallet and container pooling businesses in the Americas

CHEP EMEA: The pallet and container pooling businesses in Europe, Middle East and Africa and the CHEP-branded reusable plastic container (RPC) business in South Africa

CHEP Asia-Pacific: The pallet and container pooling businesses in Asia-Pacific and the CHEP-branded RPC businesses in Australia and New Zealand

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In each of these operating segments, Brambles rents, tracks, and maintains equipment, including pallets, crates and containers, and in some segments, Brambles leases facilities, including approximately 750 service centres where our pallets, crates and containers are repaired or washed, and may own or lease fleets to transport equipment to customers. Brambles also owns 18 pine timber farms and a sawmill and pallet manufacturing plant in South Africa. In each of these operating segments, Brambles employs workers, consistent with all applicable labour and employment laws and regulations.

Through its Better Communities sustainability goals, Brambles strives to build resilience, promote circularity and account for the connections between society, the economy and nature. To implement these goals, amongst other things, we support food banks with volunteer hours, corporate donations and sponsorships and in-kind donations, allowing a seamless flow of platforms to receive food donations from brands and retailers, many of whom are Brambles' customers, for re-distribution. For more information about Brambles' Better Communities goals, please see Brambles' [2022 Sustainability Review](#).

3. BRAMBLES' POLICY FRAMEWORK

Brambles has a robust policy framework, beginning with our Code of Conduct. Our Code sets out our commitment to responsible business practices and good governance, making clear that we are committed to doing what is right each day, and is supported by and references a range of Group policies, including our Human Rights Policy, our Zero Harm Charter, our Speak Up Policy and our Supplier Policy. Our Code of Conduct and these policies are available at www.brambles.com.

The Code of Conduct

Brambles' Code of Conduct provides the ethical and legal framework for all employees in the conduct of Brambles' business. It sets out how Brambles relates to its customers, employees, shareholders, suppliers and the community. The Code applies to everyone working for Brambles and requires all its employees to comply with all applicable legal requirements, including all prohibitions against forced, bonded or compulsory labour, human trafficking or other kinds of slavery, at all times.

Human Rights Policy

Brambles' Human Rights Policy, which is incorporated in the Code of Conduct, was approved and adopted by the Brambles Limited Board of Directors in November 2016. It is reviewed annually and was last updated in July 2021. This Policy, which articulates in a single, stand-alone document the various human rights principles advanced throughout Brambles' Code of Conduct, is guided by international human rights principles encompassed in the Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights. Amongst others, it prohibits—in Brambles' operations and those of its suppliers—the use of child labour, forced, bonded or compulsory labour, human trafficking or other kinds of slavery.

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As a demonstration of its commitment to these principles, Brambles is a signatory to the United Nations Global Compact (UNGC) and continues to support the UNGC's Ten Principles in the areas of human rights, labour, environment and anti-corruption. Brambles' annual Communication on Progress can be found in the UN Global Compact tab of the Sustainability section of our website at www.brambles.com. Further, in September 2016, Brambles signed the CEO Statement of Support for the United Nations Sustainable Development Goals, which includes a set of goals to end poverty, fight injustice and inequality, and protect the planet by 2030.

Brambles participates in Australia's Global Compact Network Modern Slavery Community of Practice, which allows Australian businesses to keep abreast of new developments and share Modern Slavery learnings.

Zero Harm Charter

Brambles has also adopted a Zero Harm Charter. It sets out Brambles' commitment to achieving zero injuries, zero environmental damage and zero detrimental impact on human rights. The principles set out in the Zero Harm Charter, which is available on Brambles' website, include that every Brambles employee will care for the human rights of those affected by its operations.

Speak Up Policy

Brambles has a whistle blower policy (called the Speak Up Policy). The policy, which is reviewed annually and was last updated in June 2022, encourages anyone to report suspected breaches of the Code of Conduct or any other policy, including the Human Rights Policy and the Zero Harm Charter. It provides appropriate protections against victimization of persons who make reports about potential breaches. Reports may be made through various channels, including the Brambles Speak Up Hotline. The Brambles Speak Up Hotline is a confidential hotline, operated in local languages by an independent, third-party company, available to all employees and their families and all suppliers, suppliers' employees and their families at no charge 24 hours a day, 7 days a week. Should anyone contacting the Brambles Speak Up Hotline wish, they may make a report anonymously. All complaints are assessed and investigated as necessary consistent with Brambles' Speak Up Investigative Procedures.

Supplier Policy

Brambles' Code of Conduct also provides that Brambles is committed to working with suppliers to develop more efficient, safer and sustainable supply chains by abiding by the principles and values outlined in the Code of Conduct. To that end, in 2013, Brambles adopted a Supplier Policy, which requires its suppliers to, amongst others:

- Conduct their businesses in accordance with the laws and regulations of the countries in which they are located;
- Show respect for the diverse range of people and cultures with whom Brambles works and their human rights;
- Abide by the same minimum working age requirements outlined in the human rights statement in the Code of Conduct; and
- Follow the principles in Brambles' Zero Harm Charter.

