



VINARCHY

MODERN SLAVERY
FY25 STATEMENT



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Vinarchy is committed to preventing slavery and human trafficking within its operations and its global supply chain.

Tackling modern slavery is a key pillar of our global sustainability agenda.



01. INTRODUCTION

VINARCHY HAS A ZERO-TOLERANCE APPROACH TO MODERN SLAVERY IN ITS OPERATIONS AND SUPPLY CHAINS.

As one of the world's leading dedicated wine companies with an extensive sourcing footprint and operations spanning all continents, we recognise the importance of embedding ethical and social considerations within our procurement and operational decision-making processes.

We also recognise the inherent risks of modern slavery within global supply chains, particularly in industries with complex and diverse supply chains like ours, and in regions where vulnerable individuals are most at risk.

We take these risks seriously and are committed to proactively identifying and addressing such risks.



Jeremy Stevenson
Chief Corporate Officer



THIS STATEMENT

This statement is made pursuant to Part 2 of the Modern Slavery Act 2018 (Australia), section 54(1) of the Modern Slavery Act 2015 (UK) and the California Transparency in Supply Chains Act 2010.

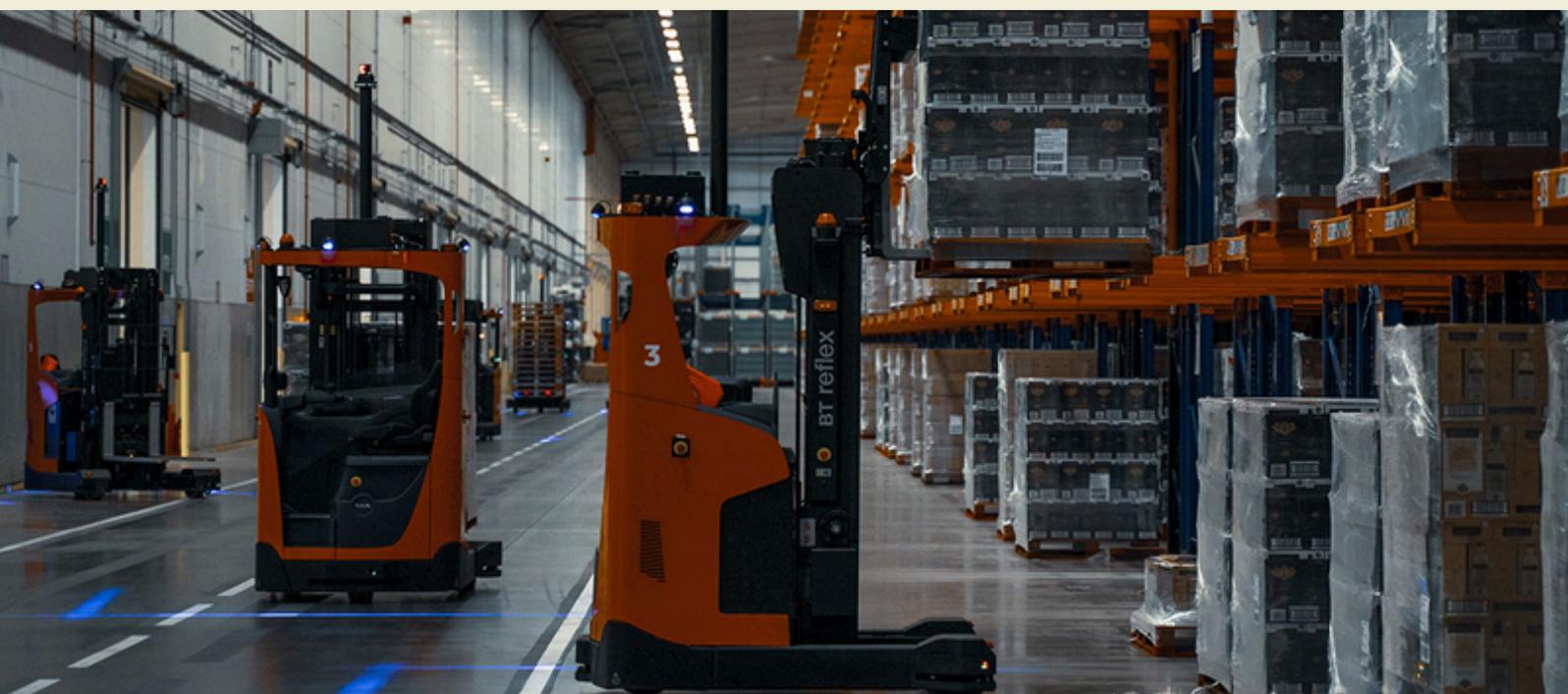
This statement constitutes Vinarchy's modern slavery and human trafficking statement for the financial year ending 30 June 2025. It was approved by the Board of Directors of Vinarchy Australia Limited on 23 December 2025, the Board of Directors of Vinarchy UK Limited on 23 December 2025 and the Board of Directors of Vinarchy North America, Inc. on 22 December 2025.

