

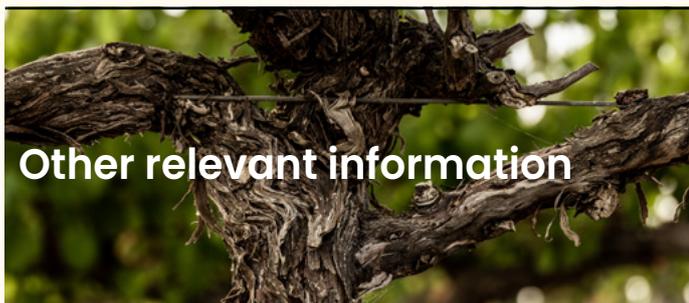


TREASURY  
WINE ESTATES

# 2023 Statement on Human Rights & Modern Slavery



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## Important information

This report is in summary form and is not necessarily complete. It should be read together with the Company's other announcements lodged with the Australian Securities Exchange, including the 2023 Sustainability Report, which are available at [www.asx.com.au](http://www.asx.com.au).

This report contains information that is based on projected and/or estimated expectations, assumptions, or outcomes. Forward-looking statements are subject to a range of risk factors. Forward-looking statements can generally be identified by the use of forward-looking words such as, 'expect', 'anticipate', 'likely', 'intend', 'could', 'may', 'predict', 'plan', 'propose', 'will', 'believe', 'forecast', 'estimate', 'target', 'outlook', 'guidance', 'goal', 'ambition' and other similar expressions. The Company cautions against reliance on any forward-looking statements, particularly in light of the constantly evolving policy environment across our operating markets, shifting consumer preferences and priorities, uncertainty as to the rate of development and adoption of related technology, the outcomes of future innovation, and the inability to accurately predict the future climate and its impacts on our operations as well as stakeholder responses.

At the date of this report, the Company believes that there are reasonable grounds for these forward-looking statements. While the Company has prepared this information with due care based on its current knowledge and understanding and in good faith, there are risks uncertainties and other factors beyond the Company's control which could cause results to differ from projections. The Company will not be liable for the correctness and/or accuracy of the information, nor any differences between the information provided and actual outcomes and reserves the right to change its projections from time to time. The Company undertakes no obligation to update any forward-looking statement to reflect events or circumstances after the date of this report, subject to disclosure obligations under the applicable law and ASX listing rules.

Information in the report is current as at 30 June 2023 unless otherwise stated. References to 'TWE', 'Company', 'we', 'us' and 'our' are to Treasury Wine Estates Limited and/or, except where the context otherwise requires, its subsidiaries. All currency referred to in the Report is in Australian dollars, unless otherwise stated.



# About Treasury Wine Estates

# Introduction

Treasury Wine Estates Limited (TWE) is committed to respecting and protecting human rights. We seek to prevent modern slavery in all its forms across our operations and global supply chain.

At TWE, we believe that human rights recognise the inherent value of each person and encompass the basic freedoms and protections that belong to all of us, and that our business, people, and communities can only thrive when human rights are safeguarded.

We endeavour to respect and uphold the human rights of our people and everyone who touches our business, either directly or indirectly.

TWE acknowledges that addressing modern slavery and protecting human rights requires an ongoing commitment to undertaking due diligence across our operations and through our supply chain to build a more comprehensive understanding of human rights and modern slavery risks.

TWE is committed to continuous improvement in this area, and ensuring that our processes, systems, and interventions are as effective as possible in preventing and remediating modern slavery and protecting human rights. We remain a committed member of the United Nations Global Compact and seek to drive progress towards the future we want through responding to our priority Sustainable Development Goals (UN SDGs).

TWE's 2023 Statement on Human Rights and Modern Slavery (Statement) sets out the actions taken by TWE and our reporting entities to understand, mitigate, and address human rights and modern slavery risks for the financial year 1 July 2022 to 30 June 2023 (F23).

This Statement has been approved by TWE's Board on 5 December 2023 and is publicly available via the homepage of the Company's website at [www.tweglobal.com](http://www.tweglobal.com).



**Tim Ford**  
Chief Executive Officer  
5 December 2023



**John Mullen**  
Chairman  
5 December 2023



## Key milestones

In F23, we did not identify any instances of modern slavery in our operations or supply chain.

During F23, TWE:

- Achieved an engagement score of 71% and inclusion score of 75% in our annual employee engagement survey
- Continued employee education and awareness of human rights with 98% completion by eligible employees
- Assessed a further 675 of our suppliers for their ethical, social, and environmental performance
- Increased overall female representation to 42.7% (+0.8%)
- Continued to deliver against our \$1.4bn sustainability linked loan, which is delivering financial incentives as we progress towards a number of sustainability commitments including our gender representation targets.



## Reporting entities

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The following reporting entities are covered by the 2023 Human Rights and Modern Slavery Statement:

- Treasury Wine Estates Ltd
- Treasury Wine Estates Vintners Ltd
- Treasury Wine Estates Australia Ltd
- Penfolds Wines International Ltd
- Penfolds Wines Australia Pty Ltd
- Treasury Wine Estates (UK) Holding Co Pty Ltd
- Wolf Blass Wines Pty Ltd
- Bilyara Vineyards Pty Ltd
- Aldershot Nominees Pty Ltd
- Treasury Wine Estates (NZ) Holding Co Pty Ltd.

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Treasury Wine Estates Limited and each of our wholly owned subsidiaries operate as one corporate group with central management and control functions. As a result, each of Treasury Wine Estates Limited's wholly owned subsidiaries adhere to group wide policies and procedures and all sustainability (or ESG) risks are reported on and monitored centrally.