4. BRAMBLES' EMPLOYEES

Brambles employs approximately 12,700 employees globally. All employees are covered by the Brambles Code of Conduct and related policies such as the Human Rights Policy, Zero Harm Charter, Speak Up Policy and Supplier Policy, described above, and are expected to abide by their principles. These principles are reinforced through induction Code of Conduct training and refresher Code of Conduct training, which occurs every two years and most recently in Financial Year 2022, to enable employees to understand what is expected of them and what to do in the event they suspect wrongdoing.

5. BRAMBLES' SUPPLY CHAIN

Brambles purchases goods and services from a diverse supply chain. Our supplier arrangements range from one-off purchases to multi-year, large value strategic relationships governed by master agreements.

Over 8,000 Suppliers Globally
 USD5.8 billion
 Total FY22 Spend
 Across 18 Categories
 (Including 15 Indirect
 Categories)

In Financial Year 2022, these purchases were made from 98 different countries. Suppliers in the USA received 24% of all spend, and suppliers in the top 20 countries—USA, South Africa, Australia, UK, Canada, Germany, Spain, France, China, New Zealand, Brazil, India, Poland, Italy, Belgium, Netherlands, Argentina, Mexico, Türkiye and Thailand—received 87% of all spend.

Our spend is managed across eighteen categories, including fifteen indirect categories as follows:

Category	% Of FY22 Total Spend
Direct or Raw Materials	34%
Transportation	24%
Third Party Plant Operators	14%
Indirect Procurement <i>including:</i>	28%
<i>Real Estate</i>	<i>Fleet</i>
<i>Plant Equipment</i>	<i>Utilities</i>
<i>Professional Services</i>	<i>Travel</i>
<i>IT and Telecommunications</i>	<i>Marketing</i>
<i>Facilities Management</i>	<i>Learning and Development</i>
<i>Packaging</i>	<i>Office Services</i>
<i>Maintenance, Repair and Operation</i>	<i>Material Handling and</i>
<i>Supplies</i>	<i>Equipment</i>
<i>Human Resources Services and</i>	
<i>Resourcing</i>	

Direct materials, or materials used in our pooling equipment, are critical to Brambles' operations. Timber, our primary direct material, represents the greatest proportion of our annual direct spend.

Brambles relies on sustainably sourced timber, and, in Financial Year 2022, we purchased 100% of our wood from certified sustainable timber providers, whose forest management practices were certified by either the Forest Steward Council (**FSC**) standard or the Program for the Endorsement of Forest Certification (**PEFC**)

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standard (and local standards endorsed by PEFC). Before these certifications can be issued, these timber suppliers must demonstrate that they protect and promote workers' rights and abide by applicable law, amongst other things. To maintain these certifications, the timber suppliers must satisfactorily pass third party audits on an annual basis.

6. RISKS OF MODERN SLAVERY PRACTICES IN BRAMBLES' OPERATIONS AND SUPPLY CHAINS

Brambles has adopted a risk management framework, which incorporates effective risk management as a part of Brambles' strategic planning process, requiring business operating plans to address the effective management of key risks and to embed a strong risk management culture. As a part of that framework, Brambles' headquarters and each of its businesses has a risk and control committee (**RCC**). Each RCC conducts an in-depth review on a regular basis of the risk profile of the relevant business unit, or of Headquarters, as the case may be, including their respective exposure to material environmental or social risks and identifies and assesses the effectiveness of mitigants for those risks. Brambles also has established a Sustainability Risk Committee (**SRC**). The role of the SRC is, amongst others, to identify, assess, monitor and report on Brambles' exposure to sustainability risks, determining whether Brambles has a material exposure to any sustainability risks and monitoring new and emerging sustainability risks.

As the RCC and the SRC focus on risks to Brambles, in Financial Year 2020, Brambles also established a Human Rights Working Group (**HRWG**), which is comprised of members from its Human Resources, Procurement, Legal and Compliance, and Sustainability functions, to assess Brambles' potential to cause, contribute to or be directly linked to Modern Slavery through its operations or its supply chains. The HRWG monitors the risks of Modern Slavery through human rights assessments and Brambles' due diligence program.

As set out in more detail below, our human rights due diligence program considers our business activities and potential risks to individuals in line with the UN Guiding Principles for Business and Human Rights. We consider risks in our operations (to include our service centres) and our suppliers who support our operations where we could cause or contribute to negative human rights impacts. We also consider risks associated with our suppliers (operating at lumber farms, in their own repair facilities, or at their own sawmills or manufacturing facilities, for example) where we may be linked through our business relationships.

