



# Advancing the world's supply networks

**Brambles**

Brambles Limited (ABN 89 118 896 021)  
Financial Year Ending 30 June 2024

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

Both the UK *Modern Slavery Act 2015* (**UK Act**) and the Australia *Modern Slavery Act 2018 (Cth)* (**Australian Act**) require that businesses disclose information relating to their efforts to address the risks of Modern Slavery<sup>1</sup> in their operations and their supply chains. Brambles makes this Modern Slavery Statement (**Statement**) on behalf of Brambles Limited (ABN 89 118 896 021) and its subsidiaries. For purposes of the UK Act, this Statement is made by Brambles on behalf of the Brambles UK entities set out in Annexure A and, for purposes of the Australian Act, this Statement is made by the reporting entities Brambles Limited, CHEP Australia Limited, Brambles Industries Limited, Brambles Holdings International Pty Ltd, Brambles Finance Australia Pty Ltd, Brambles Spain Pty Ltd and CHEP Technology Pty Ltd.<sup>2</sup>

This Statement is not made on behalf of any non-controlled joint ventures.<sup>3</sup>

This Statement is set out in the following 9 parts:

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

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

<sup>2</sup> A list of Brambles' principal subsidiaries is set out on page 139 of Brambles' [2024 Annual Report](#).

<sup>3</sup> Brambles has non-controlling interests in two joint ventures: one in China (Loscam (Greater China) Holdings Limited) and one in the US (MStar Holdings Corporation).

## 1. Introduction

This is our ninth Statement in response to the UK Act and our fifth Statement in response to the Australian Act. In the past year we have continued to improve upon our work on Modern Slavery, deepening our understanding of the risks in our operations and supply chains and ensuring we have in place the most effective responses to those risks. Our most significant work was to better integrate our human rights monitoring programme into our daily plant operations and to enable our teams in the USA, IMET and Southeast Asia with the tools and understanding to manage Modern Slavery risks, particularly at our subcontracted sites.

This Statement sets out the steps we have taken throughout the financial year ended 30 June 2024 (**Financial Year 2024**), steps we will continue to take and future actions.

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

- Launched our second ethics and compliance survey to all office-based personnel globally and plant-based employees in the USA and the UK, seeking their views on the human rights culture at Brambles and their awareness of the Speak Up Hotline
- Delivered Speak Up training to all office-based employees
- Completed enhanced due diligence on all existing staffing companies and third-party labour providers
- Launched our supply chain traceability programme amongst our higher-risk timber suppliers by identifying the suppliers in their supply chains
- Expanded our human rights monitoring programme in our subcontracted sites across India, Middle East and Türkiye (collectively, **IMET**) and Southeast Asia in Financial Year 2024, carrying out inspections and third party audits
- Carried out targeted human rights training across our Supply Chain operations in the USA and IMET
- Supported the remediation of identified non-conformities as a result of our human rights monitoring programme
- Held our first in-person Supplier Conference to introduce family-owned and small or medium-sized suppliers to Brambles' Responsible Sourcing Programme and to build stronger supplier relationships and enablement opportunities, including encouraging responsible supply chain practices to protect and strengthen human rights in our communities

## 2. Business and organisational structure

As a pioneer of the sharing and circular economy, Brambles is one of the world's most sustainable logistics businesses. The world's largest brands trust Brambles to help them transport the goods that matter more efficiently, safely and sustainably.

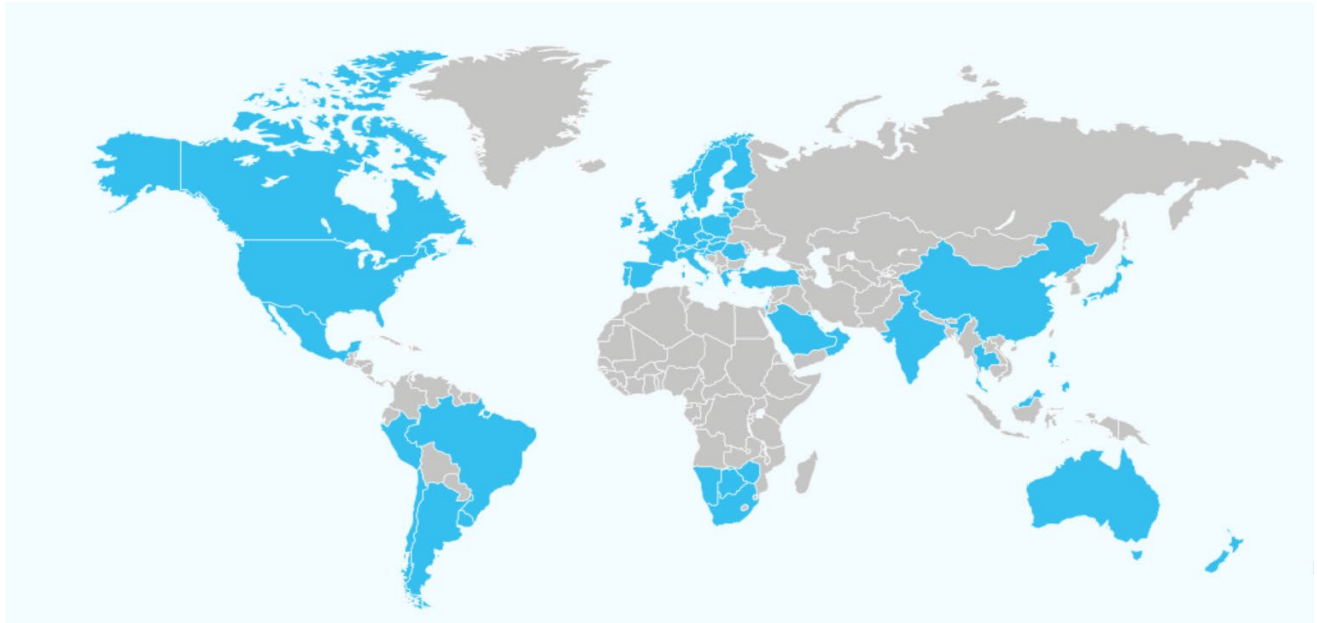
Brambles' platforms form the invisible backbone of global supply chains. Our circular business model, which is underpinned by our vision to pioneer global regenerative supply chains, facilitates the 'share and reuse' of the world's largest pool of reusable pallets, crates and containers. This enables us to provide innovative solutions, deliver value to customers, and create connections that make the world's supply chains more resilient and regenerative through our people, operations and technology.

