

# Australian Vintage Limited

## Modern Slavery and Human Trafficking Statement

### (Statement)

#### Introduction

Australian Vintage Limited (ACN 052 179 932) condemns modern slavery and is committed to preventing and addressing modern slavery and human trafficking in its global operations.

This Statement is published on behalf of Australian Vintage Ltd and its subsidiaries (collectively referred to as “AVG”) for the financial year ended **30 June 2023**. The Statement is made pursuant to section 54(1) of the *Modern Slavery Act 2015* (UK) and section 13(1) of the *Modern Slavery Act 2018* (Cth).

#### 1. Who is Australian Vintage Limited?

Australian Vintage Limited is a leading Australian wine and drinks business listed on the Australian Securities Exchange. AVG owns, operates and manages vineyards, and specialises in boutique and bulk wine production, packaging, marketing and distribution. AVG is a significant vineyard owner and manager in Australia and prides itself on producing outstanding and innovative wines.

#### 2. AVG’s Structure, Operations and Supply Chains

##### Structure

Australian Vintage Limited is the parent company of a number of wholly-owned subsidiaries listed in Annexure A to this Statement. Australian Vintage Limited is responsible for the operations of the business and is the entity that engages all employees, contractors and suppliers. The risk of modern slavery in AVG’s business lies with Australian Vintage Limited and not its subsidiaries.

AVG’s workforce consists of approximately 450 employees, all of which are either engaged by Employment Contracts or Enterprise Bargaining Agreements. All employees, regardless of the jurisdiction in which they reside, are employed by Australian Vintage Limited.

##### Operations & Supply Chains

AVG is a global business which operates principally in Australia, with all owned vineyard and production facilities based in Australia.

AVG’s headquarters are located in Adelaide, South Australia. The company’s Sales and Marketing offices are located in Sydney, Australia and London, United Kingdom. AVG operates a winery in Buronga Hill, New South Wales and a packaging facility in Merbein, Victoria. The company operates three cellar doors; two in the Hunter Valley, New South Wales and one in the Adelaide Hills, South Australia.

Further information regarding AVG’s business and structure is contained in its Annual Report available at <http://www.australianvintage.com.au/investors/>.

##### Key Brands

AVG’s core brands are McGuigan, Tempus Two, Nepenthe and Barossa Valley Wine Company. AVG also owns the AusGrape brand, which specialises in grape juice, concentrates and winemaking products.

### 3. The Risks of Modern Slavery Practices at AVG

The risks of modern slavery in AVG's supply chain can be categorised into the three following categories:

1. AVG may cause modern slavery practices;
2. AVG may contribute to modern slavery practices; and
3. AVG may be directly linked to modern slavery practices.

AVG considers that its risk of causing modern slavery is extremely low. AVG believes in the fair treatment and remuneration of employees. It complies with all applicable employment legislation and industrial awards, and none of its employees are paid less than the minimum wage in their relevant jurisdiction. AVG also invests in the safety, health and wellbeing of its staff, which is overseen by the company's global People & Culture department.

The risk that AVG may contribute to modern slavery practices is considered to be low to moderate. Although pricing is a relevant consideration to AVG in any negotiation with a supplier or service provider, AVG takes other factors into consideration and does not engage providers solely on the basis of cost.

AVG considers the risk that it might be directly linked to modern slavery practices to be moderate. AVG endeavours to discuss modern slavery with key suppliers as part of the negotiation and/or contractual process.

### 4. AVG's Mitigation, Due Diligence & Remediation Processes

#### Policies and Practices

AVG has certain policies in place to assist in ensuring that modern slavery is not taking place in its business or operations, as described in further detail below. Internal policies are available on the intranet for employees to access and peruse at their convenience and external policies are available at <https://australianvintage.com.au/investor-centre/corporate-governance/>.