Historically, the HRWG, together with the with RCCs, the SRC, and each regional business unit and functional group (including the Global Supply Chain team), identified the following as the most salient Modern Slavery risks in our operations and supply chains:

Human Trafficking

Bringing a person into a situation of exploitation through a series of actions, including deceptive recruitment

Forced Labour

Any work which people are not doing voluntarily and which is extracted under a threat or form of punishment

Bonded Labour

Labour demanded as a means of repayment of a debt or loan

Child Labour

Where children under the age of 18 are engaged in hazardous work

Risks of Modern Slavery: Brambles' Operations

Brambles' personnel are employed directly by a Group Company. This, along with our policies, compliance training and internal hiring procedures consistent with our policies, lowers the risk of Modern Slavery in our own operations.

Nevertheless, some of our operations utilize contract or third-party labour in Band 0 positions, our labour and support positions. This contract or third-party labour makes up roughly 20.27% of our workforce globally:

Region	% Contingent Worker	% Employee	% Total
Asia Pacific	9.58%	90.42%	100.00%
Europe	26.83%	73.17%	100.00%
IMETA	23.14%	76.86%	100.00%
Latin America	38.65%	61.35%	100.00%
North America	16.38%	83.62%	100.00%
Grand Total	20.27%	79.73%	100.00%

As some of these contract or third-party laborers are immigrants, temporary migrant workers, or other vulnerable populations who may be less aware of their rights and, by extension, may be susceptible to exploitation, we focused our Modern Slavery risk assessment on these arrangements. The assessment examined the inherent risks, considering:

- Nature of the work: job requirements and corresponding skillset
- Geography: country reports on human rights practices and country condition reports
- Recruiting processes: labour recruitment policies and practices and transparency

This assessment led us to conclude that our highest Modern Slavery risk in our operations was in plant operations, where 2.67% of all Band 0 workers were engaged through staffing companies or third-party labour providers which may provide workers from vulnerable populations. In response, and in addition to controls already in place as described on pages 16-17, we made two changes to our mitigants against that risk. First, our Third-Party Due Diligence Program (see the *Policies* section on pages 15-16 below) was updated so that any third parties providing such services to our operations underwent an enhanced form of due diligence, executed compliance terms and conditions, which include Modern Slavery provisions. 45 staffing or third-party labour providers successfully completed this enhanced due diligence in Financial Year 2022. Second, we implemented a policy and standard operating procedure to guide Brambles' engagement of staffing companies or third-party labour providers which may provide workers from vulnerable populations. This procedure documents Brambles' onboarding approach to assessing staffing companies and includes checks to address the following criteria:

In Financial Year 2022, 45 existing staffing companies underwent risk-based due diligence consistent with Brambles Third Party Due Diligence Standard Operating Procedures. All successfully completed enhanced due diligence.

- Workers are not indebted or coerced to work or required to pay to work.

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- Workers are free to move, and amongst other things, they are not forced to leave identity papers with the staffing company. (As a matter of policy, Brambles does not take possession of any workers' identity papers, other than as necessary to and for the limited purposes of completing a right to work check.)
- Workers are not under the age of 15 or under the age of 18 in hazardous conditions.
- Workers have the right to enter or terminate their employment freely and without fear of retaliation.
- We periodically review all employee, including temporary employee, addresses and bank account details to search for duplicates. Where duplicates are identified, we ensure that there is a valid reason for them. We encourage our suppliers to do the same.

Once a worker, including workers supplied by temporary labour or staffing companies, commences work at a Brambles plant, our procedure also requires that they receive training, including safety, human rights and Speak Up training, and have or are provided personal protective equipment at no charge.

This procedure launched in our operations in Malaysia and Thailand in Financial Year 2020, and in Financial Year 2022, we extended the relevant portions of it globally.