Through the CHEP brand, Brambles primarily serves the fast-moving consumer goods, fresh produce, beverage, retail and general manufacturing industries.

## Overview of Brambles' Organisational Structure

Brambles Limited, the ultimate holding company of the Brambles Group, is listed on the Australian Securities Exchange (ASX), and our registered office is in Sydney, Australia. Brambles also has a corporate office in London, UK.

Brambles operates in approximately 60 countries as of 30 June 2024, with our largest operations by headcount in Australia, the UK, the USA and South Africa as set out below:



## Overview of Brambles' Operations

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

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

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

Brambles' operations are located worldwide, and we manage our businesses within the following operating segments:

CHEP Americas:	The pallet and container pooling businesses in North America and Latin America
CHEP Europe and IMETA:	The pallet and container pooling businesses in Europe, India, Middle East, Türkiye and Africa and the CHEP-branded reusable plastic container (RPC) business in South Africa
CHEP Asia-Pacific:	The pallet and container pooling businesses in Asia-Pacific and the CHEP-branded RPC businesses in Australia and New Zealand

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

Through its Communities Positive sustainability goals, Brambles strives to build resilience, promote circularity and account for the connections between society, the economy and nature. To implement these goals, amongst other



things, we support food banks with volunteer hours, logistics expertise, financial and in-kind donations, allowing a seamless flow of platforms to receive food donations from brands and retailers, many of whom are Brambles' customers, for re-distribution. For more information about Brambles' Communities Positive goals, please see Brambles' [2024 Sustainability Review](#).

### 3. Brambles' Policy Framework

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

#### The Code of Conduct

Brambles' Code of Conduct outlines our core values and standards for how we do business. It reflects our commitment to act with the highest standards of integrity and ethical conduct. Operating with these values will allow us to not only improve the supply chain but the communities in which we live and work. The Code applies to everyone working for Brambles and requires all of our employees to comply with all applicable legal requirements, including all prohibitions against forced, bonded or compulsory labour, human trafficking or other kinds of slavery, at all times.

#### Human Rights Policy

Brambles' Human Rights Policy, which is incorporated into the Code of Conduct, was approved and adopted by the Brambles Limited Board of Directors in November 2016. It is reviewed annually and was last updated in July 2023. This Policy, which articulates in a single, stand-alone document the various human rights principles advanced throughout Brambles' Code of Conduct, is guided by international human rights principles encompassed in the Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights.

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

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

#### Zero Harm Charter

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

#### Speak Up Policy

Brambles has a whistle blower policy (called the Speak Up Policy). The Policy, which is reviewed annually and was last updated in July 2023, encourages anyone to report suspected breaches of the Code of Conduct or any other policy, including the Human Rights Policy and the Zero Harm Charter. It provides appropriate protections against victimisation of persons who make reports about potential breaches or investigate or participate in investigations of such reports. Reports may be made through various channels, including the Brambles Speak Up Hotline. The Brambles Speak Up Hotline is a confidential hotline, operated in local languages by an independent, third-party company, available to all employees and their families and all suppliers, suppliers' employees and their families at

no charge 24 hours a day, 7 days a week. Should anyone contacting the Brambles Speak Up Hotline wish, they may make a report anonymously. All complaints are assessed and investigated appropriately, consistent with Brambles’ Speak Up Investigative Procedures.

Supplier Policy

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

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

4. Brambles’ Employees

Brambles employs approximately 12,700 employees globally. All employees are covered by the Brambles Code of Conduct and related policies such as the Human Rights Policy, Zero Harm Charter, Speak Up Policy and Supplier Policy, described above, and are expected to abide by their principles. These principles are reinforced through induction Code of Conduct training and refresher Code of Conduct training, which occurs every two years and most recently at the start of Financial Year 2025, to enable employees to understand what is expected of them and what to do in the event they suspect wrongdoing.

5. Brambles’ Supply Chain

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

In Financial Year 2024, these purchases were made from 67 different countries. Suppliers in the USA received 38% of all spend, and suppliers in the top 10 countries—USA, Mexico, UK, Australia, Spain, Canada, Germany, France, Poland and Italy—received 82% of all spend.

