



ASAHI HOLDINGS (AUSTRALIA)

# MODERN SLAVERY JOINT STATEMENT

FINANCIAL YEAR 2024 ASAHI HOLDINGS (AUSTRALIA) PTY LTD





"We recognise the need to balance our mission **"to deliver on our great taste promise and delight our customers and consumers"**, with our responsibility and leverage as a global beverages company to drive positive change.

Asahi is firmly committed to respecting human rights that are recognised internationally and set out in the International Bill of Human Rights and the principles concerning fundamental rights in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

We remain vigilant about mitigating modern slavery in our domestic and global operations and supply chains. This is reflected in our improved and enhanced procurement and monitoring practices to assess and mitigate such risks.

Our 2024 modern slavery statement builds on our previous statements, shares our progress, and highlights Asahi's ongoing commitment in this space across our business activities in Australia and New Zealand. We pledge to continue to play our part in supporting the prevention, and hopefully one day, the eradication, of modern slavery."

**Roland van Bommel**

Chairman Asahi Holdings (Australia) Pty Ltd

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Asahi Holdings (Australia) Pty Ltd (ACN 135 315 767) (**Asahi**) is pleased to submit this modern slavery joint statement pursuant to the Modern Slavery Act 2018 (Cth) in respect of its financial year 1 January 2024 to 31 December 2024 (**FY24 Reporting Period**).

This modern slavery statement outlines the steps taken by Asahi and its reporting entities during the FY24 Reporting Period and continuing into early 2025 to identify and mitigate the risk of modern slavery occurring in its business operations and supply chain.

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# REPORTING ENTITIES

This modern slavery joint statement is made by Asahi on behalf of itself and the following wholly-owned subsidiaries:

- Asahi Beverages Pty Ltd (ACN 004 243 994)
- Asahi Premium Beverages Pty Ltd (ACN 077 568 480)
- CUB Pty Ltd (ACN 004 056 106)
- CUB Australia Holding Pty Ltd (ACN 615 290 849)
- CUB Beverage Investments Pty Ltd (ACN 150 900 093)
- Fosters Group Pty Ltd (ACN 007 620 886)
- Brewing Holdings Pty Ltd (ACN 004 059 394)
- Brewing Investments Pty Ltd (ACN 004 233 005)

In this modern slavery statement, Asahi and the aforementioned subsidiaries and their owned or controlled entities, are all referred to as the "Asahi Group - Australia". References to "we", "us" and "our" refer to the Asahi Group - Australia. Asahi Group - Australia operates as one corporate group with centralised management and control functions including senior management, corporate support, sourcing and supply chain functions all managed centrally in the Asahi Regional Hub. All group entities have the same Executive Chairman, Chief Executive Officer and Executive Management and substantially similar board composition. On this basis, the Asahi Group - Australia has been able to implement one due diligence process across all group entities except where differences are noted in this statement.

In addition, there are many shared suppliers across the Asahi Group - Australia and all group entities operate under a common set of governance policies and processes set by the Board and the senior management team and all sustainability (or ESG) risks are reported on and monitored centrally<sup>1</sup>.

For these reasons, the Asahi Group - Australia prepares a single, consolidated modern slavery statement annually.

## CONSULTATION WITH EACH OF THE REPORTING ENTITIES AND THEIR OWNED AND CONTROLLED ENTITIES

The process of consultation undertaken to prepare this statement, as between the entities listed above and their owned or controlled entities, involved consultation with the Executive Management of each entity and the Asahi Group – Australia. This statement was prepared by Asahi with consultation and input from senior managers responsible for Asahi Group – Australia's operations and supply chains, including the Procurement Leadership Team, and members of the human resources and legal teams, all of which service and support each entity in the Asahi Group – Australia.

Allpress was also separately consulted as part of the preparation of this statement. It was then circulated to relevant members of the senior executive team, including the Chief Procurement Officer and Group General Counsel and Company Secretary prior to board approval. Accordingly, each of the members of the Asahi Group – Australia have been consulted in the preparation of this statement.

<sup>1</sup> As Never Never was acquired mid-2024, Asahi is in the process of integrating Never Never into its processes.





**STRUCTURE, OPERATIONS,  
PEOPLE & SUPPLY CHAINS**





## 1. STRUCTURE

Asahi is the private parent company of the Asahi Group – Australia which comprises privately incorporated wholly-owned subsidiaries. The majority of its subsidiary entities are incorporated in Australia and New Zealand with a small number of entities incorporated in the UK and Singapore.

The registered office for all Australian group entities is located at 58 Queensbridge Street, Southbank VIC 3006.

Asahi is a wholly owned subsidiary of Asahi Group Holdings Ltd (**AGH**), a Japanese public company listed on the Japan Stock Exchange.

AGH prohibits all forms of modern slavery in its organisation and supply chain. AGH has a longstanding commitment to human rights, including labour rights and the fight against modern slavery and human trafficking, and these principles are set out in its global codes and policies.

Further details of AGH's approach to human rights are set out in:

- **Asahi Group Holdings - [Code of Conduct](#)**
- **Asahi Group Holdings - [Human Rights Principles](#)**
- **Asahi Group Holdings - [Responsible Procurement Policy including Supplier Code of Conduct & Supplier Guidelines](#)**

These AGH Codes, Principles and Guidelines direct AGH's and the Asahi Group's due diligence activities while applying to the Asahi Group – Australia and being supplemented with our own Human Rights Policy (as detailed further).





## 2. OPERATIONS

The Asahi Group - Australia is proud to be Oceania's leading beverages company. The Asahi Group - Australia has a total of 17 breweries and manufacturing plants across Australia, where it produces some of Australia's most iconic and loved alcohol and non-alcohol beverage brands.