Risks of Modern Slavery: Brambles' Supply Chains

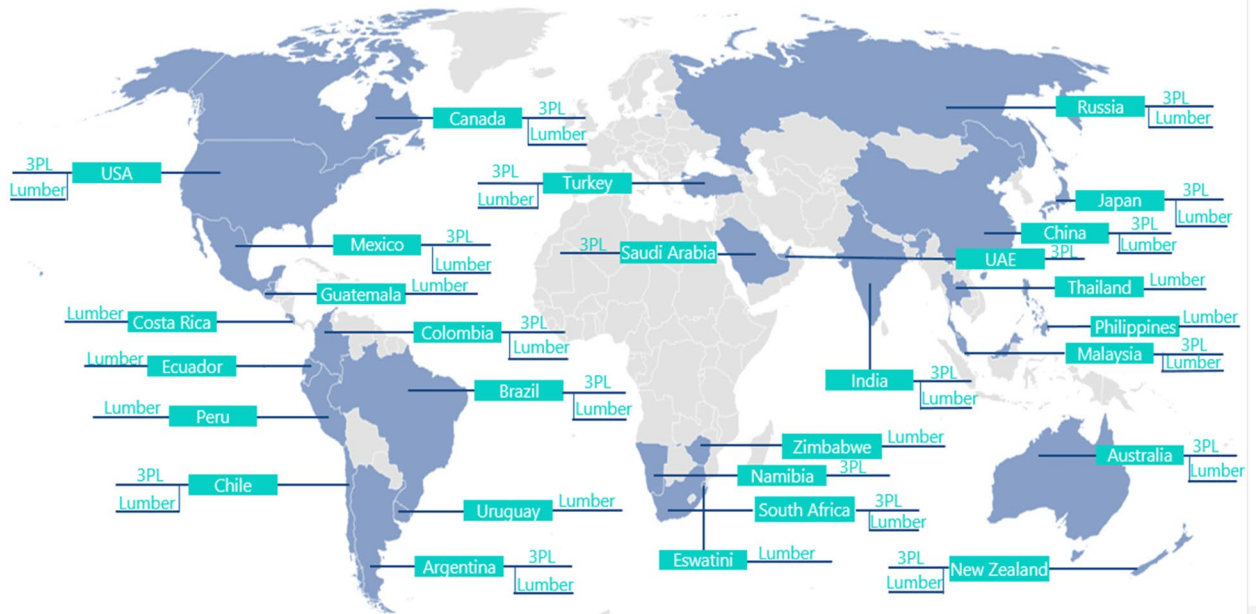
As set forth above, Brambles utilizes more than 8,000 suppliers from across the globe, presenting different Modern Slavery risks. In Financial Year 2022, and after considering the nature of the work provided by the suppliers, their geography, the transparency of their operations and the potential for recruiting processes, we continued to focus on our two highest risk categories of suppliers: timber providers and third-party plant operators (**3PLs**). As described above, timber providers supply the wood, from FSC or PEFC or PEFC endorsed local certified sustainable forestry operations, used to build or repair pallets. Third party plant operators, on the other hand, are third party suppliers who operate some of the plants or service centres where our pallets are repaired or containers are washed. This necessarily requires that they employ and manage service centre workers, some of whom may come from vulnerable populations.

Our Financial Year 2022 timber providers and third-party plant operators are in the countries⁴ shown in the three maps below:

⁴ Although Brambles purchased timber and had third party plant operators located in Russia at the start of Financial Year 2022, all such activity ceased as a result of the Russian/Ukrainian conflict.

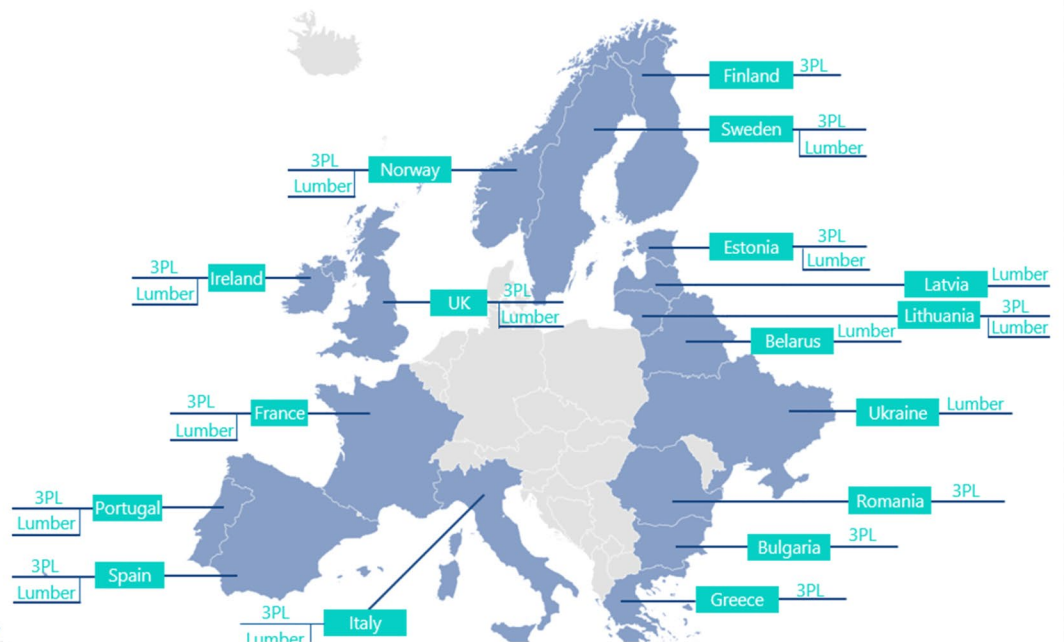
FY22 Lumber Suppliers and Third-Party Plant Operators

Global (Other than Europe)



