

**Modern Slavery Statement
2024**

BAT Australia Modern Slavery Statement 2024

Introduction

This is BAT Australia’s fifth Joint Modern Slavery Statement prepared in accordance with the Modern Slavery Act 2018 (Cth).

It provides a general overview of the steps taken by the Reporting Entities (defined below) and their subsidiary companies during the year ending 31 December 2024 to address modern slavery and human trafficking risks in the BAT Australia business and supply chain.

In addition to complying with the Australian Modern Slavery Act 2018 (Cth), BAT Australia’s ultimate parent entity, British American Tobacco p.l.c., also prepares a Modern Slavery Statement covering the BAT Group subsidiary companies that are subject to the requirements under the UK Modern Slavery Act 2015. While there is consistency between the two statements in terms of global operations, supply chains and actions taken by the Group to address modern slavery risks, this Australian Modern Slavery Statement has been specifically prepared to address the mandatory reporting criteria set out in the Australian Act. It is a standalone document submitted to the Australian Government’s Modern Slavery Register. References to the ‘BAT Group’, the ‘Group’ or ‘BAT’ within this document refers to British American Tobacco p.l.c. and companies in the British American Tobacco Group.

Approval

This statement has been approved by the Board of Directors of BAT South Pty Ltd and the other Reporting Entities pursuant to clause 14(2)(d)(ii) of the Modern Slavery Act 2018 (Cth).

Entities in Scope

BAT South Pty Ltd (ACN 095 066 345), an Australian company incorporated and registered in Australia, whose registered address is at Level 25, 210 George Street, Sydney NSW 2000. BAT South Pty Ltd is the holding company that owns several subsidiaries in Australia, New Zealand and the South Pacific, including BAT Australasia Ltd, BAT Australia Ltd and BAT Australia Overseas Pty Ltd (collectively known as ‘BAT Australia’).

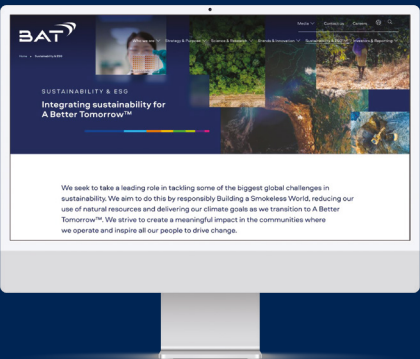
Within the meaning of section 5 of the Modern Slavery Act 2018, BAT South Pty Ltd, BAT Australasia Ltd, BAT Australia Ltd, and BAT Australia Overseas Pty Ltd are deemed as reporting entities and shall collectively be referred to in this statement as the ‘Reporting Entities’ or ‘Reporting Entity’, as the case may require.

Consultation

In developing this statement, in those circumstances where a Reporting Entity holds control (as defined in the Modern Slavery Act, within the meaning of the Australian Accounting Standards) over a subsidiary, BAT Australia liaised with the relevant senior management of such a subsidiary to convey BAT Australia’s expectations, raise awareness and understanding of their approach in mitigating modern slavery risks and ensure consistency. When a Reporting Entity does not have control over such subsidiaries, subsidiaries are responsible for independently considering and applying, as appropriate, the Group’s policies in their response to issues of modern slavery.

Inside this document

Welcome from our Area Director – APMEA South	3
Business and Supply Chain	4
Policy Commitments	8
Assessing and Managing Risk	9
Due Diligence	13
Training and Capacity Building	16
Measuring Effectiveness and Next Steps	18
Further Information	19



- + For downloads and access to our entire reporting suite, visit bat.com/reporting
- + To access the UK Modern Slavery Statement, visit bat.com/investors-and-reporting/reporting/sustainability-reporting/modern-slavery-statement

Welcome from BAT Australia's Area Director

APMEA South

BAT Australia's long-standing commitment has always been to respect the human rights of BAT Australia's employees, the people it works with and the communities in which it operates.

This statement sets out the steps that BAT Australia and the Group have taken to prevent modern slavery risks across our business during the year ended 31 December 2024.

With a global footprint, the BAT Group acknowledges the potential risk of exposure to modern slavery within the Group's operations or in its extended supply chain.

In 2024, the BAT Group refined its Group sustainability strategy to better address its material sustainability topics, such as human rights, and continue delivering value to its stakeholders.

One of the five impact areas of the BAT Group's strategy is 'Communities', which encompasses the Group's employees, farmers and suppliers.

The BAT Group supports farmers to help them enhance their livelihoods and build resilience, while keeping in mind the Group's ambition to transition to a Smokeless World.

The BAT Group's 2024 Highlights include:

- Providing human rights training to more than 417,000 farmers and community members.
- 91% of BAT's product materials and higher-risk indirect suppliers have undergone at least one independent labour audit within a three-year cycle. The Group remains on track to reach its target of 100% by 2025.
- Continuing to work with the Responsible Business Alliance (RBA), leveraging their insights and resources.

BAT Australia's 2024 Highlights include:

- Initiating an independent assessment of BAT Australia's grievance mechanism, conducted by external human rights specialists.
- Supporting The Freedom Hub during 2024 Volunteer Week by coordinating and providing volunteer resources.
- Appointing a dedicated modern slavery resource to strengthen internal awareness and engagement on key risk areas.

As BAT Australia creates A Better Tomorrow™ by Building a Smokeless World, we continue to improve how we manage human rights across BAT Australia's own operations and supply chain.



Peter Simmons
Area Director



Business and Supply Chain

BAT Australia's purpose is to create A Better Tomorrow™ by Building a Smokeless World

Commitment to human rights

BAT Australia recognises its role in respecting the human rights of all workers and farmers in its value chain and members of the local communities in which it operates.

In 2024, BAT Australia continued to build upon and strengthen its approach to managing human rights risks within the context of the Group's sustainability strategy.

+ Find out more about BAT Group's sustainability agenda in the Group's [2024 Combined Annual and Sustainability Report](#)

The BAT Group's Business Structure

The BAT Group's headquarters is located in the UK, with subsidiary operations around the world, employing more than 48,000 people.

The Group's employees work in a range of roles and environments, including office-based management, tobacco leaf fields, manufacturing and operations, trade marketing and distribution, as well as research and development.

The Board of British American Tobacco p.l.c. is collectively responsible to its shareholders for the long-term success of the Group and for the Group's strategic direction, purpose, values and governance. It provides the leadership necessary for the Group to meet its business objectives within a robust framework of internal controls.

The Board is supported by the Audit Committee, which monitors risks and adherence to the Group's standards, including for human rights across 147 markets.

The Audit Committee is underpinned by the Group's Regional Audit Committees and Corporate Audit Committee with committees for each of the two Group regions, for the U.S. business, and for locally listed Group entities and specific markets, where appropriate.

The Group's Management Board, chaired by the Chief Executive, is responsible for overseeing the implementation of Group strategy and policies set by the Board, and for creating the framework for Group subsidiaries' day-to-day operations.

48,000+

Group employees worldwide in 147 markets

BAT Australia's Business Structure

BAT Australia forms part of the Asia Pacific, Middle East & Africa Region (APMEA) of the BAT Group and is further a part of the Direct Reporting Business Unit (DRBU), APMEA South. The APMEA South DRBU comprise the BAT entities in Australia, Indonesia, Malaysia, Singapore, Vietnam, Cambodia, New Zealand and the South Pacific islands. BAT Australia's business structure is pyramidal, with BAT South Pty Ltd (a Reporting Entity for the purposes of this Statement) as the higher entity within the structure. BAT South Pty Ltd is the holding company of a number of companies directly or indirectly, including but not limited to:

1. BAT Australia Ltd (a Reporting Entity for the purpose of this Statement);
2. BAT Australasia Ltd (a Reporting Entity for the purpose of this Statement);
3. BAT Australia Overseas Pty Ltd (a Reporting Entity for the purpose of this Statement);
4. BAT Australia Services Ltd;
5. Rothmans Asia Pacific Limited;
6. The Benson & Hedges Company Pty Limited;
7. W.D. & H.O. Wills Holdings Limited;
8. BAT (New Zealand) Ltd – Registered in New Zealand;
9. Central Manufacturing Company Pte Ltd (trading as BAT Fiji) – Registered in Fiji;
10. Solomon Islands Tobacco Company Limited – Registered in Solomon Islands;
11. British American Tobacco (PNG) Limited – Registered in Papua New Guinea; and
12. British American Tobacco Company (Samoa) Ltd – Registered in Samoa.

