



**SAN MIGUEL
YAMAMURA**

**MODERN SLAVERY
STATEMENT
2023**

ACKNOWLEDGEMENT OF COUNTRY

We acknowledge the Traditional Owners of Country throughout Australia and that the sovereignty of the land on which we live, work, and play was never ceded. We recognise the deep and enduring spiritual connections and relationship Aboriginal and Torres Strait Islander people have to Community, as well as the lands, oceans, waterways, air, and sky. We pay our respects to Aboriginal and Torres Strait Islander cultures; and to Elders past, present and emerging. Furthermore, we acknowledge and pay our respects to First Nations people, and other Traditional Custodians of the lands where San Miguel Yamamura Australasia works around the world.



ABOUT THIS STATEMENT

The submitting entity is San Miguel Yamamura Australasia ('SMYA'), which qualifies as a reporting entity under the Modern Slavery Act 2018 (Cth).

This Statement covers all entities within SMYA and reports on the state of operations, structure, governance framework and activities during the reporting period 1 January to 31 December 2023. All entities are covered by SMYA policies, procedures and systems, including those relating to contracting, purchasing and human resources. The assessment of modern slavery risks in SMYA Australia's supply chain, as described in this Statement, includes suppliers procured by SMYA on behalf of its subsidiaries or by the subsidiaries themselves.

All dollar figures presented in this Statement are in AUD.



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ABOUT SMYA

SMYA is an established leader in packaging and contract beverage filling services in Australia and New Zealand. SMYA started with Cospak Pty Ltd more than 10 years ago and today incorporates 3 other member partners, Vinocor, JMP Retail and SANECTOR, the latter being a unified identity formed from Portavin, Best Bottlers and Barossa Bottling Services.

Our product portfolio includes a wide range of packaging products, such as glass, plastic and metal containers, corks and closures caps, retail bags and material handling products, as well as beverage-filling services catering to the diverse needs of customers in the wine sector.

We are headquartered in Sydney with offices and facilities across Australia, New Zealand, and China.

SMYA's dedication to sustainability has been recognised by several industry organisations, including through the Australasian Packaging Innovation and Design Awards, where we won multiple awards for our innovative and sustainable packaging solutions.

Our Sustainability Promise outlines our commitment to ethical procurement, and we have implemented several initiatives to assess and address the risks of labour exploitation, human trafficking and modern slavery among our direct suppliers.

OUR VALUES

Our companies share common values and principles, prioritising sustainability, customer satisfaction, innovation, and quality in our business operations, and we are committed to creating value for our stakeholders. Our Research and Development ('R&D') teams are constantly exploring new materials, designs, and processes to provide the best packaging solutions for our valued customers. We prioritise customer satisfaction and are dedicated to building long-term partnerships with our clients, customers and suppliers and believe in positively impacting the communities touched by our business activities.

We are driven by our core values:



Passion



Outstanding



Win



Engage



Respect

We demonstrate **drive, focus** and **resilience**.

We are committed to being the **best of the best** and **strive for excellence** in Quality, Safety, Service, and Innovation.

We **strive to be first in our industry**, delivering success for our employees, our customers and our shareholders.

We believe in **open and honest communication** with all stakeholders.

We **collaborate** as a team.

We **share our fun and hospitality**.

We **conduct** business with **integrity**.
We **care about the environment and communities** in which we work and live.

We strive to be **socially responsible** and consider the **sustainability** of our practices.

We **recognise diversity as a strength** and nurture individual capabilities.

STATEMENT FROM OUR MANAGING DIRECTOR AND DEPUTY MANAGING DIRECTOR



SMYA Managing Director
Rene Cabrera



SMYA Deputy Managing Director
Ross Sinclair

We are proud to submit SMYA's second Modern Slavery Statement as a reporting entity under the Modern Slavery Act 2018 (Cth). This Statement outlines our continuing journey to identify, prevent, and address modern slavery risks and the practical steps we are taking to continue to assess and address these risks within our operations and supply chain. We recognise the importance of transparency and accountability in addressing this critical issue within our business activities in Australia and globally.

In this statement, we outline our progress over the past year, highlighting key initiatives, challenges, and areas for improvement. We remain committed in our dedication to upholding human rights, encouraging ethical labour practices, and eliminating modern slavery practices throughout our extended value chain.