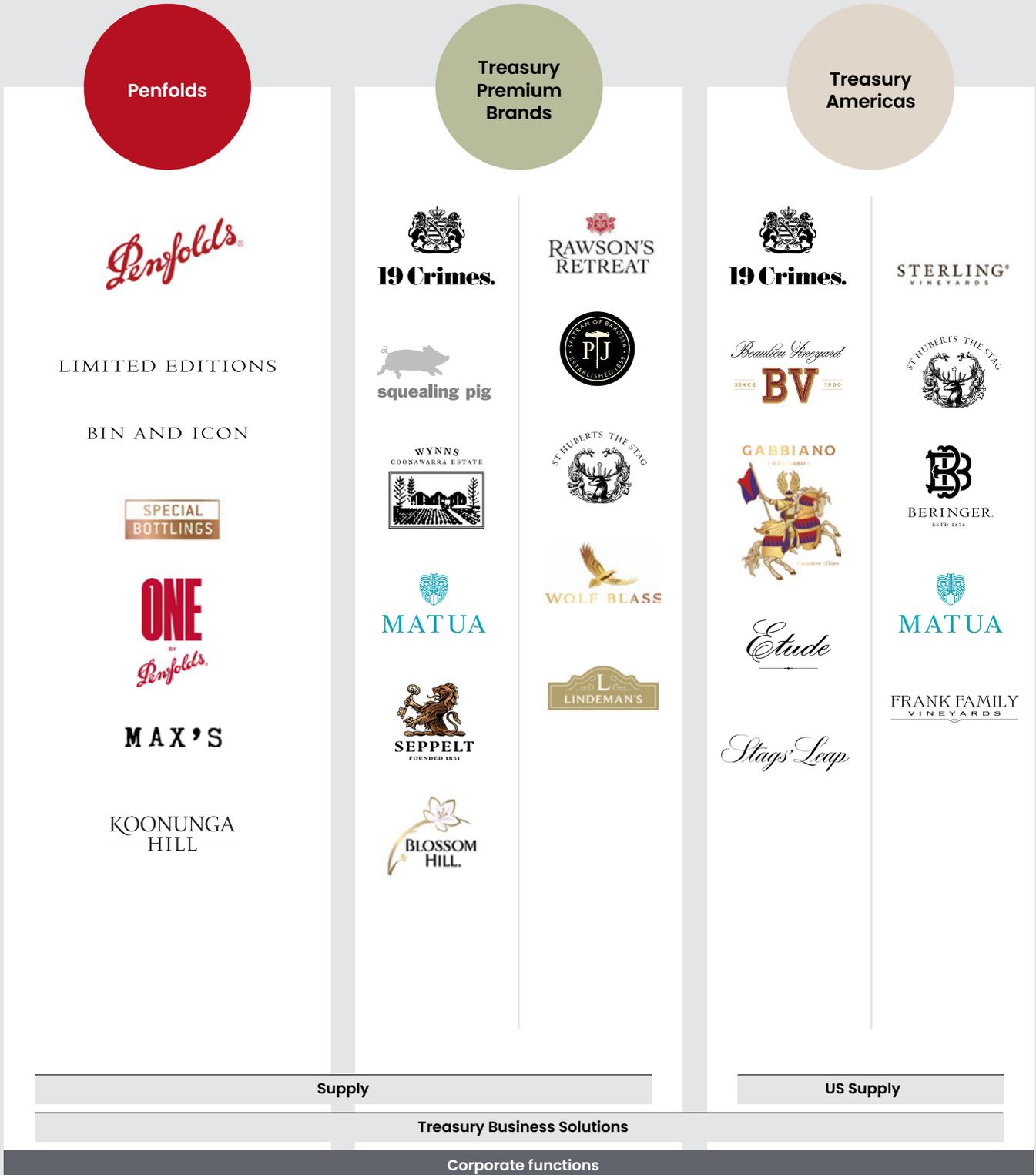
We have reviewed and determined that no TWE investments currently meet the reporting threshold. Nonetheless, we continue to engage several of these investments to ensure they are aware of the issue of modern slavery as well what steps TWE is taking to manage the risk.

Further details on the Company's trading names, operating structure and joint ventures are outlined in detail in our 2023 Annual Report.



# Our operating model

Focus and accountability to unlock our long-term growth potential



## Our business

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TWE is a premium focused, global leader in wine, listed on the Australian Securities Exchange (ASX).

Our iconic wines are loved by consumers around the world and are available in major retailers, premium wine stores, restaurants, bars, and online.

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TWE is a vertically integrated wine business that employs 2,500 team members focused on three principal activities:

- Grape growing and sourcing
- Wine production
- Wine marketing, sales and distribution.

### Wine production

TWE owns world-class wine production and packaging facilities. In Australia, TWE owns and operates seven wineries and one packaging facility, with wines primarily produced in South Australia and Victoria. In New Zealand, TWE owns one winery in the Marlborough. In the US, TWE has seven wineries and one packaging facility in California's North and Central Coast regions. In Europe, TWE owns one winery in Italy and three wineries in France.

### Marketing, selling and distribution

TWE generates revenues and profits from the production, marketing, and sale of its portfolios of branded wine in more than 70 countries, with its route-to-market model reflecting regional insights and opportunities.

The Company has taken deliberate action to embed greater balance across its regional earnings mix and sourcing models.

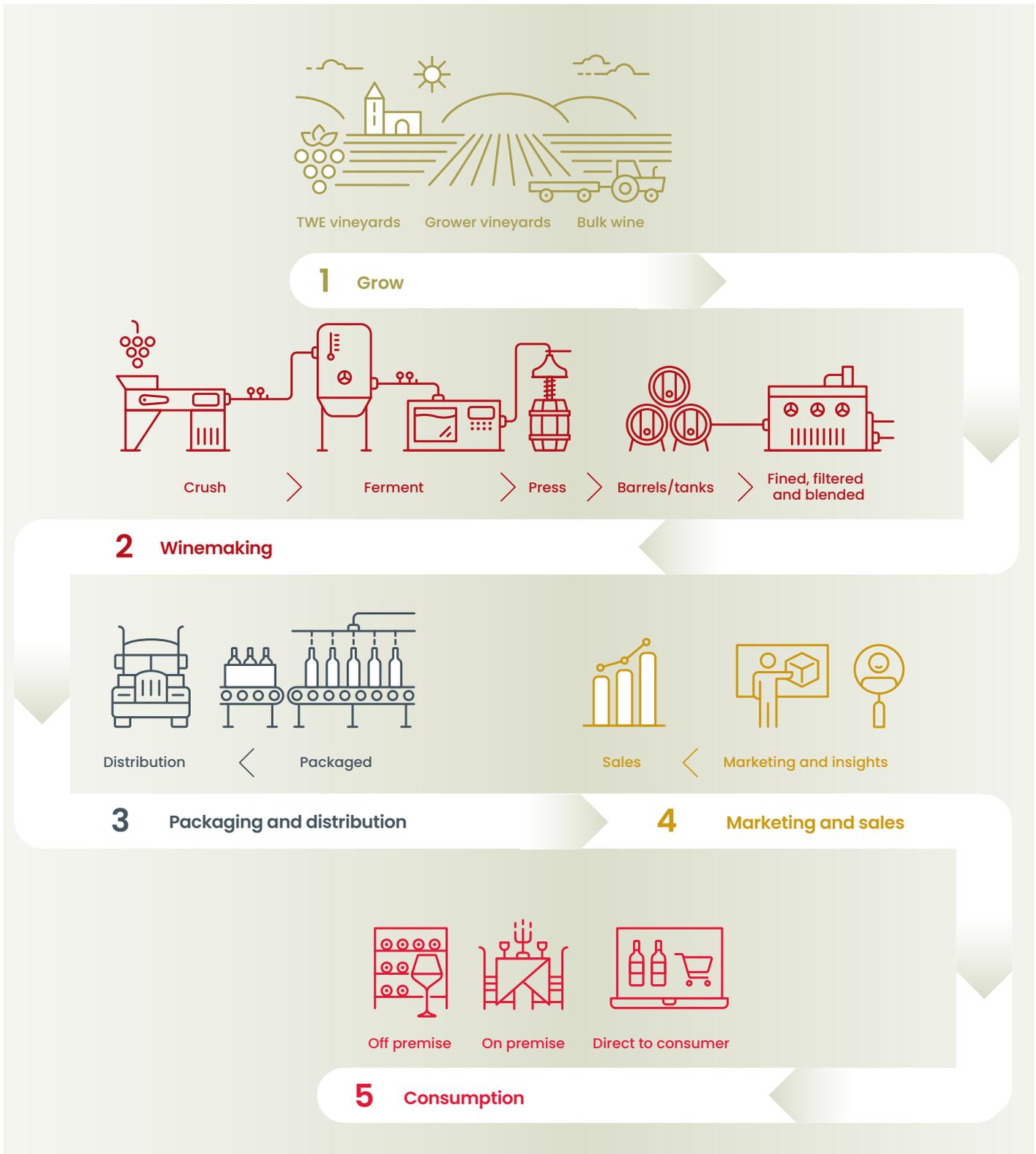
TWE's profitability continues to be increasingly driven by the high-growth luxury and premium segments, as well as improved profitability across all segments.



# Our value chain

Our business connects with people, communities, ecosystems, and businesses from around the world. This means that our economic, social, and environmental impacts extend beyond our own operations and our direct control.