For BAT Australia, the committee established for governance and compliance purposes is the APMEA South Leadership Governance Committee.

In Australia, all operational functions are conducted via BAT Australia Ltd, which imports and distributes tobacco and cigar products within Australia. BAT Australia Ltd also sold zero-nicotine vapour products before 30 June 2024. Due to legislative changes, the sale of these products was discontinued after this date. BAT Australia Ltd's main offices are in Sydney, New South Wales, and its employees work in various roles and environments, including managerial office-based roles, logistics and operations, trade and distribution, and research and insights.

BAT Australasia Ltd and BAT Australia Overseas Pty Ltd do not have operations or supply chains; their functions are predominantly to hold shares and receive dividends from subsidiary companies. BAT Australasia Ltd also owns certain trademarks and intellectual property.

BAT (New Zealand) Ltd is the primary operating entity in New Zealand; Central Manufacturing Company Pte Ltd is the primary operating entity in Fiji; Solomon Islands Tobacco Company Limited is the primary operating entity in the Solomon Islands; British American Tobacco (PNG) Limited is the primary operating entity in Papua New Guinea; and British American Tobacco Company (Samoa) Ltd is the primary operating entity in Samoa.

The Board of Directors of BAT South Pty Ltd (the 'Board') is collectively responsible for BAT Australia's long-term sustainable success and its strategic direction, purpose, values, and governance.

It together with the Board of Directors of BAT Australia Limited, provides the leadership necessary for BAT Australia to meet its business objectives within a robust framework of internal controls.

The Board is supported by its subsidiaries' Boards, the Senior Leadership Team, the APMEA South Leadership Governance Committee, the Governance, Risk, and Compliance Committees (GRCC) for each end-market, and the Modern Slavery Working Group, which monitor performance, risks, and adherence to BAT Australia and the BAT Group's policies and standards, including those related to human rights and modern slavery.

The APMEA South Leadership Governance Committee oversees the governance, risks and controls in the APMEA South DRBU including BAT Australia, including modern slavery risks. Its members include senior leaders from all end-markets within APMEA South. Each end-market GRCC provides oversight and escalates risks to this committee. This committee reports regularly (at least annually) to the Board and executives on all matters relating to the implementation of Group and local policies, including human rights and modern slavery.

The Australian end market GRCC also maintains oversight of business risks specific to Australia, including modern slavery risks. This committee is supported by a Modern Slavery Working Group that meets bi-monthly. The Modern Slavery

Business and Supply Chain

Continued

Working Group comprises representatives from key functions (including procurement, legal, and sustainability) who manage Australia, New Zealand, and the South Pacific's daily modern slavery agenda. The governance framework provides a channel for the appropriate flow of information, monitoring and oversight of key issues, including those relating to human rights and modern slavery, at all levels of BAT Australia.

Managing human rights impacts

The BAT Group's Double Materiality Assessment (DMA) provides insights on the material sustainability risks, including topics such as child labour.

Management of material sustainability topics, including human rights, are also discussed at the Group's Committees and forums, such as the:

- Group Sustainability Leadership Team;
- Operations Sustainability Forum;
- Leaf Sustainability Forum; and
- Supply Chain Due Diligence Committee.

Issues considered in these forums are raised, where appropriate, at the Group Management Board level or with the Audit Committee.

The Chief Corporate Officer has overall responsibility for the strategic delivery of the Group's sustainability agenda, supported by the Sustainability Team, including the Group's Chief Sustainability Officer, and subject-matter specialists across the Group.

The Group's governance framework allows for the appropriate information, monitoring and oversight of key issues, including those relating to human rights and modern slavery across the business from local business units to Board level.

+ Find out more about our **Group strategy, business model, structure and governance** in our **2024 Combined Annual and Sustainability Report**

BAT Australia's Supply Chain

BAT Australia's portfolio of products includes both combustible and non-combustible products ('New Category products'). In terms of combustible products, all of BAT Australia's traditional cigarette products are purchased from the BAT Group's internal factory located in Indonesia.

Regarding New Category products, BAT Australia has products in New Zealand and Australia. The Australian portfolio includes Vuse zero-nicotine vapour products. However, in accordance with Australian regulations, the sale of these products ceased in Australia on 30 June 2024.

The New Zealand portfolio includes Vuse nicotine vapour products, which are sold in accordance with New Zealand regulations.

BAT Australia also distributes third-party products in Australia and New Zealand. All third-party product suppliers must undergo and adhere to BAT Australia's Know Your Supplier Process (KYSP), which includes, without exception, the completion of BAT Australia's modern slavery risk level assessment and modern slavery questionnaire, as further set out on [page 13](#).

BAT Australia's supply chain intersects several industries exposed to human rights risks and impacts, including agriculture, manufacturing and electronics for the New Categories supply chain. BAT Australia assesses suppliers' inherent risk exposure against Verisk Maplecroft human rights indices and conducts independent audits on higher-risk suppliers.

BAT Australia also has a number of suppliers of indirect goods and services that are not product-related, such as IT services, consultants, and facilities management.

As valued business partners, BAT Australia must listen to and engage with our suppliers to build trust and drive progress. Through our supplier engagement, BAT Australia strives to positively influence how suppliers manage sustainability risks, including those relating to modern slavery.

25,000+
Suppliers within the BAT Group



Tobacco supply chain

Tobacco leaf used in BAT Australia's products is sourced from the BAT Group. The Group's own Leaf Operations source approximately 73% of the Group's tobacco by contracting directly with c.91,000 farmers.

The remainder is sourced from third-party suppliers who contract with c.157,000 farmers.

In India, although tobacco is purchased from farmers at auction, the BAT Group's third-party suppliers provide traceability and monitoring of their farmer base, in line with Group requirements.

The BAT Group's sourcing model provides its directly contracted farmers and those contracted to third-party suppliers with a reliable and secure relationship which, in turn, facilitates a more efficient and reliable supply chain for the Group.

Other materials, goods and services

The BAT Group has relationships with approximately 700 direct and 25,000 indirect product materials suppliers.

Through its New Category products, the Group's supply chains in areas such as consumer electronics and e-liquids continue to grow.

Total tobacco sourced

73%

BAT Group's own Leaf Operations

27%

Third-party sourcing

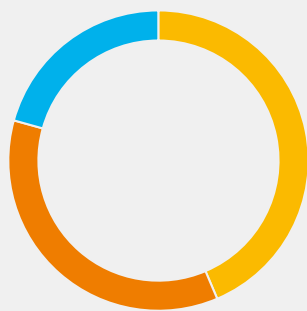
Business and Supply Chain

Continued

The Group's business is divided into three complementary regions, maximising opportunities for quality growth in the sector.

The Group's in-depth marketplace analysis delivers insights on consumer trends and segmentation, which facilitate geographic brand prioritisation across the Group's regions and markets. As consumer preferences and technology evolve rapidly, the Group is also leveraging its global digital hubs and innovation centres.