REPORTING AND CONSULTED ENTITIES

This statement covers the Australian, UK and US activities of Vinarchy, including Vinarchy Australia Limited (our Australian trading company), Vinarchy UK Limited (our UK trading company) and Vinarchy North America, Inc. (our US trading company). Entities owned by each of these entities have been consulted on their operations and supply chains to the extent that they differ from the operations and supply chains of the reporting entities.

The reporting entities covered by this statement are:

- Vinarchy Australia Limited, ACN 008 273 907 of Level 10, 10 Franklin Street Adelaide, SA 5000 (**VAL**)
- Vinarchy UK Limited, Company No. 137407 of Thomas Hardy House, 2 Heath Road, Weybridge, Surrey KT13 8TB (**VUKL**).
- Vinarchy North America, Inc. of 1300 First Street, Suite 368, Napa, CA 94559 (**VNA**).



02. ABOUT VINARCHY

WHO WE ARE, WHAT WE DO AND WHERE WE OPERATE

Structure

Vinarchy is a global wine company owned by a consortium of institutional investors, including Samuel Terry Asset Management, Sona Asset Management, Intermediate Capital Group, Capital Four and other lenders, and led by Bain Capital Special Situations (part of Bain Capital).

In terms of the reporting entities covered by this statement:

- VAL is structured as a public company (unlisted), incorporated in Australia, with offices across Australia and its headquarters in Adelaide, South Australia.
- VUKL is structured as a private limited company incorporated in the UK, with its headquarters in Weybridge.
- VNA is structured as a C corporation incorporated in the State of California in the United States, with its headquarters in Napa, California. Its principal business activity code identifies it as a winery.

Vinarchy has vineyards, production sites (including wineries) and offices in over 20 countries around the globe. Vinarchy's global team consists of more than 1,600 employees.

Operations

Vinarchy is a global, vertically integrated wine business with core operations including:

- Grape growing & sourcing
- Winemaking & production
- Sales & marketing

Grape Growing & Sourcing: Vinarchy sources its grapes through a combination of owned and leased vineyards, and from third party growers under supply contracts. Vinarchy also sources bulk wine from third party suppliers under supply contracts. Grapes and bulk wine are sourced from all over the world, including Australia, New Zealand, Spain, South Africa, Italy, Argentina, France, the US and Chile.

Winemaking & Production: Vinarchy has operations in Australia, New Zealand, the UK, Spain and South Africa. Vinarchy's operations in New Zealand, Spain and South Africa are undertaken by separate entities to the reporting entities covered by this statement.

Vinarchy produces and packages wine at its own production and packaging facilities located in Australia, New Zealand, Spain and South Africa producing more than 32 million 9LE cases annually.