Carlton & United Breweries (**CUB**), a wholly owned subsidiary of Asahi since June 2020, is Australia's oldest continually operating manufacturing business, tracing its origins to the Cascade Brewery, which commenced brewing in Tasmania in 1832. CUB Australia Holdings Pty Ltd, CUB Investments Australia Pty Ltd, Brewing Holdings Pty Ltd, CUB Beverage Investments Pty Ltd and Foster's Group Pty Ltd are all intermediate holding companies.

On the alcohol beverage side of our business (incorporating both CUB Pty Ltd and Asahi Premium Beverages Pty Ltd) our brands include Asahi Super Dry, Carlton Draught, Great Northern, Victoria Bitter, Cascade, Mountain Goat, Pure Blonde, Peroni, 4 Pines, Balter, Vodka Cruiser, Hard Rated as well as Somersby cider (third party licensed brand).



On the non-alcohol beverage side of our business, which includes Asahi Beverages Pty Ltd, our brands include Schweppes, Solo, Cottee's, Spring Valley juices, Cool Ridge and Frantelle water. We also produce and/or distribute under license a number of globally recognised beverages, including Pepsi, Gatorade, Lipton Iced Tea and Red Bull.

In 2021 Asahi acquired Allpress, a premium coffee company headquartered in Auckland with operations in Australia, New Zealand, the United Kingdom, Japan and Singapore. Allpress is a leading wholesale coffee bean supplier across New Zealand and Australia and this acquisition heralded Asahi's expansion into the large and growing fresh coffee category.

In 2022, Asahi acquired premium beverage company Strangelove Beverage Company Pty Ltd (**Strangelove**), an adult soft drink, premium mixer and mineral water business founded in Byron Bay. Strangelove complements Asahi's leading multi-beverage portfolio with products such as Tonic No. 8, Lo-Cal Yuzu and a range of premium sparkling waters.





In 2024, Asahi acquired Never Never Distilling Co. Pty Limited (**Never Never**), a premium craft distillery and seasonal bottled beverage business operating out of South Australia. The addition of Never Never, builds on Asahi's existing portfolio in the premium spirits category.

As a part of our operations, Asahi also participates in Container Deposit Schemes (CDS) in New South Wales, Australian Capital

Territory and Victoria, forming a part of the Scheme Coordinator in each jurisdiction. The Scheme Coordinators, Exchange for Change (NSW and ACT) and VicReturn (Victoria), are responsible for managing the marketing of the CDS together with running the Scheme's financial operations and ensuring the integrity of the Schemes.

Asahi is also a shareholder in the Circular Plastics Australia (PET) Joint Venture (**Circular**

**Plastics (PET) JV**) along with PACT Group, Cleanaway and Coca-Cola Europacific Partners. In early 2022, the Circular Plastics (PET) JV recycling facility in Albury-Wodonga was officially opened and an additional plastics recycling facility located in Altona, Victoria commenced operations in late 2023. The Circular Plastics (PET) JV recycles plastic packaging materials into "rPET" or recycled plastics for re-use in an effort to reduce the amount of virgin plastic used in the industry.

### 3. PEOPLE



During the FY24 Reporting Period, the Asahi Group - Australia employed approximately 3,600 people across Australia, in our head office in Melbourne, its ten breweries, other manufacturing sites and state sales offices. Asahi Beverages (NZ) Limited a subsidiary of Asahi, employs approximately 390 people across New Zealand with the majority comprising full time employees. Allpress employs approximately 300 people across Australia, New Zealand, Singapore, Japan and the United Kingdom.

As at 31 December 2023, the Asahi Group - Australia has approximately 18 collective industrial instruments and 5 major unions, however, our employees are free to associate with any union of their choosing.

Our workforce is diverse, and comprises staff that fill roles that include administration, executive/management, manufacturing, warehousing, field sales, service technicians,

hospitality and support professionals including finance and legal. In FY24, none of our staff were under 18 years of age. We also employ approximately 5 to 10 working holiday visa holders across our business intermittently during the course of the year.

Asahi recognises it is our workforce's passion, integrity, courage, respect and accountability that brings our values to life, fuels our engagement and enables us to continue to build Asahi as a great 'place to be.' Together with AGH, we conduct engagement surveys with all our global employees through a Global Engagement, Ethics & Compliance Survey to collect feedback, insights and encourage all employees to have their voice heard. The aim of the engagement survey is to measure how our people think, feel and act in relation to our company and whether they are enabled and have the energy to be effective in their work. Through the survey we also look to understand employee

awareness of our Code of Conduct being a key foundation that guides how we act as both a company and as employees in order to identify our areas of strength and improvement. In FY24 we achieved an Oceania region overall engagement score of 83% in the Global Engagement Survey with the survey also demonstrating that the majority of Oceania region employees had read and understood the Asahi Group - Australia Code of Conduct and felt it was safe to speak up at our company most of the time.

Asahi Group – Australia holds itself and our business partners, including suppliers, to the highest standards of integrity. We are committed to creating a positive and rewarding workplace and ask all of our employees to contribute towards helping us make a positive impact to the societies in which we operate, including respecting human rights and working with our suppliers to promote the protection of human rights.



## 4. SUPPLY CHAINS

The Asahi Group - Australia's supply chain arrangements remained largely similar to the previous reporting period.

The Asahi Group - Australia sources a broad range of goods and services from Australia and internationally from countries including United Arab Emirates, Italy, Japan, China, Brazil, Philippines, Belgium, Denmark, Switzerland, USA, India, England and Singapore and works with several thousand suppliers and service providers.

The majority of our approximate \$4 billion annual supplier spend (excluding our non-Australian corporate entities) occurs with our suppliers located in Australia (above 85%) sourcing significant quantities of raw ingredients including hops, barley, malt and sugar, packaging materials, and transport and logistics services. Another portion of our annual supplier spend is the import of finished goods such as products under the Peroni brands manufactured by related Asahi entities internationally (Italy).

