

# Respecting human rights



# Contents

Acknowledgement of Country	3	Cleaning and security	32
A message from our Chairman and CEO	4	Viticulture	34
About Endeavour Group	6	Modern slavery awareness training and partnerships	37
Our structure and operations	8	Remediation	38
Our supply chain	12	Overseas recruitment	42
Identifying our modern slavery risks	16	Assessing the effectiveness of our actions	44
Assessing and addressing our modern slavery risks	24	Progress against our F23 commitments	46
Our Modern Slavery Risk Management Framework	27	Consultation and approval	47
Our Responsible Sourcing Program	29	Reporting criteria index	48



## Our commitment to human rights

Our purpose, 'Creating a more sociable future, together', puts people at the very heart of our business. We bring people together every day through our brands, products and places, and it takes 30,000 of our own team and hundreds of thousands more in our extended supply chain working together to make that possible.

We respect all human rights: every person who helps us do what we do should be safe at work, paid properly and treated fairly.

There's work to do, and we're committed to doing the right thing. That is, acting responsibly, inclusively and with care, to support the people we work with.

## Endeavour Group Limited

Endeavour Group Limited (ACN 159 767 843) is an Australian public company listed on the Australian Securities Exchange (ASX: EDV). The Company's registered office address is 26 Waterloo Street, Surry Hills NSW Australia. Any reference to Endeavour Group, Endeavour, 'we', 'our' or 'us' refers to Endeavour Group Limited and its controlled entities (together 'Endeavour,' 'Endeavour Group' or 'the Group'). This Statement has been published in accordance with the *Modern Slavery Act 2018* (Cth) (the Act). It identifies the steps that Endeavour Group and relevant group companies – including each wholly owned entity of Endeavour Group and other entities it controls for accounting purposes – took during the period of 26 June 2023 to 30 June 2024 (referred to as 'F24' or 'the reporting period' in this Statement), to assess and address modern slavery risks in our operations and supply chains. Information presented in this Statement is, unless stated otherwise, current as at 30 June 2024.

This Statement may contain forward-looking statements in relation to Endeavour Group Limited ACN 159 767 843 ('Endeavour') and its controlled entities (together 'Endeavour Group' or 'the Group'), including statements regarding Endeavour Group's intent, belief, goals, objectives, initiatives, commitments or current expectations with respect to the Group's business and operations, market conditions, results of operations and financial conditions, and risk management practices. Forward-looking statements can generally be identified by the use of words such as 'forecast', 'estimate', 'plan', 'will', 'anticipate', 'may', 'believe', 'should', 'expect', 'intend', 'outlook', 'guidance' and similar expressions. These forward-looking statements are based on the Group's good-faith assumptions as to the financial, market, risk, regulatory and other relevant environments that will exist and affect the Group's business and operations in the future. The Group does not give any assurance that the assumptions will prove to be correct. The forward-looking statements involve known and unknown risks, uncertainties and assumptions and other important factors, many of which are beyond the control of the Group, that could cause the actual results, performances or achievements of the Group to be materially different from future results, performances or achievements expressed or implied by the statements. Investors and prospective investors are cautioned not to place undue reliance on forward-looking statements. Except as required by applicable laws or regulations, the Group does not undertake any obligation to publicly update or revise any of the forward-looking statements or to advise of any change in assumptions on which any such statement is based. Past performance cannot be relied on as a guide to future performance.



## Acknowledgement of Country

We acknowledge the First Peoples of the lands on which Endeavour operates across Australia and New Zealand. We acknowledge the Aboriginal and Torres Strait Islander peoples as Traditional Custodians and First Nations of Australia. We pay respects to their Elders past and present, and recognise their unique cultural and spiritual relationships to the land, waters and seas and their rich contribution to society. We acknowledge that their continuing care for Country and ancient soils since time immemorial has gifted us a uniquely Australian terroir.

We also acknowledge and respect ngā iwi Māori and their unique role as tangata whenua of Aotearoa/New Zealand and as Treaty of Waitangi partners. We commit to listening to and learning from the voices, stories and cultures of First Peoples where we operate our businesses. Aboriginal and Torres Strait Islander people are respectfully advised that this document may contain images and/or names of Aboriginal and Torres Strait Islander people who may be deceased.

'Celebration Place' by Riki Salam (Mualgal/Yalanji/Ngai Tahu), our Reconciliation artwork.

We are deeply privileged to have Riki tell a story that is uniquely Endeavour, through a dynamic visual language and the timelessness and omniscience of the Dreaming. The artwork Riki created for us symbolises both occasion and belonging, time and space, and the process of coming together, as well as the outcome of being one through shared experiences and knowledge. The concept represents water and knowledge flowing throughout the country. From desert country to stone country, rainforest country. From freshwater to saltwater all water carries knowledge from upstream to downstream. This knowledge is passed down from generation to generation to keep Culture strong.

See Reconciliation Action Plan 2022 artwork 'Celebration Place' by Riki Salam (Mualgal/Yalanji/Ngai Tahu), [www.endeavourgroup.com.au/sustainability](http://www.endeavourgroup.com.au/sustainability)



A message from our Chairman and CEO

# Our commitment to human rights



We're committed to respecting the rights of every person in every business that helps us aspire to our purpose of bringing millions of people together every day through our brands, products and places.

We're proud of and united by our purpose: 'Creating a more sociable future, together'. It reminds us that people are at the heart of everything we do, and that our contribution leaves a lasting imprint on people in our business, supply chain and the communities we are part of.

We know the work we do and the way we do it matters. Our values set the standard: we're real, we're responsible, and we're inclusive. We respect the people who supply and support our business, and want them to be safe at work, paid properly and treated fairly. We expect the same values from our suppliers, especially in the way they do business on our behalf. We believe this is the key to driving long-term value for our business, and theirs, building stronger local economies and more sustainable communities. Above all else, it's about doing the right thing.

These values guide our approach to everything we do, particularly in respect to modern slavery. The behaviours and practices which constitute modern slavery are not only serious human rights violations; they go against everything we stand for.

We also know no business, sector or industry is immune from the risks of modern slavery, particularly in the face of market challenges posed by climate change, inflation pressures, labour shortages and the rising cost of living.

As a large employer, producer and operator with a geographically complex supply chain, we take our responsibilities seriously, and we're doing the groundwork to meet our commitments. We're taking time to listen and learn from our suppliers, and working with external experts to better understand the risks, so that we can best mitigate and take action. We're strengthening our internal governance and compliance, and training relevant teams to build a shared understanding of our responsibilities and commitments.

A key output of this work in F24 was the development of our new Human Rights Statement, which you'll see on page 27. Grounded in our values, the Statement is our own whole-of-business commitment to respect the rights of all people, particularly workers (including migrant workers), First Nations peoples, human rights defenders and women. We also commit to the continued building of our due diligence program to reduce human rights risks, and regular reporting of our performance in this space.

We're proud to share what we've been up to in our third annual Modern Slavery Statement under the *Modern Slavery Act 2018* (Cth). Our Statement reflects our ongoing commitment to all internationally recognised human rights to create a lasting, positive imprint on the people we work with. It details the progress we've made against our commitments and the measures we've taken over the past year. We also share what we're working on next, because there's more work to do to mitigate risks in our own operations, and across our supply chain. As we understand more, we'll continue to review and adapt our approach - working in partnership with our suppliers, and theirs.

Guided by our values, we will act responsibly, inclusively, and with care. That's the positive imprint we're creating for people in our business, our supply chain, and the many communities we're a part of.

We are pleased to sign and present this Statement.

**Ari Mervis**  
Chairman

**Steve Donohue**  
Managing Director and  
CEO

23 August 2024

# About Endeavour Group



Endeavour Group is a collection of some of Australia's best known businesses and brands in liquor retail, drinks production, hotels and entertainment. We're a team of 30,000 great people, united and inspired by one purpose:

## Creating a more sociable future, together

### Our values

We're real  
We're inclusive  
We're responsible

### Our ways of working

We work with spirit  
We endeavour for better  
We're team players

## Our Imprint

We use the mark left by the base of a bottle of wine on a coaster as a constant reminder of our imprint.

What we do - and the way we do it - matters, especially the way we treat the people who help us bring our products, places and experiences to life. The respect and care we show our people, our suppliers and those in our extended supply chain drives better long-term value for our business, and builds stronger, more sustainable and connected communities.

Guided by our values and the ways of working that connect every member of our team, we're fiercely committed to doing the right thing. We act responsibly, inclusively, and with care because we want our imprint to be a lasting, positive one on all.



## Modern Slavery

We're committed to using our influence to prevent and mitigate all forms of modern slavery within our operations and extended supply chain, in line with our commitment to human rights. Not only is it the right thing to do; it supports our purpose, and our ambition to leave a positive imprint on the people we work with, and the communities we are part of.

In alignment with the *Modern Slavery Act 2018* (Cth), the *Criminal Code Act 1995* (Cth) and international laws and conventions, we understand modern slavery to include human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour, and deceptive recruiting for labour or services. While modern slavery is one of the worst forms of human rights abuse, in line with our values and Human Rights Statement, we're committed to preventing, mitigating and addressing all forms of human rights harm - so that people are safe at work, paid properly and treated fairly, and with respect.



# Our structure and operations

Our network of retail stores, hotels, specialty drinks businesses, bottling facilities, wineries and digital platforms make up the footprint of our operations in Australia. We also own and operate a winery in New Zealand.

## Our structure

Endeavour Group Limited is a publicly listed company, headquartered in Sydney, Australia. A collection of brands, reporting entities and non-reporting entities contribute to our consolidated revenue. We operate Australia's largest retail drinks network under the Dan Murphy's and BWS brands, and the largest portfolio of licensed hotels in communities across the country.

There are three reporting entities for the purpose of the Modern Slavery Act:

### Endeavour Group Limited (ABN 77 159 767 834)

Endeavour Group Limited is the parent company of Endeavour Group. Endeavour Group Limited is incorporated in Australia and listed on the Australian Securities Exchange.

Endeavour Group Limited is a reporting entity under the Modern Slavery Act. It also owns and controls two other reporting entities and a number of non-reporting entities.

### ALH Group Pty Ltd (ABN 68 098 212 134)

ALH Group Pty Ltd is owned and controlled by Endeavour Group Limited and is also a reporting entity. It controls one other reporting entity, Australian Leisure and Hospitality Group Pty Limited, and a number of non-reporting entities.

### Australian Leisure and Hospitality Group Pty Limited (ABN 37 067 391 511)

Australian Leisure and Hospitality Group Pty Limited is our third reporting entity. It sits under ALH Group Pty Ltd. It does not own or control any other reporting or non-reporting entities.

Endeavour Group Limited owns and controls 28 total subsidiary companies (wholly and majority owned), including both reporting and non-reporting entities. All but two of these entities are incorporated in Australia: our Isabel Estate winery operations in New Zealand; and a wine importer in the United States, which Endeavour became a majority owner of in F24. This was the only new entity added to our portfolio in the reporting period, and no entities were delisted or removed. There were no material changes to our operations and supply chain in F24.

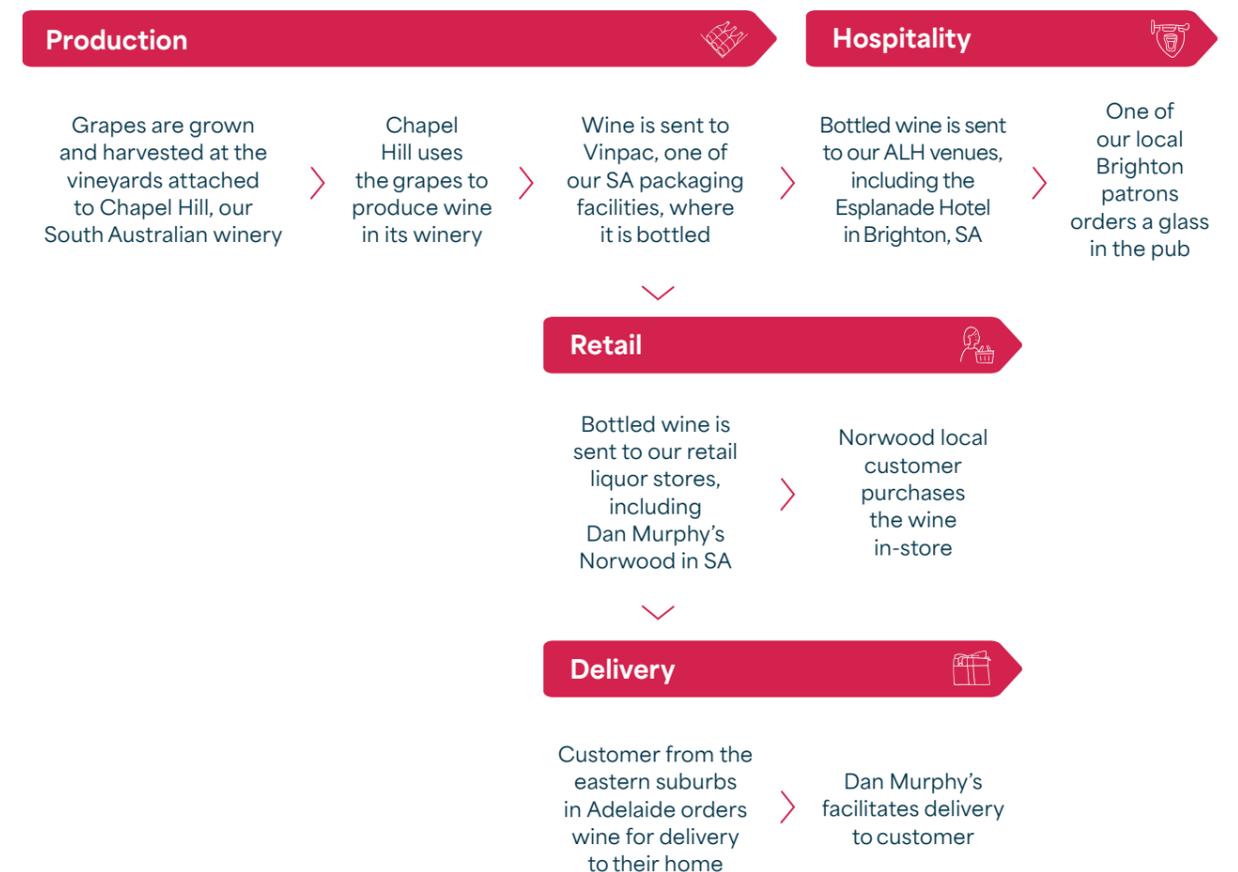
Together, these entities, businesses and brands form Endeavour Group. With one Executive Leadership Team, Board and strategy, and Group-wide policies and governance processes, we work together as one team, living our purpose and values.

## Our key operations

Our business operations are complex and complementary. They often intersect and support each other across four key areas: production, retail, hospitality and delivery.