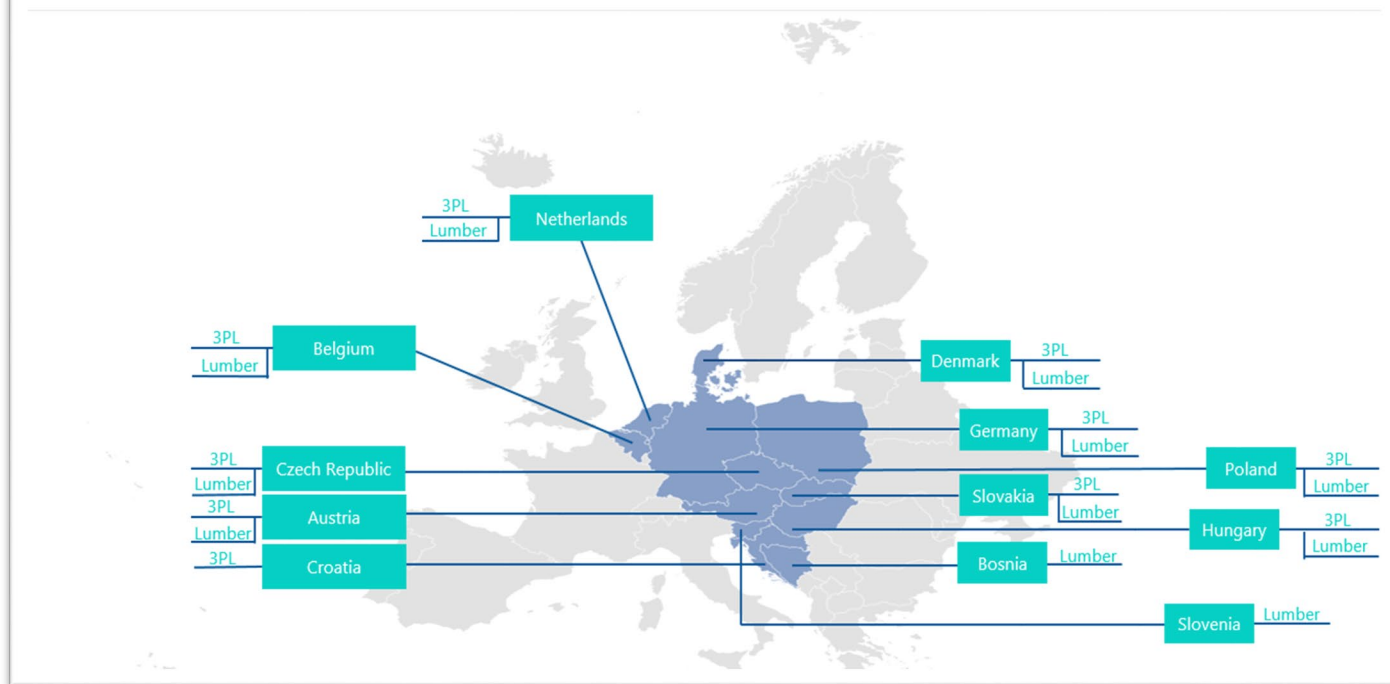
FY22 Lumber Suppliers and Third-Party Plant Operators

Europe (Western and Eastern)



FY22 Lumber Suppliers and Third-Party Plant Operators

Europe (Central and Northern)



All timber providers and third-party plant operators must undergo enhanced due diligence consistent with our Third-Party Due Diligence Standard Operating Procedures. This enhanced due diligence not only examines the suppliers' existing policies and procedures and requires that they sign compliance terms and conditions, which incorporate Modern Slavery-specific provisions, but requires that potentially high-risk suppliers in the highest risk countries undergo an inspection or audit carried out by an independent third party within the first six months of any potential engagement.

In Financial Year 2022, Brambles engaged or continued to engage timber suppliers in 41 countries. All such timber suppliers have completed enhanced due diligence. This due diligence, together with our desk-based research and input from external stakeholders, produced a Financial Year 2022 assessment that ranked the risk by sourcing country as set out below.

Modern Slavery Lumber Highest Risk Countries	Modern Slavery Lumber Moderate Risk Countries	Modern Slavery Lumber Lower Risk Countries	
Belarus ⁵	Bosnia	Argentina	Netherlands
Brazil	China	Australia	New Zealand
Colombia	Poland	Austria	Norway

⁵ Although Brambles purchased timber from Belarus at the start of Financial Year 2022, all such activity ceased as a result of the Russian/Ukrainian conflict.

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Modern Slavery Lumber Highest Risk Countries	Modern Slavery Lumber Moderate Risk Countries	Modern Slavery Lumber Lower Risk Countries	
Latvia	Türkiye	Belgium	Portugal
Lithuania		Canada	Slovakia
Malaysia		Chile	Slovenia
Russia ⁶		Czech Republic	South Africa
Swaziland		Estonia	Spain
Thailand		Finland	Sweden
Ukraine		France	Switzerland
		Germany	UK
		Ireland	Uruguay
		Italy	USA
		Japan	

62.57% of our total Financial Year 2022 timber spend was sourced from the lower risk countries set out above, while 10.68% was sourced from moderate risk countries. Although 26.75% of our total Financial Year 2022 timber spend was sourced from highest risk countries set out above, 84% of this came from one country: Brazil.