Over 8,000 Suppliers Globally  
USD4.79 billion Total FY24 Spend  
Across 19 Categories  
(Including 15 Indirect Categories)

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

Category		% Of FY24 Total Spend
Direct or Raw Materials		23%
Transportation		31%
Third Party Plant Operators		19%
Asset Recovery		2%
Indirect Procurement <i>including:</i>		25%
• Real Estate	• Marketing	• Fleet
• Plant Equipment	• Learning & Development	• Utilities
• Professional Services	• Office Services	• Travel
• IT and Telecommunications	• Material Handling & Equipment	• Packaging
• Human Resources Services and Resourcing	• Facilities Management	

- Maintenance, Repair & Operation Supplies

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

Brambles relies on sustainably sourced timber, and, in Financial Year 2024, we purchased 100% of our wood from certified sustainable timber providers, whose forest management practices were certified by either the Forest Stewardship Council® FSC®-N004324 (**FSC®**) or the Programme for the Endorsement of Forest Certification PEFC/01-44-79 (**PEFC**) standard (and PEFC endorsed national forest certification systems). Before these certifications can be issued, these timber suppliers must demonstrate that they protect and promote workers' rights and abide by applicable law, amongst other things. To maintain these certifications, the timber suppliers must satisfactorily pass third party audits on an annual basis.

## CASE STUDY: THE TABASCO REGENERATION FORESTRY PROJECT CREATES NEW ECONOMIC OPPORTUNITIES FOR COMMUNITIES IN MEXICO

In the heart of the Tabasco state in Mexico, we are progressing a project which aims to revolutionize our approach to timber procurement and turn our regeneration vision into reality, generating lasting environmental benefits and social value. The project's success is based on our commitment to sustainable forestry, creating reliable, certified timber sources in Mexico, our largest market in LATAM. Through collaboration with local stakeholders in Tabasco, including community landowners, forestry specialists, NGOs and governmental bodies, historical ranching land is being converted back to a forested landscape, creating new economic opportunities, developing skills, and supporting economic stability for local communities.

Indeed, the Tabasco Regeneration Forestry Project transcends basic environmental stewardship; it provides an opportunity to create lasting social value. Collaborating with local farmers and landowners fosters job opportunities and sustainable income streams. For every 10 hectares of reforestation, one new forestry role is created, and one highly skilled Forest Engineer is required for every 500 hectares. It also supports talent development as professional qualifications are required in forestry. And CHEP's agreement to purchase all harvested timber for the next three decades ensures economic stability and protects land ownership rights. This commitment not only sustains Tabasco communities but empowers them to flourish.

## 6. Risks of modern slavery practices in Brambles' operations and supply chains

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

As the RCC and the SRC focus on risks to Brambles, in Financial Year 2020, Brambles also established a Human Rights Working Group (**HRWG**), which is comprised of members from our Human Resources, Procurement, Legal and Compliance, and Sustainability functions, to assess Brambles' potential to cause,



contribute to or be directly linked to Modern Slavery through our operations or supply chains. The HRWG monitors the risks of Modern Slavery through human rights assessments and Brambles’ due diligence programme.

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

Historically, the HRWG, together with the RCCs, the SRC, and each regional business unit and functional group (including the Global Supply Chain team), have identified the most salient Modern Slavery risks in our operations and supply chains. In Financial Year 2024, we reviewed and updated these salient risks to include health and safety:

Health and Safety	Human Trafficking	Forced Labour	Bonded Labour	Child Labour
Where people are denied a safe and healthy working environment	Bringing a person into a situation of exploitation through a series of actions, including deceptive recruitment	Any work which people are not doing voluntarily and which is extracted under a threat or form of punishment	Labour demanded as a means of repayment of a debt or loan	Where children under the age of 18 are engaged in hazardous work

Risks of Modern Slavery: Brambles’ Operations

As previously reported, the risk of Modern Slavery in our own operations is low. This is because the vast majority of Brambles’ personnel are employed directly by a Group Company consistent with a global employment framework that complies, at a minimum, with all local laws, to include minimum wage laws, hours of work and leave entitlements. We periodically review the laws that apply in locations where we operate to ensure we meet these requirements, and if there are any gaps identified, they are remediated immediately. In many aspects, our terms and conditions of employment go beyond what is required by local law to ensure we are respecting and supporting the human rights of employees and providing a safe and fair working environment.

Additionally:

- Our Code of Conduct and related policies set out our values and principles, emphasising Zero Harm and no tolerance for discrimination, harassment, bullying, retaliation or retribution, bribery, corruption or serious worker misconduct;
- All personnel receive regular training, beginning with induction training, on the values and principles set out in the Code of Conduct that are required to be followed by every employee every day;
- Our personnel have the right to engage in collective negotiations with or without the involvement of third parties, such as unions;
- Our Speak Up Hotline offers our personnel a confidential and secure way to report concerns of wrongdoing, in addition to the other means of speaking up that are promoted throughout the Company; and
- We conduct regular assessments and internal audits of our processes and systems and, where issues are identified, take prompt action to remedy them. Amongst these assessments, we periodically review all employee addresses and bank account details to see whether more than one employee resides at the same

address or utilises the same bank account. Where duplicate addresses or bank accounts are identified, we ensure that there is a valid reason for them. We encourage our suppliers to do the same.

For more information about how we ensure respect and support for our people, please see the Workplace Positive section in our 2024 Sustainability Report.