As a business we believe in meaningful, long-term partnerships and networks that use the size and scale of our business to make positive change across our material areas of the business, and broader stakeholder groups. This means making connections across our value chain, from the producers and manufacturers which supply us with raw materials, all the way to our customers and consumers.



## Governance

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TWE believes that transparent and robust governance practices are critical to delivering value to shareholders, promoting investor confidence, and meeting our ambition of being the world's most admired premium wine Company.

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At the heart of our business is the TWE Code of Conduct, our TWE ambition of being the world's most admired premium wine company, and our DNA. Each have at their core a focus on doing business the right way and TWE's responsibility to compete for business openly, honestly, fairly and with the highest ethical standards and internationally proclaimed human rights. This thinking has been woven into our performance appraisal, goal setting and development goals across the organisation.

TWE's approach to compliance management is articulated in our Compliance Management Policy (CMP) and underpinned by our Compliance Management Framework (CMF). This governance structure is informed by ISO Standard ISO 37301:2021 – Compliance management systems – Requirements with guidance for use and applies to the TWE Group. The CMF governs a portfolio of 17 key compliance areas, one of which is specific to Human Rights & Modern Slavery. Each compliance area is owned by a member of senior management who acts as a compliance champion across the business globally. Group Compliance oversees the areas' alignment with the CMF and periodically reports on their performance to the Risk, Compliance and Governance Committee (RCGC) and Audit and Risk Committee (ARC).

Because of TWE's global footprint, our operations are subject to legal requirements set out by multiple national and local laws and regulations. TWE has defined Group policies and Group standards that must be complied with regardless of location. Where local laws or regulations mandate additional or stricter requirements than those established by Group policies and Group standards, TWE must ensure compliance with the local requirements in the relevant market in addition to or instead of internal Group requirements.



# Governance

TWE's governance structure ensures that the Board, with assistance from the Wine Operations and Sustainability Committee (WOSC), oversees TWE's approach and management of Environmental, Social and Governance (ESG) matters.



The Board and the WOSC also have oversight of the Company's key ESG disclosures, including this Statement on Human Rights and Modern Slavery and the Board approved Sustainability Report. The governance structure of sustainability at TWE is represented above.

TWE's governance practices provide for continuous monitoring and reporting of non-financial risks across the organisation. Regular reporting is conducted on a range of topics including Inclusion, Equity and Diversity, Code of Conduct breaches, Whistleblower reports, litigation and compliance, anti-bribery and corruption matters, HSE performance, internal audit outcomes, and private sessions with internal and external audit. These reports

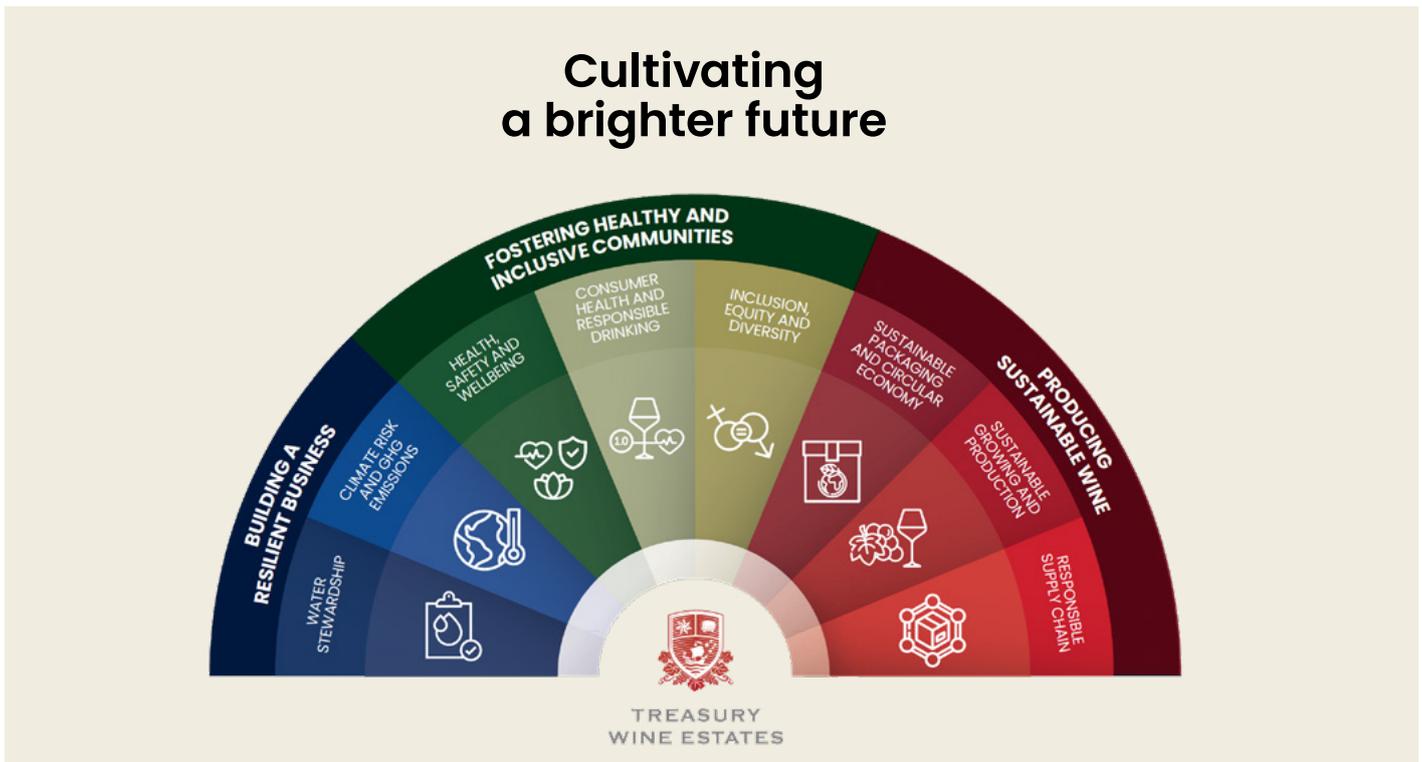
extend beyond management level and are submitted to the Board bi-annually. In addition, our Executive Leadership Team (ELT) are expected to actively support the delivery of our sustainability commitments, including those related to responsible supply chain and Inclusion, equity and diversity commitments. This key performance objective directly influences remuneration outcomes.

A cross functional working group has been formed to help raise awareness and drive organisational alignment on human rights issues.

# Sustainability strategy

Our sustainability strategy reflects the areas where we can make the greatest impact. We have aligned our efforts with those identified by the UN SDGs and continue to work towards responding to pressing global issues across different ESG themes.

Our agenda responds to eight material topics which are captured in three focus areas. We must play a part in shaping a positive future for everyone who is connected to our business – from grape to glass – and continue to drive positive outcomes across the natural environment and society.



## Materiality

Materiality is a stakeholder-led process that identifies the ESG issues and associated risk, opportunity, and impact for an organisation. In F23 we updated our materiality assessment to reflect emerging issues, megatrends and the changes that have occurred within TWE's operating environment since our previous assessment, which was conducted in F21. The refreshed assessment included a range of areas such as the global action to protect nature, the elevated need for transparency, the deteriorating global economic conditions (notably inflation and cost of living

pressures), an attitudinal shift towards alcohol, and changing labour markets and global supply chain disruption.

The review confirmed the importance of 'Responsible Supply Chain' which incorporates our consideration of a range of social (e.g. employment practices, labour conditions and human rights) and environmental impacts (e.g. greenhouse gases, water, efficiency) in the supply chain.