Revenue by region

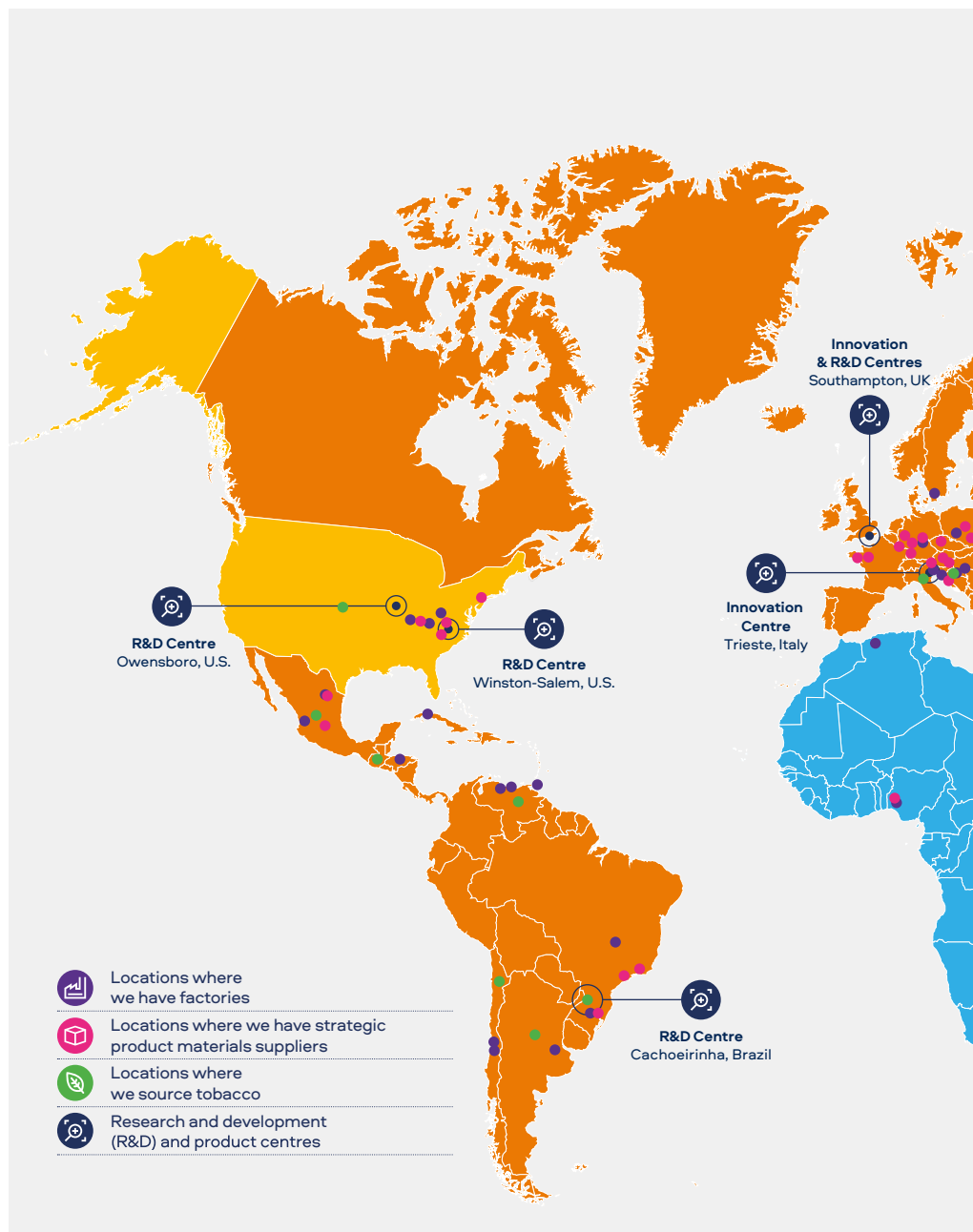


£25,867m
Total revenue

U.S.	£11,278m
AME	£9,241m
APMEA	£5,348m

+ For more detail on BAT Group's **Regional Performance**, see [pages 42 to 47](#) of its [2024 Combined Annual and Sustainability Report](#)

The BAT Group's supply chain and operations

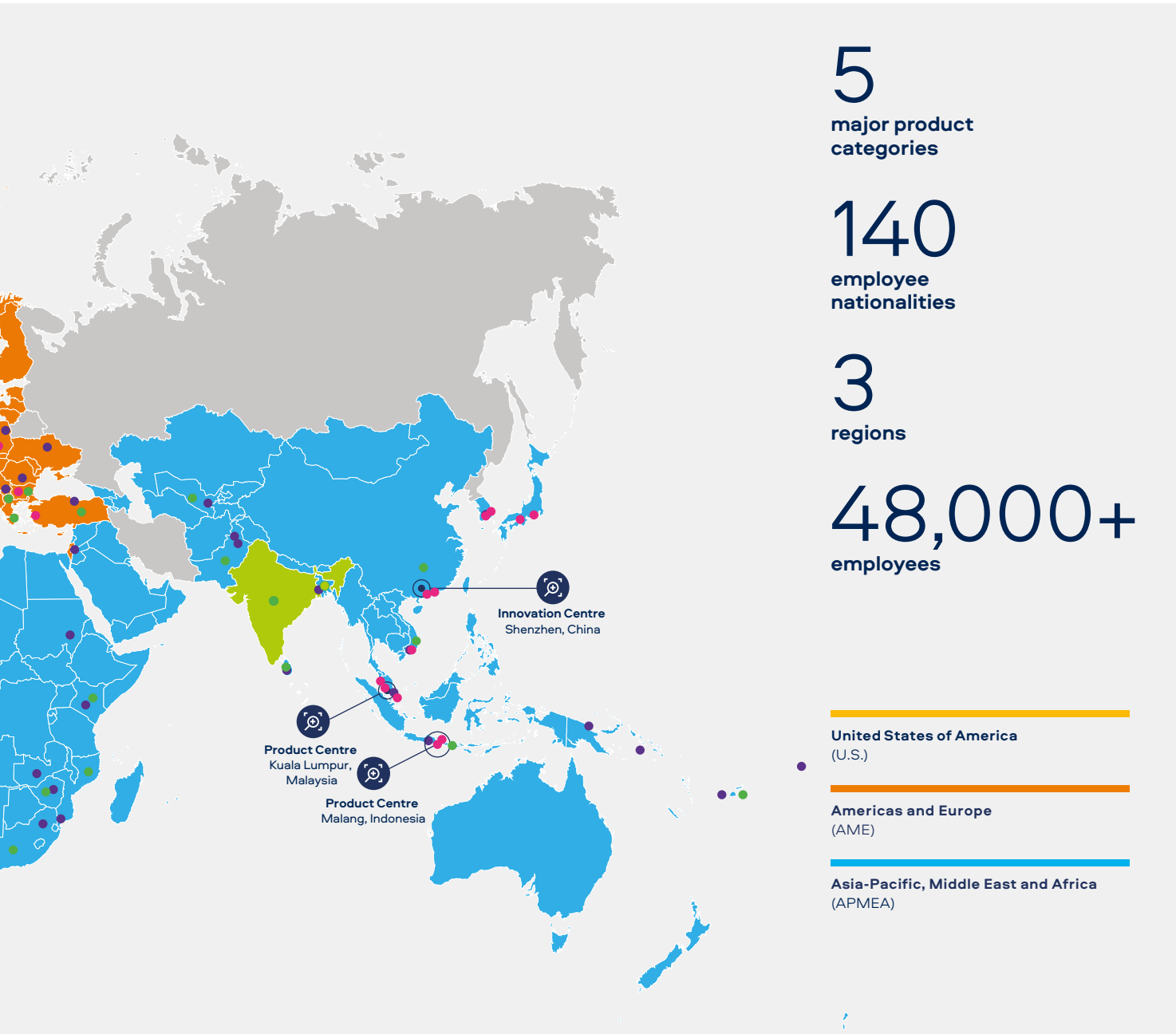


Business and Supply Chain

Continued

BAT-owned manufacturing facilities¹				
	United States	AME	APMEA	Total
Fully integrated manufacturing	1	13	23	37
Other processing sites (including leaf threshing and OTP²)	—	8	9	17
Sites manufacturing other products (including Snus, Modern Oral and Liquids)	2	4	—	6
Research and development facilities	2	2	3	7
Total	5	27	35	67

- Notes:
- 1. As of 31 December 2024.
 - 2. Other Tobacco Products include but are not limited to roll-your-own, make-your-own and cigars.



Policy Commitments

All BAT Group companies are expected to adopt policies, principles and standards to manage human rights and modern slavery risks across supply chains.

Commitments, Policies, Standards and Controls

The BAT Group remains committed to respecting fundamental human rights as affirmed by the Universal Declaration of Human Rights.

This includes respecting the rights of:

- its employees;
- the people the Group works with; and
- the communities in which the Group operates.

The Group’s approach is aligned with the UN Guiding Principles on Human Rights (UNGPs).

The Group’s policies and principles for human rights and modern slavery issues, including the Standards of Business Conduct (SoBC) and the Supplier Code of Conduct (SCoC) (indicated by * in the table below) are reviewed and endorsed by the p.l.c Board and, for local adoption and implementation by relevant Group companies, including BAT Australia.

Updated in 2024, the SoBC and SCoC are reviewed regularly to ensure alignment with best practice.