Some of our operations utilise contract or third-party labour in Band 0 positions, our labour and support positions. This contract or third-party labour makes up roughly 24% of our workforce globally:

Region	% Contingent Worker	% Employee	% Total
Asia-Pacific	7.25%	92.75%	100%
Europe	31.29%	68.71%	100%
IMETA	24.97%	75.03%	100%
Latin America	68.75%	31.25%	100%
North America	19.45%	80.55%	100%
<b>Grand Total</b>	<b>24.16%</b>	<b>75.84%</b>	<b>100%</b>

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

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

As a result of this assessment, we believe our highest Modern Slavery risk in our operations is in our service centre operations, where some Band 0 workers are engaged through staffing companies or third-party labour providers which may provide workers from vulnerable populations. In response, and in addition to controls already in place as described on pages 13-16, we have taken action to mitigate this risk. First, we have updated our Third-Party Due Diligence Programme (see the *Policies* section on page 15 below) so that any third party providing such services to our operations undergoes an enhanced form of due diligence, executes compliance terms and conditions, which include Modern Slavery provisions, and confirms it has appropriate recruiting policies or procedures in place to ensure that it operates in line with Brambles' values:

- Workers are not indebted or coerced to work or required to pay to work;
- Workers are free to move, and amongst other things, they are not forced to leave identity papers with the staffing company. (As a matter of policy, Brambles does not take possession of any workers' identity papers, other than as necessary to and for the limited purpose of completing a right to work check, on completion of which they are returned);
- Workers are not under the age of 15 or between the ages of 15 and 18 in hazardous conditions; and
- Workers have the right to enter or terminate their employment freely and without fear of retaliation.

In Financial Year 2024, we completed this enhanced due diligence on 51 existing staffing companies and third-party labour providers.

Second, once a worker, including workers supplied by temporary labour or staffing companies, commences work at a Brambles service centre, our procedures require that they receive regular training, including safety, human rights and Speak Up training, and have or are provided personal protective equipment at no charge.

#### Risks of Modern Slavery: Brambles' Supply Chains

There has been no material change to the risk profile of our supply chains.

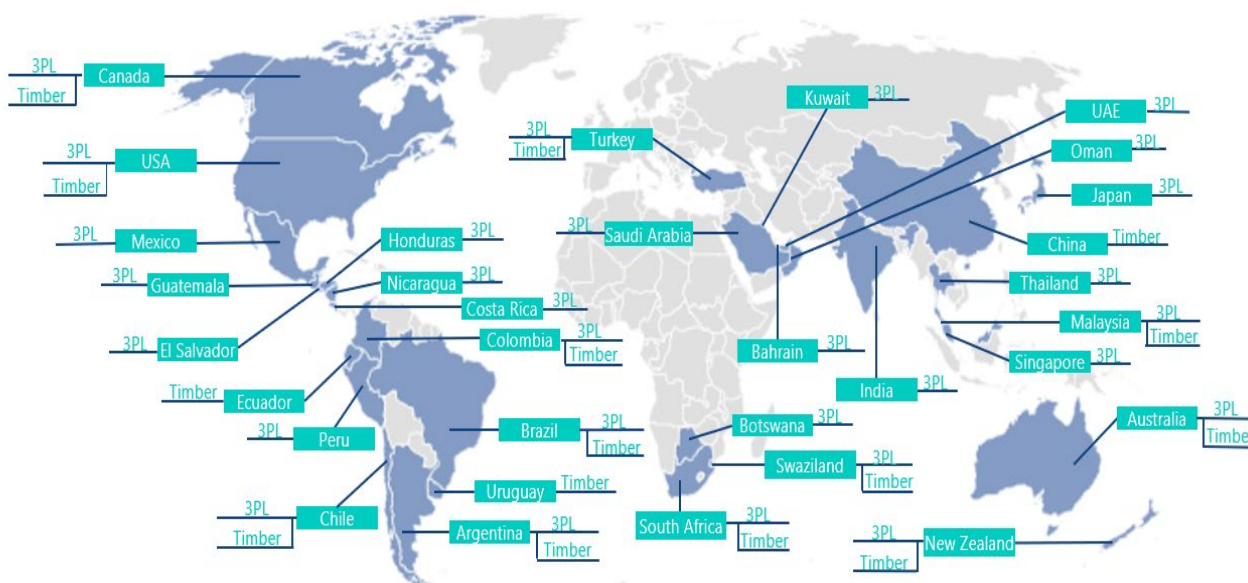
As set forth above, Brambles utilises more than 8,000 suppliers from across the globe, and we regularly work with them to assess whether they are abiding by the principles set out in our Supplier Policy. Many of our suppliers have processes in place for managing their own risks and are open to working with us to meet our standards. Where suppliers may fall short of our standards, we work constructively with them to drive improvement. In instances where suppliers refuse to improve their standards, or object to working with us, we may withdraw from contracts or switch to a new supplier.

We recognize that some of our supplier categories are at higher risk than others for Modern Slavery. As a result, in Financial Year 2024, and after considering the nature of the work provided by the suppliers, their geography, the transparency of their operations and the potential for recruiting processes, we continued to focus on our two highest risk categories of suppliers: timber providers and third-party service centre operators (**3PLs**). As described above, timber providers supply the wood, from FSC® or PEFC or PEFC endorsed local certified sustainable forestry operations, used to build or repair pallets. Third party service centre operators, on the other hand, are third party suppliers who operate some of the plants or service centres where our pallets are repaired or containers are washed. This necessarily requires that they employ and manage service centre workers, some of whom may come from vulnerable populations. We have additional mitigations in place to manage the risks associated with these activities, as outlined below.