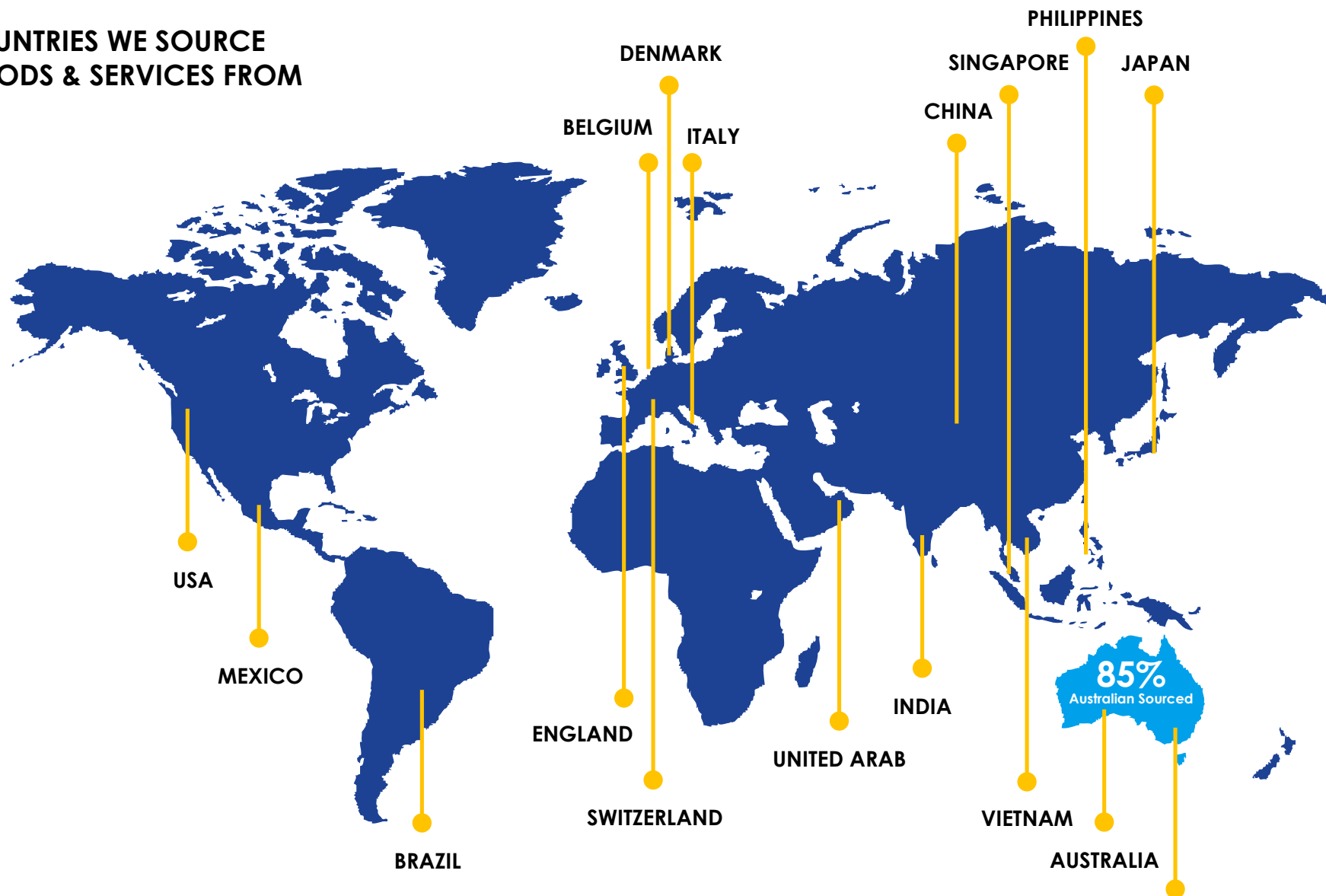


**Less than 15% of our suppliers are domiciled outside Australia.**

The key goods and services within our supply chain include:

- Packaged finished alcoholic and non-alcoholic beverages;
- Packaging;
- Ingredients including agricultural produce (such as hops, malt, sugar, fruit and coffee beans), carbon dioxide, fruit-based and beverage concentrates and flavours;
- Labour;
- Freight and logistics;
- Facilities and office-based support and equipment, including information technology systems and support;
- Utilities;
- Machinery, equipment and consumables for our manufacturing sites; and
- Container exchange and deposit schemes.

## COUNTRIES WE SOURCE GOODS & SERVICES FROM



PRIMARILY  
SOURCED  
IN AUSTRALIA



HOPS



BARLEY  
& MALT



SUGAR



PACKAGING  
MATERIALS



TRANSPORT &  
LOGISTICS

ASAHI  
BEVERAGES  
REGISTERED  
OFFICE





## RISK OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAIN



As our supply chain has remained relatively consistent over the years, our focus in the FY24 Reporting Period has been to minimise modern slavery risks when engaging new suppliers and our ongoing oversight and monitoring of our existing suppliers and their compliance with our Supplier Code of Conduct while also improving our supply chain visibility via Sedex and EcoVadis. Reflecting on our progress during FY24, we remain of the view that there is more risk of the Asahi Group - Australia 'being linked with' modern slavery via our supply chain rather than causing or contributing to modern slavery within our own operations.

#### **This is because:**

- 30% of our staff operate under enterprise agreements in Australia;
- the Asahi Group – Australia predominantly conducts its own recruitment and where we use recruitment agencies, we do so for limited roles using licensed agencies;
- of the robust policy framework in place (see below);
- the training and education we provide to our staff (see below);
- all employees are paid at least the minimum wage and salaries are periodically benchmarked;
- we have reviewed our whistleblower reports for 2024 and have not identified any reports that raise modern slavery concerns in relation to our operations; and
- all employees are free to associate with any union of their choosing.



As flagged earlier in this statement, the salient risks of modern slavery such as forced labour, child labour, debt bondage and deceptive recruiting for labour or services are in our supply chains. These risks are heightened in the agriculture sectors, in farms that use vulnerable workers such as children, temporary, seasonal and migrant workers with limited ability to read or write in the language native to their jurisdiction. The labour hire sector in Australian farming has been in the spotlight in recent years due to the reports of exploitation of workers on seasonal visas under the federal government's labour mobility scheme.