A simplified example of how our key operations can intersect in practice is below:



1 B2C = business to customer delivery, B2B = business to business delivery.

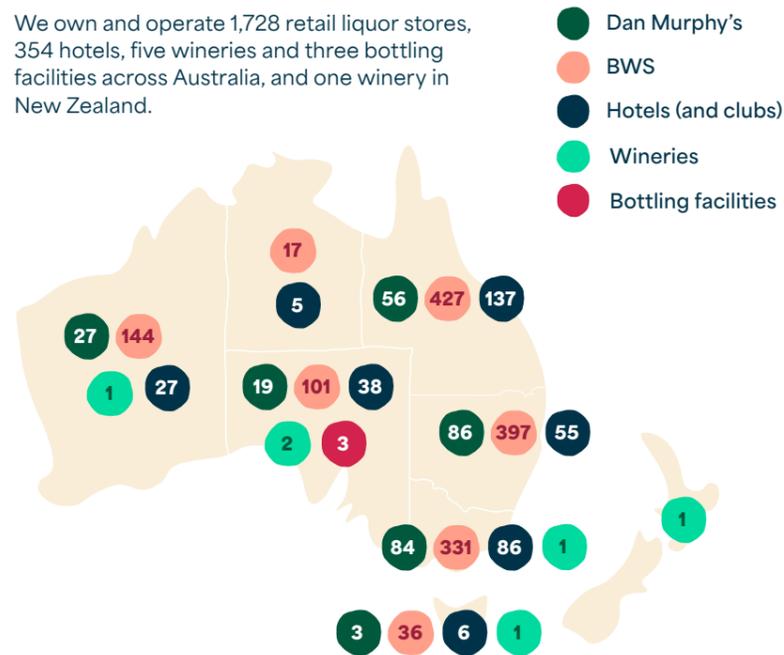
## Our key brands

Endeavour is made up of many different brands with different stories, united in an ambition to be Australia's most responsible operator of hotels, alcohol and gaming facilities.

- Dan Murphy's** is a leading retail liquor brand with 275 stores nationally. Each store carries a range of products, including hundreds of spirits, beers and wines, with thousands more available to purchase online.
- BWS** is a leading retail liquor brand with 1,453 stores in its portfolio. BWS offers a tailored range that meets the needs of its local communities.
- ALH Group** operates 354 licensed venues across Australia, offering a range of hospitality experiences including electronic gaming, sports bars, bistros, restaurants, cafés, accommodation, nightclubs, live sports and racing.
- LANGTONS** is Australia's largest secondary (auction) market in Australia for fine and unique local and imported wines.
- JIMMY BRINGS** was Australia's first express alcohol delivery company, delivering a curated range of beer, wine and spirits to customers.
- Shorty's** delivers liquor to corporate customers, offering an extensive range to cater for office functions, events, showcases and other celebrations.
- Pinnacle Drinks** creates and manages our broad portfolio of Own Brand products, which are sold through Endeavour's hotels, stores and on-demand delivery services.
- PARAGON** Wine Estates encompasses our collection of award winning and premium heritage wineries and wine brands in growing regions around Australia and New Zealand.
- MixIn** by Endeavour is our retail media arm, focused on supporting the growth of our supplier brands through highly contextualised advertising.
- endeavourX** is our product-led innovation brand that enables the creation of personalised digital experiences.

## Our operations by location<sup>1</sup>

We own and operate 1,728 retail liquor stores, 354 hotels, five wineries and three bottling facilities across Australia, and one winery in New Zealand.



275

Dan Murphy's stores<sup>2</sup>

1,453

BWS stores

354

Hotels (incl. managed clubs)

6

Wineries

3

Bottling facilities

<sup>1</sup> As at 30 June 2024.  
<sup>2</sup> Including 3 "The Cellar by Dan Murphy's" concept stores.



Endeavour Group 2024 Modern Slavery Statement

## Our team

We employ more than 30,000 team members in communities across Australia and New Zealand. Our team includes people in our offices, stores, hotels and direct employees of our wineries and bottling facilities.

A wide range of jobs and career pathways are available across our businesses and brands. Roles include retail and hospitality service, chefs, cooks and venue managers, winemakers and viticulturists, digital and data specialists, and corporate support roles across marketing, human resources, finance and data analysts and more. We strive for diversity, inclusion and equity across our business, supported by attraction, retention and remuneration frameworks and policies.

We define our own operations as those which relate to direct employees of any Endeavour entity. Sometimes supply chain workers hired by third parties help to fulfil our operations, such as labour hire workers picking grapes on our vineyards to support production. However, as they're not directly employed by us, but rather by one of our suppliers, we consider these workers to be part of our supply chain workforce.

Our median total remuneration gender pay gap is 0.7% and we're working through plans to achieve pay parity. In F24, we were recognised in the Workplace Gender Equality Agency Employer Gender Pay Gaps Snapshot.

30,000+

Total team members

96%

Team members covered by an award or Enterprise Agreement

45%

Women in senior leadership positions

2.85%

Team members identify as First Nations

Dedicated Human Resources and Employee Relations teams manage trade union negotiations as well as set, maintain and follow appropriate procedures so that our entities and brands comply with all relevant laws, regulations and awards relating to employee rights to work, pay and entitlements.

# Our supply chain

There are thousands of people across our supply chain who play an important role in our business, helping us bring our brands, products and experiences to life for our customers, every day. We take our responsibility to respect their human rights seriously.

## Our supply base

The scale and diversity of our operations means our supply chain is large and geographically complex. It includes sole traders and small family businesses through to listed companies and multinationals. We have 9,300+ tier one (direct) suppliers, and thousands more in tiers two and below. For the purpose of this Statement, we define tier one suppliers as those who have a direct contractual relationship with Endeavour to supply goods or services. Tiers two and below are our indirect suppliers; being those who, either directly or indirectly, supply our tier one suppliers.

For example, our wine supply chain could look like this at times:



In other instances, we might source grapes directly from the grower and produce the wine in our own bottling facilities. In this case, the grower would be our tier one supplier.

A majority of our tier one suppliers are based in Australia. 90% of our tier one suppliers are small suppliers. We define small suppliers as those who receive payments from Endeavour of less than \$1 million, with less than \$10 million in annual turnover. These suppliers receive dedicated support from our Merchandise Assist Team, as well as benefits under our permanent Small Supplier Policy, which reduces the Group's payment terms to 30 days for approved Australian businesses with an annual revenue under \$10 million, and 14 days for approved Australian businesses with an annual revenue less than \$1 million.

We have 30 tier one First Nations suppliers. These First Nations suppliers supply a range of products and services including beer, wine, general office products and security services. In F23, we became members of Supply Nation to help shape our work in procurement and supplier diversity with reference to First Nations suppliers. We spent more than \$1.5 million with First Nations suppliers in F24.

Our total tier one supplier spend in F24 was \$8.4 billion across both retail and non-retail suppliers.

## Our retail supply chain

Suppliers who help to develop, produce and manufacture the products and services we sell to customers form our retail supply base. This includes suppliers who provide us with retail-ready products such as proprietary branded liquor, right through to suppliers who, either directly or indirectly (i.e. as tier two and below suppliers), supply the materials necessary for an item to be retail-ready. Examples include suppliers of glass bottles; food products (such as fruit, vegetables and meat) used by chefs in our hotels and wineries to make meals for our customers; and grapes grown for wine. We have 2,000+ tier one retail suppliers.

## Our non-retail supply chain

Equally as important to our operations are the suppliers who provide goods and services that support our business operations. Examples include security services providers who supply security guards to help keep our team and customers safe, and suppliers of store furnishings and team member uniforms. These suppliers support us to keep our stores and hotels open, to market our products, to irrigate our vineyards, and more. We have 7,300+ tier one non-retail suppliers.

# Our supply chain: beyond tier one

People working in our extended supply chain are vital to our business. They support our suppliers to develop our products (both for retail and non-retail) or provide services essential to our operations.

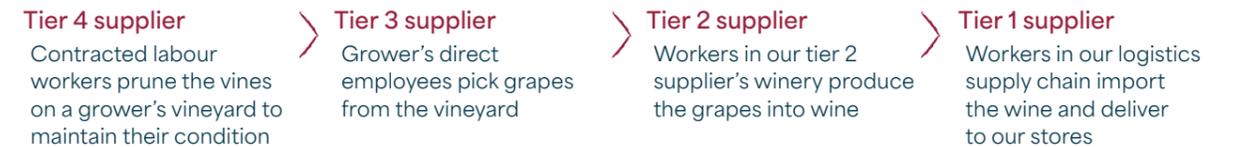
We recognise that modern slavery risks can be more likely to occur in tiers two and below of the supply chain. Without direct relationships with these suppliers, we do not have full oversight of their employees' working conditions, which makes it difficult to monitor for modern slavery or other human rights risks. Additionally, these suppliers may be more likely to be engaged in production and other activities that involve base skilled labour and other risk factors.

Here are some examples of how supply chain workers support our primary operations in tiers two and below of our supply chain:

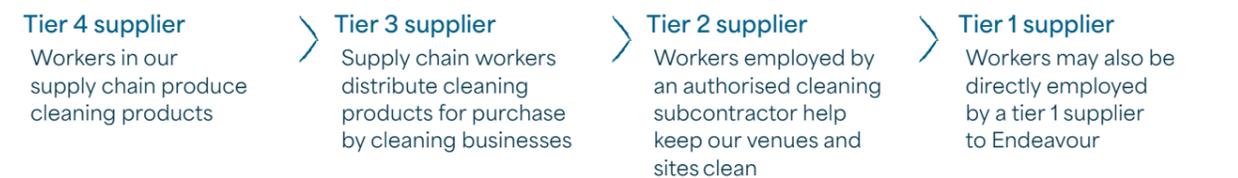
## Production: Glass bottles



## Retail: Wine



## Hospitality: Cleaning



## Delivery: B2C



# Our geographical supply base

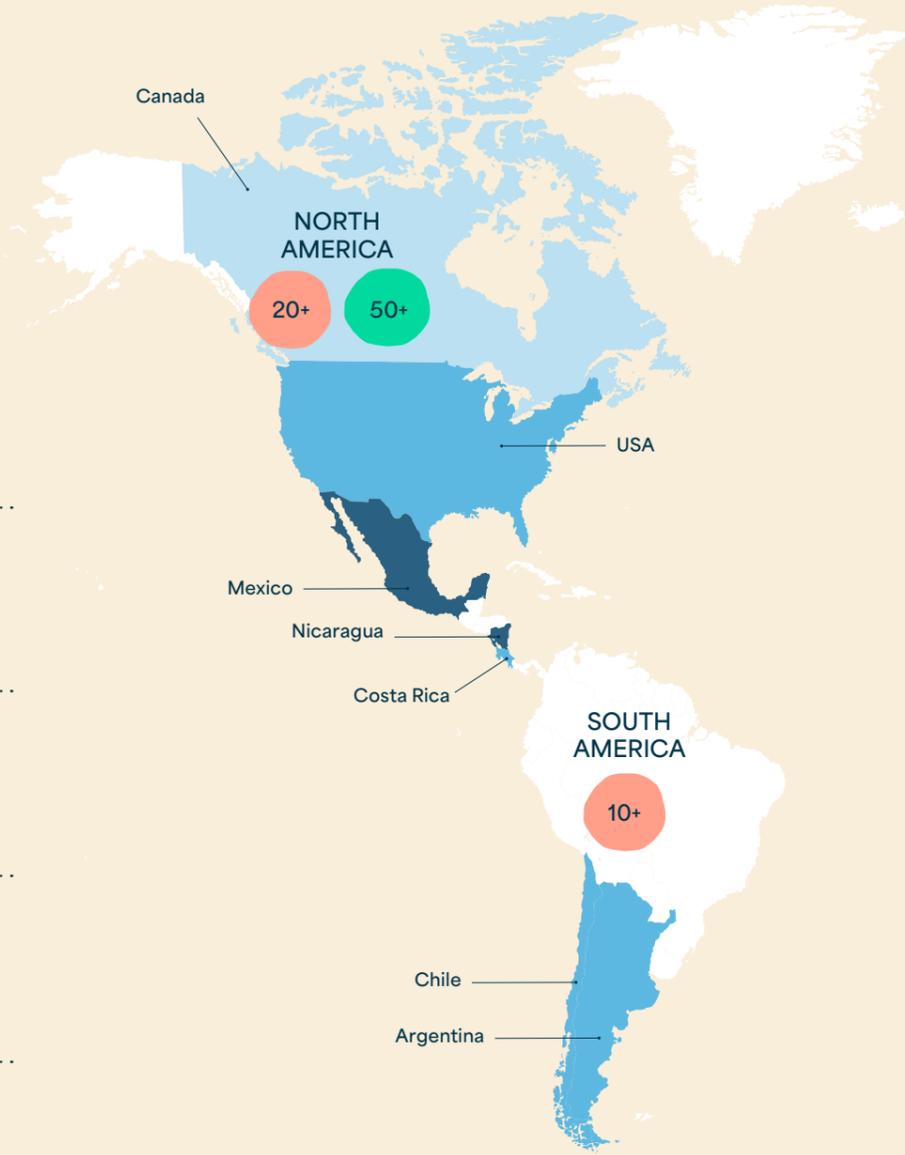
While most of our tier one suppliers are within Australia, our supply chain is global and our tier one suppliers span over 34 countries.

## Examples of products procured by country

These examples are based on the locations of the head offices of some of our direct suppliers based on available data at the time of preparing this Statement. They do not necessarily reflect the locations of suppliers' operational sites.

- Retail suppliers
- Non-retail suppliers

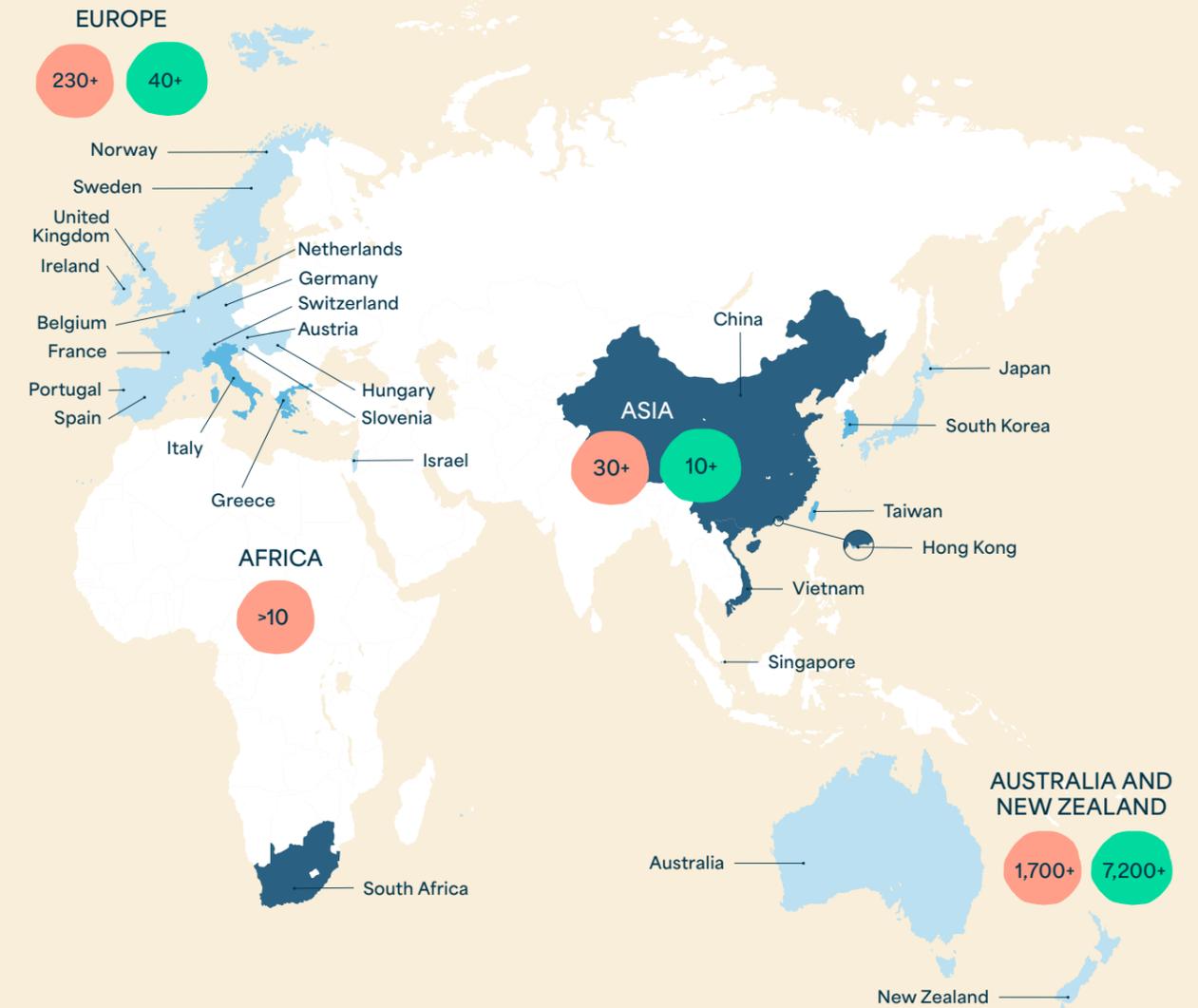
<b>USA</b>	<b>South Africa</b>	
IT	Wine	
Wine	Spirits	
Spirits		
<b>France</b>	<b>Spain</b>	
Wine	Wine	
Spirits	Beer	
Barrels	Spirits	
<b>UK</b>	<b>Italy</b>	
IT	Wine	
Beer	Spirits	
Spirits		
<b>Japan</b>	<b>China</b>	
Beer	Non-liquor merchandise	
Spirits		
<b>Australia</b>	<b>New Zealand</b>	<b>Argentina</b>
Beer	Wine	Wine
Wine	Beer	
Craft spirits	Spirits	
Grapes		
Cleaning	Building maintenance and construction	
Security	Marketing	
Consulting services	IT	



## Risk of modern slavery<sup>1</sup>

Endeavour has direct (tier one) suppliers based in the countries coloured on this map.