Our Financial Year 2024 timber providers and third-party service centre operators are in the countries shown in the three maps below:

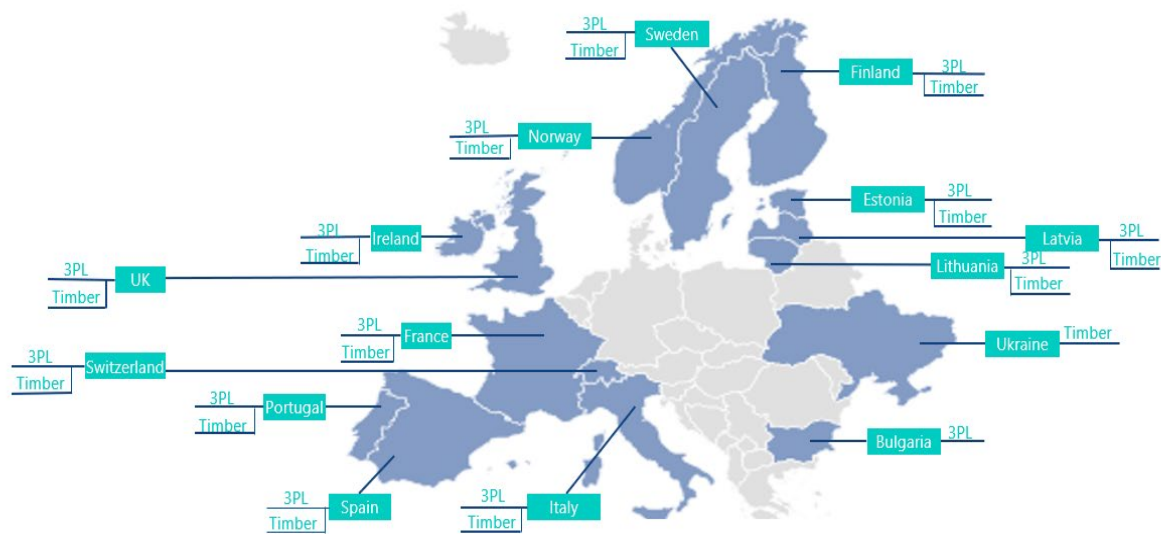
## FY24 Timber Suppliers and Third-Party Plant Operators

### Global (Other than Europe)



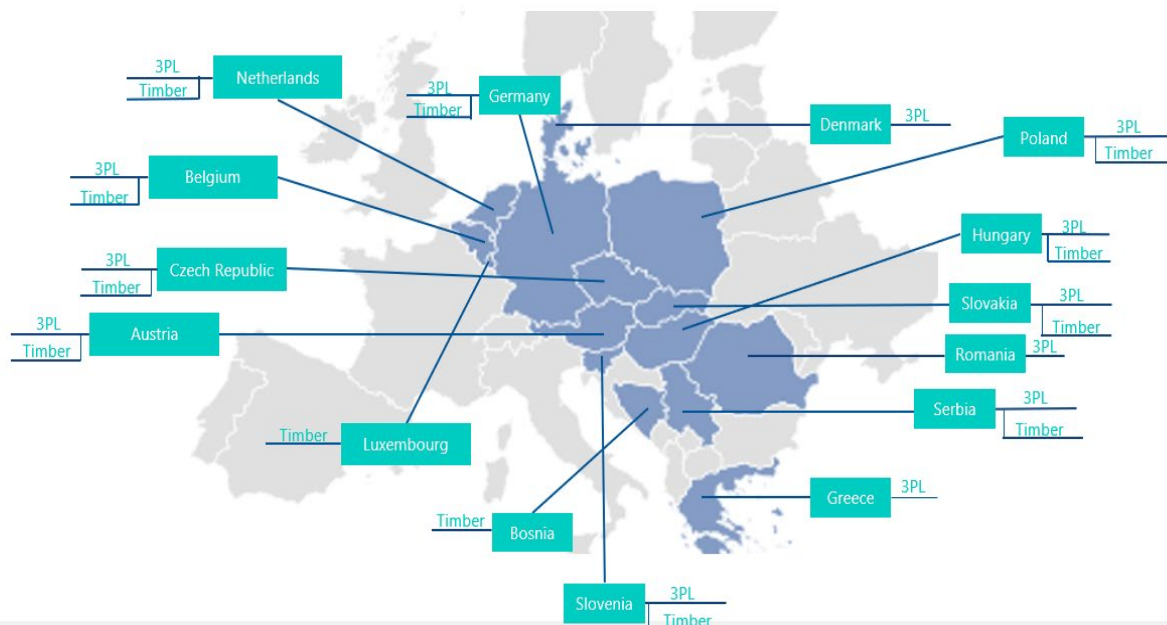
## FY24 Timber Suppliers and Third-Party Plant Operators

Europe (Western and Eastern)



## FY24 Timber Suppliers and Third-Party Plant Operators

Europe (Central and Northern)



### Specific risk mitigations for our timber suppliers

In Financial Year 2024, Brambles engaged or continued to engage timber suppliers (to include timber providers, saw mills and new pallet manufacturers, collectively **timber suppliers**) in 39 countries. All such timber suppliers

have completed enhanced due diligence. This due diligence, together with our desk-based research and input from external stakeholders, produced a Financial Year 2024 assessment that ranked the risk by sourcing country as set out below.