These risks are not particular to the Asahi Group – Australia, but exist in any industry that relies on manual, low-skilled migrant workers, such as in the agriculture, construction, security and cleaning industries. The risk is lower (but not eliminated) in developed economies with robust workplace relations laws such as those in the countries in which the Asahi Group – Australia's operations are located.

Overall, the following areas have been identified as having potential risks of modern slavery practices in the Asahi Group - Australia's supply chain. As part of our risk-based approach, we continue to review, investigate and mitigate modern slavery risks with a particular focus on the following areas.





## COMMODITY OR SERVICES RISKS

We have identified the commodities or services in our supply chain carrying higher risks of modern slavery due to the inherent risks in the commodity or service. They include:



**CITRUS & FRUIT**



**COFFEE/COCOA BEANS**



**LABOUR HIRE**



**TEA PRODUCTS**



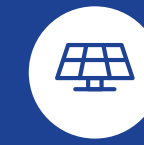
**GRAIN PRODUCTS**



**SUGAR**



**GLASS & ALUMINUM**



**SOLAR PANELS**



**OCEAN FREIGHT**

Like all businesses, we also appreciate the inherent risk of modern slavery in the IT hardware, corporate merchandise, uniforms, PPE and furniture we use to operate our business.

On average, our risk assessments have found that our direct suppliers in the above-mentioned chains have a moderate risk of modern slavery in their own operations, with the exception of the agricultural sector. Our first-tier suppliers are often wholesalers or importers, so the risk assessment outlined above is largely driven by potential modern slavery risk that we have identified beyond our direct suppliers.

## COUNTRY RISKS

- MEXICO
- COLOMBIA
- BRAZIL
- GERMANY
- ETHIOPIA
- UNITED ARAB EMIRATES
- CHINA
- INDIA
- THAILAND
- MALAYSIA
- PHILIPPINES
- INDONESIA



The Asahi Group - Australia procures a smaller volume of goods or services manufactured in, or sourced from, countries with a higher prevalence of, or vulnerability to modern slavery<sup>2</sup>, including:

- China (eg. apples, juice, sweeteners, flavours and additives)
- Malaysia (eg iced tea finished products & coffee ready products)
- Indonesia (quinine flavour)
- Germany (equipment)
- Brazil (eg. coffee beans, citrus concentrates)
- Colombia (eg. coffee beans)

- Mexico (limes)
- Philippines (pineapple)
- The United Arab Emirates (eg. glass bottles)
- Ethiopia (coffee beans) and
- India (offshore business services).

We understand that by procuring higher risk goods or services from riskier countries for modern slavery, Asahi Group – Australia's supply chain may become linked to adverse human rights impacts and potentially, modern slavery practices.



## LABOUR RISKS

The utilisation of vulnerable workers such as low-skilled, temporary and seasonal labour in areas of high labour intensity and low oversight is also a source of modern slavery risk, particularly debt bondage, irrespective of country risk. As noted earlier in this statement, this is an issue even in Australia, which is a country considered to have an overall lower prevalence of, and vulnerability to modern slavery, according to the Global Slavery Index. This risk is compounded where foreign workers are sourced via labour hire companies typically in the agricultural, manufacturing and cleaning sectors. Where vulnerable workers are engaged in these sectors within jurisdictions with increased prevalence of modern slavery, this heightens the risk for those vulnerable individuals.

Similar to last year, we identified a some suppliers with labour-related non-compliances reported in our Sedex data, due diligence and audit reports. The issues identified included irregularities in the payment of overtime, payment of wages, excessive deductions and excessive working hours. Further engagement and investigations were undertaken with select suppliers to understand their processes and either satisfactory evidence was presented or corrective actions were developed where required.



The complex nature of global supply chains means that the abovementioned risks are also pertinent in the supply chains of our direct suppliers. Where we are aware of the risks beyond our direct suppliers, it is described in this statement. For example, we have noted the possible risk of modern slavery in our ocean freight service providers, citrus suppliers, and solar panel suppliers and discuss in detail below our coffee bean and tea sourcing risks.



## HIGH RISK COMMODITIES

### COFFEE BEANS

Green coffee beans are a critical input for our Allpress business and the production and processing of coffee is tied to a long history of colonialism and slavery.

More specifically the coffee bean industry has been linked to deforestation, exposure to pesticides, forced labour, child labour and debt bondage. The US Department of Labor's List of Goods Produced by Child Labor or Forced Labor (ILAB List) lists 17 countries producing coffee using child labour or forced labour<sup>3</sup>:

- Brazil
- Colombia
- Costa Rica
- Cote D'Ivoire
- Dominican Republic
- El Salvador
- Guatemala
- Guinea
- Honduras
- Kenya
- Mexico
- Nicaragua
- Panama
- Sierra Leone
- Tanzania
- Uganda
- Vietnam

<sup>3</sup> US Department of Labour - [website](#)