Berri Estates, Vinarchy's production facility in the Riverland (South Australia), is the largest grape processor in the Southern Hemisphere, and the largest cask manufacturing facility in Australia. Berri Estates has a crush capacity of 226,000 tonnes of grapes per year and employs around 265 staff year-round and up to 415 during the vintage season. Berri Estates is Vinarchy's primary commercial winemaking hub. Rowland Flat, the production facility in the Barossa Valley (South Australia), is Vinarchy's premium and sparkling wine production site, which has a crush capacity of 25,000 tonnes of grapes per year. Vinarchy's two smaller premium production facilities in South Australia (St Hallett winery in the Barossa Valley and Hardy's Tintara winery in McLaren Vale) will transition production to Rowland Flat for the 2026 and 2027 vintages respectively. Vinarchy also uses a third party in South Australia for its traditional method sparkling for its Croser brand.

In South Africa, Vinarchy operates a production facility and uses third parties to provide packaging services on a contract basis.

In New Zealand, Vinarchy has production facilities in Hawke's Bay and Marlborough, which produce 10% of New Zealand's wine and uses third parties to provide packaging services on a contract basis.

In Spain, Vinarchy has four production sites (AGE winery, Tarsus winery, Ysios winery and Campo Viejo winery), one co-packing facility utilised for non-Rioja wine and one logistics centre in Fuenmayor.

In the UK, Vinarchy uses third parties to provide both production and packaging services on a contract basis.

Vinarchy also produces and packages beverages for third parties at its production and packaging facilities.



Marketing & Sales: Vinarchy has a portfolio of about 150 brands, with Hardys, Campo Viejo and Jacob's Creek being its three 'global pillar' brands, and more than \$1.5 billion in annual net sales revenue. Vinarchy markets, sells and distributes its wines to customers in more than 130 countries. With a deep understanding of its markets, Vinarchy uses its own dedicated marketing and sales teams, as well as carefully selected distributors (including Pernod Ricard under short-term and long-term transitional arrangements as part of Vinarchy's acquisition of Pernod Ricard's wine businesses in Australia, New Zealand and Spain) and agents. Vinarchy also markets its products through its own e-commerce site, wine clubs, and through its cellar doors across Australia, New Zealand, Spain and South Africa.

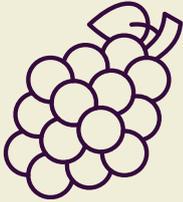
OUR WINERIES, OFFICES AND BRAND HOMES



OUR SUPPLY CHAIN

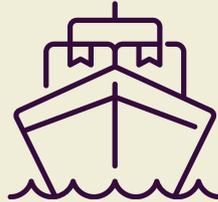
The journey from grape to glass

An overview of the key elements in our supply chain:



VINEYARD (OWNED, LEASED OR THIRD-PARTY)

- P&E
- EQUIPMENT HIRE
- LABOUR HIRE (INCLUDING VINTAGE CASUALS OR FIXED TERM EMPLOYEES)
- VINEYARD SUPPLIERS (INCLUDING VINES, SOIL, TRELLIS, IRRIGATION AND CHEMICALS)



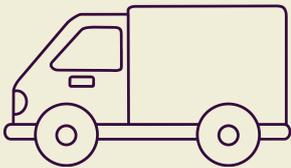
(OR) BULK WINE

- BULK WINE PURCHASE
- BULK WINE SWAPS



WINERY

- P&E
- HARDWARE
- EQUIPMENT HIRE
- LABOUR HIRE (INCLUDING VINTAGE CASUALS OR FIXED TERM EMPLOYEES)
- PACKAGING MATERIALS (INC. GLASS, CAPSULES, LABELS AND CARTONS)
- REPAIRS AND MAINTENANCE
- PPE
- UTILITIES
- WINEMAKING SUPPLIERS (INC. BARRELS, OAK, CHEMICALS, WATER AND ADDITIVES)
- CONTRACT PROCESSING
- CONTRACT PACKAGING
- STORAGE