Our goal is to ensure that all people involved in our operations are treated fairly and with respect, and that our business practices uphold the highest standards of fairness and ethical conduct.

This Statement was approved by the SMYA Board on 28th June 2024.

Rene Cabrera

Managing Director – Rene Cabrera

Ross Sinclair

Deputy Managing Director – Ross Sinclair

REPORTING CRITERIA 1 & 2

Our Organisational Structure

Starting with Cospak Pty Ltd more than 10 years ago, SMYA now offers packaging and beverage-filling solutions to over 10 industry sectors. We employ over 500 staff across 17 sites in Australia and internationally and service approximately 2,500 customers in 35 markets.

SMYA consists of 4 integrated member partners, which are described in Table 1 below.

Table 1. SMYA Members Partners

The logo for COSPAK, featuring the word "COSPAK" in a bold, red, sans-serif font.

Established in 1969, COSPAK (SMYC Pty Ltd) is one of the leading wholesale packaging suppliers servicing Australia and New Zealand. COSPAK is a manufacturer, importer, and distributor of packaging products in glass, plastics, metal paper and flexibles.

Industries serviced include wine, beverage, food, chemical, personal care and pharmaceuticals.

The company has offices, manufacturing plants and warehouses in Australia, New Zealand, and China (Guangzhou), as well as a strategic supply base extending to Europe, the United Kingdom, the Middle East and Asia. COSPAK employs more than 250 permanent staff working in manufacturing, warehousing, design, sales and administration across Australia, New Zealand and China.



Vinocor (SMYV Pty Ltd) is Australia and New Zealand's premier supplier of corks, screwcaps, hoods and capsules to the wine industry. The company operates a state-of-the-art cork finishing facility in South Australia.

Vinocor employs 18 permanent staff and provides specialised services to the wine sector including design, testing, manufacture and technical support.



Starting in 1998 and acquired by SMYA in 2018, JMP Retail (SMYJ Pty Ltd) is a global supplier of packaging solutions specialising in retail and online packaging solutions, cargo protection and materials handling.

JMP Retail employs 20 permanent staff across 2 facilities in Queensland and Victoria.



Created through a merger of Best Bottlers, Barossa Bottling and Portavin Integrated Wine Services, SANECTOR (SMYBB Pty Ltd) is a beverage filling and packaging solutions business servicing the Australian wine sector.

Key services include bulk wine storage, dry goods supply, labelling, wine bottling, oenological services, Quality Assurance, and wine warehousing.

SANECTOR employs over 200 permanent staff across 6 facilities in Western Australia, South Australia, Victoria and New South Wales.

We specialise in packaging and beverage solutions providing a wide range of integrated services to our customers including:



DESIGN



**RESEARCH
AND DEVELOPMENT**



MANUFACTURING



QUALITY ASSURANCE



**FILLING AND BOTTLING
(MOBILE AND FACILITY)**



SALES



**WAREHOUSING AND BULK
WINE STORAGE**



MATERIALS HANDLING



**SPECIALISED SERVICES
(TESTING, TECHNICAL SUPPORT,
OENOLOGICAL SERVICES)**

OUR GOVERNANCE FRAMEWORK

As outlined in our company's Corporate Governance Manual, our Board of Directors, Officers and employees are committed to and guided by the principles, policies, programs and procedures of best practice corporate governance. We believe that corporate governance is a necessary component of what constitutes sound strategic business management, including the sound management of modern slavery and broader human rights risks, and are committed to taking the actions necessary to assess and address these risks. Our corporate governance compliance plan outlines the roles and responsibilities of our board, management team and staff to identify stakeholders directly impacted by our operations and to ensure comprehensive, accurate, reliable, timely and effective communication with all stakeholders.

In pursuit of corporate governance excellence, we have undertaken proactive measures to address the issue of modern slavery within our operations and supply chain. Recognising the urgency and significance of this global challenge, the organisation has enlisted the assistance of external modern slavery and human rights experts. This collaboration aims to foster heightened awareness, enhance knowledge, and provide essential guidance to assess, address and mitigate the risk of modern slavery throughout SMYA's operations and supply chain.