In addition to this enhanced due diligence, we have implemented additional mitigating actions so that our timber sourcing program does not rely exclusively on it or on FSC, PEFC or PEFC endorsed local certification to manage Modern Slavery risks. These actions include:

- Bespoke enhanced due diligence, using a questionnaire updated in Financial Year 2022, to identify Modern Slavery issues when contemplating onboarding any new timber supplier. Where any assessment, intelligence or due diligence highlights a higher risk (such as potentially engaging a new supplier from one of our highest risk countries, like Brazil), or where we are entering a new market (like Thailand or China), we use local experts and specialists to tailor this review.
- Extended diligence beyond the timber supplier and its practices in Financial Year 2022. Indeed, we identify the forest from which the timber supplier will source its timber as well as any harvesters, transporters or other subcontractors the timber supplier may use so that we can develop a supply chain map, examine the record and risks and implement mitigants as necessary.
- Updated agreements to require, amongst other things, that higher risk timber suppliers undergo periodic onsite audits independent of FSC, PEFC or PEFC endorsed local certification audits.
- Collaborative approaches through impending supplier academies, where timber suppliers are reminded of the risk of Modern Slavery, Brambles' commitment to its eradication is made clear and

⁶ Although Brambles purchased timber from Russia at the start of Financial Year 2022, all such activity ceased as a result of the Russian/Ukrainian conflict.

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the development of written policies and implementation of good governance practices are encouraged.

Brambles also continues to carry out enhanced due diligence on third party plant operators. 235 existing third party plant operators successfully completed this enhanced due diligence in Financial Year 2022. As part of this enhanced due diligence, we placed special emphasis on the treatment of foreign workers working at service centres managed and operated by third party operators.

To evaluate the risks related to Modern Slavery at service centres managed by third party operators, we analysed indicators such as location and the use of third-party agents to recruit or manage workers. In those cases where we identified heightened risk, we required that the third-party plant operators make specific representations acknowledging conformance with Brambles' standards related to the protection of vulnerable populations. We also developed and, in Financial Year 2022, launched a bespoke questionnaire, seeking an additional level of detail so that we can assess the third-party service operator's ability to comply with Brambles' procedures governing the utilization of foreign workers and other vulnerable populations.

7. ACTIONS TO ASSESS AND ADDRESS THE RISKS OF MODERN SLAVERY

Robust policies, training, due diligence, compliance terms and conditions and monitoring are our key controls to assessing and addressing the risks of Modern Slavery in our own operations and in our supply chains.

Policies

Brambles has implemented a comprehensive suite of policies and procedures that set out the ethical and legal framework in which we operate, ensuring that we build a more sustainable future consistent with our shared values and that we act with integrity and respect for our people, our supply chains, the environment and the communities in which we do business. The following are the most relevant to preventing or mitigating the risk of Modern Slavery in our own operations and in our supply chains:

Policy	Description
Code of Conduct	Provides the ethical and legal framework for all employees in the conduct of Brambles' business
Human Rights Policy	Prohibits the use of child labour, forced, bonded or compulsory labour, human trafficking or other kinds of slavery in Brambles' operations and supply chains
Zero Harm Charter	Establishes Brambles' commitment to achieving zero injuries, zero environmental damage and zero detrimental impact on human rights
Corporate Social Responsibility Policy	Outlines Brambles' commitment to providing a safe working environment for all workers and to engaging suppliers which comply with applicable laws, including all applicable labour, employment, human rights, wage and hour, environmental and health and safety laws

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Policy	Description
Diversity Policy	Recognizes the importance of inclusion and diversity throughout Brambles' operations
Global Dignity at Work Policy	Establishes Brambles' commitment to creating a work environment free from harassment, bullying and victimization and ensuring all workers are treated, and treat others, with dignity and respect
Anti-bribery and Anti-corruption Policy	Sets out our commitment to complying with anti-bribery and anti-corruption laws and regulations in the countries in which we do business
Third Party Due Diligence Standard Operating Procedures	Establishes risk-based due diligence procedures that must be followed before new suppliers are onboarded
Timber Due Diligence Standard Operating Procedures	Establishes specific procedures that must be followed when engaging timber providers, including the review of human rights practices
Procurement Policy	Sets out our expectations for ethical and responsible sourcing
Speak Up Policy and Investigative Procedures	Establish ways to raise concerns of wrongdoing, including human rights concerns, without fear of retaliation or retribution

Training

Brambles' mandatory Know the Code training module is designed to help its employees understand the underlying principles set out in the Code of Conduct. This module includes a chapter devoted to human rights, offering specific guidance on how to identify and report suspicions of child labour and forced, bonded or compulsory labour, human trafficking or other kinds of slavery. This mandatory Know the Code training module is assigned to all employees during their induction and during bi-annual refresher trainings.

The most recent refresher training, which included a chapter devoted to human rights and the warning signs of forced labour, took place between April 2022 and June 2022. More than 99% of all Brambles' employees completed this training.

Moreover, procurement employees must complete periodic training, covering myriad topics on responsible sourcing. For example, in Financial Year 2020, all procurement employees completed human rights training. Targeted refresher human rights training, delivered to 30 procurement employees, also took place in Financial Year 2022.