100%

of BAT’s Group employees completed **annual SoBC training and sign-off**

Policies and Procedures	Key Stakeholder Groups
Standards of Business Conduct (SoBC)* Available at bat.com/principles	BAT’s People Governments and wider society
Supplier Code of Conduct* Available at bat.com/principles	Customers Suppliers Governments and wider society
Group SoBC Assurance Procedure	BAT’s People
Leaf Supplier Manual	Suppliers Governments and wider society
Group Code of Human Rights in Tobacco Farming	BAT’s people Governments and wider society

Standards of Business Conduct

The high standards of integrity BAT is committed to upholding are enshrined in the SoBC. These include BAT’s Respect in the Workplace chapter and Human Rights chapter, which align with the UNGPs and the International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work.

In line with the requirements under the SoBC, BAT Australia, aims to ensure its operations are free from slavery, servitude and forced, compulsory, bonded, involuntary, trafficked or exploited migrant labour.

Further, BAT Australia requires that its employees, employment agencies, labour brokers or third parties it retains to act on its behalf will not:

- require workers to pay recruitment fees, take out loans or pay unreasonable service charges or deposits as a condition of employment; or
- withhold or require workers to surrender identity papers, passports or permits as a condition of employment.

Where national law or employment procedures require use of identity papers, they must be used strictly in accordance with the law.

If identity papers are retained or stored for reasons of security or safekeeping, this will only be done with the informed and written consent of the worker, which should be genuine, and with unlimited access for the worker to retrieve them, at all times, without any constraints.

+ Further information about **our SoBC** can be found on bat.com/sobc

Supplier Code of Conduct

The SCoC complements BAT’s SoBC by defining the minimum standards expected of our suppliers, including for human rights. The SCoC applies to all our suppliers.

In line with the SCoC, BAT Australia’s suppliers are required to ensure their operations are free from child labour and from forced, bonded, involuntary, trafficked or unlawful migrant labour.

BAT Australia’s suppliers are expected to promote adherence to the SCoC and to carry out the appropriate due diligence within its own supply chain.

Available in multiple languages, the SCoC is shared as part of BAT Australia’s onboarding process with suppliers.

+ Further information about **BAT’s SCoC** can be found on bat.com/principles

Standards and controls

To support the effective implementation of BAT Australia’s policy commitments, BAT Australia has considered and implemented for local adoption a number of standards, procedures and controls, including:

- **SoBC Assurance Procedure** defines how all reports of alleged SoBC breaches should be investigated and remediated fairly and objectively. This includes a four-step process, involving an initial assessment (in line with data privacy and employment laws) followed by an investigation plan, implementation, reporting of findings and closure.
- **Leaf Suppliers Manual** sets out the detailed standards the Group expects Leaf suppliers to adhere to. These include a range of criteria relating to standards in agricultural practices, such as agrochemicals compliance and the prevention of child labour.
- **Group Code of Human Rights** in Tobacco Farming applies to the Group’s own Leaf Operations. Aligned to the UNGPs and other international standards, it consolidates existing standards as well as strengthens procedural requirements and additional guidance on topics, such as responsible contracting and management of environmental impacts. All BAT Leaf employees in scope and directly contracted farmers receive training on this Code.
- **Modern Slavery Policy Australasia** applies to Australia, Papua New Guinea, Fiji, Samoa, Solomon Islands, New Zealand and sets out a modern slavery risk management framework for BAT Australia.

Assessing and Managing Risk

Understanding the risks.

The BAT Group’s Tobacco supply chain

The agricultural sector as a whole (of which tobacco growing is a part) is a focus area for human rights-related risks given the large numbers of temporary workers, use of family labour in small-scale farming and high levels of rural poverty.

The ILO estimates that the agricultural sector accounts for 12.3%¹ of all incidents of forced labour and 70%² of all child labour globally.

Debt bondage can also be a particular concern if farmers take out loans to invest in harvesting crops, but do not have a guaranteed buyer or price – leaving them vulnerable to debt risk.

Other product materials, goods and services

As a whole, the BAT Group’s manufacturing sector (of which the Group’s product materials and goods suppliers are a part) is estimated by the ILO to account for 18.7%¹ of forced labour and 10.3%² of child labour globally, with the majority of cases documented in lower-income countries.

Key forced labour risks identified in the manufacturing sector as a whole relate to excessive working hours and production targets, payment of high recruitment fees, illegal retention of passports and, in some cases, illegal imprisonment and physical punishment of workers.¹

Human rights risks for indirect goods and services depend on the sector and country of operation. According to the ILO, 10%¹ of forced labour and 15.2%² of child labour are estimated to be in low-skilled service sectors.

+ Further details of BAT’s **due diligence procedure** can be found on [page 13](#)

BAT Operations

The BAT Group recognises that certain countries and circumstances present higher risks for human rights issues, such as those with weak regulation or enforcement or high levels of corruption, criminality, or unrest.

In addition to Group-wide procedures and controls, BAT has a process in place to identify and monitor BAT operations in those higher-risk countries.

BAT Australia takes allegations relating to human rights extremely seriously and seeks to openly engage with the relevant stakeholders, responding appropriately to the issues raised.

If BAT Australia receives reports of inappropriate behaviour, BAT Australia takes appropriate steps to investigate, address any issues identified, and report on progress and outcomes, as appropriate.

Comparative risk levels across our business and operations based on current trends



Notes:

1. ILO (2022). Global Estimates of Modern Slavery: Forced Labour and Forced Marriage, ILO, Geneva, 2017.
2. International Labour Office and United Nations Children’s Fund, Child Labour: Global estimates 2020, trends and the road forward, ILO and UNICEF, New York, 2021. License: CC BY 4.0.

Assessing and Managing Risk

Continued

Managing the risks.

Enhancing farmer livelihood

For the BAT Group, enhancing farmers’ livelihoods is key to promoting a positive social impact across the Group’s tobacco supply chain.

Rural poverty is one of the primary root causes of human rights issues in agriculture.

The Group works with its directly contracted farmers to help them improve their economic stability and access to resources.

Where farmers have sustainable living incomes, farming is more attractive to the next generation and reduces the risks of exploitation, child and forced labour and encourages improved adherence to safety and environmental standards.

Helping farmers to Thrive

The Group’s Thrive programme covers over 93% of total tobacco leaf purchased in 2024 by volume and provides data on a number of topics, including human rights.

Based on a framework covering the five ‘capitals’ outlined below, Thrive seeks to address challenges in farming communities. The Group’s indicators set out to measure progress in relation to the Five Capitals.

All those involved in the Group’s Thrive Supply Chain¹ are required to conduct annual evaluations based on these metrics, providing insights that inform the strategy and guide the development of action plans.

Maintaining standards through grievance mechanisms

The BAT Group tracks access to grievance mechanisms in the Thrive Supply Chain¹ as part of Thrive assessments, which in 2024 showed:

- 97.96% of farmers and farm labourers reported having access to at least one type of grievance mechanism;
- Of the 307 grievances raised in 2024, 100% were reported as resolved by the end of the growing season; and
- Regular meetings with farmers and workers or their representatives were reported as the most widely available grievance mechanism. Other mechanisms used included meetings with unions, local NGOs, government-led mechanisms and third-party owned telephone hotlines.

In addition, farmers and workers can access BAT’s ‘Speak Up’ channel that has a hotline, email address and online portal.

Recognising the importance of grievance mechanisms in understanding and addressing the concerns of rights holders, the Group continues to improve the accessibility and variety of these mechanisms based on their feedback.

The Group seeks to promote a culture of openness among contracted farmers and labourers, encouraging them to raise issues related to human rights without retribution.

Supporting living income

Based on the Anker Methodology,² the BAT Group has been conducting an annual living income analysis since 2022.

In 2024, the methodology was adapted to better represent the living costs of tobacco farmers in rural areas. The analysis was applied to 97% of farmers in the Thrive Supply Chain.

The results support the creation of action plans to target key income drivers, such as reducing production costs, increasing yield and diversifying crops.

Farmers’ feedback is provided to the Group’s Leaf suppliers, who manage the action plans.