More detail on the process is available in our [2023 Sustainability Report](#).

## Risk mitigation and remediation

TWE has implemented a strategic and consistent enterprise-wide approach to risk management, underpinned by a risk-aware culture. The Board, supported by the ARC, has approved a Risk Management Policy (Policy) and a Risk Management Framework (Framework) to oversee and manage both financial and non-financial risks. The Board, as well as its ARC and the Human Resources Committee, retain oversight of our human rights and modern slavery risks.

The Policy provides guidance and direction on the management of risk related to the Company and states our commitment to the effective management of risk to reduce uncertainty in the Company's business outcomes.

TWE's Framework defines the approach and standards for risk assessment including periodic identification, analysis, and evaluation of financial and non-financial risks at group level and in each major function or region. The framework includes both financial and non-financial risks, such as environmental and social risks. TWE intends to continue to use the Framework to help improve its supplier governance framework and refine the risk factors used for supplier onboarding and monitoring.

Material Business Risks (MBR) are those that could have a material impact on the achievement of TWE's strategies and future prospects. Each year, via our Annual Report, we disclose the risks of greatest materiality to the business, and existing mitigations against the risk. Some of these relate to the issue of human rights (in its broadest sense through MBRs that relate to health, safety and wellbeing or incidents leading to negative coverage) and modern slavery (for example, through MBR that relates to the performance of partners (suppliers, distributors, and retailers)).

The F23 Operating and Financial Review (OFR) section of the Annual Report provides further information on TWE's material business risks and how they are managed.

## Compliance

F23 has seen continued progress and development in TWE's governance and compliance framework. TWE's Compliance Management Framework (CMF) was fully operationalised in F23, following the completion of an 18-month implementation roadmap. Centrally driven processes are now in place to oversee and support TWE's global capabilities to understand and meet obligations applicable to our business, and to execute regular compliance reporting to Management and the Board. These centrally driven processes include the annual assessment of TWE's key compliance risks, the assessment and attestation by responsible business owners that compliance control areas are managed in conformance with the CMF, the management and reporting of compliance incidents to the global compliance function, and the bi-annual reporting of the Group's compliance performance to the ARC.

Priority areas in F24 will include uplifting our Global Compliance Training Program and undertaking initiatives to address ASIC's feedback following their review of our Whistleblower Program in F23.



# Certifying our wines

A fundamental component of our approach to growing and production is the attainment and retention of third-party independently verified sustainability certifications across TWE’s owned and leased vineyards and wineries, our growers and bulk wine providers.

We believe that certification programs not only foster stronger relationships between growers, wineries and their regions but provide confidence to consumers that they are receiving a product that is produced sustainably – that is with regard to both the social and environmental impacts. For example, the Sustainable Winegrowing Australia (SWA) program has regard to worker obligations and compliance, contractor selection and hiring, remuneration, health and safety, amongst others.

This year we have focused our collective global efforts on increasing the certification of our owned and leased vineyards and wineries, in addition to our growers and bulk wine. Over F23 we have maintained certification across 99.3% of our owned and leased operations globally. We have also worked with our growers and bulk wine providers to pursue certification, with around 86% of fruit sourced from Australian growers now certified by Sustainable Winegrowing Australia. This significant progress means we can soon use trust marks on many of our brands to give consumers greater confidence that our wines have been produced sustainably. Refer to the imagery below which outlines a range of certified labels from across our different operating geographies.

## Americas

Etude has now included Certified California Sustainable Winegrowing (CCSW) on the Deer Camp Vineyard Pinot Noir 2021 wine label



## Europe

Chateau Cambon La Pelouse has now included the High Environmental Value Certification (HVE) logo on the Cru Bourgeois Exceptionnel Haut Medoc 2018 wine label



Castello di Gabbiano has now included VIVA Sustainable Wine certification on the Bellezza Chianti Classico 2018 wine label



## Australasia

St Huberts has included the SWA label on The Stag Victorian Rose 2022 wine label



Wynns has included the SWA label on Wynns Cabernet Shiraz Malbec Merlot 2021 wine label





# Human rights at Treasury Wine Estates

# Understanding our human rights risks

Human Rights Impact Assessment identified Forced Labour, Child Labour, Human Trafficking and Forced Marriage as the most salient modern slavery risks in our global operations and supply chains.

We have identified the following areas to be at highest risk of modern slavery:

- Temporary or contracted labour in our vineyards and wineries
- National and international logistics of our dry good supplier, bulk wine and finished goods
- Low-skilled labour and migrant labour used by our varied service providers including cleaning and maintenance.

We recognise there is always opportunity for us to improve our systems and processes as well as controls that assist with ensuring supplier compliance with our policy and expectations. Additionally we seek to further improve our understanding of modern slavery and how it manifests in our supply chain as well as more targeted engagement with suppliers from high-risk sectors.

The United Nations Guiding Principles (UNGPs) continuum of involvement helps to assess how a business may cause, contribute to, or be directly linked to modern slavery, depending on its relationship to the risk, and is summarised in the table below.

Based on this work we consider that the vast majority of our suppliers and spend do not currently present a high risk of modern slavery.

	Description	Example of location and associated potential salient risk in our business	Assessment
<b>Cause</b>	A business may cause modern slavery when its activities (including omissions) directly result in modern slavery occurring.	<ul style="list-style-type: none"> <li>• In our business, impacting our people (direct workforce)</li> <li>• Owned assets</li> <li>• Leased assets</li> </ul>	Due to the policies, procedures and practices in place that govern our own operations, our current assessment considers the likelihood of causing modern slavery to be low. Refer to the understanding our human rights risks (this section) and <a href="#">direct workforce sections of this Statement</a> .
<b>Contribute</b>	A business may contribute to modern slavery where its actions (or omissions) increase the likelihood of modern slavery occurring, even if the business did not engage in modern slavery practices itself.	<ul style="list-style-type: none"> <li>• Supply chain, including indirect workforce</li> </ul>	While we are committed to taking steps to ensure our practices do not contribute to modern slavery, we recognise we have a close and often direct relationship with suppliers and business partners, including those in sectors we have identified as of higher potential risk. We are committed to ongoing monitoring and evaluation. Refer to the <a href="#">indirect workforce and managing risks in procurement sections of this Statement</a> .
<b>Directly linked</b>	A business could be directly linked to modern slavery where it has a business relationship with an entity that causes or contributes to modern slavery.	<ul style="list-style-type: none"> <li>• Supply chain, including indirect workforce</li> <li>• Business partners</li> </ul>	We may be directly linked to modern slavery through a supplier or business partner's exploitative practices. We are committed to ongoing monitoring and evaluation of our engagement and procurement activities, and effectiveness of our policies and procedures. Refer to the <a href="#">indirect workforce and managing risks in procurement sections of this Statement</a> .

# Human Rights Charter

TWE's Human Rights Charter (Charter) sets out our commitment to upholding human rights and the prevention of modern slavery. The purpose of the Charter is to enable awareness and understanding of TWE's commitment to human rights, in recognition that modern slavery and human rights risks apply across our operations and value chain. As a result, everyone has role to play.

The Charter, translated into the main languages of the markets in which we operate, sets out the expectations across our business from our Board of Directors, right through to our employees, third party suppliers and brands and the role they each need to play in upholding human rights. The Charter is underpinned by global policies and programs, including risk assessment processes that are designed to identify potential impacts and adopt preventative measures.