DISTRIBUTION

- DOMESTIC FREIGHT
- EXPORT FREIGHT
- DISTRIBUTORS
- WHOLESALERS
- WAREHOUSING PROVIDERS
- 3PL PROVIDERS



CONSUMER

- MARKETING AGENCIES
- MARKETING CAMPAIGNS
- ADVERTISING
- SEASONAL STAFF
- POS SYSTEM PROVIDERS



OTHER

VINARCHY'S SUPPLY CHAINS ALSO INCLUDE OTHER GOODS AND SERVICES, SUCH AS:

- PROFESSIONAL SERVICE PROVIDERS/CONSULTANTS
- CLEANING AND SECURITY
- COMPANIES WHO SERVICE OUR SITES
- SOFTWARE/HARDWARE VENDORS
- INSURANCE PROVIDERS
- TRAINING PROVIDERS

03. IDENTIFYING RISK

RISK ASSESSMENT

Vinarchy takes a proactive and multifaceted approach to monitoring modern slavery risks within its operations and supply chains. This includes using the risk mapping register below, which was developed with the assistance of LSEG Data & Analytics (formerly Refinitiv), being a provider of due diligence and screening for third party risk management, to identify risks in operations and supply groups. The register informs Vinarchy’s due diligence activities and training provided to the business and suppliers to help identify and address modern slavery risks.

Risk in Operations	Risk Description			
Supply Group	Vulnerable Population	High Risk Category	High Risk Geography	High Risk Business Model
Grape Growers	Yes - migrant and low-wage labour used for pruning and picking	Yes - raw material	Yes - often rural areas	Yes - often labour hire used
Freight	Yes - likely to use low-wage labour	Yes - service procurement	No	Yes - often outsourced
Labour Hire	Yes - likely to use low-wage labour	Yes - service procurement	Yes - often rural areas	Yes - often labour hire used and second/third tier
Packaging	Yes - likely to use low-wage labour	Yes - likely to source raw materials	No	Yes - often labour hire used
Export Freight	Yes - likely to use low-wage labour	Yes - service procurement	Yes - often leaves by boat	No

Vinarchy leverages third-party tools and databases to assess risks. This includes use of screening checks through LSEG Data & Analytics and use of the Supplier Ethical Data Exchange (Sedex) platform, which is the largest collaborative platform for sharing ethical supply chain data.

Vinarchy also monitors risks by engaging directly with suppliers through audits and site visits, distributing self-assessment questionnaires to suppliers, engaging in industry and multi-stakeholder forums and through confidential whistleblowing mechanisms, which are available to workers and stakeholders to raise concerns.

RISKS IDENTIFIED IN FY25

In FY25, Vinarchy conducted a double materiality assessment to identify emerging and ongoing risks within its operating environment, global trends, and shifts in Vinarchy's operating environment. The assessment was informed by desktop research, stakeholder feedback, consumer and investor insights, industry analysis and global sustainability practices. It was guided by the Global Reporting Initiative (GRI) Standards and the AA1000 Accountability Principles, with reference to the Taskforce on Climate-related Financial Disclosures (TCFD), the Sustainability Accounting Standards Board (SASB), the International Sustainability Standards Board (ISSB), and the Australian Accounting Standards Board (AASB). Engagement included Vinarchy's Executive and Senior Leadership Teams, industry representatives and customers. That assessment identified:

- Ongoing and emerging modern slavery risks, particularly within agricultural labour practices. Key risk drivers include Vinarchy's and the broader industry's reliance on seasonal and migrant workers, who may face a heightened risk of exploitation due to visa dependency, language barriers, limited awareness of workplace rights, and reliance on employer-provided accommodation or transport, all of which may deter workers from reporting misconduct.
- Climate change as an amplifying risk factor of modern slavery by increasing labour instability, displacement and migration, and placing pressure on suppliers to respond rapidly to sourcing and production disruptions. These pressures can result in shortened procurement processes and reduced visibility and oversight of labour practices, particularly in lower tiers of supply chains.