- Higher geographic risk of modern slavery
- Medium geographic risk of modern slavery
- Lower geographic risk of modern slavery



## Retail and non-retail suppliers

This map and breakdown is based on the known locations of our direct (tier one) suppliers based on available data at the time of preparing this Statement. It does not necessarily reflect the locations of suppliers' operational sites.

**Retail supply chain:** examples of key high-risk industries

Agriculture, horticulture and viticulture

Glass bottle manufacture

**Non-retail supply chain:** examples of key high-risk industries

Cleaning

Building maintenance and Construction

<sup>1</sup> Based on available data from the 2023 Global Slavery Index.

# Identifying our modern slavery risks

We're doing what we can to understand more about our modern slavery risk profile, so that we can do the right thing for the long term. By identifying our modern slavery risks, and monitoring for new and emerging risks in our industries, and the industries of our suppliers, we're better prepared and informed about the actions we can take to make a positive impact.

To identify our modern slavery risk areas, we first consider four key risk factors:

Risk factor	Presence of vulnerable populations	Business models structured around high-risk work practices	Product and service categories	Geography or country of origin
<b>Risk details</b>	Use of base-skilled labour, migrant labour or non-native language speakers can increase modern slavery risks, including where workers may not understand workplace protections available in the country they are working in.	Using subcontractors, labour hire providers or other third parties reduces transparency and may limit visibility over working conditions.	Specific categories in the supply chain are more prone to labour-related risks, such as due to the way they are manufactured, use of certain raw materials, or reliance on vulnerable workers.	Modern slavery can be more likely to occur in locations with conflict, weak rule of law, high levels of corruption or poor governance. We also recognise that this does not mean modern slavery cannot occur in Australia.

We then consider our relationship to the risks identified using the United Nations Guiding Principles on Business and Human Rights (UNGPs) continuum of involvement, which helps to assess how a business may cause, contribute to or be directly linked to modern slavery.

Continuum	Description	Hypothetical example
<b>Cause</b>	A business may cause modern slavery when its activities (including omissions) directly result in modern slavery occurring.	For example, a business could cause modern slavery by requiring its migrant employees to hand over their passports to their manager to retain, which the business uses to prevent the workers leaving their jobs, resulting in forced labour.
<b>Contribute to</b>	A business may contribute to modern slavery where its actions (or omissions) significantly increase the likelihood of modern slavery occurring in a third party's operations or supply chains.	A business could contribute to modern slavery through its commercial practices. For example, by imposing time and cost pressures so severe that suppliers cannot deliver their orders without engaging in worker exploitation.
<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.	A business may be directly linked to modern slavery where, for example, their suppliers use subcontractors (such as labour hire providers) who exploit their workers through debt bondage.

## Our salient human rights risks

In our two previous years of reporting under the Modern Slavery Act, we focused on the areas that we had the greatest leverage to effect change, prioritising our efforts in industries and areas of risk where we had direct oversight or influence. As our modern slavery risk mitigation program matures and in line with the UNGPs, we recognise that:

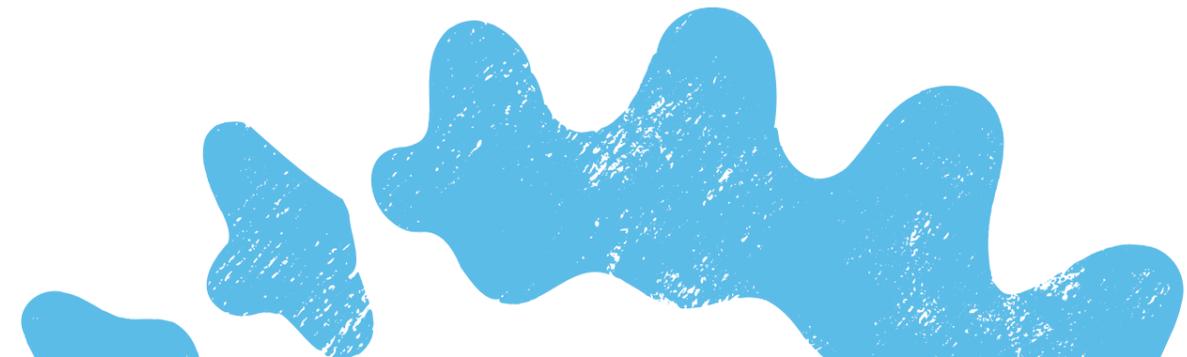
1. Effective human rights due diligence focuses on risks to people, not risks to business; and
2. Where there are risks to people, companies should be looking for ways to build influence in the deeper tiers of their supply chain to effect change.

To identify and understand the key human rights impacts that Endeavour may be connected to, in F24 we engaged a third party business and human rights firm to conduct a human rights saliency assessment on our business. The assessment considered:

- Impacts that are most severe, based on their scope, scale and irremediability.
- Impacts that are most likely to occur (but severity is paramount, so it is weighted more heavily).
- Avoiding human rights impacts (rather than attempting to positively promote human rights).
- Risks to people's human rights, rather than risks to the business (noting overlap).



The following process was used to determine our salient human rights risks:



From this process, our salient human rights impacts were determined to be:

Salient risk	Risk area	Key driving factors
1 Modern slavery (including forced labour and debt bondage)	Supply chain	<ul style="list-style-type: none"> <li>• Sourcing from reported high risk geographies.</li> <li>• Procurement of products with reported associated human rights risks such as uniforms and solar panels.</li> <li>• Procurement of products and materials that rely on the use of temporary, migrant and seasonal labour.</li> <li>• Procurement of services reliant on high risk business models (e.g. high levels of subcontracting).</li> </ul>
2 Substantive right to an effective remedy	Supply chain and delivery operations	<ul style="list-style-type: none"> <li>• The Endeavour Whistleblower service is not regularly used for the reporting of modern slavery or related human rights issues.</li> <li>• While this may indicate a low risk of human rights impacts occurring in Endeavour's operations and supply chain, it may be reflective of the grievance mechanism not being effectively operationalised for human rights impacts.</li> </ul>
3 Other labour exploitation (including underpayments)	Supply chain	<ul style="list-style-type: none"> <li>• Procurement of products that involve materials from reported high risk jurisdictions.</li> <li>• Reported demanding work conditions in some industries (e.g. the provision of security services and the manufacturing of solar panels) and potential cost pressures can contribute to the heightened risk of labour exploitation.</li> </ul>
4 Excessive working hours (that are not reasonably limited)	Supply chain	<ul style="list-style-type: none"> <li>• Sourcing from categories that rely heavily on subcontracting resulting in limited visibility over workers' hours.</li> <li>• Presence of other contributing factors limiting workers' access to fair working conditions (e.g. a high reliance on migrant/base-skill labour).</li> <li>• Demanding workloads and rigid timeframes (e.g. order changes, tight turnaround times, seasonal demands, cost pressures) can further exacerbate excessive working hours.</li> </ul>
5 Workplace health and safety	Supply chain	<ul style="list-style-type: none"> <li>• Known presence of subcontracting and reliance on indirect labour in the supply chain (e.g. cleaning and security).</li> <li>• The labour-intensiveness of the work and the use of hazardous materials and machinery in some key areas of the supply chain (e.g. construction).</li> <li>• Sourcing materials from potentially high risk geographies (e.g. polysilicon is produced for use in the manufacturing of solar panels).</li> </ul>

Many of these salient risks are closely related to modern slavery. For example, if not addressed, poor workplace health and safety practices could escalate into modern slavery.

## Identifying our risks using present risk factors, UNGPs and application of salient risks

To identify our risks, we looked at the industries that we operate in and the products and services we procure. We also reviewed the industries our suppliers operate in and the products and services they procure. We then considered the present risk factors and our potential to cause, contribute to or be directly linked to modern slavery in each area. Finally, we applied the results of our saliency assessment to determine which of our salient risks is relevant to each area.

We understand that modern slavery and other human rights risks may change over time, and we recognise that risk identification and prioritisation is an ongoing process, and Endeavour will monitor and assess changes in its risk profile over time.

### Horticulture/viticulture: We retail wine and use fruit and vegetables in our hotel kitchens

<b>Risk factors</b>	<b>Relevant salient risks</b>	<b>Risk factor details</b>
	1 2 3 4 5	These industries often rely on a migrant workforce and, due to the seasonal nature of the work, on contracted and subcontracted labour.

#### Endeavour's potential relationship to the risk (using UNGPs continuum of involvement)

As we own and operate our own vineyards and have many more in our supply chain, the likelihood of us potentially contributing to or being directly linked to modern slavery in these sectors may be higher than in other areas where we may have a lower level of exposure.

**Examples of potentially affected workers**  
Migrant workers engaged by third parties to prune and pick produce could be charged excessive fees which are used to exploit these workers through debt bondage.

### Cleaning: We utilise cleaning services for our stores, venues, offices and other sites

<b>Risk factors</b>	<b>Relevant salient risks</b>	<b>Risk factor details</b>
	1 2 3 4 5	High presence of migrant and base-skilled labour. High levels of subcontracting are known to occur, with external reporting on industry risks in this sector.

#### Endeavour's potential relationship to the risk (using UNGPs continuum of involvement)

We engage cleaners through suppliers and their contractors and could be directly linked to modern slavery if these workers were exploited. The direct nature of our relationship with relevant suppliers in this sector (including where workers are present on our sites) could also mean we might contribute to modern slavery in this area if our controls failed.

**Examples of potentially affected workers**  
Cleaners employed by a subcontractor to Endeavour may not be receiving their fair pay and entitlements if their employer does not pay them in accordance with relevant laws, regulations and awards.

#### Salient risk key:

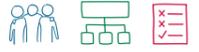
- 1 Modern slavery
- 2 Right to remedy
- 3 Other labour exploitation
- 4 Excessive working hours
- 5 Workplace health and safety

#### Risk factor key:

- Presence of vulnerable populations
- Business models structured around high-risk work practices
- Geography or country of origin
- Product and service categories



**Security:** We utilise security services for our stores and venues

<p><b>Risk factors</b></p> 	<p><b>Relevant salient risks</b></p> <p>1 2 3 4 5</p>	<p><b>Risk factor details</b></p> <p>High presence of migrant and base-skilled labour. High levels of subcontracting are known to occur, with external reporting on known industry risks in this sector.</p>
--------------------------------------------------------------------------------------------------------------	-------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**Endeavour's potential relationship to the risk (using UNGPs continuum of involvement)**

We engage security guards through suppliers and their contractors and could be directly linked to modern slavery if these workers were exploited. The direct nature of our relationship with relevant suppliers in this sector (including where workers are present on our sites) could also mean we might contribute to modern slavery in this area if our controls failed.

**Examples of potentially affected workers**

Security guards stationed may be subject to mistreatment if their employer engages in bullying, harassment or discrimination.

**Non-retail products:** We procure gaming machines, solar panels, rubber gloves, packaging and uniforms, among others

<p><b>Risk factors</b></p> 	<p><b>Relevant salient risks</b></p> <p>1 2 3 4 5</p>	<p><b>Risk factor details</b></p> <p>Products may be manufactured in regions with comparatively weaker human rights protections. Additionally, these products commonly rely on raw materials that may be produced or processed by base-skilled workers in reported high risk geographies.</p>
--------------------------------------------------------------------------------------------------------------	-------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**Endeavour's potential relationship to the risk (using UNGPs continuum of involvement)**

We may be directly linked to modern slavery through our supply chain.

**Examples of potentially affected workers**

Factory workers manufacturing our uniforms and gaming machines could be charged excessive recruitment fees which are used to exploit these workers through debt bondage.

**Outsourced IT helpdesk services:** We have outsourced IT support in our supply chain

<p><b>Risk factors</b></p> 	<p><b>Relevant salient risks</b></p> <p>1 2 3 4</p>	<p><b>Risk factor details</b></p> <p>Inherently high risk due to potential presence of subcontracting arrangements in reported high risk geographies.</p>
----------------------------------------------------------------------------------------------------------------	-----------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------

**Endeavour's potential relationship to the risk (using UNGPs continuum of involvement)**

We may be directly linked to modern slavery in this sector.

**Examples of potentially affected workers**

IT support workers could experience forced labour if their passports were withheld by their employer and used to coerce these workers to remain with their employer.

**Gig economy:** We rely on the gig economy in our delivery operations

<p><b>Risk factors</b></p> 	<p><b>Relevant salient risks</b></p> <p>1 2 4</p>	<p><b>Risk factor details</b></p> <p>Largely migrant workforce in an industry that relies heavily on independent subcontracting, with limited oversight over working conditions.</p>
----------------------------------------------------------------------------------------------------------------	---------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**Endeavour's potential relationship to the risk (using UNGPs continuum of involvement)**

In some instances we engage gig economy drivers directly and in others through our suppliers. We are therefore at risk of both contributing to and being directly linked to modern slavery.

**Examples of potentially affected workers**

On-demand delivery drivers in our supply chain may be exposed to unsafe working conditions if they are required to work excessive hours.

**Raw materials from high risk geographies:** We source products with raw materials that may come from reported high risk geographies (such as tobacco and alcohol)

<p><b>Risk factors</b></p> 	<p><b>Relevant salient risks</b></p> <p>1 2 3 4 5</p>	<p><b>Risk factor details</b></p> <p>Production relies on the use of temporary, migrant and seasonal labour, particularly in harvesting crops and growing tobacco, with limited oversight of working conditions.</p>
----------------------------------------------------------------------------------------------------------------	-------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**Endeavour's potential relationship to the risk (using UNGPs continuum of involvement)**

Raw materials are used by suppliers who are often several tiers deep in our supply chain. We therefore have limited oversight into working conditions and have a risk of being directly linked to modern slavery in this area.