The Charter sets out three core commitments:

- We protect human rights – we believe in acting fairly and making decisions based on merit
- We respect human rights – we believe respect for human rights is the cornerstone of a culture in which everyone can contribute and feel included so we strive to conduct business in a way that respects the rights and dignity of people and avoids complicity in human rights abuses
- We remedy human rights – we encourage all stakeholders to report and express concerns relating to suspected violations of our policies, including the Charter.



# Training and education

We want our leaders and team members to be aware of and understand the policies which reflect the Company's commitment to promote ethical and responsible behaviour and prevent human rights and modern slavery breaches within its global operations.

We ensure that all permanent, desk-based employees undertake human rights and modern slavery training and repeat this training every two years.<sup>1</sup> The training is designed to raise awareness of human rights, the alignment between human rights and our values, culture, and policies, as well as to give specific insight into the issue of modern slavery. Desk-based employees also complete online compliance training modules, with the content including Code of Conduct, Anti Bribery and Corruption, and Whistleblower policies. New employees must complete compliance training as part of their induction, during the first three months of their employment, and thereafter, every two years. Learner assessments are built into the majority of these online modules and employees are only considered to have successfully completed the training if they have achieved the necessary level of understanding. Non-completion is monitored and managed via notifications sent to the employee's Manager. On a quarterly basis any non-compliance is escalated to each Divisional People & Culture Director. Completion rates are reported to both the ARC and Human Resources Committee every six months.

During F23 and Q1 F24 we also conducted compliance training for all non-desk-based employees in the Supply function within Australia. These employees attend face-to-face training which covers a range of our governance documents and topics: Human Rights, Modern Slavery, TWE DNA, Code of Conduct, Social Media Policy, Conflict of Interest Policy, Inclusion, Equity and Diversity Policy, Anti-Bullying, Harassment and Discrimination Policy and Raising a Concern.

In the US, all non-desk-based supply employees receive in person training at the time of hire covering Harassment Prevention, Respectful Workplace Conduct, Retaliation, Bullying, Bystander Intervention and Reporting Harassment and Discrimination. Retraining is conducted annually.

For our leaders, the 'Managing People at Treasury' learning platform includes inclusion, equity and diversity training and resources to help managers mitigate bias from people processes and learn how to best support diverse groups. Leader training sessions are conducted regularly throughout the year to ensure fair and balanced conversations and raise awareness of issues such as unconscious bias in talent review and performance management processes. The TWE People Manager Charter reinforces our expectations of creating a supportive and safe working environment.

The uplift of the global compliance training program including reviewing training frequency, allocation criteria, and delivery methods to improve learner experience and understanding, reduce training fatigue, and prioritise training related to high compliance risks facing TWE is ongoing. An initial pilot will commence in F24 with Anti-bribery and Corruption training which will be conducted online across all desk-based employees globally.

## Education and awareness of human rights

Our human rights training is designed to raise awareness of human rights in general, their alignment with our values, culture and policies as well as to give specific insight into the issue of modern slavery. In F23, 98% of eligible desk-based employees completed the required training modules covering human rights and modern slavery.

Our human rights training covers material such as:

- The connection to other policies to ensure a fair, inclusive, safe and respectful workplace and responsible decision making
- Each employee's role in living and breathing TWE's human rights commitments
- How human rights apply to hiring practices; inclusion, equity and diversity; and flexible work arrangements
- How human rights apply to treating colleagues with dignity; health and safety including safety at home
- Fair wages and employment rights.

Modern slavery training is more focused, covering:

- What modern slavery is and TWE's commitment to preventing modern slavery in any area of our business
- TWE's specific modern slavery risk areas
- "Red flags" that may indicate modern slavery
- What employees can do to help prevent and report modern slavery.

In September 2023 there were media reports about slavery-like conditions and potential human trafficking cases in the Bordeaux and Champagne regions of France. In response we developed and delivered a 'toolbox talk' for our operational employees in Europe. Whilst not directly involved in these incidents it provided a useful platform to remind our employees of these issues, reinforce how to spot warning signs or red flags and how to raise any issues.

<sup>1</sup> This training is conducted online globally, excluding France and Italy where the training content is not available in local languages.

# Supporting framework

TWE policies are reviewed regularly, in consultation with the Risk & Governance Function, to ensure they are current and appropriate. The TWE policies, procedures and programs listed below reflect the TWE DNA, ways of working and expectations of our team.

Policy	Overview of relevance to Modern Slavery
<p><b>Code of Conduct</b> Available languages</p> 	<p>Outlines the Company's 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 TWE's Code of Conduct may constitute a disciplinary offence and can result in termination of employment.</p> <p><a href="#">Code of Conduct &gt;</a></p>
<p><b>Anti-bribery and Corruption Policy and Guidelines</b></p> 	<p>Confirms that TWE does not tolerate any form of bribery or corruption. The Anti-bribery and Corruption Policy aligns with best practice and emerging governance requirements including the revised third edition of the ASX Corporate Governance Principles &amp; Recommendations.</p> <p><a href="#">Anti-Bribery and Corruption Policy &gt;</a></p>
<p><b>Anti-harassment, Discrimination and Bullying Policies</b></p> 	<p>States TWE's commitment to strive for a diverse and inclusive culture where all individuals are treated with courtesy, dignity and respect and reinforces that everyone has the right to work in a professional and safe environment that promotes equal employment opportunities and is free from unlawful discrimination, harassment, and workplace bullying.</p>
<p><b>Global Inclusion, Equity and Diversity Policy</b></p> 	<p>States TWE's commitment to creating an inclusive, supportive and collaborative culture to attract and retain the best possible talent, and create an environment where people from diverse backgrounds can fulfil their potential.</p> <p><a href="#">Global Inclusion, Equity and Diversity Policy &gt;</a></p>
<p><b>Employing and Engaging Minors Policy</b></p> 	<p>States TWE's commitment to safeguard a minor's employment circumstances when they are employed or engaged by TWE or a third party on behalf of TWE.</p>
<p><b>New Market Entry Policy</b></p> 	<p>Before entering any new market, TWE undertakes a risk assessment in accordance with the New Market Entry Policy. This assessment includes an analysis of the likelihood and consequences of a range of risks, including legal and reputational risk.</p>
<p><b>Recruitment and Selection Policy</b></p> 	<p>States TWE's commitment and approach to attracting and selecting high-calibre talent that reflects the diversity of our consumers. We act fairly and make people decisions based on merit.</p>
<p><b>TWE Responsible Procurement Code (RPC)</b></p>  <p>Simplified</p>	<p>States TWE's expectation that suppliers conduct business in accordance with the highest ethical standards and internationally proclaimed human rights frameworks. Specific clauses relate to employee benefits, working conditions, hours worked, forced labour, and child labour amongst others.</p> <p>Regarding suppliers, failure to abide by the RPC can result in termination of the supply arrangement.</p> <p><a href="#">Responsible Procurement Code &gt;</a></p>
<p><b>Risk Management Policy</b></p> 	<p>Provides guidance and direction on risk management related to the Company and states our commitment to the effective management of risk to reduce uncertainty in the Company's business outcomes.</p>

## Supporting framework (continued)

### Compliance Management Policy



States the principles and commitments governing compliance management at TWE, and the responsibilities of employees and leaders at all levels of the organisation.

[Compliance Management Policy >](#)

### Whistleblower Policy



Adopted to ensure that people can raise concerns regarding actual or suspected contravention of TWE's ethical standards or the law without fear of reprisal or feeling threatened by doing so. More information is available in the 'grievance mechanisms' section.