Our corporate governance framework emphasises transparency, accountability, and ethical conduct. By engaging with external experts, we are committed to combating modern slavery and creating a sustainable and responsible business ecosystem. This strategic partnership will enable SMYA to assess and identify any potential modern slavery risks on an ongoing basis, implement robust policies and procedures, and foster a culture of vigilance and compliance with relevant modern slavery and labour rights legislation, as well as international guidelines and conventions.

OUR MODERN SLAVERY POLICY FRAMEWORK

We have several policies and codes of conduct to manage modern slavery and human rights risks at the group level. However, because our company is diverse, some of our partners have their own in-house policies, many of which were developed prior to joining SMYA. Collectively, our policy framework commits us to ethical sourcing, protection of human rights, and ensures zero tolerance to child labour. Our policies guide us in our work to identify, assess and address modern slavery risks across our operations and extended supply chain.

Key group and business unit policies and codes of conduct are summarised in Table 2.

Table 2. Policies and codes of conduct

Policy or Code	Scope and Purpose
Internal Code of Conduct (Group Level)	Provides guidance to on our ethical standards and core values (such as honesty in business dealings, personal and professional behaviour, discrimination and harassment in the workplace, etc), our expectations for conduct with other staff, suppliers, and customers.
Supplier Code of Conduct (COSPAK)	Outlines our expectations that suppliers and strategic partners will treat all workers with respect and dignity, ensuring safe working conditions and conducting environmentally responsible and ethical operations. Key obligations outlined in the Code include freely chosen employment, combatting modern slavery, young workers, wages, working hours, safe workplaces, fair treatment, non-discrimination, harassment, wages, freedom of association and collective bargaining.
Human Trafficking and Forced Labour (Group Level)	Outlines our commitment to comply with, and respect individual rights under, Human Trafficking and Forced Labour laws. The Group and our staff shall not tolerate, engage in, or support human trafficking or forced labour of any kind through our activities, including in our supply chain, or assist clients or any other party in doing so.
Child Labour (Group Level)	Outlines commitments that the Group, associated companies and business partners, including suppliers, will not tolerate the use of child or forced labour, or exploitation of children in any of our global operations and facilities. The policy defines 'child labour' and 'exploitation', outlines applicable laws and labour standards and our expectations of suppliers and business partners not to use child labour in any part of their operations.

OUR MODERN SLAVERY POLICY FRAMEWORK (cont)

Policy or Code	Scope and Purpose
Anti-Discrimination and EEO (Group Level)	Applies to all facilities that produce goods or provide services to SMYA. Based primarily on Ethical Trade Initiative ('ETI') Base Code on conducting business ethically, manufacturing responsibly and demonstrating environmental consciousness.
Business Ethical Statement (SANECTOR)	Commits SANECTOR management and staff to conduct business in accordance with the highest ethical standards and to meeting the company's core values, without exception. Requirements relevant to this statement include fair labour standards (ETI, Federal and State legislation), SMYA Code of Conduct, supplier responsibility and fairness in business dealings.
Whistleblower Policy (Group Level)	Encourages the reporting of instances of suspected unethical, illegal, fraudulent or undesirable conduct involving our businesses, and ensures that those who make a report shall do so without fear of intimidation, disadvantage or reprisal.
Human Rights Commitment (Group Level)	Commits SMYA to respecting and promoting human rights consistent with the United Nations ('UN') Guiding Principles on Business and Human Rights, International Labour Organization and other global business and human rights frameworks. It applies to management and staff as well as responsible procurement and sustainable supply chain management.
Core Labour Requirements (JMP retail)	Based on the Forest Stewardship Council ('FSC') Core Labour Requirements FSC STD-40- 004 to not use child labour, eliminate all forms of compulsory and forced labour, ensure there is non-discrimination in employment and occupation and respect the right of freedom of association and collective bargaining.

We are committed to reviewing and updating these policies regularly to ensure new and emerging risks and issues are addressed.

OUR OPERATIONS

SMYA has 4 member partners: Cospak (SMYC Pty Ltd), Vinocor (SMYJ Pty Ltd), JMP Retail (SMYJ Pty Ltd) and SANECTOR (SMYBB Pty Ltd).

We operate plants and facilities across Australia, New Zealand, and China.