The five ‘capitals’ of the Group’s Thrive programme

Capital	Descriptor
 Financial	Economic livelihoods of farmers, including access to resources
 Natural	The ecosystem necessary to sustain agricultural production and livelihoods
 Human	Skills, knowledge, labour and human rights
 Social	Self-sufficient and resilient communities
 Physical	Infrastructure needed to maintain viable places to live and work

Notes:

1. BAT’s metrics derive data from BAT’s annual Thrive assessment, which includes BAT’s directly contracted farmers and those of its third-party suppliers, which represented over 93% of the tobacco BAT purchased by volume in 2024 (‘Thrive Supply Chain’). BAT’s ambitions cover all tobacco it purchases for its products (‘tobacco supply chain’).

2. <https://www.ankerresearchinstitute.org/anker-methodology>

Assessing and Managing Risk

Continued

Promoting income diversification

The Group supports crop diversification programmes adapted to local environmental and socio-economic realities.

In 2024, 94% of farmers in BAT's Thrive Supply Chain were reported to have diversified crops.

To date, more than 138,000 farmers, farm labourers and local community members have been trained on crop diversification.

In addition, several small-scale initiatives are underway to identify potential crops for additional income.

138,000+

people in the Group's farming communities received **training on crop diversification techniques** in 2024.

+ Find out more about **enhancing farmer livelihoods** in the Group's **2024 Combined Annual and Sustainability Report**

Case Study in BAT Australia's South Pacific Region



Engaging and Training Farmers in Fiji

In Fiji, where contracted farmers supply leaf for BAT's Operations, teams in the Leaf Growing Division provide support through various systems to advance the eradication of child labour. One of the key innovations driving this is the Farmer Sustainability Monitoring (FSM) system, a digital platform used to collect real-time data directly from the field.

As Nikhat Khan, BAT Fiji's Leaf Agronomy and Sustainability Manager, explains, the FSM data collected by field technicians is uploaded into Thrive to track instances of child labour.

"By inputting FSM data to Thrive, we can track key indicators, such as the number of workers employed on each farm, wage levels, and the ages of workers.

This ensures that there is no child labour or forced labour in the fields, as the system flags any discrepancies for immediate investigation," Nikhat says.

The BAT Fiji Field technicians regularly visit farms to conduct on-the-ground training for farmers, focusing on ethical labour practices, proper use of protective equipment, and worker welfare.

"These training programmes emphasise the importance of adhering to global labour standards, which include fair wages, safe working conditions, and the prohibition of child labour."

Assessing and Managing Risk

Continued

Ethical recruitment for BAT Australia employees

BAT Australia’s commitment to fairness and inclusivity is embedded throughout the recruitment process, helping to promote equal access to opportunities and mitigate human rights risks for employees.

The hiring process is managed by BAT Australia’s Inhouse Talent and Global Business Services teams, which work to implement Group-wide standards, bearing in mind local regulatory requirements and contexts.

Prospective employees undergo rigorous pre-employment checks in accordance with local standards.

The standards apply to all permanent, fixed-term, part-time and full-time employees.

Where recruitment agencies are involved, these agencies undergo checks and only recruitment through vetted vendors is permitted.

Providing safe spaces to ‘Speak Up’

The SoBC makes it clear that employees, business partners and suppliers should speak up if they have a concern about actual or suspected wrongdoing.

BAT Australia does not tolerate harassment, victimisation or reprisals of any kind against anyone raising a concern and such conduct is itself a breach of the SoBC.

Anyone can raise concerns (anonymously, if preferred) through the confidential, independently managed online and telephone ‘Speak Up’ channels, available 24 hours a day in local languages.

Employees can also speak to Human Resources, their line manager or a Designated Officer.

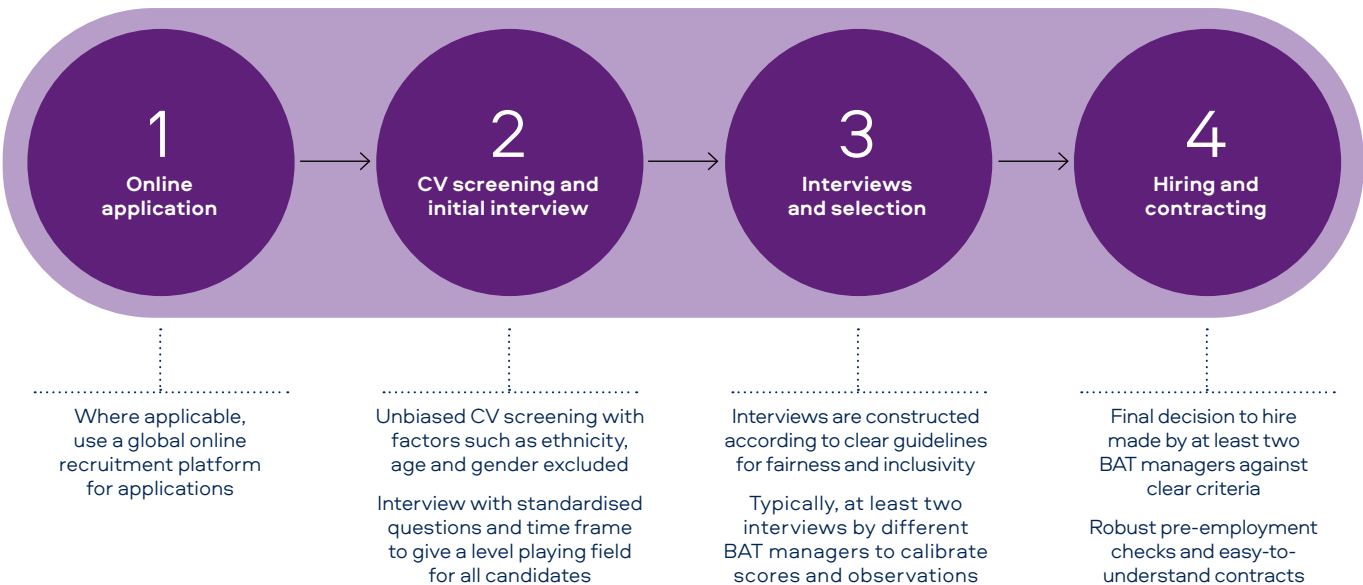
Investigating and remediating workplace breaches

The SoBC sets out how allegations of wrongdoing or SoBC breaches should be investigated and dealt with fairly and objectively.

In 2024, BAT Australia received nine reports of alleged SoBC breaches relating to Respect in the Workplace Policies.

Following investigation into each report, five cases were substantiated, with the remaining cases still under investigation at the end of the year.

How BAT Australia manages risks in the recruitment process



Due Diligence

BAT Australia due diligence

Every year, all BAT Australia employees must formally confirm their compliance with the SoBC.

Individuals must complete the annual SoBC sign-off, in which they confirm their commitment and adherence to the SoBC and declare or update any personal conflicts of interest.

Monitoring human rights in BAT Australia's direct operations

BAT Australia has a robust supplier chain due diligence procedure (see diagram below). All new suppliers must undergo BAT Australia's Know Your Supplier Process (KYSP) before commencing work. The KYSP helps assess the suppliers' inherent risk exposure prior to their onboarding and/or being awarded the contract.

To pass the KYSP, in relation to modern slavery and human rights-related risks, suppliers must:

- Confirm adherence to the SCoC: The SCoC defines the minimum standards expected of our suppliers, including for human rights; it specifically requires all suppliers to ensure their operations are free from child labour and from forced, bonded, involuntary, trafficked, or unlawful migrant labour. Complying with the SCoC is mandatory and is incorporated into our contractual arrangements.
- Complete Coupa Risk Assessment (CRA): CRA is aimed at identifying a supplier's anti-bribery, anti-corruption and anti-financial crime risk and whether a potential supplier is engaging in any corrupt practices which could lead to violations of the US Foreign Corrupt Practices Act, the UK Bribery Act, the Criminal Code Act 1995 (Cth) and any other applicable local laws that may apply.

- Confirm modern slavery risk level assessment (preliminary risk assessment): A supplier's risk is determined by its location and the goods or services it provides, referencing the human rights indices developed by Verisk Maplecroft (including the Modern Slavery Index). Those suppliers deemed to be high or medium risk based on location and industry are required to complete a secondary risk assessment.

- BAT Australia's Secondary Risk Assessment: Modern Slavery Risk Assessment in Risk Analysis (RAMP) is used to complete a full assessment of high-risk suppliers and some medium-risk suppliers. This assessment involves gaining insight into the supplier's internal systems focused on preventing participation in modern slavery practices, and their remediation processes in the event they encounter any form of modern slavery within their organisation and/or supply chain.