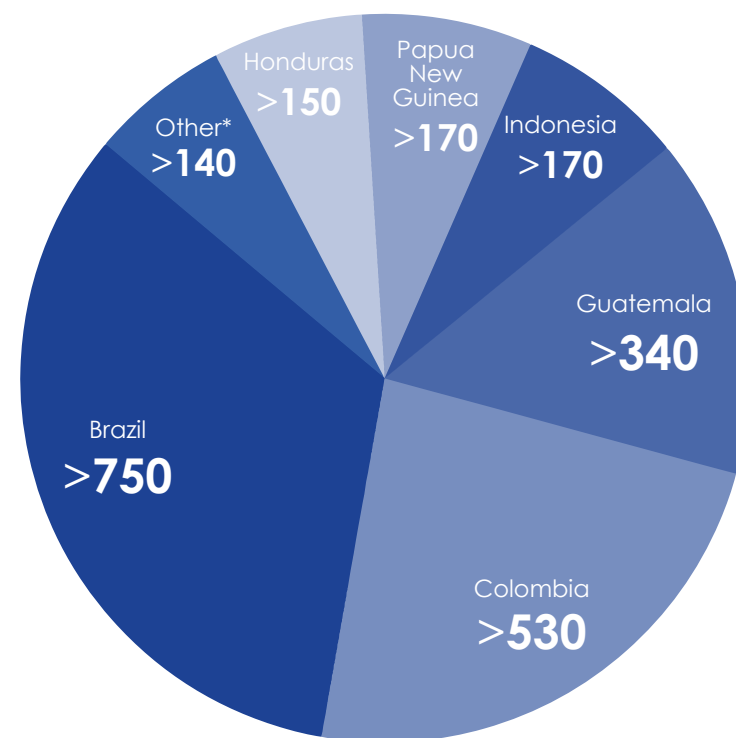
Coffee bean processing and production is concentrated in countries with low-income levels, many of which have high levels of poverty and some of which lack effective social and environmental infrastructure. The geographic origin of green coffee beans sourced by Allpress during FY24 was from approximately twenty (20) different countries with the majority of our sourcing concentrated in South and Central America, South-East Asia and sub-Saharan Africa.

The risks of modern slavery throughout coffee supply chains are often most severe and concentrated in the cultivation and harvesting of cherries and processing of green beans. Child and forced labour are the most prevalent types of modern slavery linked to cultivation and processing. Across the sector, these risks are driven by a range of factors including an unstable commodity market, use of vulnerable workers such as migrants, women and children, labour intensive processes, family farming and the prevalence of poverty in key sourcing countries.

Accordingly, the sourcing of green coffee beans by our Allpress business from various sources including from countries in the ILAB List increases the risks of modern slavery practices present in our supply chain.

Although Allpress sources green coffee beans through exporters and importers rather than directly from farms or co-operatives, we seek to trace to farm level of the product wherever possible. Much of the coffee Allpress purchases comes from the same regions and farms year after year. By doing so, we seek to increase our leverage to promote supplier respect of human rights. We acknowledge the real risk of modern slavery and forced labor exists beyond the first tier of our supply chain.

## Allpress Coffee Beans Purchased in FY24 (tonnes)



\*Other origins include Ethiopia, Peru, Mexico, Tanzania, Kenya, India & Rwanda

A close-up photograph of tea leaves in a plantation, with sunlight filtering through the foliage, creating a warm, golden glow. The leaves are vibrant green and show signs of being recently watered, with droplets visible on their surfaces.

## TEA LEAVES

As in our last reporting year, we use tea and tea extract or concentrate in a number of our products, such as selected flavours of our Lipton Iced Tea and T2 products which we manufacture and distribute under license from a third party.

The ILAB List lists 7 countries producing tea using child labour or forced labour<sup>4</sup>:

- India
- Kenya
- Malawi
- Rwanda
- Tanzania
- Uganda
- Vietnam

The tea industry continues to be linked to forced labour, child labour and rising instances of labour abuse among other human rights violations.<sup>5</sup>

The Business & Human Rights Resource Centre reports that “Women constitute anywhere between 30-60% of the total workforce engaged in tea production and are paid less than men within the sector. By controlling all aspects of workers’ lives on plantations, from housing to education and access to basic services like water and sanitation, plantation owners are able to withhold wages on any pretext and create conditions of indebtedness and bondage.”<sup>6</sup>

<sup>4</sup> US Department of Labour - [website](#)

<sup>5</sup> [https://media.business-humanrights.org/media/documents/2023\\_tea\\_report\\_2205.pdf](https://media.business-humanrights.org/media/documents/2023_tea_report_2205.pdf)





**TEA ESTATES,  
FARMERS &  
GARDENS**



**TEA POWDER  
MANUFACTURING**



**CONCENTRATE  
MANUFACTURING**



**SHIPPING &  
DISTRIBUTION**



**MANUFACTURER AND  
BOTTLER OF ICED TEA  
(UNDER LICENCE)**



While certification bodies like Ethical Tea Partnership, Rainforest Alliance and Fairtrade are used to demonstrate compliance with human rights and sustainability standards, they do not see themselves as substitutes for due diligence.<sup>7</sup>

Although we have seen attempts during the Reporting Period by governmental and extra-governmental organisations to combat these issues such as the Tea Triangular agreement between Uganda, Malawi and Kenya to combat child labour in the countries respective tea supply chains, tea remains a high-risk commodity for modern slavery.<sup>7</sup>

We purchase the majority of our tea through a third-party in the form of tea kits or concentrates. Given the heightened risks of modern slavery in the cultivation of tea leaves, we engaged with the supplier regarding their sourcing of tea. We were informed that they source tea largely from Sri Lanka with a small share originating from India. All tea included in the tea kits is Rainforest Alliance certified with a traceability level of segregation (SG) (re-certified during the reporting year) in-line with our third-party's own policies and programs. During the Reporting Period, we procured tea extract for one of our flavours which held Rainforest Alliance certification with the traceability level of identify preserved (IP)<sup>8</sup>.

During the FY24 Reporting Period, we also worked with our partners to gain a better understanding of our tea supply chain.

While we have an improved understanding of our tea sourcing, we still recognise it is likely that the risks of modern slavery exist at farm level.

As explained further below, we seek to mitigate and monitor the risks through our relationships with our suppliers and business partners and predominantly source Rainforest Alliance certified tea, although we recognise that certification cannot substitute for human rights due diligence.

<sup>6</sup> Trouble brewing: The need for transparency in tea supply chains - [link](#)

<sup>7</sup> Ibid.