We also identified the following ongoing and emerging modern slavery risks:

Geoeconomic shifts and geopolitical conflicts

Rising geoeconomic hostility and protectionist trade measures (including tariffs and export controls), and ongoing geopolitical conflicts in areas such as Europe and the Middle East, continue to disrupt global supply chains and affect key maritime routes. These conditions increase costs, constrain delivery timelines, result in diversification of supply chains and reduce the effectiveness of traditional monitoring mechanisms such as on-site audits, elevating the risk of exploitative practices, especially beyond direct suppliers.

Oversupply of wine in Australia

Change in consumer preferences in Australia and globally, reduction in demand for Australian wine in a number of Australia's largest export markets and oversupply of grapes have created a permanent structural oversupply of commercial grade wine grapes in Australia, which has placed sustained financial pressure on winemakers and growers. These economic conditions increase the likelihood of exploitative practices across the industry.

PROACTIVELY IDENTIFYING RISK

GSI Mapping and Assessment

Since FY23, Vinarchy has continued to carry out an assessment of all new third parties to whom it sold, and from whom it purchased, goods and services, to assess its risk exposure.

This assessment involves cross-referencing third parties that have undergone screen checks through LSEG Data & Analytics (a necessary component of Vinarchy's contracting and supplier-onboarding process) against countries of origin identified on the Global Slavery Index (GSI) maintained by Walk Free (walkfree.org/global-slavery-index) as having a prevalence score of 10 or higher. The GSI prevalence score estimates the number of people in modern slavery per 1,000 population.

In FY24, this assessment only identified third parties in two countries as having a prevalence score of 10 or higher, and all of those third parties were customers. Vinarchy continues to monitor its relationship with a supplier of goods or services, which was identified in the FY23 assessment as being from a country with a prevalence score of 10 or higher. That supplier is now a member of the UN Global Compact on Human Rights.

Vinarchy also continues to screen all new third parties through LSEG Data & Analytics as part of its onboarding process, however the cross-referencing exercise has not been done for FY25 as all the third parties Pernod Ricard sold to, and purchased from, goods and services as part of its Australian, New Zealand and Spanish wine businesses had not been fully onboarded. Previous assessments have reaffirmed that Vinarchy's risk exposure is low as the bulk of its suppliers are situated in Australia and the UK, which have low incidences of modern slavery. In light of Vinarchy's acquisition of Pernod Ricard's wine businesses in Australia, New Zealand and Spain on 30 April 2025, Vinarchy intends to continue this assessment to evaluate the risk exposure of the combined businesses. Vinarchy anticipates its exposure to remain low given that Vinarchy's operations in Spain primarily involve local and European suppliers, and its grape sourcing is largely domestic – those operations are subject to Spanish and European Union regulatory frameworks which provide robust protection in relation to employment conditions, health and safety and labour rights, all of which are relevant to the assessment of modern slavery risks. Also, the other operations are in Australia and New Zealand where Vinarchy already operates.



04. ADDRESSING RISK

STEPS TAKEN - Longstanding protections

Vinarchy's global sustainability strategy identifies key areas where we believe we can make real change, including corporate governance. Our governance program has been designed to ensure our employees and suppliers operate sustainably, ethically, and safely.



A corporate governance program supported by clear policies and processes plays a critical role in mitigating the risks of modern slavery in our operations and supply chains. Given our global footprint, we have global policies and processes, as well as local policies and processes to ensure that we comply with relevant market labour laws and best practice. We review our policies and processes on a regular basis to ensure that they are up-to-date and effective. We also regularly train our staff on these important policies and processes.

Our policies and processes are listed below.