Modern Slavery Timber		
Highest Risk Countries	Moderate Risk Countries	Lower Risk Countries
<ul style="list-style-type: none"> <li>• Bosnia</li> <li>• Colombia</li> <li>• Ecuador</li> <li>• Lithuania</li> <li>• Malaysia</li> <li>• Serbia</li> <li>• Slovakia</li> <li>• Türkiye</li> <li>• Ukraine</li> </ul>	<ul style="list-style-type: none"> <li>• Argentina</li> <li>• Brazil</li> <li>• China</li> <li>• Czech Republic</li> <li>• Estonia</li> <li>• Hungary</li> <li>• Poland</li> <li>• Slovenia</li> </ul>	<ul style="list-style-type: none"> <li>• Australia</li> <li>• Austria</li> <li>• Benelux</li> <li>• Canada</li> <li>• Chile</li> <li>• Finland</li> <li>• France</li> <li>• Germany</li> <li>• Ireland</li> <li>• Italy</li> <li>• Latvia</li> <li>• New Zealand</li> <li>• Norway</li> <li>• Portugal</li> <li>• South Africa</li> <li>• Spain</li> <li>• Swaziland</li> <li>• Sweden</li> <li>• Switzerland</li> <li>• UK</li> <li>• Uruguay</li> <li>• USA</li> </ul>

Approximately 62% of our total Financial Year 2024 timber spend was sourced from the lower risk countries set out above, while approximately 34% was sourced from moderate risk countries. Approximately 4% of our total Financial Year 2024 timber spend was sourced from highest risk countries set out above, down from 29% in Financial Year 2023.

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

In addition to this enhanced due diligence, we have implemented additional mitigating actions so that our timber sourcing programme does not rely exclusively on it or on FSC®, PEFC or PEFC endorsed national forest certification systems to manage Modern Slavery risks. In Financial Year 2024, these actions included:

- Bespoke questionnaires, updated again in Financial Year 2024, to identify Modern Slavery issues when contemplating onboarding any new timber supplier. Where any assessment, intelligence or due diligence highlights a higher risk (such as potentially engaging a new supplier from one of our highest risk countries), or where we are entering a new market, we use local experts and specialists to tailor this review;
- Extended diligence beyond the Tier 1 timber supplier and its practices. Indeed, we identify the forest from which the timber supplier will source its timber as well as any harvesters, transporters or other subcontractors the timber supplier may use to source the timber so that we can develop a supply chain map, examine the record and risks, implement mitigants as necessary and then monitor. As part of this extended due diligence, we place special emphasis on the treatment of migrant workers as the risk of Modern Slavery is higher among this group because the workers may be less educated, less familiar with workplace laws and less proficient in local languages. Migrant workers may be even more vulnerable because they are separated from their family support structure and may have concerns about employment security and its impact on their visa or immigration status;



- Ongoing monitoring, which may include audits, and support for the remediation of any nonconformities identified during the audits. In Financial Year 2024, 3 timber suppliers completed such audits;
- Site visits at our higher risk timber suppliers. These visits give us the opportunity to see the timber suppliers' practices in real-time, address any issues while on site, and deliver training on Brambles' Supplier Policy. In Financial Year 2024, we carried out more than 15 such site visits;
- Supported the remediation of identified non-conformities during audits and site visits;
- Updated agreements to require, amongst other things, that higher risk timber suppliers undergo periodic onsite audits independent of FSC®, PEFC or PEFC endorsed national forest certification systems audits, and make available their supply chain to due diligence and monitoring; and
- Collaborative approaches through an in-person Supplier Conference, where family-owned and small to medium-sized timber suppliers were reminded of the risk of Modern Slavery, Brambles' commitment to its eradication was made clear, and the development of written policies and implementation of good governance practices was encouraged.

### Specific risk mitigations for our third-party service centre operators

We also carry out enhanced due diligence on third party service centre operators. As part of this enhanced due diligence, we place special emphasis on the treatment of low-skilled and migrant workers.

To evaluate the risks related to Modern Slavery at service centres managed by third party suppliers, we analyse indicators such as location and the use of third-party agents to recruit or manage workers. In those cases where we identify heightened risk, we ask that the third-party service centre operators make specific representations acknowledging conformance with Brambles' standards related to the protection of vulnerable populations.

In addition to these representations, we implemented additional actions in Financial Year 2024 to mitigate against the risk of Modern Slavery in our third party service centre environment:

- Training of our operations team members in the US and IMET who regularly visit third party service centres to increase awareness of human rights and Modern Slavery risks;
- Designing and implementing an ongoing monitoring programme, starting with localised salient Modern Slavery issue assessments in the USA, IMET and Southeast Asia. Similar issue assessments will be carried out in Africa and LATAM in Financial Year 2025;
- Using these assessments, identifying our higher risk third-party operated service centres. 13 of the highest risk service centres then completed SEDEX Members Ethical Trade Audits (**SMETA**) in Financial Year 2024, while 17 other service centres were inspected by Brambles' employees. This audit and inspection process will be launched in Sub-Saharan Africa, LATAM, and Canada in Financial Year 2025;
- Developing a detailed human rights questionnaire to be used by Brambles' employees during on-site inspections. As part of these inspections, we speak directly with local workers to gather their feedback and input; and
- Supporting the remediation of identified non-conformities during audits and inspections.