<sup>8</sup> [Click here](#) for more information on the traceability level as defined by Rainforest Alliance



## ACTIONS TAKEN

BY THE ASAHI GROUP - AUSTRALIA  
TO ASSESS AND MITIGATE RISKS



## ESTABLISHING THE ASAHI GLOBAL PROCUREMENT OFFICE

During the Reporting Period, a new global office, Asahi Global Procurement Pte. Ltd. (**AGPRO**), was established in Singapore to rationalise global procurement activities. The aim of AGPRO is to increase efficiency and enable a coherent approach to addressing sustainability topics while allowing different regions to implement best practice. AGPRO oversees Asahi Group's strategic procurement initiatives, integrating global, regional, and local functions to manage human rights impacts in supply chains. Sustainability under AGPRO is split into four key pillars:

The risk of modern slavery and adverse human rights impacts in our supply chain are assessed under the global Responsible Procurement Program (the "**Program**") . The Program applies to the Asahi Group – Australia and defines actions and mechanisms to carry out risk-based due diligence on suppliers regarding Modern Slavery in the Asahi Group – Australia's supply chain.

With the launch of this new Program, AGPRO, together with AGH, launched new global responsible procurement policies that are informed by leading standards and unify our supplier requirements relating to responsible procurement and human rights (referenced on page 28). Supporting these key policies and our broader human rights due diligence mechanism are our updated Asahi Speak Up Policy and Asahi Group Human Rights Principles.

During FY24, AGPRO conducted preliminary risk assessments on suppliers to ascertain the baseline risks of adverse impacts on workers, communities and nature occurring in our most critical global supply chains. Together, we determined the inherent risk for each supplier based on their industry and country of operations and validated our suppliers' risk profiles using EcoVadis' IQ+ inherent risk assessment solution. The risk assessment articulates our understanding of the nature, prevalence and severity of sustainability issues in our supply chains, and positions our human rights due diligence mechanism for future expansion into other areas of sustainability.

Resulting from the risk assessments, a pilot was launched, targeting the highest-risk raw-material ingredient suppliers. The pilot is described further below.

Other activities carried out together with AGPRO included:

- A supplier training session on the new global Responsible Procurement Program with 38 attendees;
- The integration of human rights evaluation into our existing procurement processes, established governance models, and created escalation procedures for supplier non-conformance to enhance overall supply chain responsibility;
- Streamlined the use of third-party tools such as Sedex and EcoVadis to improve clarity and consolidate due diligence activities.

Asahi Group - Australia continued to work proactively to ensure compliance and progress our efforts to identify, minimise and mitigate modern slavery risks.

### KEY PILLARS



Climate Change



Nature



Human Rights



Circularity

# KEY MILESTONES 2024

In this FY24 Reporting Period, we progressed the following actions aimed at mitigating modern slavery risks in our business:



Roll-out of new global documents: Asahi Group Global Supplier Code of Conduct, Asahi Group Responsible Procurement Policy and Asahi Group Responsible Procurement - Supplier Guidelines.



Implemented the second stage of Allpress' three year modern slavery risk management plan and commenced human rights risk assessments for coffee exporters.



Built on existing due diligence in relation to the supply chain of the Lipton Iced Tea category, ensuring rainforest alliance certification was in place for tea present in tea kits used in our manufactured goods.



Conducted baseline modern slavery and human rights risk-assessments on all procurement categories.



Improved the utilisation rates of Sedex and implemented the use of EcoVadis to support our assessment of modern slavery and human rights risks and ongoing monitoring and analysis of audit reports where necessary.



Created a new labour hire modern slavery due diligence process with the goal of implementation for all labour providers in 2025.



Rolled out company-wide training to salaried employees to increase their understanding of salient human rights in our supply chain.



Rolled-out specialised scenario-based training for procurement team members on how to identify modern slavery red flags, including a guide for common indicators.



Hosted a guest speaker with lived experiences to share their story and provide context to how the Asahi Group-Australia can better mitigate the risk of modern slavery in our supply chain.



Worked with our partners regarding the origin and certification of tea sourced directly and under license.



Preliminary desktop risk assessment conducted on Never Never's supply base as part of their acquisition during the reporting period.

## 1. ALLPRESS' MODERN SLAVERY RISK MANAGEMENT PLAN

Building on last years' progress, stage 2 of Allpress' three-year modern slavery risk management plan included the following actions being undertaken by the Allpress business in 2024:



Established clear modern slavery risk management targets and measures of performance, including requirements for enhanced risk assessments of coffee exporters as well as requesting supplier agreement to our Global Supplier Code of Conduct.



Together with the establishment of our new global grievance mechanism and Speak-up platform, explored avenues to make the mechanism more accessible to our supply chain.



Aligned our approach to conducting due diligence to with our new global Responsible Procurement Program.



Updated the Allpress purchase order template to include a link to our Conditions of Purchase which refers to the Asahi Group Global Supplier Code of Conduct.



## 2. LABOUR HIRE MODERN SLAVERY DUE DILIGENCE PROCEDURE

While the use of labour hire can yield benefits for businesses in the case of labour shortages or where specialised labour is required, a lack of regulation and oversight poses a risk of temporary worker exploitation. At Asahi, we use both skilled and unskilled temporary workers hired via agencies in our own operations to supplement our talent pool at manufacturing sites, warehouses and in our head office.

Towards the end of the FY24 Reporting Period we strengthened our existing processes with the introduction of a modern slavery questionnaire, as well as drafting a new labour hire procedure for labour hire agencies. The intent of this procedure is to conduct cyclical and enhanced modern slavery due diligence through the review of agency management systems, policies and processes.

We anticipate that this process will be rolled out in Q1-Q2 2025.





### 3. TRAINING AND UPSKILLING

Increasing awareness remains a key component of our approach to modern slavery mitigation and we continue to build capability among our employees to identify the risks of modern slavery and the actions required to respond effectively.

We continued to educate our employees in managing our modern slavery risk during 2024 by:

- Rolling out a revised training module for all Asahi Group - Australia salaried employees across Australia and New Zealand with an average completion rate of above 90%;
- Expanding training within our Allpress business with targeted training provided to supply chain and buying teams;
- Implementing a new procurement user guide designed to support the identification of modern slavery red-flags during site-visits.