In the RAMP platform, suppliers must provide relevant internal policies and procedures to confirm that they have effective and adequate mechanisms to minimise the risk of modern slavery occurring within their organisation. The risk assessment covers areas such as the supplier's business activities, workforce composition, regions it sources its products/services from, reporting obligations, policies, guidelines, grievance mechanisms, internal training, and how it engages with third parties about modern slavery, including contractual obligations, as well as audits, other forms of assessment, and remediation. It is noted that the above platform was only used up until Q4 2024. To streamline the risk assessment process and

ensure effectiveness, BAT Australia is transitioning to a new platform that will go live in 2025. This platform will complete preliminary and secondary risk assessments, streamlining the above process.

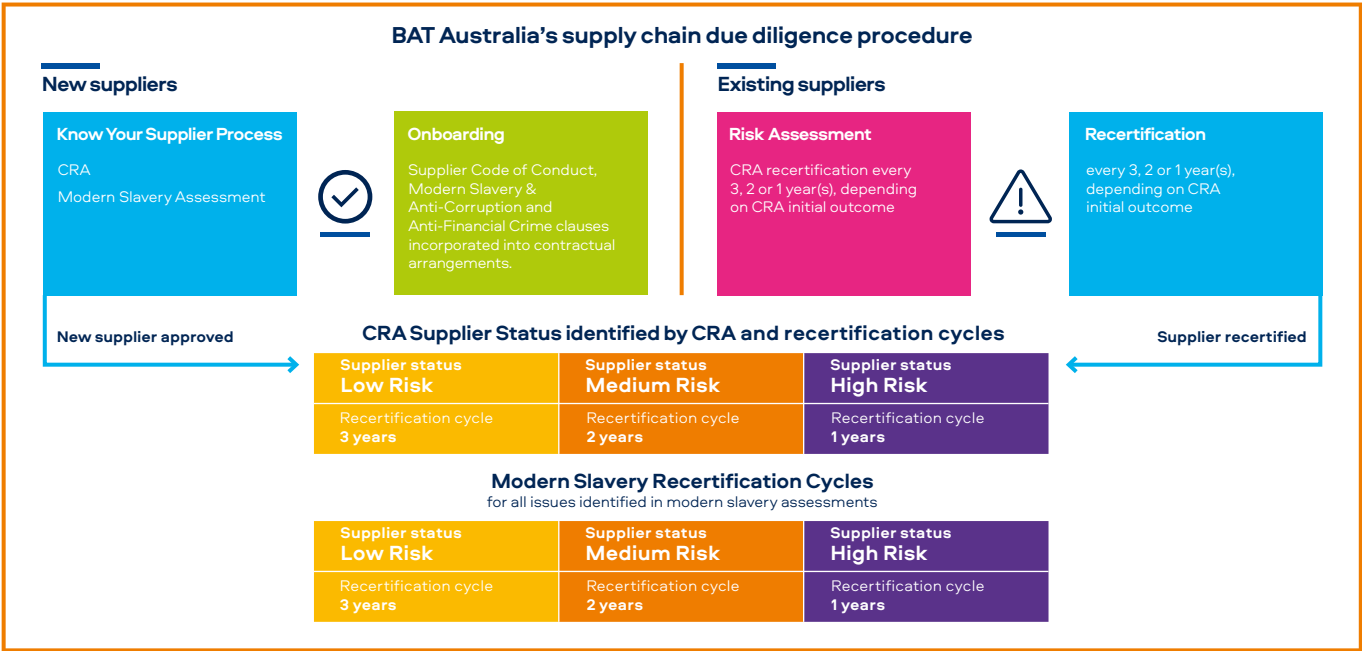
- Recertification process: BAT Australia has a recertification process for all suppliers. Those with a high final risk assessment are to be reassessed yearly, those with a medium final risk assessment every two years, and those with a low final risk assessment every three years.

BAT Australia's Modern Slavery Assessment Findings

In 2024, BAT Australia engaged 149 new suppliers, each of which underwent the KYSP before onboarding and was therefore assessed for its inherent risk exposure to human rights-related risks, among other risks. Of these new suppliers, 16 were deemed high risk, 30 were deemed medium risk, and 103 were deemed low risk.

Of our new suppliers, approximately 31% were classified as high or medium risk and flagged for processing in RAMP to provide a final risk rating. The high-medium risk supplier population included those in the information technology, building, marketing, human resources, manufacturing, and hospitality industries.

High & Medium risk suppliers must provide information on their business activities and disclose how they are addressing modern slavery within their operations. BAT Australia engages with these suppliers, requesting internal policies & procedures to understand if there are adequate processes and mechanisms in place to minimise the risks of modern slavery in our supplier's organisations.



Due Diligence

Continued

How the Group assesses and responds to human rights risks

Respecting human rights across the Group's tobacco supply chain

Tobacco is vulnerable to human rights and modern slavery-related risks. Issues on the ground can be complex and nuanced. Effective remediation requires cooperation and dialogue, rather than confrontation.

The Group's approach, therefore, emphasises working with families and communities to find longer-term solutions, while respecting the local context and the challenges of operating small, family-run farms.

The majority of the Group's tobacco (73% by volume) is sourced by BAT Group's own Leaf Operations through contracts with c.91,000 farmers, who receive on-the-ground support from Field Technicians through all crop stages. The Group's direct relationship with such farmers helps create positive relationships.

The Group's Field Technicians visit the directly contracted farmers approximately once a month during the growing season. This includes conducting interviews with farmers and workers, as well as checking the conditions and practices on the farms against the Group's standards.

Farmer Sustainability Management platform

The Group's digital platform, Farmer Sustainability Management (FSM), is used by Field Technicians to record data during farm visits of our directly contracted farmers. Over 30% of the FSM criteria are related to human rights.

Field Technicians also conduct unannounced visits, interviewing farmers and farmworkers to check for, amongst other things, child and forced labour incidents. They also track remediation actions identified.

The system includes 'red flags' for serious issues, such as child and forced labour.

All data is centrally tracked and analysed to provide appropriate oversight and to implement management action when needed.

The Group's third-party suppliers are expected to monitor their contracted farmers and to report their findings in the Thrive system.

Maintaining standards through assessments

The BAT Group conducts Human Rights Impact Assessments (HRIA) and In-depth Assessments (IDAs) using a risk-based approach. These assessments are carried out in line with the UNGPs and conducted by independent human rights experts.

Since the first HRIA conducted in 2019, the Group has completed 10 HRIAs, engaging with over 5,239 rights holders. The evaluations included themes, such as the potential risk of child labour, health and safety, workers' rights and farmer livelihoods.

IDAs have a wider scope and cover other social and environmental topics. By the end of 2024, 16 suppliers in 12 countries had undergone IDAs since 2022.

The Group continues to take steps to address issues identified in HRIAs and IDAs, and track remediation actions, as appropriate.

Sustainable Tobacco Programme

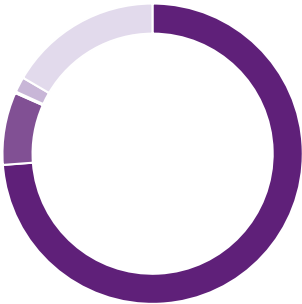
Participation in the Sustainable Tobacco Programme (STP) is a contractual requirement for all the Group's Leaf suppliers.

The STP mandates an annual self-assessment covering key themes such as human rights.

All Leaf suppliers are expected to comply with local laws and regulations, as well as the STP's requirements.

If a non-compliance is identified, BAT takes appropriate actions, including the suspension or termination of the supply agreement, taking into consideration responsible disengagement and relevant OECD Guidance.

Thrive-reported Prompt Actions¹ in 2024



Categories	% breakdown
Handling, use and storage of agrochemicals	73.81
Not following PPE guidance for harvesting	7.81
Controls to ensure use of sustainable wood	0.16
Controls for preventing child labour	1.66
Others	16.56

100%

of farms in the BAT Group's Thrive Supply Chain² monitored for child labour

Notes:
1. See page 10 for the definition of 'Thrive Supply Chain'.
2. Prompt Action: A prompt action refers to an issue that's been identified by a Field Technician which is deemed to require an immediate response due to its nature.