**Examples of potentially affected workers**

Workers stationed on mines extracting raw materials may be subject to worker exploitation if their employer required them to work in unsafe conditions.

**Transport and logistics (including shipping):** We have an extensive logistics network to import products to Australia and transport them to our sites

<p><b>Risk factors</b></p> 	<p><b>Relevant salient risks</b></p> <p>1 2 3 4 5</p>	<p><b>Risk factor details</b></p> <p>High risk category due to the known high levels of subcontracting and reliance on indirect labour, as well as working conditions due to the use of heavy machinery. We also recognise the heightened risks of modern slavery to seafarers that have been reported.</p>
----------------------------------------------------------------------------------------------------------------	-------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**Endeavour's potential relationship to the risk (using UNGPs continuum of involvement)**

We directly engage transport and logistics suppliers and have many more in our supply chain. There are therefore risks that Endeavour could contribute to or be directly linked to modern slavery.

**Examples of potentially affected workers**

Seafarers may be subject to forced labour if they are required to remain on the ship for excessive, extended periods of time.

**Construction:** We regularly refurbishing our stores and venues

<p><b>Risk factors</b></p> 	<p><b>Relevant salient risks</b></p> <p>1 2 3 4 5</p>	<p><b>Risk factor details</b></p> <p>The construction industry carries human rights risks due to the levels of known subcontracting, use of hazardous materials and machinery, and materials sourced from potentially high risk geographies.</p>
------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**Endeavour's potential relationship to the risk (using UNGPs continuum of involvement)**

We directly engage construction suppliers, meaning there are risks we could contribute to or be directly linked to modern slavery.

**Examples of potentially affected workers**

Construction workers engaged to build or refurbish our sites could be subject to modern slavery through debt bondage if they were required to pay excessive fees to their employer to maintain their employment.

<p><b>Salient risk key:</b></p> <ul style="list-style-type: none"> <li>1 Modern slavery</li> <li>2 Right to remedy</li> <li>3 Other labour exploitation</li> <li>4 Excessive working hours</li> <li>5 Workplace health and safety</li> </ul>	<p><b>Risk factor key:</b></p> <ul style="list-style-type: none"> <li> Presence of vulnerable populations</li> <li> Business models structured around high-risk work practices</li> <li> Product and service categories</li> <li> Geography or country of origin</li> </ul>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**Mergers and acquisitions:** We sometimes purchase existing businesses to bring them into one of our brands

**Risk factors**



**Relevant salient risks**



**Risk factor details**

By purchasing existing businesses to bring them into one of our Endeavour brands, we inherit any potential existing risk factors those businesses may carry.

**Endeavour's potential relationship to the risk (using UNGPs continuum of involvement)**

Where a site we acquire is directly linked to modern slavery risks in its own supply chain, we would become directly linked to these same risks once we acquire the site. If a site we acquired was somehow causing or contributing to modern slavery (which we consider unlikely), we may also be at risk of causing or contributing to modern slavery once we acquire the site.

**Examples of potentially affected workers**

Workers at a site we acquire (e.g. a new winery) could be exploited if they were being required to work excessive overtime hours without compensation.

**Overseas recruitment:** We engage recruitment firms to bring cooks and chefs from overseas to fill labour shortages in our hotels

**Risk factors**



**Relevant salient risks**



**Risk factor details**

Known industry risks associated with overseas recruitment include debt bondage and deceptive recruitment. Workers may be recruited from countries that may have comparatively weaker reported human rights protections.

**Endeavour's potential relationship to the risk (using UNGPs continuum of involvement)**

While cooks/chefs brought to our business through overseas recruitment firms end up direct employees of Endeavour, there are risks that they may be subject to modern slavery practices via the recruitment firms, including if they were required by these firms to pay recruitment fees which could lead to debt bondage.

**Examples of potentially affected workers**

Cooks and chefs working in our hotel kitchens could experience debt bondage if they were required to pay excessive recruitment fees that were used by overseas recruitment firms to exploit these workers.

**Production:** Our production operations include our wineries and bottling facilities, and we rely on production in our supply chain for our retail and non-retail products

**Risk factors**



**Relevant salient risks**



**Risk factor details**

Production in our wineries and bottling facilities includes the use of contract labour. Production in our supply chain spans multiple jurisdictions (including countries with comparatively weaker human rights protections), and often relies on a base-skilled and migrant workforce.

**Endeavour's potential relationship to the risk (using UNGPs continuum of involvement)**

Our extensive production operations and supply chain (with both direct - tier one - and indirect - tiers two and below) means we are at risk of both contributing to and being directly linked to modern slavery.

**Examples of potentially affected workers**

Factory workers in manufacturing facilities could be victims of child labour if they were minors exposed to hazardous working conditions that put them at risk of serious injury.

**Salient risk key:**

- 1 Modern slavery
- 2 Right to remedy
- 3 Other labour exploitation
- 4 Excessive working hours
- 5 Workplace health and safety

**Risk factor key:**

- Presence of vulnerable populations
- Product and service categories
- Business models structured around high-risk work practices
- Geography or country of origin



**Other impacts affecting modern slavery risks**

**Labour shortages**

In industries or regions where labour is difficult to source, choice of suppliers and influence over their practices can be limited. As we disclosed in our F23 Modern Slavery Statement, we encountered two separate instances where labour hire providers servicing our vineyards opted to cease doing business with Endeavour rather than comply with requests to demonstrate labour compliance. Sourcing seasonal labour in remote locations is challenging when suppliers perceive that they can easily seek work with other businesses. This reduces our influence and has the potential to limit oversight into suppliers' practices. For this reason, we consider industries with known labour shortages to carry higher modern slavery risks. These industries include viticulture, security, and construction.

**Cost of living**

Since the previous reporting period, Australia's Consumer Price Index rose by 3.8%<sup>1</sup> and Employee Living Cost Index by 6.2%<sup>2</sup>. The global rising cost of living has increased costs for not only our business, but for our suppliers and their workers. We recognise that increased cost pressure has the potential to lead businesses to attempt to reduce their costs how they can, and we are mindful of the risk that this could lead to worker exploitation. Additionally, living cost pressures could incentivise workers to accept jobs with employers who may engage in unlawful practices, which could include modern slavery. We therefore consider the increasing cost of living to be a risk factor for modern slavery.

1 Australian Bureau of Statistics: Consumer Price Index, Australia [www.abs.gov.au](http://www.abs.gov.au)  
 2 Australian Bureau of Statistics: Living Cost Index, Australia [www.abs.gov.au](http://www.abs.gov.au)

# Assessing and addressing our modern slavery risks

To address modern slavery and to make positive, sustainable change, we need a strong foundation and high-level commitments to support this work. We're strengthening our governance structures to mitigate risks, and embedding management frameworks and standards into our ways of working.

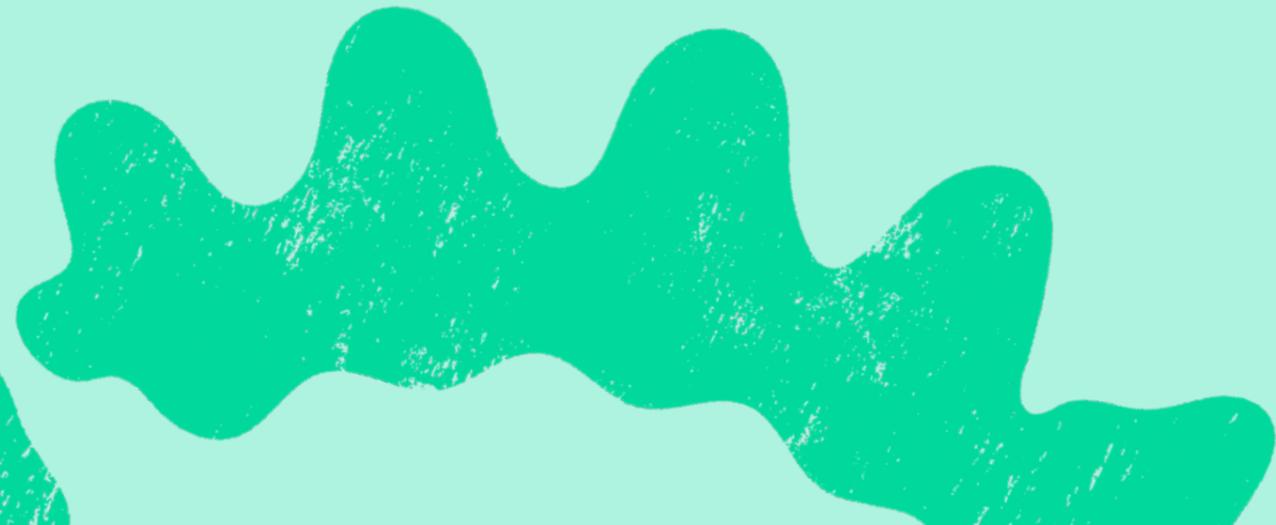
We've been working to strengthen our modern slavery response through improved policies and frameworks, direct worker voice projects, and through partnerships with industry. In F24 we:

- Published our new Company-wide, Board-approved Human Rights Statement;
- Conducted an exercise to assess modern slavery risks with migrant workers in our hotels;
- Took steps to strengthen our supplier due diligence processes;
- Partnered with Fair Farms to deliver a pilot project for grower certification; and
- Undertook a salient human rights assessment to better understand our potential to be involved in modern slavery and other human rights harm.

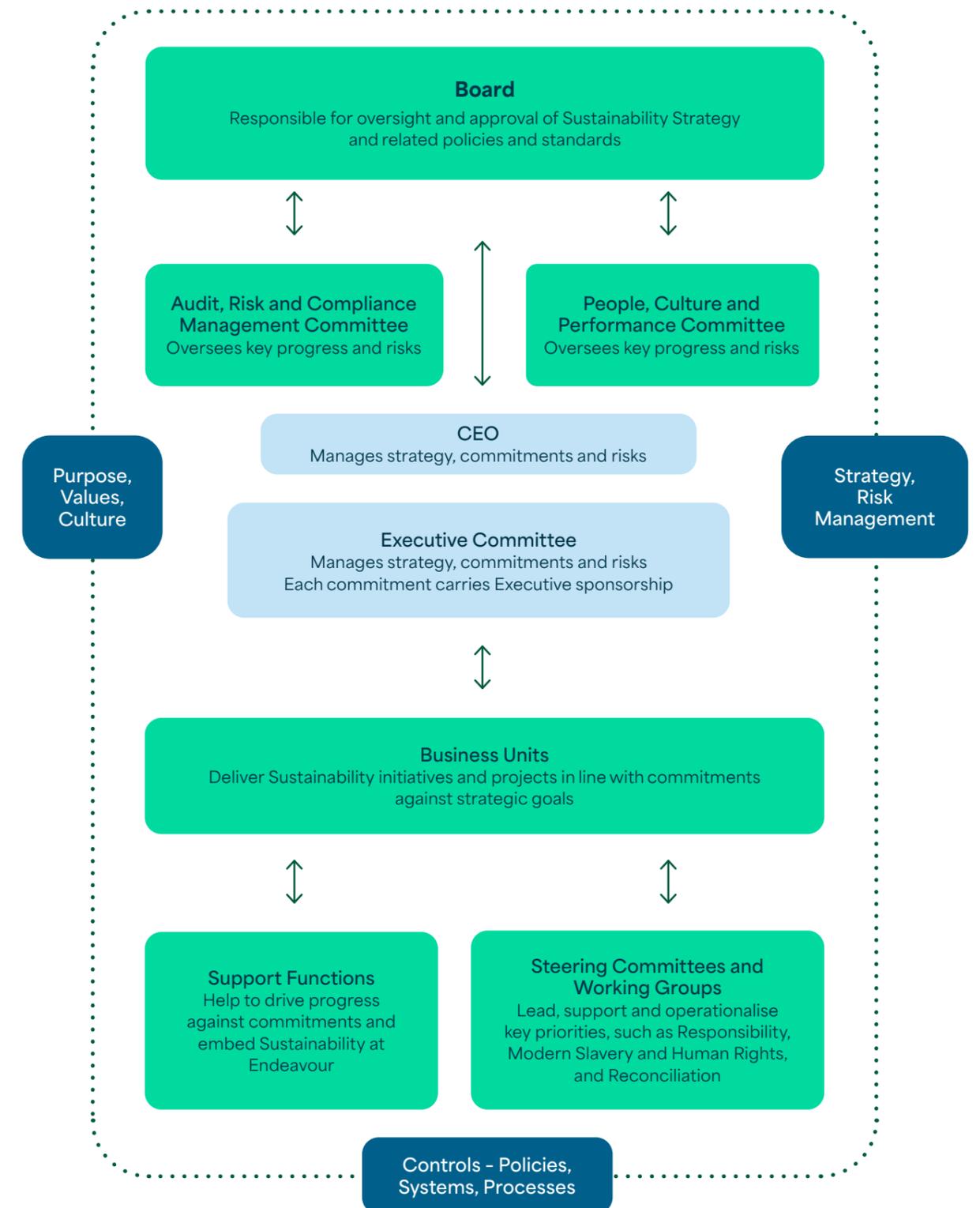
## Our Sustainability Governance Framework

Our modern slavery response forms part of our broader Sustainability Governance Framework, including our Sustainability Strategy, which includes a goal to respect and promote human rights in our operations and supply chain. Within this goal is a commitment to maintain an effective Responsible Sourcing Program to help ensure our products and services are ethically produced and sourced, and that our supply chain is free of modern slavery, including practices such as forced labour. It also includes building strong, mutually beneficial relationships with our suppliers by fostering trust, being transparent and engaging with them fairly and equitably.

🔗 See [www.endeavourgroup.com/sustainability](http://www.endeavourgroup.com/sustainability)



## Our Sustainability Governance Framework



## Our Modern Slavery Governance Structure

### Board

Our Board reviews and approves our Human Rights Statement, Responsible Sourcing Policy and annual Modern Slavery Statement.

### Audit, Risk and Compliance Management Committee

The Audit, Risk and Compliance Management Committee (a Committee of the Board) receives two standalone papers about Endeavour’s modern slavery response and progress each year. The Committee provides feedback and direction on the actions taken to identify, assess and address modern slavery risks in the biannual papers, and they also receive quarterly updates on the progress of Endeavour’s Responsible Sourcing Program and human rights commitment as part of a wider ESG Board quarterly update. During the reporting period the Committee were also briefed on the Human Rights Statement and recommended its approval to the Board.

### CEO and Executive Committee

Endeavour’s CEO is accountable for implementing our human rights commitments. Operationally, our responsibility for modern slavery risk management sits with the Director of Corporate Affairs and Sustainability, whose team develops our modern slavery risk management frameworks and strategies.

### Business units

The central Sustainability team works closely with relevant business units to implement modern slavery risk mitigation frameworks and strategies and embed them into our ways of working. We also have dedicated sustainability subject matter experts in different parts of our business including Procurement, Pinnacle, Facilities Management and Endeavour Build (formats, fit outs and construction), who work closely with the central Sustainability team on ESG matters including modern slavery.

### Support functions

Supporting the business units to execute our modern slavery response is the central Sustainability team, including our dedicated Human Rights resource.