- **Social Compliance Policy:** outlines AVG's commitment to core human and labour rights, fair compensation, the prevention of child and forced labour, freedom of association and other employment requirements and standards. The policy was implemented by AVG based on the principles in the Business Social Compliance Initiative, a leading supply chain management system designed to improve working conditions in supply chains in factories and farms worldwide.
- **Ethics and General Conduct Code of Conduct:** describes AVG's principles of business conduct and basic legal and ethical obligations which bind the directors, officers and employees of AVG. The code provides guidelines for acceptable behaviour in ethical decision-making, addressing issues such as compliance with laws and regulations and the reporting of unlawful and unethical behaviour.
- **Remuneration Policy:** is in place to ensure that AVG appropriately compensates employees for the services they provide to AVG, determines their remuneration in a way that ensures a level of equity and consistency across AVG and complies with all relevant legal requirements.
- **Equal Opportunity and Diversity Policies:** affirm AVG's commitment to treating employees and prospective employees fairly, irrespective of their personal characteristics, such as race, age, physical or mental disability and religion.

## Due Diligence & Remediation

Other steps AVG takes to prevent and protect against modern slavery include the following:

- **Employees:**
  - All employees are engaged via Employment Contracts or Enterprise Bargaining Agreements.
  - AVG undergoes an extensive negotiation process for each of its Enterprise Bargaining Agreements with the relevant operational sites and provides all employees with the right to negotiate their employment terms (with the option for employees to be represented by a union representative at all negotiations).
- **Service Providers and Suppliers:**
  - AVG seeks to ensure that its Services Agreements with service providers contain provisions with respect to the treatment of those service providers' employees.
  - AVG endeavours to discuss the importance of its modern slavery requirements with key suppliers when negotiating or re-negotiating Supply Agreements and seeks to insert a provision on modern slavery which sets out the supplier's obligations and AVG's rights in the event of a breach of those obligations.
  - AVG's onboarding safety program requires that all labour hire providers provide evidence of labour hire certification, as required by legislation in their relevant jurisdiction, prior to commencing services for AVG.
- **Viticulture Department:**
  - AVG has prepared training material for its Viticulture department with respect to resourcing its owned and leased vineyards. The Legal and People & Culture departments are available to assist the Viticulture department with resourcing questions as they arise.
  - AVG's Grower Liaison Officer and Senior Viticulture Officer liaise directly with all grape growers regarding the arrangements for the sale of grapes to AVG (including, but not limited to, executing a Grape Supply Agreement and answering any queries or concerns). With effect from Vintage 2020, AVG has endeavoured to ensure that its new Grape Supply Agreements contain a reciprocal modern slavery provision.

## Monitoring & Management of Risk

The Risk & Sustainability Committee (**Committee**), governed by the Risk & Sustainability Charter (**Charter**), monitors and reviews the system of risk management which AVG has established to identify, assess and manage operational and compliance risks.

The Committee is responsible for, among other things, AVG's risk profile, overseeing and approving risk management strategy and policies and internal compliance. This includes monitoring compliance with applicable legislation and regulations and the policies listed above under 'Policies and Practices' and ensuring procedures, controls and reporting mechanisms are in place to prevent breaches.

The Charter is available at <https://australianvintage.com.au/investor-centre/corporate-governance/>

## 5. Effectiveness of Actions Taken at AVG

### Assessing Modern Slavery Risks

Each department at AVG, including the People & Culture department, participates in an annual risk review in consultation with the Risk Manager. A risk register is then prepared by the manager of each department and those risks are monitored and reported against to the Committee.

### Addressing Modern Slavery Risks

AVG has People & Culture representatives designated for each department in the business. As such, employees can contact their respective representative to raise any human resources-related concerns. The People & Culture department have procedures in place for investigating and resolving issues raised by employees.

AVG has been working with some of its suppliers in its supply chain by complying with requests to complete supplier questionnaires addressing AVG's supply chain and Modern Slavery risks. AVG takes Modern Slavery seriously and is committed to continuing to work with its suppliers.