Due Diligence and Supplier Acknowledgments

Before Brambles onboards any new supplier, it carries out risk-based due diligence. Under this due diligence program, new suppliers are assessed for human rights risk, amongst other risks. Suppliers that meet certain risk factors such as geographic or industry risk must undergo additional due diligence. This additional due diligence examines, amongst other things, the supplier's human rights policies and procedures and searches the internet and other media sources for any negative reports, including those relating to Modern Slavery. Due diligence is repeated periodically in accordance with the supplier's risk profile.

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High risk suppliers must sign Brambles' compliance terms and conditions (see below) and certify compliance with, amongst others, Brambles' prohibition of child labour, forced, bonded or compulsory labour, human trafficking or other kinds of slavery. The certification is via a Supplier Acknowledgment Form which, amongst other things, asks suppliers to acknowledge that they "prohibit forced and child labour in [their] workforce and in those of [their] company's suppliers." It also asks them to acknowledge that they have reviewed and understood Brambles' Supplier Policy and Zero Harm Charter and that they will abide by the principles set out in both documents (as well as applicable laws and regulations) and require that their employees and suppliers do the same. Brambles is working towards requiring all remaining suppliers to sign its compliance terms and conditions and complete the Supplier Acknowledgment Form.

Brambles continued to update its due diligence program in Financial Year 2022. Indeed, as it has completed enhanced due diligence on high-risk suppliers from timber to labour to third party plant operators and received audit reports from some of these high-risk suppliers, it has updated its program to target additional areas of inquiry and review.

Compliance Terms and Conditions

At the conclusion of onboarding, Brambles' new suppliers are asked to sign Brambles' compliance terms and conditions and all new high-risk suppliers are required to do so. These compliance terms and conditions contain specific provisions which reference Brambles' Supplier Policy and make mandatory the obligation to comply with all applicable human rights laws and ensure that any suppliers with whom the new suppliers work do so as well.

Site Visits

We visit and inspect suppliers, particularly timber and third-party plant operators during which, amongst other things, we assess compliance with the requirements outlined above. The number and frequency of these visits was curtailed during Financial Year 2022 due to COVID19 pandemic restrictions. While we recognize that these visits and inspections will not eliminate the risk of Modern Slavery, they do help us to identify issues which may require further action.

Risk Assessments and Third-Party Audits

Although all suppliers are expected to meet—and, in certain cases, are required to demonstrate that they meet—the standards set out in Brambles' Supplier Policy, we place special emphasis on the treatment of foreign workers in our supply chain. To evaluate the Modern Slavery risks, in Financial Year 2022, we examined our third-party plant operators, as described above, as well as our staffing companies. This assessment included a review of the supplier location, supplier reputation, the use of third-party agents to recruit or manage workers and, where available, written policies. This assessment revealed that 49% of our existing third-party plant operators and 37% of our existing labour providers had written human rights policies, and 47% of our existing third-party plant operators and 31% of our existing labour providers had written safety policies. Although these results do not necessarily indicate noncompliance with our Supplier Policy, we recognize the need to raise greater awareness and are prioritizing our collaboration with our supply chain partners, which is an important component of strengthening our mitigation of Modern Slavery risks.

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Additionally, as part of this assessment program, certain suppliers (e.g., those that are higher risk because of their industry, reputation, location or because of their use of vulnerable populations in work linked to our business relationship) are required to complete an audit carried out by an independent third party or certified auditor, which examines their adherence to Brambles' Supplier Policy and other standards related to Modern Slavery. We recognize that findings of non-conformities following such an audit do not necessarily mean that forced labour has occurred. Rather, they may simply suggest that the supplier lacks the necessary policies, procedures or controls to prevent such an occurrence.

As a result, following any finding of non-conformity, suppliers must immediately stop any practice contributing to a Modern Slavery finding and must produce, implement and complete corrective action plans to resolve the issue. Brambles will work with the supplier to build its capabilities and to encourage the completion of the corrective action plans in a timely fashion. It will also verify that any findings are adequately resolved by ensuring they are re-examined during a follow up visit or review by an independent third party or certified auditor. Although Brambles seeks to collaborate and work with a supplier first, we reserve the right to terminate our relationship with a supplier if findings of non-conformity are ignored or not adequately addressed in a timely manner.

Annual Supplier Certification

In Financial Year 2022, Brambles launched the first Annual Supplier Certification, asking existing suppliers to certify that they are aware of, and continue to comply with, the principles set out in Brambles' Supplier Policy.

8. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

Brambles monitors the effectiveness of its efforts to combat Modern Slavery through multiple mechanisms, including Brambles' Board, RCC and SRC oversight, Key Performance Indicators (**KPIs**) and the review and assessment of questionnaires, inspections and audits.