### Modern Slavery Working Group

Key to our modern slavery response is Endeavour’s Modern Slavery Working Group and its members. Representatives from our central Sustainability team, Risk and Compliance, Legal, Pinnacle and Non-Trade meet regularly to consult on the progress of the program and provide support to unlock barriers to execution.

## Our Modern Slavery Risk Management Framework

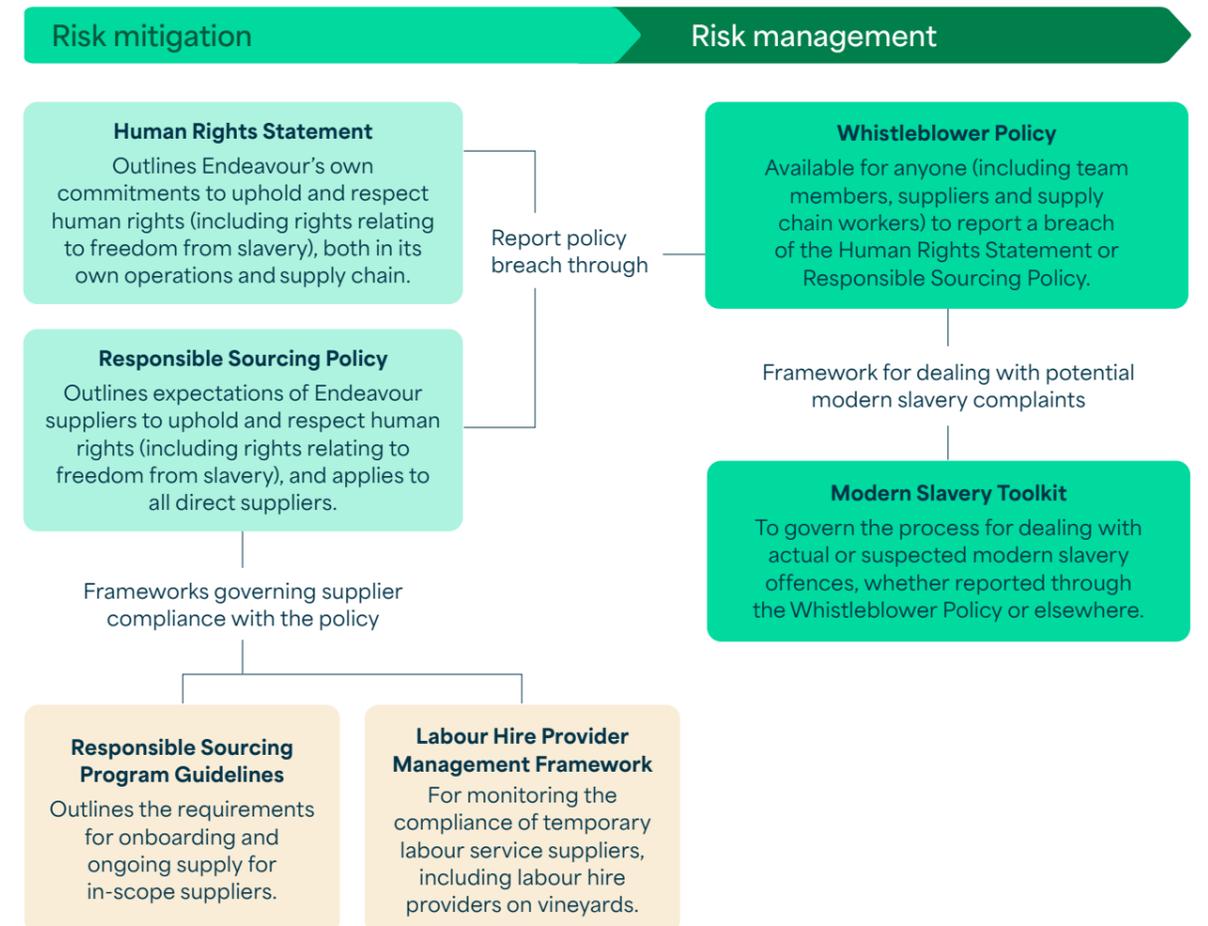
In the Endeavour Group F23 Modern Slavery Statement, we committed to introducing a Group-wide policy to affirm our commitment to human rights.

We had previously identified an opportunity to enhance our Modern Slavery Risk Management Framework. We had a policy that details Endeavour’s expectations of its suppliers in respect of human rights and modern slavery (the Responsible Sourcing Policy), but did not make the same external Board-approved commitments of itself as an entity.

In F24, we released our new Group-wide policy: the Human Rights Statement. This external policy sets out our commitment to respecting the rights of all workers in our operations and supply chain, including migrant workers; reaffirms our commitment to First Nations peoples’ rights (referencing our Reconciliation Action Plan); human rights defenders; and women’s rights. It also commits to developing and strengthening our human rights due diligence, respecting the right to remedy, and to reporting regularly on our progress. The Human Rights Statement was developed with the support of external expertise and in consultation with cross-functional areas of the business. It was approved by the Endeavour Group Limited Board of Directors in May 2024.

The below diagram shows how our new Human Rights Statement fits into our overall Modern Slavery Risk Management Framework:

### Our Modern Slavery Risk Management Framework



## Relevant policies

We have a suite of Board-approved, external policies that support our modern slavery response.

Policy/framework	Purpose and relevance to modern slavery	Policy implementation
<b>Human Rights Statement</b>	Our new Human Rights Statement sets out our commitments to human rights. It includes a commitment to using our influence to prevent and mitigate all forms of modern slavery.	Following its publication on our website, we communicated this new policy to our team through our senior leaders. Leaders were instructed to share the new policy and its commitments with their team.
<b>Responsible Sourcing Policy</b>	Our Responsible Sourcing Policy applies to our suppliers. It prohibits our suppliers from engaging in any form of modern slavery, and also requires them to have effective systems and procedures to mitigate modern slavery risks.	The policy is available on our website, and was communicated to our suppliers through our quarterly supplier magazine when it was last refreshed in the previous reporting period.
<b>Whistleblower Policy</b>	Our Whistleblower Policy sets out the process for raising concerns related to a number of matters including human rights, modern slavery and other breaches of the Responsible Sourcing Policy. Affected or potentially affected workers including team members, suppliers and their workers are encouraged to use the channel.	We've been working to strengthen the implementation of our Whistleblower Policy as it relates to its use for modern slavery and related grievances. Further information about actions taken in this area can be found on page 40.
<b>Code of Conduct</b>	Our Code of Conduct outlines our expectations of team members who perform work for Endeavour (including contractors and Directors). It includes a direction from Endeavour for team members to prioritise safety, health and wellbeing (including psychological safety), as well as setting out unacceptable behaviours such as bullying, harassment, discrimination and victimisation.	Our Code of Conduct is available on our website and is provided to our team members when they receive an offer of employment from Endeavour. Upon commencing employment, all team members are required to complete training on the Code, and to repeat this training annually thereafter. It is a condition of employment with us that our team operates in line with our Code, with compliance to the Code written into our standard employment contracts.

🔗 See [www.endeavourgroup.com/sustainability](http://www.endeavourgroup.com/sustainability)



## Our Responsible Sourcing Program

### Responsible Sourcing Policy

Through their contracts with Endeavour, our direct (tier one) suppliers agree to comply with our Responsible Sourcing Policy. The policy prohibits suppliers from engaging in any form of modern slavery and sets out the fundamental rights at work that they must respect. Our suppliers must be able to meet our minimum expectations and have capacity to continuously improve on key responsible sourcing indicators.

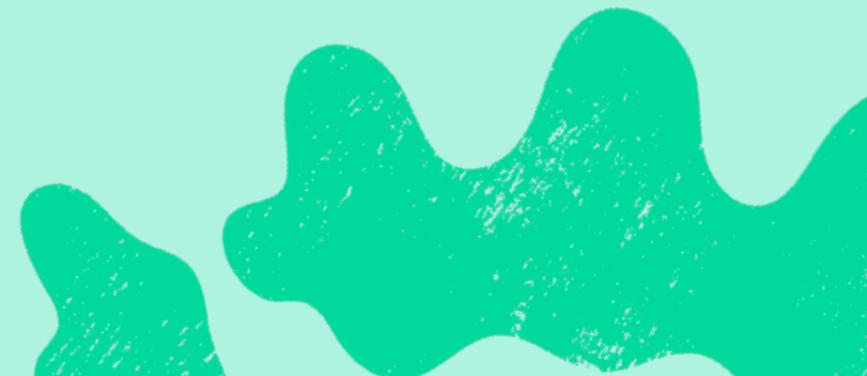
Our Responsible Sourcing Policy extends beyond compliance with regulations. We recognise that some jurisdictions may have comparatively weaker human rights related laws and protections than others, with some countries and regions engaging in reported State-sponsored forced labour. Endeavour is committed to respecting the internationally recognised human rights set out in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. These human rights are not transient or dependent on the country our suppliers' workers operate in. Therefore, it is important that our suppliers commit to upholding the human rights of their workers through compliance with our Responsible Sourcing Policy, even if our policy is more stringent than the law.

### Responsible Sourcing Program and Own Brand suppliers

Our Responsible Sourcing Program is how we monitor compliance with our Responsible Sourcing Policy. Suppliers falling in scope of the program have additional compliance requirements, designed to demonstrate to Endeavour that the supplier effectively manages human rights risks in their own operations. With over 9,300 tier one suppliers across so many different industries, it is not possible to directly monitor all of our suppliers' compliance with our Responsible Sourcing Policy on a continuous basis. That is why we have chosen to focus first on our Own Brand suppliers.

Our Own Brand suppliers include those who supply product that is trademarked or registered to Endeavour, where we are licensed by the brand owner to use the brand on the product we are developing, or where we have directed the design or development of the product composition, ingredients or packaging. Own Brand suppliers are direct suppliers to Endeavour, making products for our Own Brands, so we have a close relationship with the potential to both contribute to or be directly linked to modern slavery. Our Responsible Sourcing Program Supplier Guidelines detail additional compliance obligations.

Requirements for our Own Brand suppliers under our Responsible Sourcing Program:



As at the end of the reporting period, we have 55 Own Brand suppliers actively monitored under our program. 89% have completed their Self-Assessment Questionnaire (SAQ), with the remaining 11% taking steps to achieve compliance.

18 of our Own Brand suppliers undertook social compliance audits during the reporting period. These audits covered sites that, together, employ 4,011 supply chain workers. They are conducted by a third party audit firm and give Endeavour some oversight into supplier practices where it would not be possible or practical otherwise (for example, where the supplier is based overseas). Social compliance audits are relevant to our modern slavery response as they consider working hours, working rights (including pay and entitlements) and working conditions. As outlined on page 38, issues in these areas can indicate more serious issues with a supplier's practices.

### Own Brand supplier audit findings and insights

Health and safety issues make up the most findings from our suppliers' social compliance audits. The below explains the most commonly occurring issues in our Pinnacle Own Brand supply chain. Many of these findings relate to suppliers not having formal policies (e.g. a child labour policy) rather than an indication of more serious underlying issues.

#### Audit findings and insights

The below graphic breaks down Pinnacle's Own Brand supplier audit findings by most commonly occurring category. Other categories not listed on this page each constitute less than 3% of overall findings.



#### Health and safety 42.9%

- The most common H&S findings relate to fire safety.
- These include issues with emergency lighting, incorrect fire exit signage and missing records of fire drills.
- Others included chemical storage, H&S training and electrical safety.

#### Management systems 9.8%

- These findings cover a number of different issues relating to suppliers not having adequate policies or systems to manage human rights risks.
- Findings included inadequate training on policies and sites not having systems in place to monitor the effectiveness of their policies and procedures.

#### Working hours 9.8%

- These findings relate to hours worked exceeding legal limits or the ETI Base Code, or issues with overtime pay calculation.

#### Wages 9.8%

- These findings relate to issues identified with how suppliers record, calculate or distribute wages.
- These included isolated instances of employers miscalculating wages (which suppliers have either remediated or are taking steps to remediate). No significant underpayments were identified.

#### Regular employment 7.1%

- The majority of these findings relate to issues with workers' employment contracts.
- Other findings relate to suppliers not having adequate systems to monitor their labour hire providers' compliance.

#### Environment 4.5%

- Findings are varied and include suppliers not having adequate policies, incorrect waste disposal and no monitoring of energy or water usage.

#### Entitlement to work 4.5%

- All of these findings relate to suppliers not having systems to verify workers' rights to work.
- None relate to actual findings of people on-site without valid working rights.

#### Children and young workers 4.5%

- Most of these findings relate to suppliers not having child labour policies. Others relate to suppliers not having systems to verify workers' ages.
- None relate to actual child labour findings.

#### Other 7.1%

- A majority of findings in other categories relate to suppliers not having adequate policies (such as modern slavery policies and grievance procedures).

### Responsible Sourcing Program expansion update

In our previous Statement, we disclosed that we would work with our Exclusive branded suppliers to have them onboard our Responsible Sourcing Program with completed risk assessments. This impacts a cohort of over 300 suppliers, and is now a requirement under our Responsible Sourcing Program Guidelines. We have communicated our requirements to these suppliers and are working to support them to achieve compliance.

We identified early in the reporting period that this exercise would extend beyond F24. These are new requirements for our suppliers under our Program, some of whom require additional time and support. We also identified a need to bolster our internal reporting capabilities for the specific purpose of monitoring and managing Program compliance, as well as accurately reporting progress.

In F25, we will work to strengthen our reporting systems to support accurate reporting and sharing of data and insights gained from risk assessments.

### Updates to our general merchandise sourcing process

In F24, we initiated a review into our sourcing process for general merchandise. General merchandise describes any traded or not-for-retail goods that are not liquor or food items. Examples include gift bags and boxes, 'free with purchase' gifts, wine glasses, bottle openers and other promotional items.

Despite not being core products for our business, many of these items are sourced from or produced in geographies with comparatively weaker human rights related laws and protections, such as China. We recognised an opportunity to strengthen our sourcing process to put adequate controls in place to mitigate and manage modern slavery risks.

To align general merchandise sourcing with our Responsible Sourcing Program, we are implementing formal gates in our sourcing process. New suppliers short-listed by category buying teams will be referred to our Group Quality Assurance team for review. Just like our Own Brand retail suppliers, general merchandise suppliers must demonstrate compliance with our Responsible Sourcing Policy prior to business award, which means undertaking a social compliance audit prior to supply if the supplier's risk has been deemed moderate-to-high.

By the end of F25, the process will be formalised, and all new orders for general merchandise will be required to adhere to the new sourcing process. Suppliers must demonstrate compliance with our Responsible Sourcing Policy prior to business award.



## Cleaning and security

We engage third party cleaning and security providers across our stores, hotels and other sites. High levels of subcontracting, use of migrant labour and a base-skilled workforce may present modern slavery risks to people in these industries. We're working to reduce these risks and protect workers in our cleaning and security supply chains.

Both the cleaning and security services industries in Australia can carry known high human rights risks including modern slavery. This is due to:

- Vulnerable populations: there is a high presence of migrant workers in these industries and the work requires a base level of skill. Migrant and base-skilled workers can be more vulnerable to modern slavery risks.
- High risk business models: high levels of subcontracting are known to occur in these sectors, which can limit visibility over working conditions.
- High risk services category: there has been external reporting on the known industry risks in both the cleaning and security industries.