No. of Permanent Staff	Plants & Facilities	
<p>SMYA: 50</p> <p>COSPAK Group: 250</p> <p>JMP retail: 20</p> <p>Vinocor: 18</p> <p>SANECTOR: 200</p>	<p>Western Australia</p> <p>South Australia</p> <p>Victoria</p> <p>New South Wales</p>	<p>Queensland</p> <p>New Zealand</p> <p>China</p>

Map 1: Facilities and plants



COSPAK

China	AU - Adelaide
AU - Brisbane	AU - Hobart
AU - Sydney	AU - Perth
AU - Melbourne (Manufacturing)	NZ - Auckland (Manufacturing)

SANECTOR

AU - Melbourne	AU - Barossa Valley
AU - Mildura	AU - Margaret River
AU - Adelaide	

VINOCOR

AU - Lonsdale
NZ - Auckland

jmp retail

AU - Melbourne
NZ - Auckland

OUR SUPPLY CHAIN

At a glance:



* glass, fibre (paper and cardboard), metal, plastic, and cork.

WHAT WE BUY

SMYA's total annual procurement spend is \$240.4 million with 921 direct (Tier 1) suppliers across 37 goods and services categories.

We rely on a diverse set of goods and services to create high-quality products and deliver them to our clients in a timely and efficient manner.

Broad categories of goods and services that support the packaging sector are summarised in Table 3 (over page), which provides information on:

- The good or service category used within our sector;
- The associated material or purpose;
- Stages of production potentially at-risk of modern slavery with each good or service;
- Reported forms of modern slavery and/or labour exploitation associated with the good or service;
- Modern Slavery Risk Indices that determine potential risk (see Reporting Criteria 4 for definitions); and
- Potential relationship with SMYA and partner member's operations or supply chains.

Our relationship to modern slavery risk within our operations and supply chains ('cause', 'contribute' or 'directly linked') is defined in the UN Guiding Principles on Business and Human Rights ('UNGPs') and referenced in the Commonwealth Modern Slavery Act's Guidance Material for Reporting Entities.

Table 3: Goods and services categories

Good or Service Category	Material and Use or Purpose	Stage(s) of production potentially at risk of modern slavery	Reported Forms of Exploitation / Modern Slavery	Modern Slavery Risk Indices ¹				Potential Relationship with SMYA Operations and Supply Chain ²		
				Country	Sector	Commodity	Workforce	Cause	Contribute	Directly Linked
Raw Materials	Raw materials, such as glass, fibre (paper), plastic, aluminium, and other materials to create packaging products.	Growing, harvesting, processing, refining and processing of raw materials.	Labour exploitation, child labour, bonded/forced labour, child labour, state-sponsored modern slavery and underpayment of wages including mandatory overtime.	High	High	High	High	Low	High	High
Manufacturing / Filling Equipment	Box machines, forming, press and blow moulding, filling, wrapping, sealing, labelling, packing and palletising etc.	Manufacturing, transport and maintenance of plant and equipment.	Bonded/forced labour, deceptive recruitment and unsafe working conditions.	High	High	High	High	Low	Medium	High
Maintenance and Repair Services	To keep production lines running and upgrade machinery or equipment where required.	Consumables, spares and transport of parts. Higher potential risk with some repair service suppliers.	Bonded/forced labour, deceptive recruitment and unsafe working conditions.	High	Medium	High	Low	Low	Medium	Medium
Packaging Supplies	Tape, labels, strapping, pallets, wrap, containers, IBCs and related packaging materials	Use of raw materials, manufacturing of goods, transport of products.	Labour exploitation, child labour, bonded/forced labour, child labour and underpayment of wages including mandatory overtime	High	High	High	High	Low	High	High
Shipping, warehousing, material handling and logistics	Store, handle, bulk transport and deliver finished products to customers.	Sea freight, warehousing and logistics associated with the transport of goods.	Bonded/forced labour, deceptive recruitment and unsafe working conditions especially for seafarers.	Medium	High	Low	Medium	Low	Medium	Medium
Marketing and advertising	Specialists in campaign design, copywriting, photography, print and online ads	Low for office-based operations. High level of risk associated with conferences and events through accommodation and catering	Bonded/forced labour, poor working conditions and underpayment of wages especially in the hospitality sector.	Low	Low	Medium	Low	Low	Low	Medium
Labour	Permanent, casual and seasonal labour to support business activities, especially during peak times	Recruitment of staff through onshore or offshore labour-hire companies.	Bonded/forced labour, deceptive recruitment, underpayment of wages and unsafe working conditions.	Medium	High	Medium	High	Low	High	High
Specialised services	QA, design, research and development testing, testing, and technical support.	Low for office-based operations. Potential risk through purchases of equipment or supplies via Tier 2 and beyond suppliers	-	Low	Low	Low	Low	Low	Low	Medium