### *FY23*

In financial year ending 2023, AVG has done the following to address its Modern Slavery risks:

1. Included modern slavery as part of its tender process, making it clear to all prospective tenderers that AVG condemns modern slavery and is committed to preventing and addressing modern slavery and human trafficking in its global operations and wishes to work with partners in its supply chain who operate their business with similar values. All prospective tenderers are required to outline their approach to modern slavery and specific initiatives including their risk mitigation strategy, social compliance policy, ethics and codes of conduct for equal opportunity. These responses are factored into AVG's decision to award a tender.
2. Investigated implementation of a whistleblower reporting hotline which could be used by employees, contractors, suppliers or customers to report potential modern slavery issues in AVG's supply chain on an anonymous basis.
3. Continued to progress and expand our sustainability strategy across the pillars of Environment, Social and Governance. A key aspect of the sustainability strategy being a responsible supply chain.

### *FY22*

This built upon the initiatives undertaken in financial year 2022, including:

1. Satisfactory completion of the Sedex Members Ethical Trade Audit (**SMETA Audit**). The SMETA Audit assessed the standards of labour, health and safety, environment, and business ethics of AVG's sites and identified areas of improvement to meet best practice guidelines.
2. Introduction of an Age and Right to Work Verification Policy to ensure that AVG meets its responsibilities and obligations regarding employees having the appropriate right to work and age verifications completed. This policy was introduced as a result of the SMETA Audit and improves AVG's best practice approach to ethical business.
3. Implementation of vSure Web Application. The vSure is software responsible for Visa checks and age verification at the point of employee onboarding and monitors temporary visas for changes. The implementation of this software was key to support the Age and Right to Work Verification Policy and provides AVG with transparent information on new employee visas and age requirements.

4. Appointed a Head of Sustainability who is responsible for the sustainability of AVG's business, across the pillars of Environment, Social and Governance. A key aspect of the sustainability strategy is a responsible supply chain.

#### Raising Concerns

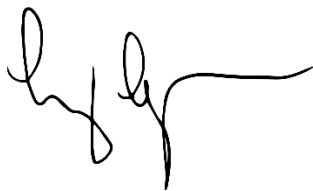
The People & Culture department is available to discuss any concerns or queries with employees in relation to the employment policies and practices of AVG. Further, the Supply Chain Manager is available to discuss any concerns relating to modern slavery in AVG's global supply chain. Any reported concerns will be addressed, and action taken, as required.

#### **6. Other Entities**

Australian Vintage Limited is the primary entity in relation to the functions and operations of AVG. Australian Vintage Limited is responsible for the operations of the business and is the entity that engages all employees, contractors and suppliers. The risk of modern slavery in AVG's business lies with Australian Vintage Limited and not its subsidiaries. Notwithstanding this, to ensure compliance with the *Modern Slavery Act 2018* (Cth), during the reporting period this Statement covers, AVG consulted with all companies it owns or controls in the development of this Statement (being the entity's outlined in attachment A). AVG shared details of the Modern Slavery Act 2018's reporting requirements, information regarding the actions it intends to take to address these requirements and provided relevant materials and updates.

#### **7. Approval**

This Statement has been approved by AVG's Board of Directors.



**Craig Garvin**

**Chief Executive Officer**

**Australian Vintage Limited**

## Annexure A

### Wholly-Owned Subsidiaries of Australian Vintage Limited (ACN 052 179 932)

#### AUSTRALIAN SUBSIDIARIES

Company Name	ACN
Australian Flavours Pty Ltd	066 117 575
Australian Vintage (Domestic) Pty Ltd	072 676 825
Austvin Holdings Pty Ltd	066 595 542
Austvin Pty Ltd	060 649 783
Barossa Valley Wine Company Pty Ltd	095 481 262
Buronga Hill Pty Ltd	002 671 605
Coldridge Development Pty Ltd	066 595 515
McGuigan Simeon Wines Pty Ltd	071 495 942
Miranda Family Investments Pty Ltd	089 816 660
Miranda Wines (Leasing) Pty Ltd	000 403 234
Miranda Wines Holdings Pty Ltd	089 815 038
Miranda Wines Pty Ltd	003 506 438
Mourquong Pty Ltd	002 860 059
Simeon Wines Pty Ltd	002 775 751
Vintners Australia Pty Ltd	007 654 462

#### INTERNATIONAL SUBSIDIARIES

Company Name	Company Number
Australian Vintage (UK) Limited A company registered in the United Kingdom	2972516
Australian Vintage (Europe) Limited A company registered in Ireland	676932