Endeavour also has stores and hotels in regional locations across Australia where there may be labour shortages. For the reasons outlined on page 23, we consider labour shortages to be a modern slavery risk factor. In addition, both the cleaning and security industries present risks of all five of our salient human rights risks.

We have previously identified gaps in our management of cleaning and security services contracts, particularly in ALH where contract management has been decentralised.

### Onboarding process for high risk service suppliers

In our F23 Modern Slavery Statement, we reported a new process in our onboarding framework for high risk services suppliers. This new process requires potential new cleaning and security service providers to complete a human rights questionnaire detailing their processes and systems to manage human rights (including modern slavery) risks in their own operations and supply chains. Before business can be awarded to a new cleaning or security service provider, our Human Rights team reviews the questionnaire to determine if the supplier's controls are sufficient, require additional information, or pose an unacceptable human rights risk. During the reporting period two supplier human rights questionnaires were reviewed as part of one tender.

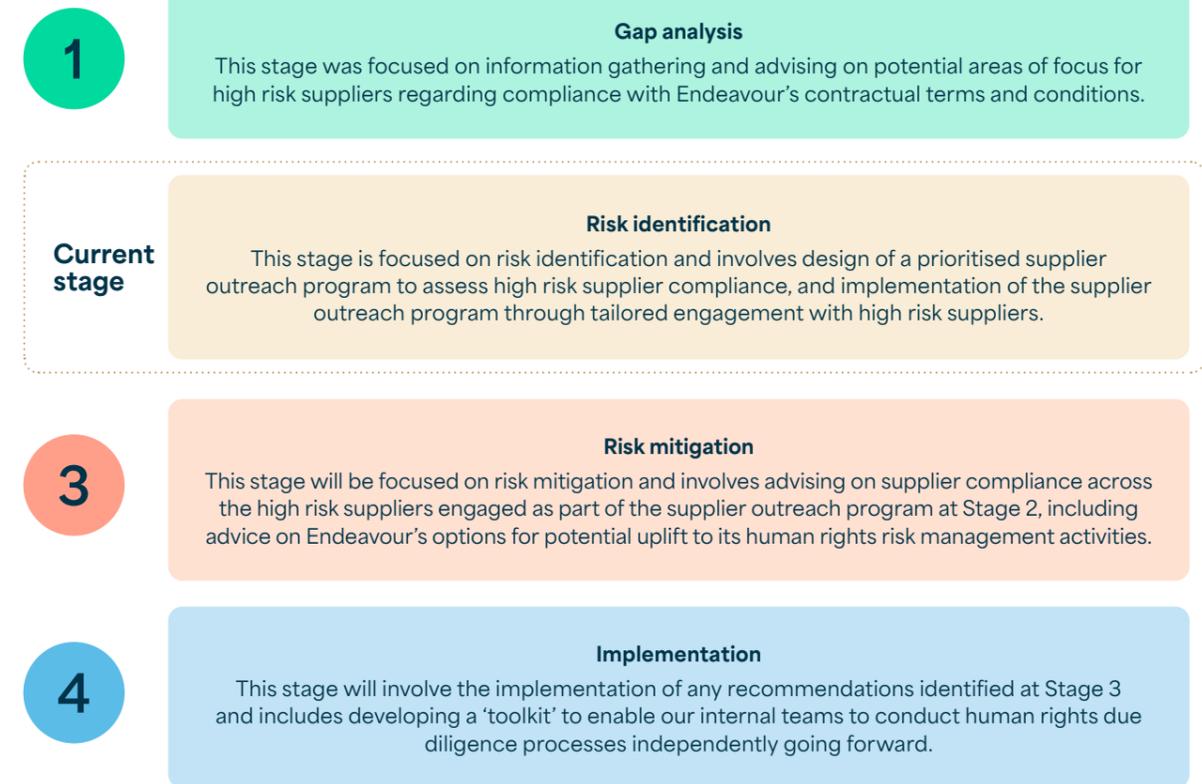
### Strengthening controls in cleaning and security service contracts

While we have made some changes to our onboarding process, we recognise the risks that remain with our current suppliers and opportunities to improve our ongoing supplier engagement. In our F23 Modern Slavery Statement, we detailed that we had engaged an external firm with expertise in business and human rights to help us conduct a due diligence exercise into our current cleaning and security service providers.

### Progress to date

This project is being executed in two stages. Stage 1 is now complete, with Stage 2 (current stage) currently underway.

## Cleaning/security project status



### Findings from stage 1

The first stage of this project considered:

- Our existing policies and procedures as they relate to human rights risk management activities.
- A selection of other relevant materials, including supplier questionnaires, risk assessments and remediation processes.
- Information gathered from two focus groups with key Legal and Procurement representatives.

One of the key recommendations that came from Stage 1 of this project was to enhance our due diligence processes for cleaning and security service providers. Without a standardised approach to contract management, there were opportunities to strengthen our engagement with these suppliers to provide better oversight over supplier compliance and potential human rights (including modern slavery) issues.

### Stage 2

To enhance our human rights due diligence in this area, we have commenced a preliminary process to scope, design and implement a tailored supplier outreach program. In F24, we issued formal notices to a subset of our suppliers in this cohort, advising them that we are conducting this due diligence project and requesting their participation in a formal review of their processes.

Following these notices, we then requested suppliers book a meeting with us to discuss their labour and subcontracting practices. We are keen to understand if there is any unauthorised subcontracting occurring in this part of our supply chain, what systems and processes our suppliers have in place to manage modern slavery risks, and how their guards are paid and treated in accordance with all relevant laws, awards and regulations.

This project is ongoing and we will report on the outcome from the remaining stages in our next Statement.



## Viticulture

There are known risks of modern slavery in the viticulture industry, which has traditionally high levels of subcontracting due to the seasonal nature of the work. With our own viticulture operations and an extensive viticulture supply chain, this is a sector where we have direct influence, but a whole-of-industry approach is needed to make positive, sustainable change.

Across our Pinnacle Drinks portfolio, we have 23 winemakers and 14 viticulturalists and vineyard managers managing 550 hectares of owned and leased vineyards. Pinnacle Drinks supply 15% of our total wine range across our retail network, with the rest produced and supplied by other businesses. As a grape grower, we grow fruit on our own vineyards as well as on vineyards we lease. We also contract suppliers to grow fruit on our behalf and purchase fruit via grower contracts in addition to purchasing bulk wine.

### The risks

Both horticulture and viticulture carry known industry risks. There are high levels of subcontracting known to occur in these sectors, and because of the seasonality of the work, it is difficult to directly employ workers to pick/prune grapes. There are also reports of poor record keeping, cash-in-hand payments, unsafe working conditions and excessive working hours in these industries. The workforce is also dominated by migrant workers in base-skilled positions, who can be more vulnerable to modern slavery risks.

### What we already know

Last year, we reported our social compliance audits at our vineyard sites. We found issues with the record keeping of our labour hire providers, transparency issues and, in some cases, unwillingness to comply. We reported two separate instances where labour hire providers opted to cease doing business with Endeavour rather than demonstrate labour compliance. Through this process we took away two key learnings:

1. Industry labour shortages can exacerbate poor practice. Seasonal labour in remote and regional locations (where vineyards are often located) is hard to come by. Businesses are competing for labour during harvest and pruning seasons, where work is only required for a definite period - meaning sites do not always have their first choice of labour hire providers.
2. A whole-of-industry approach is needed to improve practices. Labour hire providers can opt to stop providing services to businesses who ask for demonstrated compliance because they know they can seek work elsewhere with those who aren't asking for the same. When this happens, workers are moved from one site to another and, while the risk may have been mitigated for the first business' own operations, it may have been pushed into their supply chain. And, in such a case, little to no impact is made for potentially affected workers.

## Fair Farms pilot project

In our previous Modern Slavery Statement, we shared our plans to commence a Fair Farms pilot project with some of our growers. Fair Farms is an industry-led initiative that offers a certification scheme for fair and ethical employment practices on farms. To become Fair Farms certified, farms sign up to the Fair Farms platform, complete an online self-assessment questionnaire, undertake training to address any gaps identified in the questionnaire, and then participate in a social compliance audit.

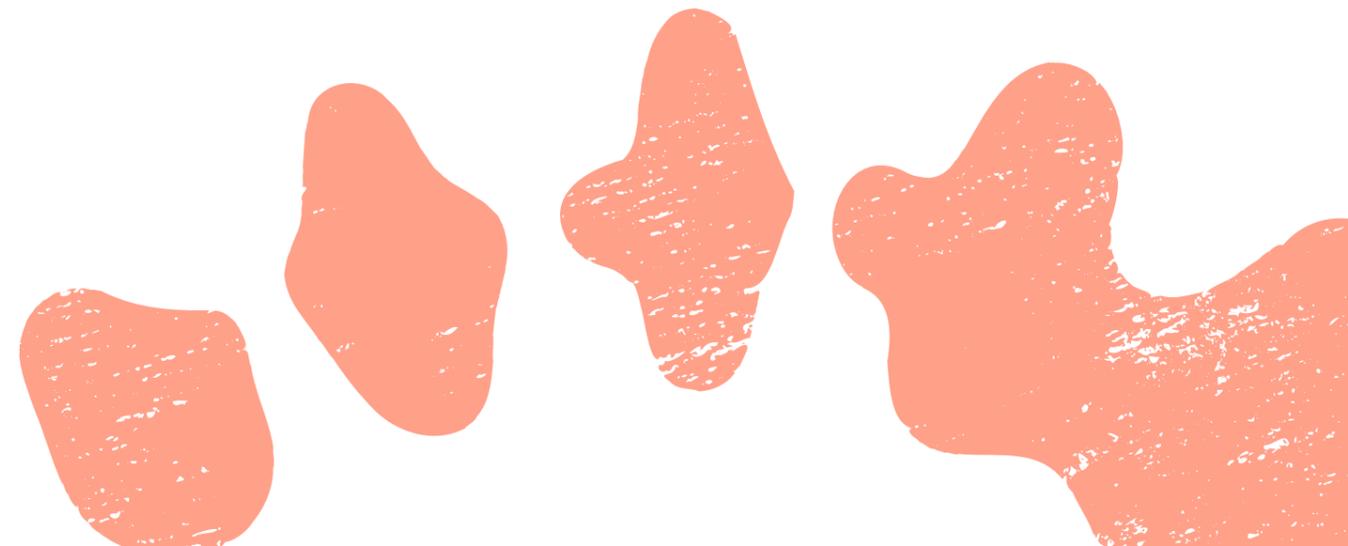
We reported last year that we were considering if and how we incorporate Fair Farms certification into our Responsible Sourcing Program for growers. In F24, we reached out to our growers in the Barossa in South Australia to seek expressions of interest for participation in this pilot project. Growers were invited to become Fair Farms certified at Endeavour's cost. In return, growers provided feedback on the program and learnings. Three growers volunteered to participate in this project and underwent Fair Farms training, with two electing to undertake the audit. Our own South Australian vineyards in the Barossa also underwent Fair Farms training and audit.

### Lessons from the pilot project

Together with the team at Fair Farms, we worked closely with our growers before, during and after their audits. From the pilot, we learned:

1. Social compliance is more difficult for smaller growers. Following the audits on each site, we reflected on the notable difference in results depending on the size of the business undertaking the audit. Bigger growers (including our own Dorrien vineyards) have greater access to resources to manage compliance. On the day of the audit at Dorrien, we had representatives from our People and Culture, Safety, Sustainability and Human Rights teams, as well as our site vineyard management team. Conversely, we have growers in our supply chain who can operate as a team of one. Such suppliers will naturally need more support, including access to processes, systems and policies to help them achieve the same level of compliance as a larger business.
2. Even as a big business, we have room to improve. Despite our best efforts to prepare for the audit, the auditor still identified a small number of health and safety-related non-conformances on our Dorrien vineyards, which we are working to remedy. This demonstrated the benefit of Fair Farms certification and having a third party independently assess site practices and identify areas for improvement.
3. When our suppliers invest in compliance, we should invest in them. Even for the best, most lawful business, social compliance comes at a cost. It requires an investment of time to prepare, to complete the audit, and to remedy any issues identified. It also requires a financial investment if the supplier is paying for their own audit, as well as any non-conformances that require spend to rectify (for example, for new equipment). We recognise the need to be fair and equitable when imposing additional requirements on our suppliers.

We are now looking at how we can introduce Fair Farms certification for growers into our Responsible Sourcing Program. Growers who participated in the pilot program agreed that maintaining certification is worth it to their business if they know they have a long-term supply contract. Suppliers are willing to invest in social compliance if we are investing in them. With this in mind, we will continue to work with our suppliers, Fair Farms and broader industry to integrate social compliance requirements into our supply terms with some of our growers. We look forward to reporting more on this in F25.



## Labour Hire Provider Management Framework

In the previous reporting period, we introduced a new Labour Hire Provider Management Framework for the onboarding and ongoing management of contractors on our vineyards. The framework includes a fit-for-purpose contract between Endeavour and the contractor; a letter to be provided to contractors detailing our expectations of compliance and transparency; and an internal checklist for vineyard managers to conduct spot checks on their contractors. These spot checks include checking workers' payslips, timesheets and rights to work documentation with the primary aim to make sure that those on our vineyards are paid correctly, not subject to unlawful deductions, and have valid Australian working rights.

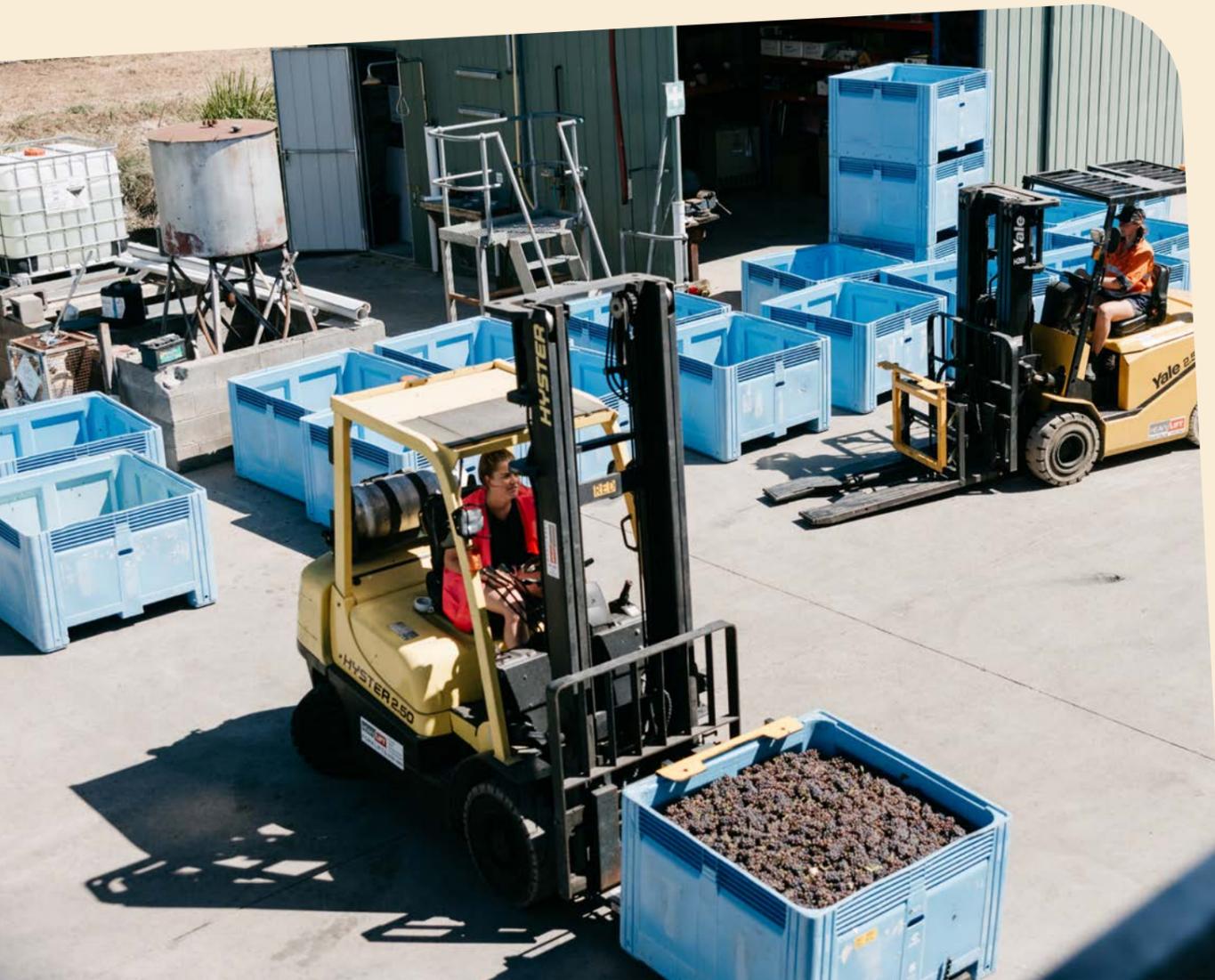
In F24, we worked to improve our internal processes, to make this process easier for our viticulturalists and vineyard managers and to integrate the Labour Hire Provider Management Framework into their ways of working. We've also been working on reviewing our approved supplier process for vineyards. We will report more on these actions in our next Statement.