1. Refer to Reporting Criteria 3 for definitions | 2. Definitions as per the United Nations Guiding Principles for Business and Human Rights (UNGPs) and Commonwealth Guidance for Reporting Entities.

Our top-spend categories include glass packaging, plastic, fibre (paper and card) packaging, metal, cork and 'Other' types of packaging. The main categories of goods and services we procure from our Tier 1 (direct suppliers) and percent spend across each category is included in Table 4.

Table 4: Key goods and services procured

Procurement category	Per cent total spend
Packaging (all types)	73
Government fees	8
Warehousing, transport and logistics	5
Property Maintenance	3
Labour hire	2
Plant and equipment	2
Corporate fees	2
Materials handling	1
Other categories	4

SUPPLIER COUNTRIES

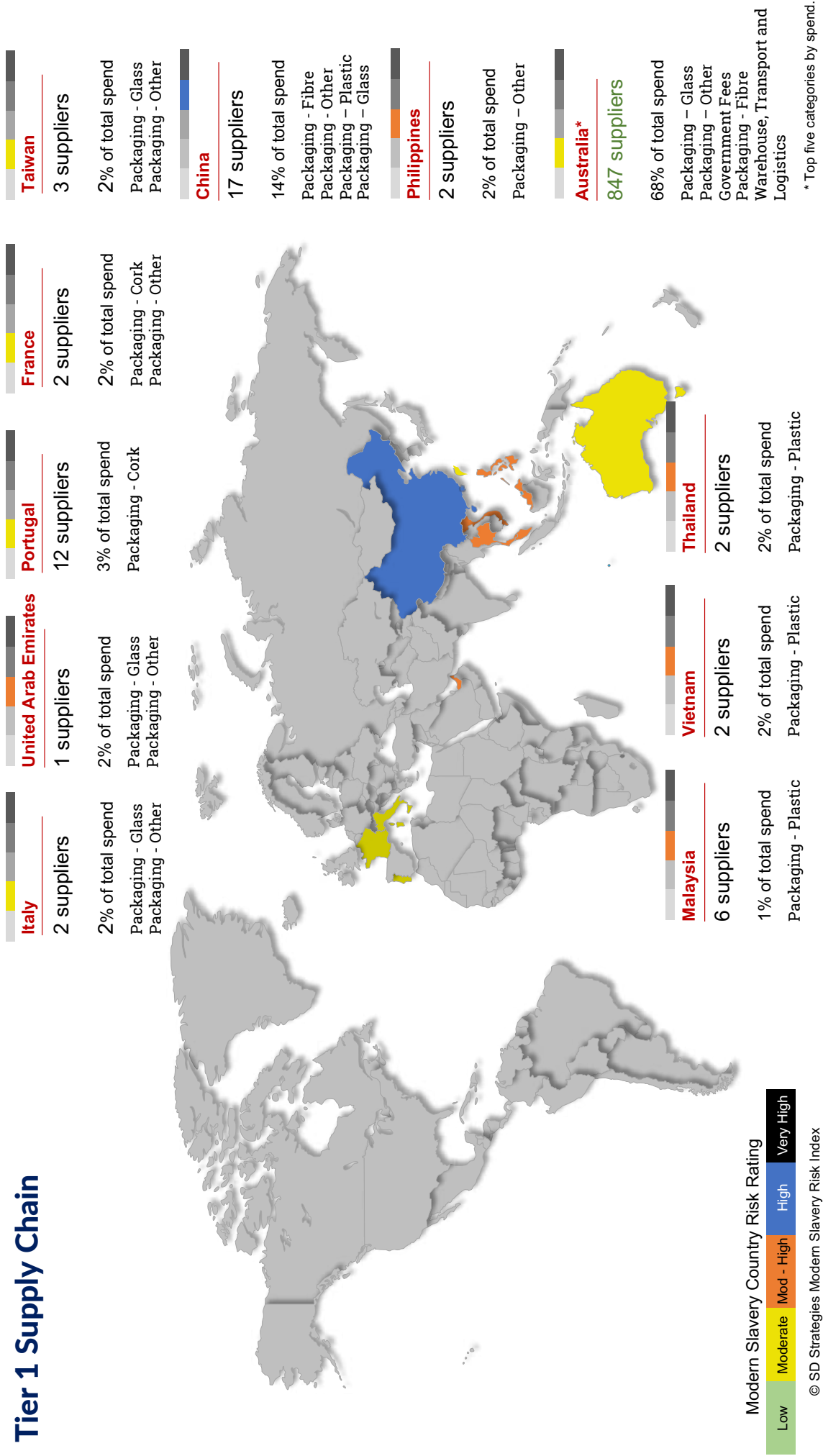
We source our goods and services from direct suppliers located in 16 countries (including Australia) with over two thirds (68%) of our total procurement spend with Australian-based suppliers.