## 7. Actions to assess and address the risks of modern slavery

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

### Policies

We have implemented a comprehensive suite of policies and procedures that set out the ethical and legal framework in which we operate, ensuring that we build a more sustainable future consistent with our shared values and that we act with integrity and respect for our people, our supply chains, the environment and the

communities in which we do business. The following are the most relevant to preventing or mitigating the risk of Modern Slavery in our own operations and in our supply chains:

Policy	Description
Code of Conduct	Applies to all employees, outlining our core values and standards for how we do business. It reflects our commitment to act with the highest standards of integrity and ethical conduct
Human Rights Policy	Prohibits the use of child labour, forced, bonded or compulsory labour, human trafficking or other kinds of slavery in Brambles' operations and supply chains
Zero Harm Charter	Establishes Brambles' commitment to achieving zero injuries, zero environmental damage and zero detrimental impact on human rights
Corporate Social Responsibility Policy	Outlines Brambles' commitment to providing a safe working environment for all workers and to engaging suppliers which comply with applicable laws, including all applicable labour, employment, human rights, wages and working hours, environmental and health and safety laws
Diversity Policy	Recognises the importance of inclusion, equity and diversity throughout Brambles' operations
Global Dignity at Work Policy	Establishes Brambles' commitment to creating a work environment free from harassment, bullying and victimisation and ensuring all workers are treated, and treat others, with dignity and respect
Anti-bribery and Anti-corruption Policy	Sets out our commitment to complying with anti-bribery and anti-corruption laws and regulations in the countries in which we do business
Third Party Due Diligence Standard Operating Procedures	Establishes risk-based due diligence procedures that must be followed before new suppliers are onboarded
Timber Due Diligence Standard Operating Procedures	Establishes specific procedures that must be followed when engaging timber providers, including the review of human rights practices
Procurement Policy	Sets out our expectations for ethical and responsible sourcing
Speak Up Policy and Investigative Procedures	Establish ways to raise concerns of wrongdoing, including human rights concerns, without fear of retaliation or retribution

## Training

Brambles' mandatory 'Know the Code' training module is designed to help our employees understand the underlying principles set out in the Code of Conduct. This module includes a chapter devoted to human rights, offering specific guidance on how to identify and report suspicions of child labour and forced, bonded or compulsory labour, human trafficking or other kinds of slavery. This mandatory 'Know the Code' training module is assigned to all employees during their induction and during bi-annual refresher trainings. The most recent refresher training, which included a chapter devoted to human rights and the warning signs of forced labour, took place at the start of Financial Year 2025. More than 99% of all Brambles' employees globally completed this training.

Moreover, in Financial Year 2024, Brambles launched a mandatory Speak Up training module to all office-based employees. 99% of all employees who were assigned this course completed it.

Finally, our supply chain operations and procurement employees must complete periodic targeted training, covering myriad topics on human rights and responsible sourcing. For example, targeted refresher human rights training was delivered to supply chain operations employees in the USA and IMET in Financial Year 2024.

## Internal Audits

Brambles' risk management programme, described above, is supported by the Company's Internal Audit function. This function, which operates independently from the lines of business, carries out audits, including

audits on our human rights programme. The last such audit of the human rights programme took place in Financial Year 2023.

### Due Diligence and Supplier Acknowledgments

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

High risk suppliers are asked to sign Brambles' compliance terms and conditions (see below) and certify compliance with, amongst others, Brambles' prohibition of child labour, forced, bonded or compulsory labour, human trafficking or other kinds of slavery. In Financial Year 2024, this certification was via a Supplier Acknowledgment Form which, amongst other things, asked suppliers to acknowledge that they "prohibit forced and child labour in [their] workforce and in those of [their] company's suppliers." It also asked them to acknowledge that they have reviewed and understood Brambles' Supplier Policy and Zero Harm Charter and that they will abide by the principles set out in both documents (as well as applicable laws and regulations) and required that their employees and suppliers do the same. In Financial Year 2024, 99% of all high-risk suppliers signed the Supplier Acknowledgment Form.

In Financial Year 2024, we completed due diligence on **834** suppliers.

Of these 834 suppliers, **112** completed enhanced due diligence, which required that they complete detailed questionnaires about their human rights policies and procedures.

We continued to update our Third-Party Due Diligence Programme in Financial Year 2024. Indeed, as we have completed enhanced due diligence on existing high-risk suppliers from timber to labour to third party plant operators and received audit reports from some of these high-risk suppliers, we updated our programme to target existing transportation suppliers.

### Compliance Terms and Conditions

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

### Site Visits

We visit and inspect suppliers and potential suppliers, particularly timber and third-party plant operators, during which, amongst other things, we meet with local workers to gather their thoughts and feedback and to assess compliance with the requirements outlined above. In Financial Year 2024, we carried out more than 15 visits at timber suppliers and 17 at third party plant operators.

While we recognize that these visits and inspections will not eliminate the risk of Modern Slavery, they do help us to identify issues which may require further action. Indeed, during one site visit in Financial Year 2024, we discovered that one third party plant operator in the Middle East was holding passports belonging to its foreign workers. Our team immediately raised this issue with the third party's management team, and the management team agreed to return the passports. We have since confirmed that the passports have been returned, and we are continuing to monitor the third party plant to ensure its practices do not revert.

### Risk Assessments and Third-Party Audits

As part of our assessment programme, certain suppliers (e.g., those that are higher risk because of their industry, reputation, location or because of their use of vulnerable populations in work linked to our business relationship) are required to complete an audit carried out by an independent third party or certified auditor, which examines their adherence to Brambles' Supplier Policy and other standards related to Modern Slavery. We recognize that findings of non-conformities following such an audit do not necessarily mean that forced labour

has occurred. Rather, they may simply suggest that the supplier lacks the necessary policies, procedures or controls to prevent such an occurrence.