In addition to the above training and education, we organised one full day to be dedicated to increasing awareness of human rights in the supply chain and identifying indicators of modern slavery using real-life examples.



The day was split into two distinct components:

- a) A specialised training session designed to develop the understanding of procurement team members on how to identify indicators of modern slavery and how to respond in different real-life scenarios, dealing with potential instances of modern slavery; and
- b) A guest speaker presentation from Mr Moe Turaga, a person with lived experiences of modern slavery in the Australian agricultural context. Mr Turaga highlighted what Asahi can learn from people with lived experiences and what businesses can do to support the eradication of modern slavery.



#### 4. UTILISATION OF SEDEX AND AUDITS TO HELP IDENTIFY MODERN SLAVERY RISKS

During the Reporting Period we continued to utilise SEDEX to exchange data with our suppliers and assess the risks of modern slavery within our supply chain. In addition to SEDEX, we introduced EcoVadis to supplement our efforts and to allow more suppliers to be captured as part of the global Responsible Procurement Program. The supplier information sourced via SEDEX and EcoVadis is referred to in this statement collectively as the Platform data.

The pilot launch of our global Responsible Procurement Program in 2024 as outlined above, assessed 29 predominantly high-risk suppliers operating in the agricultural and flavour sectors. 90% of the 29 suppliers attested to our policies and were onboarded on one of the two approved platforms under the global Responsible Procurement Program. We achieved an overall 89% completion of Platform SAQs across 35 sites where the pilot suppliers had operations.



Our review of Platform data results revealed some areas of higher risk. In these instances, we sought to align with the recommended approach set out in the UN Guiding Principles on Business and Human Rights, as well as our new global Responsible Procurement Program to work with the suppliers to investigate and address the impacts where possible and to use our leverage to drive positive change within the operations of the supplier.

As part of the SEDEX ecosystem, we also completed our own SAQs for selected manufacturing sites. The results are accessible on SEDEX for our business partners to assist in their due diligence activities.

## 5. ONGOING MEASURES AND GOVERNANCE FRAMEWORK

Asahi Group – Australia remains firmly committed to conducting procurement and sourcing activities in a fair, objective and transparent manner that satisfies our legal and regulatory requirements and our corporate and social responsibility commitments. To provide clarity on our standards and to protect universally recognised human rights, we have a number of key policies which set out the requirements of those within our organisation and those with whom we seek to do business.

Asahi policies are reviewed regularly, in consultation with the Risk and Governance function, to ensure they are current and appropriate. The Asahi Group – Australia policies listed below reflect our ways of working and expectations of our team.

POLICY	PURPOSE
<b>Asahi Human Rights Policy</b>	Articulates our commitment to respecting internationally recognised human rights and our opposition to all forms of slavery both within our activities and undertakings and within our procurement activities and own operations.
<b>Asahi Group Responsible Procurement Policy</b>	Outlines our expectations of our suppliers in areas of business integrity, human rights and labour standards, nature, and grievance mechanisms, guided by our commitment and approach to implementing and maintaining responsible procurement practices that protect the human rights of workers and communities in our supply chains and safeguard the natural world.
<b>Asahi Group Global Supplier Code of Conduct</b>	Sets out our expectations of our employees and suppliers when it comes to people, the environment, sustainability and human rights. The minimum standards set out in this document are incorporated in our standard supplier agreements and purchase order terms and conditions and we require our suppliers and our employees to familiarise themselves with the principles in the Code of Conduct and continue to monitor their own compliance with it.
<b>Asahi Beverages Whistleblowing Procedure</b>	Provides a way for our people to raise concerns regarding actual or suspected contravention of our ethical standards or the law without fear of reprisal or feeling threatened by doing so.
<b>Respect in the Workplace Policy and the Asahi Group Code of Conduct</b>	Outlines the standard of workplace behaviour that is required of all employees and describes unacceptable conduct which includes discrimination, harassment, sexual harassment and sex-based harassment, bullying, vilification and victimisation, and the consequences of engaging in such inappropriate and unacceptable conduct.

The Asahi Human Rights and Whistleblower policies are available publicly on our website and can be found here:

- [Human Rights Policy](#)
- [Whistleblower procedure](#)
- [Responsible Procurement Policy and Supplier Code of Conduct](#)



## 6. MODERN SLAVERY WORKING GROUP

Asahi's Group Legal and Group Procurement & Sustainability functions manage modern slavery compliance through a cross-divisional team including representatives from procurement and legal functions.

The Modern Slavery Working Group monitors the regional implementation of the global Responsible Procurement Program, assesses the effectiveness of controls and makes recommendations for improvement. The Modern Slavery Working Group also considers remediation and corrective action for suppliers.

The Modern Slavery Working Group provides periodic updates to the executive team (Procurement Lead, Procurement Advisor, Group General Counsel, Chief Legal Officer and Chief Procurement Officer) during the year.





## 7. CONTRACTS

All Asahi Group - Australia standard form supplier contracts incorporate clauses which require our suppliers to:

- Comply with our Supplier Code of Conduct comply with applicable Modern Slavery Laws, including laws that criminalise modern slavery and require reporting;
- Comply with Asahi Group - Australia's policies as applicable;
- Have in place, and maintain in place at all times, adequate and reasonable policies, controls, procedures and training designed to prevent, detect, assess, manage and remedy modern slavery in its operations and supply chain;
- Agree to being audited should there be any breach or suspected breach of the policies; and
- Agree that in the event of a breach of the policy, Asahi has the right to terminate the contract.

In the FY24 Reporting Period, these contract templates were reviewed and reaffirmed.





## 8. GRIEVANCE MECHANISMS FOR DISCLOSURES BY EXTERNAL PERSONS

Asahi Group - Australia maintains a Whistleblower Procedure to promote and support our culture of honest and ethical behavior. The Whistleblower Procedure For Disclosures by External Persons is available publicly on our [website](#) and on the Allpress website also.