Our top international supplier countries by spend are China (14%), Portugal (3%), France (2%), the Philippines (2%), Taiwan (2%), and Vietnam (2%). Other countries we procure goods and services from include Germany, India, Italy, Malaysia, New Zealand, Singapore, Sri Lanka, Thailand, and the United Arab Emirates (UAE).

Map 2 below provides an overview of our supply chain in countries that together account for 95% of our total spend. Information provided for each country includes the number of suppliers, percent of total spend in each country and the main categories of goods and services procured. The map provides an indication of modern slavery risks inherent in each country based on SD Strategies' Modern Slavery Country Risk Matrix.

Map 2: Tier 1 Supply Chain

Tier 1 Supply Chain



Modern Slavery Country Risk Rating



© SD Strategies Modern Slavery Risk Index

REPORTING CRITERIA 3

MODERN SLAVERY RISKS IN OPERATIONS AND SUPPLY CHAIN

In 2022 (our first reporting year), we focused our efforts on obtaining a deeper understanding of our Tier 1 (direct) supplier risks and the operational processes in place to manage those risks. We engaged external expertise to help us document, assess and prioritise our direct suppliers against 4 key modern slavery risk indicators (industry sector, commodity, geography, and workforce profile). We repeated the supplier prioritisation process in the 2023 reporting year (this statement) and, as with findings in 2022, identified similar patterns of potential risk amongst our larger Tier 1 suppliers. We acknowledge that there is a significant potential modern slavery risk associated with our suppliers both in our manufacturing base and among our Tier 2 (indirect) suppliers and beyond.

Operational Risks

SMYA staff comprise a mix of directly employed or contracted professional, technical, and base skilled workers in Australia and New Zealand and we consider the risk of modern slavery to be relatively low within our direct business operations. Some of our Australian sites use casual workers recruited through labour-hire companies during the peak season for beverage filling and bottling of wine. We acknowledge that the use of temporary migrant and seasonal labour is widespread in the horticulture, agriculture and food processing sectors, and that underpayment of wages, conditions and labour exploitation have been documented.



Importantly, our Board and leadership teams responsible for our Australia and New Zealand operations are committed to identifying and addressing modern slavery risks in our operations and extended supply chain and have committed resources to this process.

Supply Chain Risks

Our procurement team, supported by external experts, analysed close to \$240 million of procurement spend data for potential modern slavery risk against 4 key risk indices:

- **Industry sector** – Specific industry sectors (deemed as high risk in international and national guidance documentation). This includes sectors with high-risk business models such as the use of labour-hire workers and outsourcing, seasonality, franchising and aggressive pricing.
- **Commodity/product** – Specific products and commodities deemed as high risk by the United States Department of Labor's 2022 List of Goods Produced by Child and Forced Labor, the Global Slavery Index ('GSI') and other international guidance materials.
- **Geographic location** – Risk based on estimated prevalence of modern slavery and the government responses as outlined in the 2023 GSI and using the SD Strategies country risk matrix, which assesses risks against 14 global indices. High risk geographies include those with a weak rule of law, corruption, displacement, conflict, and the State's failure to protect human rights. While we predominantly use Australian suppliers, we recognise that our goods and services may come from countries other than those of suppliers' headquarters.
- **Workforce profile** – In undertaking our supplier analysis we considered the type of labour involved in the production of our goods and services, particularly where base skill, vulnerable, or temporary migrant labour is used. Our focus in 2023 deepened our understanding of risks across our supply chain and those posed by higher spend Tier 1 (direct) suppliers. We recognise that there may be modern slavery risks associated with our lower spent suppliers, as well as in our extended supply chain. These risks will be considered in future supplier risk assessments.