[Whistleblower Policy >](#)

### Workplace Health, Safety and Wellbeing Policy



States TWE's commitment to achieving an incident and injury free workplace. Supporting the Company's journey to 'Destination Zero Harm' are three guiding principles: safe people; safe plant; equipment and environment and safe systems of work; with specific commitments agreed for each principle.

[Workplace Health Safety and Wellness Policy >](#)

### Employee Assistance Program

The Employee Assistance Program (EAP) provides TWE employees and eligible immediate family members with a range of services and support. It is voluntary, confidential and easy to access, with support available for personal and work-related issues including performance, dealing with grief, stress management and career pathing.

The EAP operates in addition to specific initiatives such as support for our people impacted by Domestic and Family Violence (DFV). Our global policy includes a range of support, which includes up to 10 days paid leave for both the impacted employee and anyone supporting someone impacted by DFV as well as emergency financial support of up to AUD\$5,000. Recognising that the work environment may be the only place an employee feels safe enough to seek help for domestic and family violence we have provided training to people leaders and employees in our People and Culture and Health and Safety teams to enable them to better recognise, respond and refer impacted people to get the help they need.

### HR Assist

The HR Assist team is the first point of contact for general HR queries and support for all employees. The team can be contacted via TWE's employee self-service portal, TWEpedia, or Regional hotline. They are accessible across all regions including Australia and New Zealand, Asia, Americas and EMEA.



# Workforce

# Workforce

We believe in the inherent value of each person in our business; both our employees and everyone who touches our business, either directly or indirectly. We recognise and support their rights to basic freedoms and protections.

This is reflected through the following constructs and policies which apply to all employees in all countries in which TWE operates:

- TWE DNA – our cultural code that guides our actions
- Code of Conduct which reinforces our responsibility to understand and comply with all laws and regulations
- Inclusion, Equity and Diversity Policy.

At TWE, we are dedicated to fostering an inclusive environment, evident through our employees' commitment to bringing their whole selves to work, our inclusive brands, and our purpose-aligned community partnerships. Our commitment extends to having robust policies and practices that prioritise inclusivity, reduce bias, and stimulate innovation in the industry by recognising the value of diversity. We encourage inclusion and diversity through our several Employee Resource Groups (ERGs), which are employee-led, leadership-sponsored groups that operate in line with our IE&D Policy and Strategy.

TWE's global supply business, which includes grape growing, sourcing and production, is seasonal meaning we engage a combination of permanent ongoing employees and short-term and contracted labour to meet operational demands during busy periods such as vintage. As a result, our workforce is made up of people engaged directly and indirectly:

- Direct: Employees engaged under a TWE legal entity
- Indirect: Contractors who may be engaged under a TWE legal entity or through a third party, labour hire and subcontracted labour.

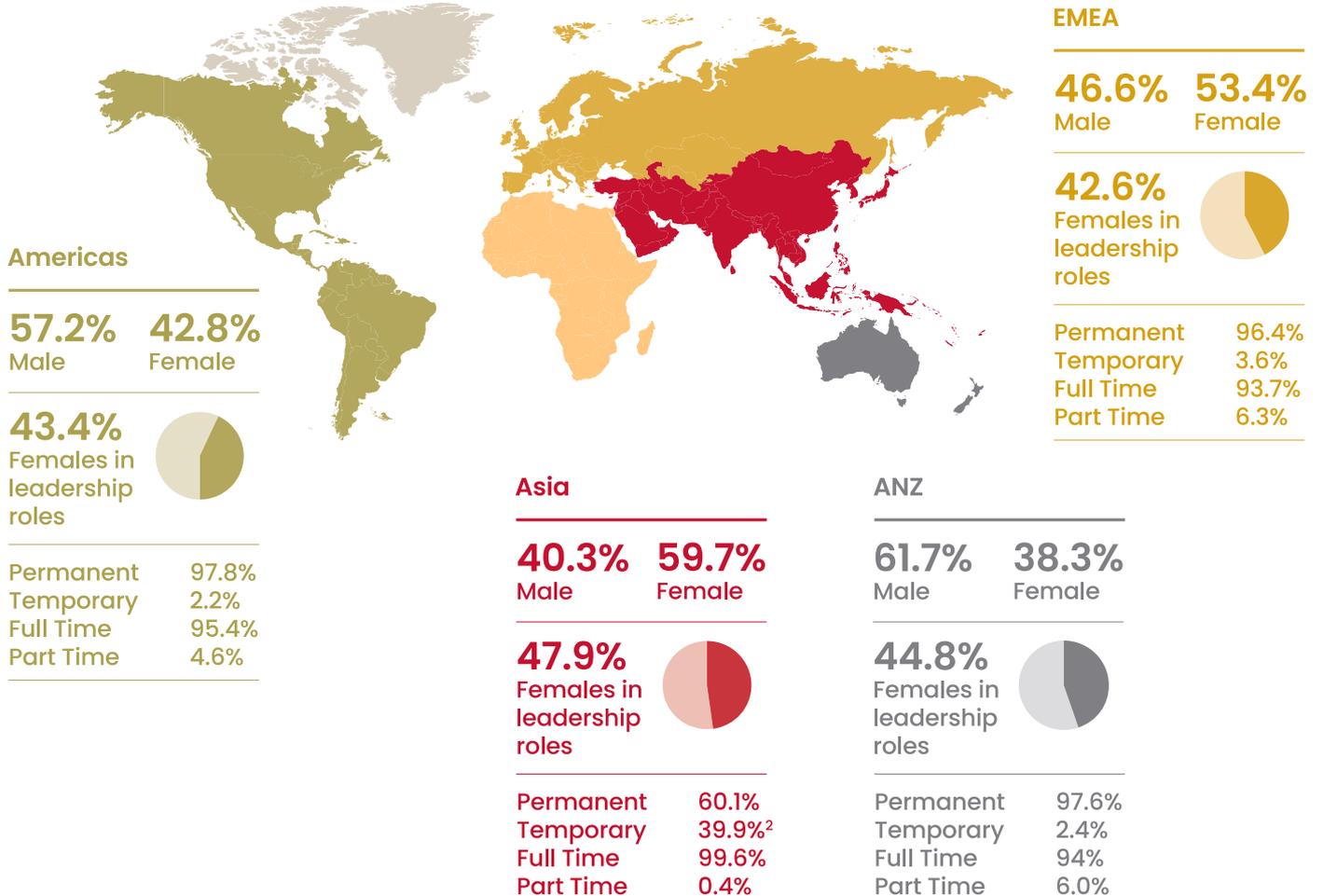


# Direct workforce

As at 30 June 2023, our direct workforce (including casuals) consisted of around 2,500 people, about 46% of whom (1,196) are employed outside Australia.

A proportion of our direct workforce is covered by Enterprise Agreements underpinned by modern awards in Australia, and Industry Collective Agreements in Italy and France.

## A snapshot of TWE employees across the world<sup>1</sup>



### To help protect the human rights of our direct workforce and directly engaged contractors, we pay particular attention to:

#### How we recruit

We have a global Recruitment & Selection Policy which is underpinned by:

- UN Universal Declaration of Human Rights
- TWE IE&D Policy
- A commitment to attracting and selecting high-calibre talent who reflect the diversity of our consumers.

This is complemented with a rigorous selection process through which applicants are assessed against measurable criteria that is relevant to success factors and traits required by TWE. We conduct necessary checks on candidates prior to making an offer of employment, including Right to Work.