The Procedure is supported by a confidential whistleblower service and our “Speak Up System”, which is maintained by an external service provider and operates across Asahi’s operations nationally.

Any concerns related to human rights in our operations or those of our Suppliers, including forced, compulsory, trafficked or child labour, can be raised through the following mechanisms:

- Speaking with the HR Business Partner, supervisor or manager if you have concerns about a Supplier’s conduct;
- Raising the concern with the Group Chief Legal Officer or Group People & Corporate Affairs Officer;
- Using the “Speak Up System”, which can be accessed via [asahigroup.ethicspoint.com](https://asahigroup.ethicspoint.com) or through a confidential hotline that is independently operated by Navex 24 hours a day, 7 days a week. The “Speak Up System” phone number is 1800 518 251 (Australia) or 0800 459 601 (New Zealand).

We have reviewed our whistleblower reports received in FY24 and have not identified any reports that raise modern slavery concerns.





## ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

The Asahi Group - Australia remains committed to continually improving our approach to mitigating the risk of modern slavery in our operations and supply chain. Achieving an effective approach to modern slavery is a complex, ongoing and evolving process which requires continuous improvement by our organisation. Asahi's Procurement Lead, Supplier Innovation & Sustainability, Group Chief Procurement Officer and Group General Counsel manage modern slavery regulatory compliance within Asahi and periodically report to the Sustainability Committee (including board members) on these matters.



We have made steady progress and addressed numerous recommendations in this Reporting Period as shown in the following table:

GOALS FOR FY24 AS SET OUT IN OUR FY23 STATEMENT	KEY ACTIONS TAKEN IN FY24
Implement the second year of our three-year Allpress risk management plan including detailed reviews and audits of selected suppliers.	<ul style="list-style-type: none"> <li>The second stage of our three-year Allpress risk management plan has been implemented including setting internal targets and updating purchase orders with our new global documents and requirements.</li> <li>Conducted training for buying and supply chain business units on human rights and modern slavery.</li> </ul>
Work with AGPRO office to ensure consistency of our approach in identifying and mitigating modern slavery risks across the Asahi Group - Australia business and supply chain with the implementation of a global human rights risk management framework.	<ul style="list-style-type: none"> <li>Processes defined under the new AGPRO global Responsible Procurement Program for new suppliers have been rolled out across Asahi Group – Australia.</li> <li>Implemented pre-screening due diligence in the source to contract process.<sup>11</sup></li> </ul>
Establish a robust and standardised supplier due diligence process for Oceania with regular audits for compliance and risk mitigation aligned to the human rights framework; establishing a supplier due diligence process for Oceania Advance risk mapping and risk assessments of our raw material suppliers.	<ul style="list-style-type: none"> <li>Piloted the Responsible Procurement Program, targeting the highest-risk raw-material ingredient suppliers.</li> <li>Adopted new global due diligence processes and procedures at a regional level.</li> </ul>
Introduction of an enhanced grievance mechanism system.	<ul style="list-style-type: none"> <li>Revised some of our policy documents for efficacy and ease of understanding (refer to <a href="#">page 28</a>).</li> <li>Introduced our new global Speak Up mechanism.</li> <li>Explored the dissemination of the mechanism to our coffee suppliers and employees.</li> </ul>

<sup>10</sup> See page 7 of the [Supplier Guidelines](#)

GOALS FOR FY24 AS SET OUT IN OUR FY23 STATEMENT	KEY ACTIONS TAKEN IN FY24
Continuing to enhance the effectiveness of the Sedex platform as a mitigation tool by increasing the number of direct and indirect suppliers joining Sedex year on year.	<ul style="list-style-type: none"> <li>• Increased uptake of SEDEX among our high-risk suppliers.</li> <li>• Expanded membership to the SEDEX platform for the majority of our exporter suppliers used by Allpress.</li> </ul>
Continue to build the expertise of our people through enhanced and refresher human rights and modern slavery training.	<ul style="list-style-type: none"> <li>• Conducted specialised training to upskill procurement team members on identifying indicators of modern slavery through scenario-based training.</li> <li>• Hosted a person with lived experiences to share their journey and raise awareness of the prevalence of modern slavery in Australia.</li> </ul>

We will continue to develop and modify our actions and approach as we identify our risks and implement mitigation measures.





## LOOKING AHEAD

Looking ahead, we have set ourselves several goals and will continue to work towards these. In 2025, we anticipate our future actions will include:

- Implementing the third stage of our three-year Allpress risk management plan including a review of the current processes and approach and exploring the topic of living wages in the context of our coffee supply chain.
- Assessing accessibility and effectiveness of our new grievance mechanism in relation to our supply chain.
- Operationalising our new labour hire due diligence procedure.
- Continue to build on the expertise of our people and leverage training and capacity of our new AGPRO office.
- Broaden the scope of the AGPRO Responsible Procurement Program.
- Develop a project with select ingredient suppliers to enhance due diligence of high-risk raw material ingredients.





## STATEMENT APPROVAL

This Statement was approved by the Board of directors of Asahi Holdings (Australia) Ltd, as the higher entity, at a meeting of directors on 03 April 2025.

- Roland van Bommel
- Neil Chatfield
- Amanda Sellers
- Taemin Park
- Yoshiaki Suzuki
- Keizo Tanimura
- Kazushi Tosa
- Natalie Toohey

Signed,

**Roland van Bommel**  
Chairman  
Asahi Holdings (Australia) Pty Ltd





# STATEMENT ANNEXURE

MANDATORY CRITERIA	PAGE
a) Identify the reporting entity.	04
b) Describe the reporting entity's structure, operations and supply chains.	06
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	13
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	22
e) Describe how the reporting entity assesses the effectiveness of these actions.	33
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	04





ASAHI HOLDINGS (AUSTRALIA)

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