Risk by Spend

Analysis of procurement spend identified 81% of spend as potentially high risk for modern slavery. This is largely attributed to spend on various types of packaging used across our business units. A further 9% of spend was categorised as medium risk for modern slavery and 10% as lower risk. The high percentage of potentially high-risk spend is typical for a company operating in the packaging sector. Our supply chain extends into countries and industry sectors and uses commodities at risk of modern slavery practices.

These findings reflect those identified in our 2022 Modern Slavery Statement. Ongoing year-on-year assessments of our operations and engagement of potentially high-risk suppliers will provide a more detailed understanding of actual risk and practical management actions we can take to mitigate these risks.

Risk by Suppliers

Analysis of potential risk of 489 Tier 1 (direct) suppliers indicates that 308 suppliers or almost two thirds (63%) are potentially high risk for modern slavery. These findings are consistent to those identified in our 2022 supplier assessment, in which 60% of suppliers were identified as potentially high risk for modern slavery.

A further 24% of direct suppliers were categorised as medium risk for modern slavery and 13% as lower risk.

We will continue to gather data on the modern slavery risk (including dynamic and emerging risks) associated with the goods and services we procure. This will enable us to gain a better understanding of potential risk in our extended supply chain both in Australia and internationally, prioritise the engagement of high-risk suppliers and take appropriate action to manage it.

Risk by Spend Category

Based on the 4 risk factors outlined above (geography, industry sector, commodity, and workforce profile), 24 of the 37 categories of goods and services we procure are potentially high risk for modern slavery.

Packaging materials overwhelmingly represented the majority of high-risk categories, including glass, fibre (paper and cardboard), metal, plastic, and cork.

Other major high-risk goods and services include labour hire, plant and equipment, materials handling and bulk containers.

Risk by Supplier Country

We purchase goods and services from 16 countries including Australia.

Of the 10 countries (excluding Australia) that account for 95% of procurement spend:

- 1 is considered 'High Risk' for modern slavery (China)
- 4 are Moderate to High risk for modern slavery (the Philippines, Malaysia, Thailand, the United Arab Emirates and Vietnam)
- 5 are moderate risk for modern slavery (France, Italy, Portugal and Taiwan)

The largest number of suppliers in High- and Moderate-to-High-risk countries are in China (17 suppliers), followed by Malaysia (6 suppliers), and Vietnam (2 suppliers). Major categories of high-risk goods produced internationally were consistent with findings in 2022, including glass, plastic, fibre, cork and other packaging.

REPORTING CRITERIA 4

Actions taken to assess and address risk

The following actions were completed in this reporting period.

Executive Training

Board representatives and key members of our Executive Leadership Team completed online training to enhance their understanding of modern slavery issues related to our business operations and supply chain. The course covered the forms of modern slavery, legislative reporting requirements, and Board responsibilities and accountabilities under the Modern Slavery Act 2018 (Cth). It also provided an overview of actions companies can take to address modern slavery risks, outlined how to respond to instances of modern slavery, and posed practical questions for Boards to consider.

Modern Slavery Working Group

Our Modern Slavery Working Group continued to represent key business activities from across our operations including human resources, procurement sales, legal and governance. The Working Group is responsible for leading our modern slavery risk management program and implementing the action plan and road map for SMYA. The Working Group collaborates with teams across the 4 group entities as required. New Working Group members provide specific expertise in sustainable procurement and the assessment of supply chain modern slavery risk.

Modern Slavery Action Plan Review

Guided by external consultants, our Modern Slavery leads undertook a review of our modern slavery action plan, which includes a high-level three-year road map that will inform our risk management approach moving forward. Our action plan includes actions to establish a project management group, address gaps in our governance and due diligence processes, update risk management processes, improve supply chain management, engage our suppliers, focus on Human Resources and recruitment activities and deliver training to key internal and external stakeholders.