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

In Financial Year 2024, we completed SMETA audits of 16 higher-risk suppliers. None of these audits raised priority findings associated with Modern Slavery. However, each identified opportunities to improve, and we are now working with the suppliers to ensure that appropriate and remedial measures are implemented.

### Annual Supplier Certification

In Financial Year 2024, Brambles launched its second Annual Supplier Certification, asking existing suppliers to certify that they are aware of, and continue to comply with, the principles set out in Brambles' Supplier Policy.

### Ethics and Compliance Survey

In addition to the programmes described above, we distribute ethics and compliance surveys to our office-based employees and, for the first-time in Financial Year 2024, our plant-based employees in the USA and the UK, seeking their input and feedback on the ways in which we address and respect human rights within the workplace.

## 8. Assessing the effectiveness of our actions

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

### KPIs

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

- Review the number of employees who have completed Code of Conduct and targeted human rights training;
- Review and assess the number of suppliers identified as being high, medium or low risk consistent with Brambles' Third-Party Due Diligence Programme;
- Review and track the implementation of any controls required because of the Third-Party Due Diligence Programme;
- Review the number of completed Supplier Acknowledgment Forms;
- Review and assess the responses from supplier due diligence questionnaires in relation to Modern Slavery and other human rights practices;
- Review and assess the number of Brambles and supplier sites physically inspected for human rights risks, the number of non-compliances identified, and steps or actions taken to remediate; and
- Review and assess the number of Speak Up complaints received, the findings and the resulting actions.

### Speak Up

In Financial Year 2024, we received 189 Speak Up complaints through our Speak Up Hotline. With respect to our own operations, none were associated with Modern Slavery risks.

We also received 5 Speak Up complaints through our Speak Up Hotline from individuals who worked (or previously worked) for a supplier. Although none were associated with Modern Slavery risks, we relayed the complaints to the suppliers and tracked their investigation to ensure that appropriate actions were taken.

### Audits and Self Assessments

Brambles is a member of SEDEX, which promotes improvements in ethical and responsible business practices. Brambles also participates in Ecovadis, an organisation which provides supplier sustainability ratings. Brambles' sites undergo SMETA audits, and several business units complete Ecovadis' independent corporate social responsibility assessments on a regular basis.

Brambles tracks the results of each audit and assessment, ensuring that where opportunities for improvement are identified, they are appropriately actioned.

## 9. Looking forward

Brambles is committed to identifying, assessing and addressing Modern Slavery risks in our own operations and in our supply chains. To that end, we will review and update, as necessary, our relevant policies, continue identifying and carrying out enhanced due diligence on our high-risk suppliers, strengthen our assessment programme and raise awareness around Modern Slavery through targeted training. To address each of these areas, over the course of Financial Year 2025, we have and will take the following actions:

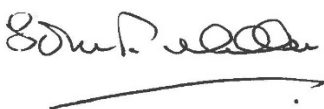
- Delivering targeted human rights training to procurement, supply chain and human resources teams;
- Reviewing and updating the Supplier Policy so that it stands alone as a Supplier Code of Conduct;
- Continuing to carry out due diligence on carriers and transportation companies;
- Carrying out localised salient Modern Slavery issue assessments in Africa, LATAM and Canada and launching standard operating procedures to mitigate against the risk of modern slavery in third party service centre operations across Africa, LATAM and Canada;
- Expanding our supply chain mapping and corresponding human rights monitoring programmes to additional supplier categories (other than timber, staffing companies, third-party plant operators and transporters); and
- Hosting a second virtual supplier academy in Financial Year 2025, where suppliers will again be invited to attend to learn more about Brambles' expectations of all suppliers as set out by the principles, including the human rights principles, set out in the Supplier Policy. While this training will cover all topics in the Supplier Policy, emphasis will be placed on human rights and Modern Slavery.

## 10. Consultation with our Group companies

Throughout Financial Year 2024, all areas of our business, including Sustainability, Human Resources, Procurement, Supply Chain, and Ethics and Compliance teams, have held ongoing engagement, consultation and input on Brambles' response to Modern Slavery. This engagement facilitated the preparation of this Statement as well as the identification, assessment and management of Modern Slavery risk across our business.

The Australian and regional leadership teams in Asia Pacific, Europe, North America, Latin America and India, Middle East, Türkiye, and Africa have endorsed their participation in this Statement prepared on their behalf, and they have reviewed and approved the final draft Statement before its publication.

This Statement is made pursuant to the Australian *Modern Slavery Act 2018* (Cth) and section 54 of the UK *Modern Slavery Act 2015* and has been approved by the Board of Directors of Brambles Limited on 12 November 2024.



John Mullen  
Chair  
Brambles Limited



## Annexure A

### List of UK Entities

- Brambles Investment Limited
- BIP Industries Limited
- CHEP Equipment Pooling BV (UK Branch)
- Brambles Finance plc
- Brambles U.K. Limited
- Rail Car Services Limited
- Wrekin Roadways Limited
- Brambles Holdings (UK) Limited
- Polybulk Limited
- BXB Digital Limited
- Brambles Nominees Limited
- Cyan Logistics Limited
- Brambles Enterprises Limited
- CHEP UK Limited