- **Supplier Code of Conduct:** This code sets out our zero-tolerance approach to modern slavery and establishes the high standards we expect from suppliers, as a TISC Report affiliate.
- **Modern Slavery Policy:** This internal policy complements the Supplier Code of Conduct by setting out our expectation for all employees to act ethically and with integrity in all business dealings and relationships. The policy helps ensure transparency in our operations and implements systems to ensure modern slavery is not taking place anywhere in our business.
- **Flexible Working Policy in Australia, the UK and Spain:** These internal policies address the ability of employees and contractors to work remotely if the role permits.
- **Code of Conduct:** This internal code sets out ethical standards of behavior we expect from all our employees.
- **Workplace Bullying and Harassment Policy:** This internal policy sets out our commitment to providing a safe and healthy environment in which all employees are treated fairly, with dignity and respect, and free from bullying and harassment.
- **Diversity and Inclusion Policy:** This internal policy sets out our commitment to creating a diverse workforce that embraces gender equality and inclusion.

Longstanding protections (cont.)

- **Contractor and Labour Hire Code of Conduct:** This Australian code addresses expectations of contractors and other workers engaged through labour hire agencies, including the health, safety and welfare of workers.
- **Child Labour Policy:** This policy confirms our zero-tolerance position on child labour and our commitment to protecting a child from economic exploitation and performing work that is hazardous, interferes with education, or is harmful to its health or physical, mental, spiritual or social development.
- **Grievance and Complaints Policy:** This policy sets out how our employees, contractors, suppliers and visitors can raise any concern or complaint relating any aspect of employment or the work environment they believe is unfair or unjustified.
- **Whistleblower Policy:** This policy compliments the Grievance and Complaints Policy and encourages employees and other external persons to disclose any concerns regarding actual or suspected non-compliance with laws or other standards of behaviour. The policy ensures that disclosures can be made confidentially and with appropriate protections.
- **Anti-Corruption and Bribery Policy:** This policy confirms our zero-tolerance approach in relation to the payment or receipt of bribes, and establishes a robust procedure for tracking, approving and auditing hospitality and entertaining given to or received from third parties.
- **Procurement Policy:** This policy sets out our expectations for all our providers of goods and services, which the business must consider as part of the selection process and includes our approach to managing modern slavery risks with suppliers.
- **Contracts:** Our standard contract terms include modern slavery clauses to help identify and mitigate modern slavery risks by setting clear expectations, creating enforceable obligations and ensuring accountability throughout the supply chain. Standard contracts also require compliance with laws, including anti-bribery and anti-corruption laws.
- **Work, health and safety initiatives**
 - We deliver training to employees through a combination of online training modules and in-person sessions to ensure employees are well-informed about our safety policies and procedures, enabling them to perform their duties safely and effectively. All completed training is recorded in a centralised database, which also issues reminders for ongoing training, supporting continuous awareness and compliance.
 - We are committed to supporting the mental health and wellbeing of our workforce. As part of this commitment, we invest in mental health first aid training and have trained mental health first aiders at our sites in Australia, New Zealand, the UK, and South Africa. In addition, the Managing Regional Director for Asia also serves as a mental health first aider, further strengthening our support network.
 - At our production sites, we provide onsite physiotherapy for preventative treatment of work-related and non-work-related musculoskeletal injuries and to assess high risk manual tasks to identify risk reduction strategies, promoting safe work practices and reducing injury risks.

Longstanding protections (cont.)