Due Diligence

Continued

Reporting and resolving incidents of child and forced labour

The BAT Group recognise child and forced labour are complex issues and incidents can be hidden or under-reported. This is why, in addition to due diligence, the Group works on addressing root causes.

Procedures for due diligence, remediation and ongoing monitoring are set out in the Group's Code of Human Rights in Tobacco Farming.

In 2024, a total of 117 incidents of child labour were reported on 0.05% of farms in BAT's Thrive Supply Chain.¹

The majority of incidents were related to stitching and/or stringing tobacco green leaves.

100% of incidents were reported as resolved during the growing season.

In cases of recurring incidents, a farmer's contract is not renewed for the next season. No recurring incident was identified in 2024.

In addition, no forced labour-related non-compliances were reported in the Group's Thrive Supply Chain¹ in 2024. The Group acknowledges the challenges in monitoring child and forced labour on farms and understands that incidents may not always be detected or reported. The Group remains committed to addressing these complex issues.

Tracking recurring non-compliance is essential to addressing causes. That is why the Group monitors the recurrence of child labour cases and often involves local communities in its remediation plans.

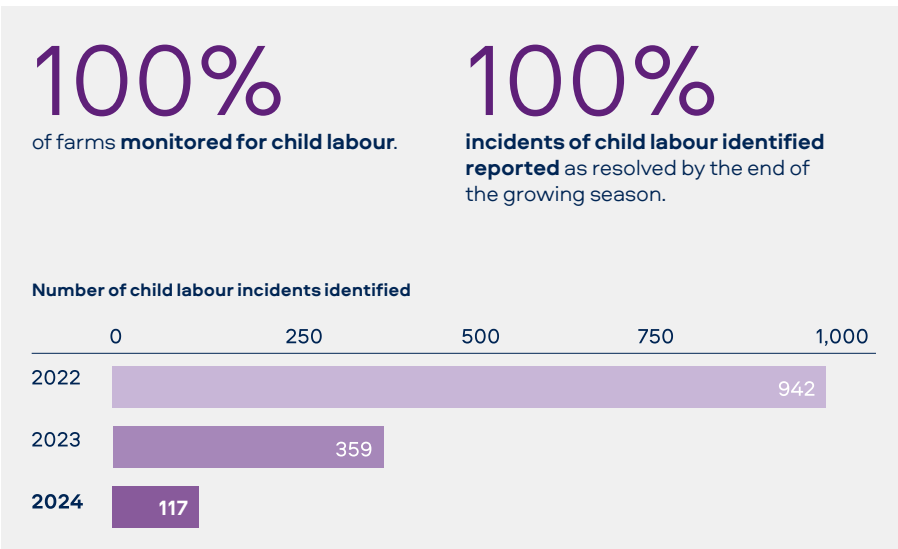
Partnerships and community-based programmes are essential in the Group's approach to respecting human rights.

By bringing together key stakeholders, the Group can co-develop solutions to help bring about lasting change.

The Group supports a range of long-term programmes to prevent child labour and enhance livelihoods across its tobacco-growing regions.

+ Find out more about the **Group's strategy, business model, structure and governance** in BAT's **2024 Combined Annual and Sustainability Report**

Monitoring and remediating child labour in the BAT Group's Thrive Supply Chain¹ during 2024



Notes:
1. See [page 10](#) for the definition of 'Thrive Supply Chain'.
2. www.ilo.org/sites/default/files/wcmsp5/groups/public/%40ed_emp/%40emp_ent/%40multi/documents/publication/wcms_844331.pdf

Training and Capacity Building

Human rights training for farmers and their communities

The Group’s own Leaf Operations and third-party suppliers in the Thrive Supply Chain¹ provide human rights training for farmers and community members, with a focus on child labour and workers’ rights.

In 2024, more than 417,000 attendees received this training.

Child labour training, developed in line with the UNGPs, is also available to everyone with access to the Group’s internal training platform.

Supplier engagement and training

The BAT Group has a relationship with approximately 700 direct and 25,000 indirect product materials suppliers, some of which are small businesses operating in developing countries where standards for human rights and health & safety are still evolving.

The Group values its relationships with these suppliers and supports them in improving their practices. If issues arise during the audits, the Group works together with these suppliers to find solutions and implement corrective actions, turning to disengagement as a last resort.

In 2024, procurement relationship managers across all regions were trained on how to monitor supplier performance based on the findings of labour audits.

In addition, over the course of the year, the Group shared best practices and agreed common commitments with suppliers at the suppliers’ summits held in China, South Africa and the U.S. These summits strengthened collaboration and capabilities to embed sustainable practices across BAT supply chains.

The Group’s in-scope suppliers also received a step-by-step guide on the audit processes and standards.

Training employees

Ensuring BAT Group employees can easily access and understand SoBC policies is fundamental to establishing effective implementation and compliance. The SoBC app provides easy access to policies, procedures and guidance, as well as to BAT’s global ‘Speak Up’ channels, available in 14 languages.

Annually, all BAT employees undergo SoBC training which includes scenarios covering issues of discrimination and modern slavery in work situations, as a part of the Group compliance sign-off procedure.

Employees without computer access complete their training offline.

In 2024, 100% of Group company employees completed the SoBC training and sign-off.

Number of attendants engaged in human rights training, with emphasis on forced labour and child labour

417,000+



Number of Group company employees who completed the SoBC training and sign-off

100%



Notes:
1. See [page 10](#) for the definition of ‘Thrive Supply Chain’.

Training and Capacity Building

Continued

BAT Australia Modern Slavery Training

BAT Australia uses Safetrac, an online compliance platform, to deliver modern slavery training to all BAT Australia employees who work in or are connected with the supply chain and operations.

The training provides a general understanding of modern slavery and BAT Australia's compliance and reporting obligations under the Modern Slavery Act.

In 2024, BAT Australia worked with Safetrac to refresh the Modern Slavery course in line with new content that Safetrac were developing and the 2024 amendments to the Act.

Additionally, BAT Australia continues to engage The Freedom Hub to socialise a greater proportion of its employees on its work with victims of modern slavery, the overall nature of modern slavery around the globe, and its various initiatives with the Group's engagement in fighting modern slavery, including how employees can become personally involved.

This education occurs predominantly through events or training sessions that BAT Australia co-hosts with The Freedom Hub.

+ For more **social performance metrics** and **operational data** see [page 18](#)

Case study



Partnerships & Community Programmes

In 2024, BAT Australia continued its collaboration with The Freedom Hub, a registered Australian charity dedicated to eradicating modern slavery in Australia, to further raise internal awareness, build team member engagement, and strengthen BAT Australia's collective understanding of human rights and ethical business practices.

Throughout 2024, BAT Australia hosted Modern Slavery Awareness events in collaboration with The Freedom Hub, creating accessible learning opportunities for employees at all levels of the business. These initiatives were designed to equip teams with practical knowledge on identifying, preventing, and responding to modern slavery risks. Awareness-raising was also supported through internal communications, event invitations, and leadership endorsement.

In July 2024, as part of BAT Australia's 'Fivers for Survivors' fundraising campaign, The Freedom Hub delivered a live session, Introduction to Business and Human Rights. The event, held in support of survivors of modern slavery, was open to team members across BAT Australia and broadcast as a webinar to over 200 participants. The session provided an opportunity for teams to engage directly with human rights experts, reflect on BAT Australia's Modern Slavery Roadmap, and explore how their roles contribute to achieving BAT Australia's 2025 commitments.

Measuring Effectiveness and Next Steps

Committed to tackling modern slavery and measuring progress.

Measuring the BAT Group's progress

Progress is assessed against the Key Performance Indicators (KPIs) outlined in the table below.

KPIs, alongside monitoring of strategic plans and emerging risks and best practice, are regularly reviewed at senior level through the BAT Group's governance framework and committees, including:

- Board Audit Committee, comprising independent Non-Executive Directors;
- Corporate Audit Committee and Regional Audit Committees;
- Operations Sustainability Forum, chaired by the Group's Operations Director; and
- Supply Chain Due Diligence Committee, chaired by the Group Head of Procurement.

The Group continues to improve and strengthen its approach to tackling modern slavery, and adapt to evolving circumstances.

