



2020 Modern Slavery Statement

Samuel Smith & Son Pty Ltd is committed to protecting human rights and preventing modern slavery in all its forms, including forced labour and human trafficking across its business activities and global supply chain.

About Samuel Smith & Son Pty Ltd

Established in 1849 by migrant and English brewer Samuel Smith, *Samuel Smith & Son* trading as Yalumba. Six generations and 170 years later, Yalumba is Australia's oldest family-owned winery and is a well-respected fine wine merchant with a rich and diverse portfolio of globally recognised brands.

The company's operational structure comprises over 1000 hectares of vineyards, as well as four wineries, in South Australia, Tasmania and New Zealand; sales and distribution teams throughout Australia, New Zealand, and a global network of distribution partners selling our wine in more than 52 international markets.

The three key business activities include:

1. Grape growing and sourcing

SS&S sources grapes from both company-owned and grower vineyards.

2. Wine production and packaging

SS&S produces wine at its own production facilities in Australia and NZ, as well as providing both third party contract processing and packaging services.

3. Wine marketing, sales and distribution

SS&S markets, sells and distributes its wines, and the wines of other producers, globally.

Reporting entities covered by this statement:

Samuel Smith & Son Pty Ltd

Negociants International Pty Ltd

S. Smith & Son Pty Ltd

S. Smith & Son Processing Pty Ltd



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DALRYMPLE VINEYARDS · EARTHWORKS · HEGGIES VINEYARD · HILL-SMITH ESTATE · JANSZ TASMANIA · NAUTILUS ESTATE
OPAWA · OXFORD LANDING ESTATES · PEWSEY VALE VINEYARD · RUNNING WITH BULLS · SMITH & HOOPER · YALUMBA

Assessing the Risks

Operations

The majority of our workforce is employed directly on permanent, casual or fixed term contracts. Our employment complies with local laws and covers core employment conditions such as minimum wages, hours of work and leave entitlements. We have a small component of indirect labour hire through third party labour providers, including third party agricultural labour services.

Forced labour and exploitation of seasonal and migrant workers in agricultural supply chains has been documented in Australia (Australian Government March 2019 Report of the Migrant Workers' Taskforce) and around the world. As such, for the services we engage, commercial contracts are in place which expressly state our requirements that any contractor provided is engaged in accordance with local statutory employment requirements.

Supply chain

Our supply chain includes:

- Wine businesses from Australia and around the world (including Argentina, Chile, France, Italy, New Zealand, Portugal, South Africa, Spain, and USA);
- Packaging materials and dry goods (glass, closures, cartons); plant and equipment (from Australia, various European countries, and China);
- Indirect service suppliers (marketing, legal, corporate and consulting services).

Detailed risk assessment work will be undertaken in FY21 to develop our understanding of modern slavery risks in our operations and our supply chain.

Risk mitigation and remediation

Policy Framework

Our existing policies and procedures articulate our values, ways of working and expectations of employees. This framework ensures that employees clearly understand their role in upholding these values.

The Yalumba Charter

The Yalumba Charter lays down guidelines for the company's expectations of integrity, honesty, and fairness in all dealings with our customers and with each other:

"We uphold the values that come with Hill-Smith family ownership – integrity, respect, honesty and sincerity."

Code of Conduct

The Code of Conduct outlines our expectation of employees to conduct themselves and their business at the highest standards and behave in an ethical and responsible manner.

Failure to abide by the Code of Conduct may constitute a disciplinary offence and can result in termination of employment.

Whistle-blower Policy

Adopted to ensure that people can raise concerns regarding actual or suspected contravention of our ethical standards or the law without fear of reprisal or feeling threatened by doing so. The Policy is supported by a confidential whistle-blower service, which is maintained by an external provider.

Matters raised under the Whistle-blower Policy are periodically reported to the Board through the Risk and Audit Committee. In addition, the Board is informed of any material incidents raised for the purposes of maintaining good corporate governance. All issues are resolved by way of investigation and action as required.

Diversity Policy

Outlines our aim to create a diverse workforce and defines the expectation of employees, suppliers and customers in upholding our diversity commitments.

Fair Treatment Statement

Defines that everyone has the right to expect a work environment free of harassment and bullying. All employees have received training to understand what actions, conduct or behaviour is unacceptable in the workplace to ensure we have a safe and inclusive work environment.

Safety and Injury Management Policy

This policy outlines our commitment to provide a safe work environment for all employees, contractors, and visitors. Our systematic approach to managing safety aims to prevent injury, based on a continuous improvement approach to hazard identification and risk management.

Employee Assistance Program

The Employee Assistance Program (EAP) is a professional counselling service that offers confidential, short-term support for a variety of issues. The service is available to employees and their immediate families. The program is voluntary, and easy to access, with support available for personal and work-related issues including performance, dealing with grief, stress management and financial counselling.

Risk Management Framework

The Risk and Audit Committee (RAC) oversee and manage all elements of risk related to the company operations and supply chain.

The major focus for the RAC is a commitment to the effective management of risk to reduce uncertainty in the company's business outcomes.

Training and Communication

All executive management, senior leaders and employees are aware of and understand the policies which reflect the company's commitment to promote ethical and responsible behaviour.

Procurement Code & Supplier Standards

We have identified via the development of this statement and assessing our modern slavery risks, that we need to formalise our procurement processes and include modern slavery compliance clauses in contract templates (where appropriate).

Supplier Standards also to be developed to define our expectations that suppliers conduct business in accordance with the highest ethical standards; uphold basic human rights; ensure health and safety of workers; and manage and reduce environmental impact.

Assessing Effectiveness

We conduct regular reviews and assessments of the effectiveness of policies, codes and processes as part of our risk management framework.

The Board governs the company, and its responsibilities include actively promoting ethical and responsible decision making within the business. The Risk & Audit Committee assists the Board in overseeing the processes used by management to monitor and ensure compliance with laws, regulations and other requirements.

Consultation and approval process

The SS&S Board, as well as its Risk and Audit Committee retain oversight of our human rights and modern slavery risks through our risk management framework.

Next Steps

SS&S is committed to continuously improving the practices, procedures and relevant education related to human rights and modern slavery to support its prevention.

During FY21, SS&S will:

- Undertake a detailed human rights impact assessment to identify actual and potential impacts to human rights within our operations and supply chain.
- Develop and implement the Procurement Code and Supplier Standards mentioned above.
- Continue to update core policies and processes to reflect our commitment to upholding human rights.
- Continue to build expertise of our people especially those that work directly with third parties and rely on contractors in their workforce, so as to better identify and act on indications of modern slavery.

This statement was approved by the Board of Directors of Samuel Smith & Son Pty Ltd on 28 June 2021.



Nick Waterman
Managing Director
28 June 2021