- **Labour Hire:** In New Zealand, Vinarchy requires all labour supply companies to be members of NZ Ethical Employees, an independent organisation founded on the United Nations Guiding Principles on Business and Human Rights. The organisation requires proactive risk mitigation and conducts audits on its members.
- **Training:** We run regular training for our global executive leadership, senior leadership, human resources, procurement and viticulture teams in relation to modern slavery. We also run annual modern slavery training for the UK procurement, human resources and compliance functions. Training in relation to modern slavery also forms part of employees' onboarding process.
- **Employee Assistance Program:** This program, which is a completely free and confidential services, is available to assist employees with work-related or personal problems that may affect their productivity, morale or general well-being. We also provide this program, as well as an onsite psychologist, for support of work and non-work related mental health.
- **Due diligence screening:** Screening checks are conducted on all suppliers, customers and third-party contractors through LSEG Data & Analytics before we agree to do business with them. The screening process considers any adverse findings in relation to anti-money laundering, fraud, corruption and criminal convictions, and any adverse media coverage.
- **Sedex Self-Assessment Questionnaire:** We have completed a self-assessment questionnaire for multiple sites, which we update on an annual basis. This self-assessment has become increasingly important for certain customers and audits that are carried out by or on behalf of customers assist to identify any gaps in our practices and pinpoint areas for continuous improvement.
- **Sustainable Winegrowing Australia:** We are a member of Sustainable Winegrowing Australia and undergo independent third-party audits which review management of the business, environmental and social impacts. The certification verifies that industry recognised best practice is followed, and sustainable outcomes are achieved.
- **Wine and Agricultural Ethical Trade Association (WIETA):** We are a member of WIETA, which is a multi-stakeholder organisation that actively promotes ethical trade in the wine industry value chain and is a globally recognised ethical auditing body registered with the Global Social Compliance Programme. We require all our grape and wine suppliers in South Africa to be members of WIETA.
- **Sustainable Wine Roundtable:** We are a member of the Sustainable Wine Roundtable, a global multi-stakeholder platform committed to advancing sustainability standards for wine, which go beyond the vineyards and wineries and look at the rest of the supply chain, including labour conditions.

STEP TAKEN - Progress taken against FY25 objectives

Vinarchy undertook the following actions in FY25 to reduce the risk of modern slavery in its operations and supply chains

FY25 OBJECTIVE	PROGRESS AGAINST OBJECTIVE
<p>Rollout to top 100 global suppliers factsheet developed to raise awareness of modern slavery risk</p>	<p>The factsheet that was developed had to be updated as part of Vinarchy's rebrand that was done as part of its acquisition of Pernod Ricard's wine businesses.</p> <p>Updated factsheet has not been rolled out due to other priority projects and the need to consolidate the supplier list following the acquisition of Pernod Ricard's wine businesses.</p>
<p>Develop grower specific factsheet to raise awareness of modern slavey risks</p>	<p>Grower specific factsheet was developed and updated as part of Vinarchy's rebrand that was done as part of its acquisition of Pernod Ricard's wine businesses.</p>
<p>Continue to analyse modern slavery risks of all third parties using the LSEG Data & Analytics platform and cross-reference the country of origin of those third parties to the Global Slavery Index.</p>	<p>Continued to screen all new third parties through LSEG Data & Analytics as part of the onboarding process, however the cross-referencing exercise has not been done for FY25 due to other priority projects.</p> <p>Also, as the acquisition of Pernod Ricard's wine businesses only completed on 30 April 2025, third parties associated with Pernod Ricard's wine businesses had not been fully onboarded and previous assessments reaffirmed Vinarchy's risk exposure was low.</p>
<p>Engage external provider to provide targeted training to key departments, including human resources, procurement and viticulture in relation to modern slavery risks.</p>	<p>A partner at a specialist international law firm focused on risk management was approached to deliver the training, but a mutually convenient time to deliver that training could not be arranged due to other priority projects.</p>

Progress taken against FY25 objectives (cont.)

FY25 OBJECTIVE

PROGRESS AGAINST OBJECTIVE

Undertake due diligence on Pernod Ricard's environmental, social and governance practices (including modern slavery) as part of the proposed merger

Independent environmental, social and governance due diligence was conducted on Pernod Ricard by ERM at the request of Vinarchy's new owners as part of the acquisition of Pernod Ricard's wine businesses in Australia, New Zealand and Spain.

The ERM due diligence considered modern slavery practices of Pernod Ricard in relation to its wine businesses and noted areas for improvement.

Update risk matrix based on the Stronger Together Employer Good Practice Checklist and due diligence conducted by ERM and add mitigations to roadmap

Completed



Progress taken against FY25 objectives (cont.)