We engage with external recruitment companies under our Responsible Procurement Code and using our Supplier Onboarding Process to ensure that providers share TWE's Human Rights beliefs and have appropriate policies and practices in place

1. The information in this table is current as of 30 June 2023 includes casual, on call and seasonal employees and excludes contractors, which make up 5.3% of TWE's total workforce.

2. The Asia region has a higher proportion of employees identified as 'Temporary' due to common legal practice in China to place employees on three-year fixed term contracts. After ten years, an employee is considered permanent.

## Direct workforce (continued)

### How we reward our people

We are committed to meeting the requirements of applicable industrial instruments wherever we operate. In addition, our Global Remuneration Policy is aligned to our commitment to respect and protect Human Rights and the prevention of Modern Slavery and applies to all countries in which TWE operates. We benchmark remuneration structures against the external market and are committed to ensuring our approach is fair, competitive and in line with contemporary market practice, including meeting any minimum wage requirements.

To ensure transparent, fair and equitable remuneration outcomes for all team members we analyse our remuneration data annually to ensure that pay decisions are reflective of performance and free from bias that may occur (consciously or unconsciously), for example, in relation to a team members' gender, age, race, and sexual orientation. Five adjustments to remuneration were made as a result of this analysis in F23. TWE conducts reviews to ensure compliance against minimum wage requirements across the Company's various jurisdictions. These processes are underpinned by TWE's Remuneration Policy.

In F23 we piloted the collection of personal demographic data (non-anonymised) in the UK in order to evaluate remuneration outcomes for employees to ensure variation between individuals is fair and free from bias. This followed significant employee consultation and engagement, and an in-depth data protection impact assessment to ensure all necessary controls were implemented to protect individual privacy. Employees are encouraged to voluntarily disclose demographic data including racial or cultural background, disability, caring status, gender including a non-binary option and veteran status. Data collection will be extended to employees in other countries during F24 and questions will be extended to include sexual orientation.

### How we encourage people to speak up

At TWE, we believe each of us has a responsibility to do the right thing. Our Code of Conduct outlines our expectations in how we do business. Like everything we do at TWE, our Code is underpinned by our DNA. Through our DNA, we seek to nurture a physically and psychologically safe environment where our people have the confidence and support to speak up if they see or experience any inappropriate behaviour.

We appreciate our employees speaking up about their concerns and encourage everyone to do the same. Processes are in place to ensure that reports of inappropriate behaviour are logged, investigated and that appropriate action is taken. Measures are in place to ensure complaints are treated confidentially, consistent with legislative protections.

Investigations into HR compliance matters are conducted by the People and Culture team or external third parties as

appropriate, with matters reported to the HR Committee biannually. Breaches of governance policies and other core policies are reported to the Audit and Risk Committee, including a high-level overview of Health and Safety and HR Compliance matters. Details of Health and Safety performance are reported via the Wine and Operations Sustainability Committee and are published in our annual [Sustainability Report](#).

### People-related compliance

During F23, a total of 71 matters were reported, representing 2.8% of our workforce. Of these, five were received anonymously via our external whistleblower service. Of the reported people-related matters, 35 (76%) were fully or partially substantiated.

Actions taken in response to substantiated matters include those listed below:

- 24% resulted in coaching, counselling, or training intervention
- 33% resulted in formal written warnings (including final written warnings)
- 31% resulted in end of employment.

To build confidence and increase trust that we respond with the appropriate level of concern and action, our Chief People Officer shared this information about the number and types of matters reported by our people and the resulting consequences directly with employees.

In addition, we conduct an annual all-employee engagement and inclusion survey to collect feedback, insights and encourage everyone to have the courage to speak up and be heard.

# Indirect workforce

Our indirect workforce is engaged through a number of suppliers across our operating regions.

Due to the seasonal nature of work required across our business, we use a combination of labour hire and subcontracted labour to support peak periods such as pruning and harvest. While not employed directly, TWE takes our obligations and responsibilities in workplace entitlements for, and working rights requirements of, all workers very seriously.

To help protect the human rights of our indirect workforce, we pay particular attention to the selection and management of suppliers. We use our legal and commercial (i.e. contracts, Purchase Order conditions and expectations set out in our RPC) as well as operational controls to ensure that suppliers understand and meet the expectations outlined in TWE’s human rights policy and have appropriate policies and practices in place to minimise the risk of modern slavery in the supply chain. Please refer to the [Procurement section](#) for more detail.

Over F23 we continued working in Australia with all our labour providers for TWE-managed vineyards to reinforce the importance of robust processes and controls to ensure workers hold appropriate rights to work and receive all their entitlements. We continue to monitor our third-party labour providers through written questionnaires, conversations and inspection of documentation and external technology ‘Check work Rights’ that enables our subcontractors to simplify their process of ensuring their employees hold appropriate working rights.

	AME	ANZ	ASA	EME	Grand total
Number of suppliers*	20	55	3	1	79

\*Number of suppliers has been refined to only include current suppliers of labour hire.





# Procurement

# Procurement

In F23 we procured goods and services valued at approximately \$1.7 billion from around 50 countries. Over 90% of this spend was in Australia, the United States, New Zealand and the United Kingdom. We have around 5,000 suppliers globally, although 67% of our spend was with 140 suppliers.

Our impact on social, ethical, and environmental aspects is not limited to our internal operations; it extends to our relationships with suppliers. We recognise the vital role of collaboration with our suppliers in minimising our impact, mitigating risks, and fostering sustainable growth. We seek enduring partnerships with suppliers and partners who share our commitment to socially responsible and sustainable business practices.

Our strategy encompasses:

- Clearly defined acceptable standards for suppliers through the Responsible Procurement Code (RPC)
- Ensuring a fit for purpose risk assessment platform to address key risks in our supply chain
- Collaborating closely with key or high-risk suppliers to enhance their performance, identify crucial risks, and seize opportunities for effective management.

Our primary or direct suppliers encompass those providing items such as grapes, bulk wine, glass, cardboard, labels, and various business-to-business packaging materials. Our network of indirect suppliers includes providers of services such as logistics, labour hire, marketing, legal, corporate, and consulting services.



# Managing risks in procurement

Over F23 we continued to improve our Supplier Governance Framework, which assesses suppliers against seven categories of risk (see table below). This involved implementing a new operating model for procurement that gave additional focus to effective risk management, sustainability, and governance of our suppliers. We have also commenced a more strategic approach to key supplier relationships, which will enable joint business planning and a focus on achieving sustainable packaging and circular economy outcomes.

Risk category	We have expectations that suppliers:
<b>Conduct</b>	Comply with all applicable laws and regulations as a non-negotiable minimum and we prefer to work with partners that demonstrate leadership in how they act in an ethical, fair, and responsible manner.
<b>Business continuity</b>	Have resources and plans in place to understand, prepare and respond to disruptions to minimise the impacts on continuity and quality of supply.
<b>Bribery and corruption</b>	Do not tolerate any form of bribery and corruption and promote a culture of compliance.
<b>Modern slavery and labour practices</b>	Respect the human rights and labour rights of the workers in their operations and supply chain.
<b>Health and safety</b>	Provide a safe and healthy workplace for their workers.
<b>Environmental management</b>	Minimise the environmental impacts of their operations, products, and services and have environmental practices and policies in place.
<b>Privacy and information security</b>	Maintain standards to safeguard the security, confidentiality and integrity of information assets and resources.

Over the past year, we have continued to strengthen our procurement processes to help detect and prevent modern slavery. Focus has been on updating tender documentation to incorporate specific modern slavery requirements. By embedding these expectations into our standard procurement templates, we are actively encouraging our suppliers to adhere to best practices and demonstrate their commitment to eradicating modern slavery from their operations. As part of the supplier evaluation, suppliers are mandated to detail how they identify and manage human rights and modern slavery risks within their operations. This includes an examination of sub-contracted services.