## Partnering with industry

Given the complexity of issues in the viticulture and horticulture industries, we understand that a whole-of-industry approach is required to improve practices. The more sites who require compliance of their contractors and who take steps to identify and manage modern slavery risks, the greater our opportunity to effect change.

During the reporting period, we partnered with one of our key wine suppliers to discuss ways we can work as an industry to improve modern slavery risk mitigation. Duxton Vineyards had trialled a direct worker voice program on their sites, where workers were invited to complete a questionnaire that assesses their employer's practices against the core International Labour Organization conventions; and are paid directly for their responses to the survey.

Duxton Vineyards has invited Endeavour to participate in this program. We will trial this direct worker voice project in conjunction with them in F25.



## Modern slavery awareness training and partnerships

We're team players, and we're always looking at ways to learn more, and work together to do better. We're committed to working collaboratively with our suppliers and industry partners to raise standards in respect of modern slavery risk.

We utilise regular communication channels and forums to remind our team about the modern slavery risk indicators they should be aware of and the channels to report issues. In F24 that included providing modern slavery updates through brand-specific forums such as Dan's Stand Up (a fortnightly update for Dan Murphy's team members), and the Pinnacle Care Committee (a quarterly update for senior Pinnacle leaders).

We also provided an update on our modern slavery response in one of Endeavour's Delivery Office Showcases (a regular update to Endeavour's 200 senior leaders). This included a reminder about modern slavery risk indicators, our modern slavery and human rights commitments, and the key areas of risk to Endeavour.

We're currently looking into how we can capture more of our team in our training program with the reporting capabilities to support this. With more than 30,000 team members, the majority in operational roles in our stores and hotels, we're mindful that modern slavery awareness training should be relevant and fit-for-purpose. For this reason, we have been offering slightly different but targeted training for individual teams. In F25, we will consider how we can broaden our reach to include more team members.

Procurement teams (including non-trade and merchandise sourcing teams) hold direct supplier relationships, and are more likely to identify modern slavery risk indicators that relate to potential supplier malpractice, such as suppliers frequently coming in under cost (could indicate labour may be underpaid). In F24 we provided this targeted modern slavery awareness training to our marketing team. We offered two separate training sessions for our non-trade procurement team in the previous reporting period.

Operations team members may be more likely to identify risks that directly relate to workers, such as the security guard working rights and working hours that was identified in the last reporting period (outlined on page 41). We provided this specialised modern slavery awareness training to our central supply chain and operations teams in F24.

In addition to training for our team, we leverage our relationships with our supply and industry partners to communicate regularly about our modern slavery response and challenges we face.

We are always keen to learn from our suppliers and partners about what they are doing to manage modern slavery risk, what they have found in their efforts, and how we can support them and the broader industry to improve conditions for workers in our supply chain. As highlighted on page 36, we have partnered with one of our key wine suppliers to run a direct worker voice project into vineyard workers in F25.

### Tools, partnerships and associations



We're a member of the United Nations Global Compact Network Australia (UNGCA), where we attend industry events to hear from human rights experts about topics such as existing and emerging risks. In F24 we attended the UNGCA Dialogue on Business and Human Rights, which provided opportunities to discuss the changing legislative environment around modern slavery and wider human rights issues in Australia and overseas.



We have partnered with Fair Farms, which offers a self-assessment questionnaire, site-specific training and third party audit to identify any pockets of risk relating to horticulture/viticulture suppliers. In F24 we worked with Fair Farms on the pilot project.



We use CheckWorkRights to automate and manage our ongoing visa compliance checks for visa holders in our hotels. We receive reports and automated notifications identifying any visa compliance issues and timely notifications of upcoming visa expiry dates.



We utilise Sedex's RADAR tool to assess suppliers' overall labour and human rights risks according to their location, operations and business practices. In F24 we assessed our Own Brand suppliers' compliance with our Responsible Sourcing Program using Sedex's reporting tools.

# Remediation

Key to building the trust of the people in our supply chain is providing safe, open lines of communication to raise issues and grievances. We maintain that trust by seeking to effectively mitigate risks and addressing issues as they arise, and seeking feedback so we can improve.

In our new Board-approved Human Rights Statement we commit to providing channels through which people and communities that may be impacted by our business can raise complaints or concerns without fear of retaliation, intimidation, harassment, discrimination or victimisation.

Similarly, under our Responsible Sourcing Policy we require our suppliers to maintain grievance channels for access by their workers (for example, through a confidential suggestion box, hotline or email). Workers must be trained on and aware of the mechanism and understand that they can communicate without fear of retribution.

Endeavour has a Whistleblowing Policy, which allows potentially affected workers, including team members, suppliers and their workers, to raise modern slavery and other human rights related grievances. Grievances can be raised by email or by phone with details provided in the policy.

The channel is run by a third party specialised in handling whistleblower complaints. The channel is available to report a range of issues such as breaches of the law, bullying, harassment or discrimination, and human rights and modern slavery issues.

While the Whistleblowing Policy sets out report handling, investigation process and governance, we also have an internal Modern Slavery Toolkit which prescribes the process for dealing specifically with modern slavery grievances. This toolkit outlines the process that team members should follow if they identify a modern slavery indicator (modern slavery indicators are outlined below).

The flowchart on the next page details the process for how we would handle a modern slavery related grievance. Throughout this process, we would aim to engage with the aggrieved or potentially aggrieved party or parties as well as the grievance raiser (if different). They would be kept well informed of the status of the investigation throughout.

Additionally, following the conclusion of the investigation and potential remedy provided, we would meet with relevant stakeholders to seek feedback on the performance of the mechanism and lessons learned to improve our quality for next time.

## Modern slavery risk indicators

We source from more than 9,300 tier one suppliers, but we know that our risk profile does not end at tier one. As outlined on page 13, we recognise that modern slavery risks can be more likely to occur in tiers two and below, where modern slavery is harder to detect without direct oversight.

In our internal Modern Slavery Toolkit, we ask our team members to be alert to the following modern slavery risk indicators:

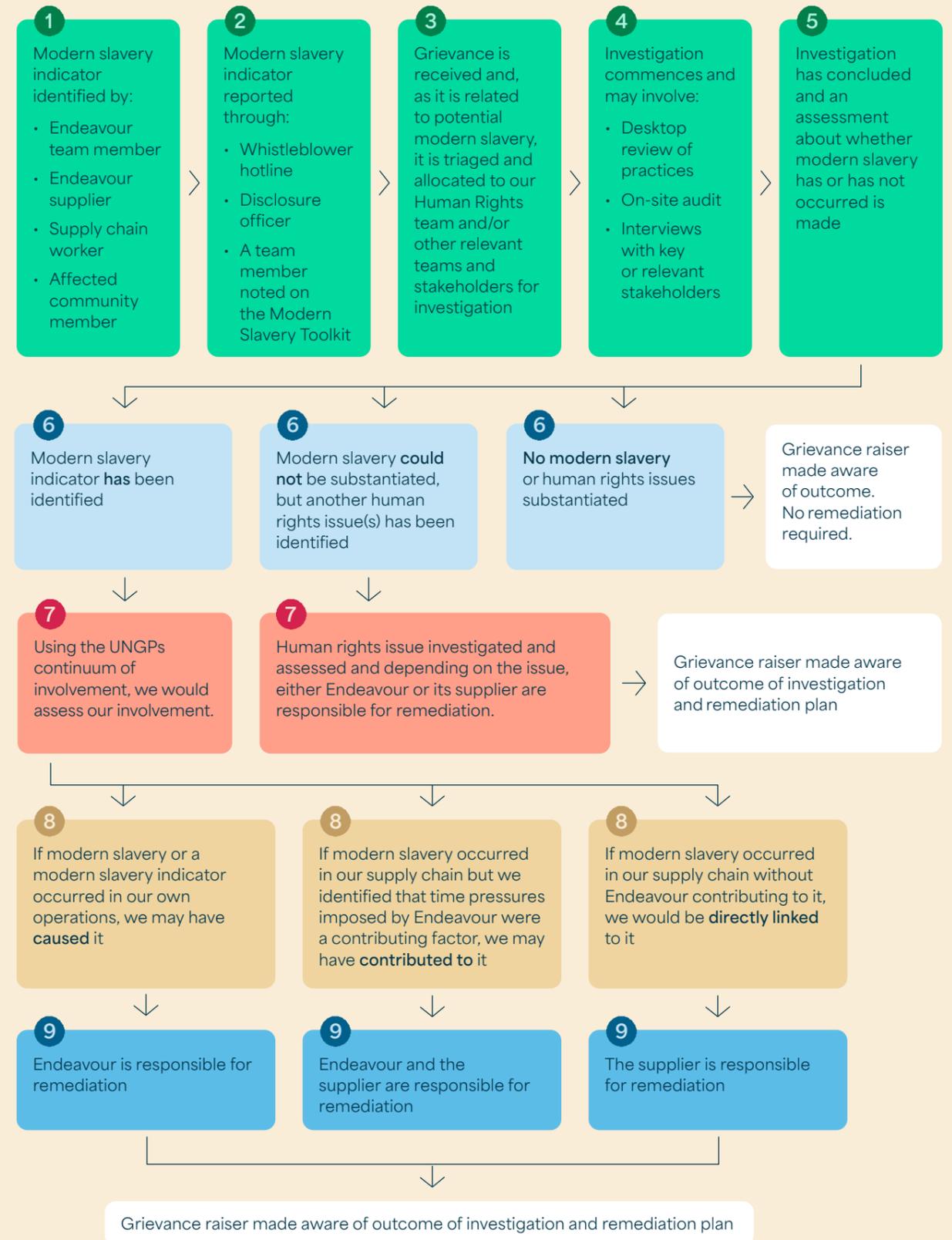
### Modern slavery risk indicators:



While these indicators are not, on their own, evidence of modern slavery, they can indicate more serious practices that may be occurring with the supplier. If any Endeavour team member identifies one or more modern slavery risk indicators, they are required to report this using the process outlined in our internal Modern Slavery Toolkit.

# Remediation flowchart

We recognise that responding to modern slavery and other forms of human rights harm is context specific and the below flowchart provides an indicative overview of how we would seek to respond:



## Operational use of our grievance mechanisms and the UNGPs

In F24, we reviewed our grievance channels as they relate to the raising of modern slavery related issues. We considered the Endeavour Whistleblower channel against the UNGPs Effectiveness criteria:

UNGPs Effectiveness Criteria	Description
A <b>legitimate</b> grievance mechanism is one that:	Enables trust from stakeholder groups for whose use it is intended, and is accountable for the fair conduct of the grievance process.
An <b>accessible</b> grievance mechanism is one that:	Is known to all stakeholder groups for whose use it is intended, and provides adequate assistance for those who may face barriers to access.
A <b>predictable</b> grievance mechanism is one that:	Provides a clear and known procedure with an indicative timeframe for each stage, and clarity on the types of process and outcome available and means of monitoring implementation.
An <b>equitable</b> grievance mechanism is one that:	Aggrieved parties have reasonable access to sources of information, advice and expertise necessary to engage in a grievance process on fair, informed and respectful terms.
A <b>transparent</b> grievance mechanism is one that:	Keeps parties to a grievance informed about its progress and provides sufficient information about its performance to build confidence in its effectiveness and to meet any public interest at stake.
A <b>rights-compatible</b> grievance mechanism is one that:	Ensures the outcomes and remedies accord with internationally recognised human rights.
A mechanism is a source of <b>continuous learning</b> when it:	Draws on measures to identify lessons to improve the mechanism and prevent future grievances and harms.
An operational-level mechanism is <b>based on engagement and dialogue</b> when it:	Consults the stakeholder groups for whose use it is intended on its design and performance, and focuses on dialogue as the means to address and resolve grievances.

During the reporting period we received zero modern slavery-related grievances through our grievance channels. The channel was used to raise other issues not related to modern slavery.

We recognise that there are areas for improvement in the effectiveness of our grievance channels for raising modern slavery related complaints if we are not receiving them. In reference to the UNGPs effectiveness criteria, we have identified gaps in:

- **Accessibility:** our traditional Whistleblower Hotline poster is only available in English, which may not be linguistically accessible to migrant workers such as those on vineyards. Additionally, we identified that the policy encourages users to raise their concerns with their team leader (if they are a team member) or category manager or buyer (if they are a supplier). It does not provide advice for supply chain workers. This may deter a supply chain worker from accessing the mechanism as they may be unsure if the channel is available to them.

- **Predictability:** while our Whistleblower Policy does allow for grievances to be raised by supply chain workers, this has not been made clear on the Whistleblower posters that they may see on-site. In accordance with the UNGPs Effectiveness Criteria, we understand that external communications should include who can access the grievance mechanism, the kinds of harm it can address, and eligibility criteria (among others).
- **Based on engagement and dialogue:** we understand that an effective grievance mechanism involves regularly and meaningfully consulting with stakeholders about their needs and expectations. This should be used to inform the design and improvements made to the mechanism, including such things as language and methods of communication and method of raising grievances.



### Direct worker voice input

During the reporting period, we ran a direct worker voice project looking at modern slavery risks in overseas recruitment with our visa cooks and chefs (see page 42). We asked workers if they were aware that they could utilise our Whistleblower hotline to raise human rights issues. Understanding and awareness was limited, and access to grievance channels was raised as a key action for improvement.

### Our plans to improve the effectiveness of our grievance channels for modern slavery related complaints

An effective mechanism would involve one that is used by affected or potentially affected parties to raise issues that might relate to modern slavery risk indicators. With the gaps identified, we have started to develop a fit-for-purpose grievance channel poster specifically for supply chain workers. This will include a simplified version of the poster for specific locations such as wineries, vineyards and hotels where labour hire workers from high risk industries (such as vineyard workers, cleaners and security guards) attend site. It will list the relevant modern slavery indicators that such workers may be facing, like underpayments, excessive working hours, unsafe working conditions and indicators of bonded labour. We will also translate the poster into relevant worker languages.