As noted above, there were a number of objectives which we were unable to advance or complete due to priority projects, including:

- Acquisition of Pernod Ricard's wine businesses in Australia, New Zealand and Spain resulting in Vinarchy becoming one of the world's largest specialist wine companies. The transaction required a significant allocation of management time and resources to complete the acquisition and establish day one operational continuity. Further significant work was required beyond day one to transition systems and suppliers, migrate data and contracts, harmonise policies, processes and governance frameworks, and progressively integrate the acquired businesses into Vinarchy's operating model, which work is still ongoing.
- Negotiating a significant syndicated financing arrangement with Commonwealth Bank of Australia to facilitate Vinarchy's acquisition of Pernod Ricard's wine businesses in Australia, New Zealand and Spain and for working capital needs.

Outside of the FY25 objectives, in FY25:

- Amid the Pernod Ricard acquisition, rapidly scaling operations and a seasonal vintage workforce, Vinarchy faced heightened workplace safety risk and responded by launching the Handle with Care program - built on the simple idea that safety is about care for yourself, your colleagues and the families waiting at home. Through practical tools, behaviour-shaping communication and daily "Caring Conversations" focused on vintage-specific risks such as fatigue, heat, manual handling and new worker vulnerability, the program created space for reflection, intervention and meaningful operational improvements. Strengthened inductions for casual and inexperienced workers, visible leadership engagement through on-site "Walks" and new digital reporting tools helped embed safer habits across the business. This resulted in Vinarchy achieving an 84% reduction in TRIFR and a 71% reduction in LTIFR, earning the 2025 SAWIA Excellence Award for Work Health & Safety (Large Business). By reframing work, health and safety from rules to relationships, Vinarchy demonstrated that a human-centred safety culture delivers both safer outcomes and stronger operational performance, with Handle with Care now embedded as a cornerstone of its ongoing work, health and safety strategy.
- Vinarchy engaged Orka Advisory to undertake an independent ESG regulatory gap analysis covering 27 relevant frameworks, including ASRS, CSRD, TCFD and ISSB. The assessment reviewed the maturity of Vinarchy's governance, risk management, strategy, and reporting processes, including those relevant to human rights and modern slavery. The analysis identified opportunities to strengthen reporting consistency, governance oversight, and audit readiness across ESG disclosures, including supply chain risk management and data assurance processes. These insights are being used to inform the development of Vinarchy's Sustainability Strategy and reporting roadmap.
- Vinarchy undertook a further review of several policies as part of its acquisition of Pernod Ricard's wine businesses, including Grievance and Complaints Policy, Whistleblower Policy, Code of Conduct, Contractor and Labour Hire Code of Conduct and Anti-Corruption and Bribery Policy.

STEPS TO BE TAKEN

Objectives for FY26

Vinarchy has identified the following objectives for FY26:

- Rollout factsheet developed to raise awareness of modern slavery risks to top 100 global suppliers of the combined legacy businesses.
- Rollout grower specific factsheet developed to raise awareness of modern slavery risks to growers.
- Continue to analyse modern slavery risks of all third parties using LSEG Data & Analytics and cross-referencing the country of origin of those third parties to the Global Slavery Index.
- Engage external provider to provide targeted training to key departments, including human resources, procurement and viticulture in relation to modern slavery risks.
- Review the following policies:
 - Modern Slavery Policy
 - Health, Safety and Wellbeing Policy
 - Global Workplace Bullying and Harassment Policy
 - Child Labour Policy
 - Diversity and Inclusion Policy
 - Flexible Working Arrangements Policy (Australia)
 - Flexible Working Policy (UK)
- Develop Sustainability Strategy to respond to increasing expectations from customers and shareholders for clear and credible sustainability commitments, regular customer requests for sustainability data, and an evolving regulatory landscape.
- Undertake Board-level climate risk scenario analysis to understand climate impacts on the business and inform strategic decision-making.
- Update risk matrix based on due diligence conducted by ERM.





VINARCHY

REDEFINING WINE