We also enhanced our requirements assessment framework to include consideration of modern slavery. This ensures that our suppliers are not only evaluated based on quality, cost, and delivery but also on their efforts to eliminate modern slavery and protect the rights of workers throughout their supply chains.

We remain committed to continuous improvement and will continue to monitor and evaluate our procurement activities and effectiveness of policies over time.

## Contracts

We have evolved our standard procurement contract terms with the inclusion of explicit clauses related to modern slavery. Embedding these clauses - related to due diligence, risk management, and reporting - helps to promote transparency and gives us greater flexibility/influence over the life of the relationship.

## Responsible Procurement Code (RPC)

TWE sets out its expectations for suppliers via the RPC in areas of human rights, ethical conduct, employee benefits (covering wages, conditions and working hours), health and safety, discrimination as well as environmental impacts. The RPC is provided to all suppliers during supplier selection, embedded into TWE contract templates, TWE Purchase Order terms and conditions, as well as being a compliance requirement for all new suppliers. TWE maintains close relationships with its suppliers to detect non-compliance and will continue to strengthen controls over our supply chain, including assessing how further verification and audit can be built into supplier management processes. Failure to meet TWE's requirements will result in remediation actions which may include termination of the relationship between TWE and that supplier. In F23, there has been no findings of supplier termination for non-compliance to the RPC.

## Supplier Risk Assessments

During F23 we assessed an additional 675 new suppliers for their ethical, social, and environmental performance, with 499 of these approved and activated. Out of these activated suppliers, 326 higher risk suppliers have been endorsed with the risk(s) identified and actioned accordingly. As at 30 June 2023 the remaining suppliers are currently pending remediation and approval.



## Other relevant information

## Other relevant information

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### Consultation

Consultation occurs as part of delivering our business agenda, and we engage with business partners, industry groups and interest groups on topics related to our broader human rights agenda. In preparing this Statement, we consulted with stakeholders from across the business including Procurement, Legal, People and Capability, Supply, Sustainability, Compliance, Risk and Company Secretary, to provide expertise and relevant content in order to respond to legislation and/or demonstrate our progress and performance.

### Our commitment to collaboration

We acknowledge that complex, global issues like modern slavery require collaboration.

As a signatory to the UN Global Compact, TWE has provided a Communications on Progress (CoP) since 2011. Through UN Global Compact Principle 4, TWE is committed to the elimination of all forms of forced and compulsory labour. Our [F23 CoP](#) is published on the UN's digital platform.

Treasury Wine Estates is a Founding Member in the Sustainable Wine Roundtable, participating in local and national sustainability accreditation groups, presentations, conferences, and events across the globe.

We utilise experts and external resource to build our understanding, capability and response and actively participate in conferences and workshops to share our experiences, lessons learned and challenges.

### Grievance mechanisms

The Company maintains a Whistleblower Policy (Policy) to promote and support our culture of honest and ethical behaviour. The Policy is available publicly on our company website and is also discussed in numerous corporate reports including our Annual Reports and Corporate Governance Statements. The Policy encourages people to raise any concerns and report suspected or actual misconduct or any improper state of affairs or circumstances in relation to TWE or any other matter that may contravene the Company's Code of Conduct or other policies or the law.

The Policy is supported by a confidential whistleblower service, which is maintained by an external service provider and is available across the Company's operations globally, with the service provided in a range of languages. The Whistleblower Policy contains global contact information for company Designated Recipients as well as how to access the confidential Whistleblower service.

The Company is committed to confidentiality and fairness, in accordance with all legal requirements, in relation to all matters raised and will support and protect those who report matters in accordance with the Policy and the law. In particular, any person who makes a report will not be discriminated against or disadvantaged in their employment with the Company by virtue of making a report. All matters raised are resolved by way of investigation and/or action as appropriate.

Whistleblower matters are periodically reported to the Audit and Risk Committee. In F23, the frequency for reporting on whistleblower matters to the ARC was increased from biannual to quarterly. In addition, the Board is informed of any material incidents raised for the purposes of maintaining good corporate governance and oversight of the Company's culture.

An independent review into TWE's Whistleblower Program was conducted by the Australian Securities and Investments Commission (ASIC) among a cohort of seven randomly selected firms. We were first notified of the review in January 2022 and received ASIC's final individual feedback in April 2023. Upon completion of the review, ASIC provided recommendations through individual feedback to TWE and publicly released Report 758 on Good practices for handling whistleblower disclosures. The Report provides insights for companies designing a whistleblowing program and is based on the whistleblowing arrangements identified through ASIC's review. Best practices highlighted in the Report will be used to inform the program's improvement work, commencing with a global employee awareness campaign rolled out on World Whistleblower Day in F23 (23 June) and continuing throughout F24.

During F23, the Company received whistleblower reports relating to various matters including conflicts of interest, policy breaches and bullying and harassment. Each of the reports made in F23 were investigated and are now resolved.

## Other relevant information

### Assessing effectiveness

The TWE Board governs the Company, and its responsibilities including actively promoting ethical and responsible decision-making within TWE.

The ARC and the Human Resources Committee assist the Board in overseeing the processes used by management to monitor and ensure compliance with laws, regulations, ethical guidelines, policies, and other relevant requirements.

The Company's Whistleblower Policy is used by employees, suppliers, and other third parties to anonymously raise any concerns and report suspected or actual misconduct or any improper state of affairs or circumstances in relation to TWE. Other alternative dedicated channels are also available where employees can raise their concerns internally about any situation that contravenes (or may result in the contravention of) TWE's compliance obligations. Processes are in place to ensure and monitor that concerns raised are appropriately investigated and addressed, and corrective actions are undertaken to prevent reoccurrence where possible.

Further, management has established the RCGC which is responsible for overseeing and advising the Executive Leadership Team on:

- Processes used to monitor, communicate and comply with the Company's policies, laws, regulations, ethical guidelines and other relevant requirements
- Employee behaviour with respect to governance, risk and compliance.

As part of TWE's Compliance Management Framework, initiatives were completed in F23 to monitor TWE's compliance performance. Qualitative and semiquantitative compliance metrics (i.e., Key Compliance Indicators and process maturity ratings) were used to assess and attest the alignment of the 17 key compliance areas with the requirements of the CMF, and biannual trend analysis of

compliance incidents was completed and reported to management and the ARC.

In regard to our training, we monitor completion rates and failure to complete training is escalated to People Leaders (and later to Divisional People and Capability Directors). Completion rates are then reported to both the Audit and Risk Committee and the Human Resources Committee. Additionally, modules include quizzes during and post-completion to assess learner understanding and ensure engagement with the material.

We monitor, manage and report progress on a range of indicators used to assess the effectiveness of our programs and performance. Our annual Sustainability Report discloses progress against key performance metrics including Inclusion, equity and diversity, Health, safety and wellbeing and results of our employee engagement survey.

TWE is committed to continuously improving our approach to human rights and modern slavery.

Last year we made a number of future commitments, progress against which has been detailed throughout this report. Looking ahead we plan to:

- Complete supplier risk assessments for 100% of contracted spend
- Continue to strengthen controls through our supply chain over F24
- Continue to build the expertise and capability of our people, with a focus on those that work directly with third parties or those that rely on contractors in their workforce.

This Statement was approved by the Board on 5 December 2023.





TREASURY  
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