KPIs

We have established KPIs to assess our effectiveness in combating Modern Slavery, including metrics which:

- Review the number of employees who have completed Code of Conduct and targeted human rights training;
- Review and assess the number of suppliers identified as being high, medium or low risk consistent with Brambles' Third-Party Due Diligence program;
- Review and track the implementation of any controls required because of the Third-Party Due Diligence Program;
- Review the number of completed Supplier Acknowledgment Forms;
- Review and assess the responses from supplier due diligence questionnaires in relation to Modern Slavery and other human rights practices;

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- Review and assess the number of Brambles and supplier sites physically inspected for human rights risks, the number of non-compliances identified, and steps or actions taken to remediate; and
- Review and assess the number of Speak Up complaints received, the findings and the resulting actions.

Speak Up

In Financial Year 2022, we received 108 Speak Up complaints through our Speak Up Hotline. With respect to our own operations, none were associated with Modern Slavery risks.

We also received two Speak Up complaints through our Speak Up Hotline from individuals who worked (or previously worked) for a supplier. In the first case, the individual claimed that workers had not been paid by the supplier. Although we determined that all workers had been paid, we terminated our relationship with the supplier after it refused to cooperate with our investigation. In the second case, the individual claimed that she had been sexually harassed by her manager. We notified the supplier of the claim and required that it carry out a thorough investigation. As a result of this investigation, we were informed that the manager's employment was terminated.

Audits and Self Assessments

Brambles is a member of SEDEX, which promotes improvements in ethical and responsible business practices. Brambles also participates in Ecovadis, an organization which provides supplier sustainability ratings. Brambles' sites undergo SEDEX Members Ethical Trade Audits (**SMETA**), and several business units complete Ecovadis' independent corporate social responsibility assessments on a regular basis. Brambles tracks the results of each, ensuring that where opportunities for improvement are identified, they are appropriately actioned.

In Financial Year 2022, one of our sites—in Malaysia—completed a SMETA audit using SEDEX's four pillar measurement criteria, which examine labour, health and safety, environmental and business ethics standards and practices. The audit identified certain non-compliances, all of which have been resolved. Unfortunately, our SEDEX audit program was and continues to be interrupted by the COVID-19 pandemic; however, we anticipate that it will resume during Financial Year 2023.

Additionally, in Financial Year 2022, we conducted audits on two suppliers, both of which were carried out by independent third-party auditors as part of the assessment program described above. With respect to the first supplier, there were no priority findings associated with Modern Slavery. However, with respect to the second supplier, we learned that its recruiters had charged recruiting fees to foreign workers, amongst other things. We are now working with the supplier to ensure that the foreign workers are reimbursed and that other appropriate corrective actions are implemented.

9. LOOKING FORWARD

Brambles is committed to identifying, assessing and addressing Modern Slavery risks in our own operations and in our supply chains. To that end, we will review and update, as necessary, our relevant policies, continue identifying and carrying out enhanced due diligence on our high-risk suppliers, strengthen our assessment program and raise awareness around Modern Slavery through targeted training. To address

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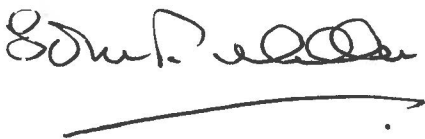
each of these areas, over the course of Financial Year 2023, Brambles has and will take the following actions:

- **Supplier Policy.** Review and update the Supplier Policy so that it stands alone as a Supplier Code of Conduct.
- **Enhanced Due Diligence Program.** Brambles will launch due diligence on carriers or transportation companies.
- **Supplier Acknowledgment Forms.** Brambles has launched a program which seeks to increase the rate of return of these forms.
- **Supplier Academies.** Brambles will launch a series of supplier academies in Financial Year 2023, where certain categories of suppliers, including timber suppliers, will be invited to attend to learn more about Brambles' expectations of all suppliers as set out by the principles, including the human rights principles, set out in the Supplier Policy. While this training will cover all topics in the Supplier Policy, emphasis will be placed on human rights and Modern Slavery.

10. CONSULTATION WITH OUR GROUP COMPANIES

Consistent with our Code of Conduct, this statement was prepared with input from all areas of our business, including Human Resources, Procurement and Global Supply Chain functions. The Australian and regional leadership teams in Asia Pacific, Europe, North America, Latin America and India, Middle East, Turkey and Africa have approved of this statement, ensuring that all entities and functions were represented and included in the review and consultation process.

This joint statement is made pursuant to the Australian *Modern Slavery Act 2018* (Cth) and section 54 of the UK *Modern Slavery Act 2015* has been approved by the Board of Directors of Brambles Limited on 15 November 2022.



John Mullen
Chairman
Brambles Limited

ANNEXURE A

List of UK Entities

Brambles Investment Limited

BIP Industries Limited

CHEP Equipment Pooling BV (UK Branch)

Brambles Finance plc

Brambles U.K. Limited

Rail Car Services Limited

Wrekin Roadways Limited

Brambles Holdings (UK) Limited

Polybulk Limited

BXB Digital Limited

Brambles Nominees Limited

Cyan Logistics Limited

Brambles Enterprises Limited

CHEP UK Limited

Boxpal Limited

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