Following the roll-out of this new poster, we will evaluate its impact, such as increased frequency of reporting of modern slavery related issues. We will consult and engage with workers on potential improvements and barriers to use.

### Update on grievance reported last year

In our previous Modern Slavery Statement, we committed to providing an update on the potential issue identified with a security services provider in our supply chain. Through our store team right at the end of the previous reporting period, we were made aware that there was a security service supplier allegedly paying guards cash-in-hand payments to mitigate the maximum working hours allowed to be worked on their visa. Cash-in-hand payments are not, on their own, examples of modern slavery but they can be an indicator of comparatively more serious practices that might also be occurring with that supplier and highlight vulnerabilities in the workforce.

On investigation, we learned that our store team was made aware of the issue through an informal conversation with a guard stationed on-site, but did not report the issue immediately. By the time we set out to investigate this supplier's practices, we learned that the contractor who had employed the guard was no longer in our supply chain. As such, we could not conduct a formal investigation and no findings were substantiated.

This issue highlighted the need for specialised training for our operations team members, as they often have direct relationships with the workers and/or suppliers which may enable them to identify modern slavery risk indicators. Following this allegation, we provided targeted training to our operations and supply chain teams on modern slavery risk indicators and the process for reporting them.

## Overseas recruitment

In F24, a direct worker voice project looking into the risks associated with our overseas recruitment supply chain. The results of the project were positive, with no human rights issues identified.

Overseas recruitment risks:

- ALH recruits a number of cooks and chefs from overseas via third party recruitment agencies to meet the shortfall in labour supply domestically.
- Human rights risks associated with overseas recruitment are widely publicised. They include deceptive recruitment (where the job obtained is materially different to the one promised) and debt bondage (where workers owe their recruiters unlawful or excessive fees to the point they are unable to leave until debts have been paid off).
- While we engage in some due diligence to screen our direct suppliers in this area, the nature of the industry means that our direct suppliers often engage with other agencies in their own supply chains to help recruit workers.

The central aim of this research project was to provide the insights required to support the overseas recruitment supply chain for visa cooks and chefs to operate in line with our Responsible Sourcing Policy.

We engaged a specialist research firm to conduct focus groups and interview workers about their experience being recruited from overseas, the fees and deductions they paid, whether the job they got was consistent with the one they were promised, and their overall experience working for ALH.

We instructed the research firm to look out for anyone who may be paying ongoing costs to recruiters after arrival in Australia (could indicate debt bondage) and anyone who was dissatisfied with their job and role at ALH (could indicate deceptive recruitment).

The participants:

- All cooks and chefs who came to work for ALH through overseas recruitment agencies were invited to participate in this research project.
- 17 people participated across three focus groups. These participants came to our business from each of our recruitment agencies and represent approximately a quarter of this cohort of employees.
- The most common country of origin of participants was Nepal, followed by Kenya. Other countries included the Philippines, Vietnam, Malaysia and Pakistan. Many of these countries are considered high risk for human rights issues.

“For me, when I landed, my head chef picked me up from the airport. He brought me to the accommodation at the hotel. I stayed there for a month, because for me it was difficult to find a place to rent because in Australia you need to have a bank account before you can rent.”

Project participant

The findings:

### Bonded labour risks

- All but one participant were found to have paid their fees upfront, prior to arriving in Australia. The one participant who did pay some costs after arrival was for a package deal that included agent fees, visas and flight costs. These were paid off after three months and were related to a participant who was already in Australia before transferring their visa to ALH.
- We are therefore satisfied that **no-one from the study was subject to bonded labour.**

### Deceptive recruitment risks

- While there were a small number of people who raised venue-specific issues, participants were very positive in terms of their views of ALH.
- Participants noted that they enjoyed working at ALH for the stability and security, the opportunity for travel and relocation to another ALH venue, good vibes at the venue and a real sense of camaraderie, good training and safety culture and good overall pay.
- Based on this feedback, we are satisfied that **there was no indication of deceptive recruitment in our supply chain.**

It was identified that participants' understanding of and ability to access grievance mechanisms was limited, and this was highlighted as an area for improvement.

As outlined on page 41, we are looking into how we can better promote our Group-wide Whistleblower Hotline for use by workers to raise human rights related complaints.



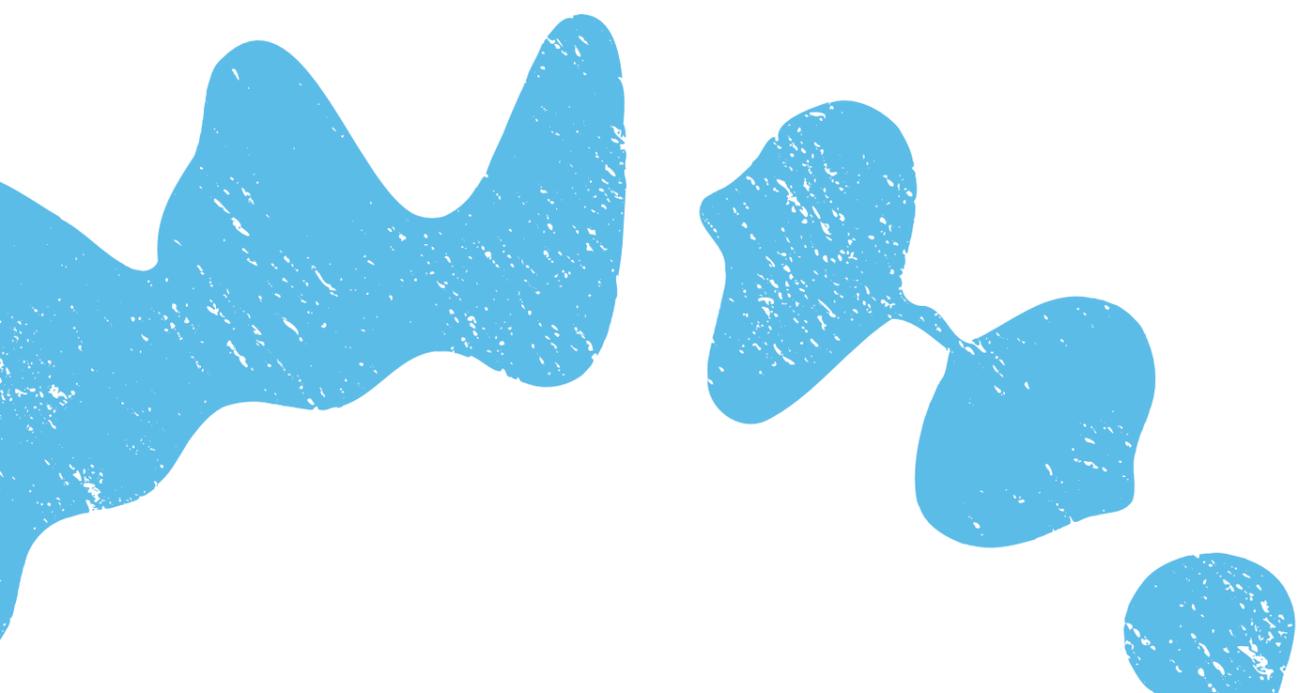
# Assessing the effectiveness of our actions

Guided by our purpose and values, we want to improve the lives and working conditions of the people working in our operations and supply chain. To do that, we continue to monitor and assess the impact of our actions.

## Alignment to international standards and benchmarks

Our Human Rights Statement, Responsible Sourcing Policy and modern slavery response are informed by leading international standards including:

- International Labour Organization (ILO)'s core conventions
- United Nations Universal Declaration of Human Rights (UDHR)
- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- Ethical Trading Initiative (ETI)'s Base Code
- United Nations Global Compact's (UNGC's) core values on human rights, labour standards, the environment and anti-corruption
- International Bill of Human Rights
- Emerging best practices from global peer programs in various industry sectors



To Endeavour, an effective modern slavery response is one that seeks to: identify potential harm; prevent future harm; and remedy harm done. We consider some of the below areas when assessing the effectiveness of our program:

Area	Description	How we assess the effectiveness
<b>Policies and frameworks</b>	<ul style="list-style-type: none"> <li>• Our policies and Modern Slavery Risk Management Framework govern our modern slavery response.</li> <li>• They set out the standards we expect of our suppliers and commitments Endeavour makes of itself.</li> </ul>	<ul style="list-style-type: none"> <li>• Feedback from stakeholders on their understanding of our policies and frameworks as they relate to our modern slavery response.</li> <li>• Internal reviews of our policies and their application in practice.</li> </ul>
<b>Responsible Sourcing Program</b>	<ul style="list-style-type: none"> <li>• Our Responsible Sourcing Program is how we monitor our suppliers' compliance with our Responsible Sourcing Policy.</li> <li>• This program is designed to help us identify, assess and address modern slavery risk in our supply chain.</li> </ul>	<ul style="list-style-type: none"> <li>• Number of suppliers with completed risk assessments.</li> <li>• Number and percentage of moderate-high risk suppliers who undertake audits.</li> <li>• Number and percentage of audit findings remediated.</li> <li>• Supplier feedback.</li> </ul>
<b>Remediation and grievance channels</b>	<ul style="list-style-type: none"> <li>• Our grievance channels are designed for the reporting of actual or suspected modern slavery or modern slavery risk indicators.</li> </ul>	<ul style="list-style-type: none"> <li>• Number of modern slavery related issues reported through our grievance mechanisms.</li> <li>• Number and percentage of issues remediated.</li> <li>• Feedback from relevant stakeholders on the accessibility and understanding of our channels for the use of modern slavery issues and reporting.</li> </ul>
<b>Board engagement</b>	<ul style="list-style-type: none"> <li>• The Audit, Risk and Compliance Management Committee (a committee of the Board) receives two specific Human Rights Program (which includes our modern slavery response) papers during the year.</li> <li>• They provide verbal feedback on the progress and proposed direction of the program.</li> </ul>	<ul style="list-style-type: none"> <li>• Audit, Risk and Compliance Management Committee feedback.</li> </ul>
<b>External reviews</b>	<ul style="list-style-type: none"> <li>• The Australian Council of Superannuation Investors (ACSI) and Monash University release annual reports benchmarking top ASX companies on their modern slavery disclosures.</li> <li>• We also engage external business and human rights expertise to support the development of our modern slavery response and external reporting (such as our Modern Slavery Statement and Human Rights Statement).</li> </ul>	<ul style="list-style-type: none"> <li>• External benchmark scores from ACSI and Monash University.</li> <li>• We also use benchmarking criteria to help assess the effectiveness of our modern slavery response.</li> <li>• Feedback from a specialist firm engaged to review our Modern Slavery Statement draft.</li> <li>• Feedback from another specialist firm on our controls to manage modern slavery risk in our high risk services areas.</li> <li>• Assessing and comparing our modern slavery response to those of our peers.</li> </ul>

# Progress against our F23 commitments

We have work to do, but we're proud to have made progress against the six commitments made in our F23 Modern Slavery Statement. We'll continue to prioritise our actions in these areas as we endeavour for better:

Commitment	Description	Progress	Page reference
<b>Human Rights Policy</b>	Build and finalise an Endeavour Human Rights Policy detailing our Group-wide commitment to human rights.	Achieved ✔	27-28
<b>Governance framework for high risk services suppliers</b>	Build a robust compliance framework for monitoring the human rights practices of high risk services suppliers.	Ongoing ●...●	32-33
<b>Collaborate with growers on a Fair Farms trial</b>	Partner with and fund Fair Farms certification for some of our growers to help capacity build and improve human rights practices in viticulture.	Achieved ✔	35
<b>Enhance access to grievance channels</b>	Continue to work with suppliers and engage in direct worker voice projects to ensure that our grievance channels align to best practice and the UNGPs.	Ongoing ●...●	40-41
<b>Continue to grow our Responsible Sourcing Program</b>	Work closely with our Exclusive branded suppliers to have them onboard our Responsible Sourcing Program with completed risk assessments.	Ongoing ●...●	29-31
<b>Modern slavery awareness training</b>	Continue to develop and roll out our modern slavery training for our team members.	Ongoing ●...●	37

## Key

- ...● Ongoing We have progressed with this commitment, and it is ongoing in the next reporting period.
- ✔ Achieved This commitment has been achieved, and we will continue to evolve and make improvements.

## Consultation and approval

Endeavour owns and controls a number of entities, including the reporting entities listed on page 8. All wholly owned reporting and non-reporting entities share the same external policies. Our Modern Slavery Risk Management Framework encompasses all of our brands and entities, our Human Rights Statement applies to every Endeavour entity, and our Responsible Sourcing Policy applies to all Endeavour suppliers.

During the reporting period, Endeavour consulted with its reporting and non-reporting entities in the development of this Modern Slavery Statement. Through meetings, information sharing, engagement with senior leaders and on-the-ground teams, we worked collaboratively to ensure we captured and reported on risks across our whole business.

This Statement was prepared by Endeavour's central Sustainability team, with input from our Legal, Non-trade, Merchandise, People, and Risk and Compliance teams. Members of these functions responsible for supporting the drafting, development and final approval of this statement have roles and responsibilities that span across Endeavour's reporting and other owned and controlled entities.

This Statement was shared with the Audit, Risk and Compliance Management Committee (a committee of the Board) and Board, ensuring consultation across all reporting and non-reporting entities in its development.

This Statement was approved by the Endeavour Group Limited Board on behalf of all reporting entities on 23 August 2024. This Statement has been signed by Ari Mervis on page 5, who is the Chairman of the Board who approved this Statement.

## Reporting criteria index

This statement is aligned to the mandatory criteria under section 16 of the Modern Slavery Act 2018 (Cth):

Act requirement	Relevant section of this statement	Page reference
Identify the reporting entities	<ul style="list-style-type: none"> <li>Our structure and operations</li> </ul>	8
Describe the structure, operations and supply chains of the reporting entities	<ul style="list-style-type: none"> <li>Our structure and operations</li> <li>Our supply chain</li> </ul>	8-15
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entities, and any entities that they own or control	<ul style="list-style-type: none"> <li>Identifying our modern slavery risks</li> </ul>	16-23
Describe the actions taken to assess and address those risks, including due diligence and remediation processes	<ul style="list-style-type: none"> <li>Assessing and addressing our modern slavery risks</li> </ul>	24-43
Describe how the reporting entities assess the effectiveness of such actions	<ul style="list-style-type: none"> <li>Assessing the effectiveness of our actions</li> </ul>	44-45
Describe the process of consultation with each reporting entity covered by the statement and with any entities that each of those reporting entities owns or controls	<ul style="list-style-type: none"> <li>Consultation and approval</li> </ul>	47
Include any other information considered relevant	<ul style="list-style-type: none"> <li>About Endeavour Group</li> <li>Progress against our F23 commitments</li> </ul>	6-7, 46

# Corporate directory

## Registered office:

26 Waterloo Street  
 Surry Hills NSW 2010  
 Tel: (02) 9333 8008  
 Web: [www.endeavourgroup.com.au](http://www.endeavourgroup.com.au)

## Contact us:

We welcome your feedback, please reach out to us at [sustainability@edg.com.au](mailto:sustainability@edg.com.au)

**ARMSTRONG**

Communication design, consultancy and production.  
[www.armstrong.studio](http://www.armstrong.studio)