In 2025, the BAT Group will continue to focus on the following activities:

- Supporting farmers to enhance livelihoods and build resilience, focusing on living income action plans and training.
- Implementing long-term solutions and addressing root causes in the communities in which it operates.
- Supporting suppliers to manage their supply chain impacts through their engagement with their suppliers and improving the traceability of their supply chain.
- Preparing for emerging regulatory requirements related to supply chain due diligence.

BAT Australia's Progress

The Modern Slavery Working Group tracks BAT Australia's progress, and updates are shared at end-market GRCCs. Progress is measured by tracking the activities in the strategic roadmap to ensure they are on track for completion. The effectiveness of each activity is also considered when updating or amending the roadmap.

In 2024, BAT Australia continued its efforts to respect human rights and tackle human rights risks. Progress includes:

- Reviewed our modern slavery training module, including updating the content to align with the Modern Slavery Act amendments.
- Continued our implementation of the three-year roadmap – making progress in reducing the risk of modern slavery within our supply chain and operations.
- Annual review of our mitigation plan framework.
- Provided volunteer resources to The Freedom Hub as part of the 2024 Volunteer Week.
- Inclusion of mandatory modern slavery clauses in all template supplier contracts in the South Pacific.
- Commenced an external review of BAT Australia's grievance mechanism by independent human rights experts.
- Acquired a devoted modern slavery resource responsible for informing and engaging all relevant parties on modern slavery risks.
- Established ongoing communications with stakeholders and BAT Australia members (including relationship managers) on process changes and key messages on ESG engagement on human rights issues.

Next steps

In 2025, BAT Australia will continue to focus on the following activities through the modern slavery working group:

- Continuing implementation of BAT Australia's three-year roadmap.
- Implement a new modern slavery risk assessment platform, which will enable preliminary and secondary risk assessment and feature dashboard reporting.
- Developing and providing Modern Slavery training to BAT Australia suppliers.
- Review the findings of the external review of BAT Australia's grievance mechanism by independent human rights experts and implement any required changes.
- Partner with an NFP/NGO that specialises in Modern Slavery through awareness-raising events.
- Enhance reporting at Governance, Risk and Compliance Committee meetings through improved dashboard functionality of the new risk assessment platform.

2024 BAT Group Performance Highlights			
KPIs	2024 performance	2023 performance	More information
% of employees that completed annual SoBC sign-off	100	100	Page 16
% of direct operations assessed for human rights risks against Verisk Maplecroft indices, including its Modern Slavery Index	100	100	Page 16
Number of independent supplier labour audits conducted since 2022 ¹	540	384	Page 18
% of farms in BAT's Thrive Supply Chain ² monitored for child labour	100	100	Page 14
Attendances at human rights training delivered by BAT Group's own Leaf Operations and third-party suppliers	417,628	418,584	Page 16

Notes:

1. BAT restated prior year performance following a data cleansing process, which included the removal of suppliers with which it no longer has commercial relationships with.
2. See [page 10](#) for the definition of 'Thrive Supply Chain'.

Further Information

About this statement

References in this statement to BAT South Pty Ltd and the following companies that are owned by it, including: BAT Australasia Ltd; BAT Australia Ltd; Rothmans Asia Pacific Limited; W.D. & H.O. Wills Holdings Limited; BAT Australia Services Ltd; The Benson & Hedges Company Pty. Limited; BAT Australia Overseas Pty Ltd; British American Tobacco Company (Samoa) Limited; Rothmans of Pall Mall (Fiji) Pte Limited; Central Manufacturing Company Pte Limited; British American Tobacco (PNG) Limited; Papua New Guinea Tobacco Co. Ltd; Paradise Tobacco Co. Limited; Solomon Islands Tobacco Company; BAT Holdings (New Zealand) Limited; and BAT (New Zealand) Limited. References to ‘we’, ‘us’ or ‘our’ should not be understood to refer to any other company in the BAT Group, including (without limitation) BAT p.l.c. The material in this statement is not provided for product advertising, promotional or marketing purposes. This material does not constitute and should not be construed as constituting an offer to sell, or a solicitation of an offer to buy, any of BAT Australia products. BAT Australia products are sold only in compliance with the laws of the particular jurisdictions in which they are sold.

Forward-looking statements

This statement contains certain forward-looking statements, including “forward-looking” statements made within the meaning of the US Private Securities Litigation Reform Act of 1995. These statements are often, but not always, made through the use of words or phrases such as “believe”, “anticipate”, “could”, “may”, “would”, “should”, “intend”, “plan”, “potential”, “predict”, “will”, “expect”, “estimate”, “project”, “positioned”, “strategy”, “outlook”, “target” and similar expressions. These include statements regarding the BAT Group’s or BAT Australia’s intentions, beliefs or current expectations concerning, among other things, the results of operations, financial condition, liquidity, prospects, growth, strategies and the economic and business

circumstances occurring from time to time in the countries and markets in which the Company operates.

All such forward-looking statements involve estimates and assumptions that are subject to risks, uncertainties and other factors. It is believed that the expectations reflected in this report are reasonable, but they may be affected by a wide range of variables that could cause actual results to differ materially from those currently anticipated. Among the key factors that could cause actual results to differ materially from those projected in the forward-looking statements are uncertainties related to the following: the impact of competition from illicit trade; the impact of adverse domestic or international legislation and regulation; the inability to develop, commercialise and deliver the Group’s New Categories strategy; the impact of supply chain disruptions; adverse litigation and dispute outcomes and the effect of such outcomes on the Group’s financial condition; the impact of significant increases or structural changes in tobacco, nicotine and New Categories related taxes; changes or differences in domestic or international economic or political conditions; the impact of serious injury, illness or death in the workplace; adverse decisions by domestic or international regulatory bodies; changes in the market position, businesses, financial condition, results of operations or prospects of the Group; direct and indirect adverse impacts associated with Climate Change and the move towards a Circular Economy; and Cyber Security risks caused by the heightened cyber-threat landscape and increased digital interaction with consumers, and changes to regulation.

The forward-looking statements reflect knowledge and information available at the date of preparation of these materials, and the Group undertakes no obligation to update or revise these forward-looking statements, whether as a result of new information, future events or otherwise. Readers are cautioned not to place undue reliance on such forward-looking statements.

Additional information concerning these and other factors can be found in BAT’s filings with the US Securities and Exchange Commission (SEC), including the Annual Report on Form 20-F and Current Reports on Form 6-K, which may be obtained free of charge at the SEC’s website, www.sec.gov

Definitions relevant to this report

The following definitions provide more information on the terms used throughout this report.

Child Labour: The definition of child labour used to identify child labour incidents in this report is aligned to the International Labour Organization’s definition of child labour.

Tier 1 Suppliers: Direct suppliers of final products or materials

Lower-Tier Suppliers: Suppliers, with whom we have a commercial relationship, who supply materials or products to our Tier 1 Suppliers.

The Sustainable Tobacco Programme (STP): An industry-wide initiative developed in collaboration with other manufacturers to bring together best practice from across the industry and drive continuous improvement. It is also aligned to important external standards, such as those of the International Labour Organization, and includes strengthened processes and more frequent on-site reviews, and acts as a due diligence platform set up to evolve and support the sector to continuously improve its impacts towards sustainable supply chains. All of our leaf suppliers are expected to participate in the STP, which requires an annual self-assessment against priority themes, including human rights.

Thrive Supply Chain: The BAT Group’s Thrive programme collects data and indicators across a number of issues, including human rights. The data from the annual Thrive assessment includes directly contracted farmers and those of third-party suppliers.

Appendix			
Mandatory Criteria Mapping Modern Slavery Act		Section Reference	Page
Identify the reporting entity covered by the statement		Our Business and Supply Chain	4–7
Describe the reporting entity’s structure, operations and supply chains		Our Business and Supply Chain	4–7
Describe the risks of modern slavery practices in the operations and supply chains Assessing and Managing Risk of the reporting entity and any entities it owns or controls		Assessing and Managing Risk	9–12
Describe the actions taken by the reporting entity and any entities that it owns or controls to assess and address these risks, including due diligence and remediation processes		Assessing and Managing Risk	9–12
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks		Due Diligence	13–16
Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)		Measuring Effectiveness and Next Steps	18
Any other relevant information		Further Information	19

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 bata.com.au/