Supplier Risk Identification and Prioritisation

We repeated the process to review and prioritise our highest spend suppliers against modern slavery risk indicators and high-risk spend categories (see Criterion 3 'Modern slavery risks in operations and supply chains' above) undertaken for our first statement. Patterns of risk and findings were consistent with those in 2022, with significant levels of potential risk identified amongst key suppliers and spend categories of goods and services.

We reaffirmed our commitment to working with our management, procurement and quality assurance teams to support efforts to assess potential modern slavery risk both within our operations and across our supplier base in higher risk countries such as China, India and Malaysia.

Revised and updated T and Cs

Modern slavery provisions were included in the Sanector Terms and Conditions ('T and Cs') to ensure reasonable steps are taken by sellers to comply with legislative requirements as applicable, that the seller understands modern slavery risks in its supply chain, is not subject to investigations in relation to breaches of modern slavery or similar laws and has adequate and reasonable controls in place to prevent, detect, assess, manage and remedy a modern slavery offence. It is anticipated that these T and Cs will be rolled out across group operations.



Modern Slavery Roadmap

The focus of our 2022 statement was on reviewing existing systems and processes for managing operational and supply chain modern slavery risks, determining our highest risk/highest priority suppliers and building a modern slavery risk management framework. Our Modern Slavery Working Group developed a broad, multi-year Modern Slavery Road Map that we will adapt as our knowledge of modern slavery risks develops and our risk management program matures.

In 2023, we reviewed and updated actions in our Road Map to reflect our enhanced understanding of modern slavery risks, management challenges and resource constraints.

The following Roadmap outlines anticipated actions we will take across 5 business areas to better understand, communicate, manage and mitigate our modern slavery risk over the next 3 years (2024 to 2026).

Area of Focus	2024	2025	2026
Governance & due diligence	<ul style="list-style-type: none"> Engage our Board, ELT and business units to implement priority modern slavery risk management actions Review governance and policy framework Include modern slavery reporting / updates on SLT meeting agendas 	<ul style="list-style-type: none"> Establish formal governance framework for managing and mitigating risk Review and update relevant policies to reflect new and emerging human rights and modern slavery risks Research leading practice models to manage risk in our industry sector 	<ul style="list-style-type: none"> Review outcomes and effectiveness of our actions and update our Modern Slavery Action Plan and Roadmap
Risk management	<ul style="list-style-type: none"> Integrate modern slavery into our corporate risk management systems and processes Include modern slavery into corporate board risk appetite statement 	<ul style="list-style-type: none"> Develop capability of risk management team to assess and implement mitigation actions within the risk framework 	<ul style="list-style-type: none"> Review and report on integration of modern slavery risk management across Group systems and processes
Procurement & supply chain	<ul style="list-style-type: none"> Update supplier risk identification and prioritisation (based on annual data) Develop and communicate risk dashboard and supplier risk prioritisation findings Identify priority shared high risk suppliers and spend categories across Group business units 	<ul style="list-style-type: none"> Undertake enhanced due diligence of priority suppliers shared across business units Harmonise risk management requirements in business unit supplier contracts Provide modern slavery training to selected high risk suppliers 	<ul style="list-style-type: none"> Start mapping Tier 2 suppliers across major high-risk contracts
Human resources, training & recruitment	<ul style="list-style-type: none"> Roll out refresher training for Board and ELT on legislative changes and enhanced accountabilities Undertake modern slavery training needs analysis for employees and contractors Review and identify risks associated with labour hire companies across our industry sector 	<ul style="list-style-type: none"> Implement broad modern slavery training for management and staff Include modern slavery risk management responsibilities in key position descriptions 	<ul style="list-style-type: none"> Assess management and employee awareness, understanding and skills to identify and manage modern slavery risk
Grievance & reporting	<ul style="list-style-type: none"> Review and update Whistleblower Policy to better reflect the UNGPs and communicate internally and externally 	<ul style="list-style-type: none"> Identify opportunities to enhance grievance mechanisms Develop documented remedy framework and communicate to all stakeholders 	<ul style="list-style-type: none"> Review outcomes and effectiveness of whistleblower / grievance and remedy systems and process Identify opportunities to implement worker voice mechanism in high-risk operations

REPORTING CRITERIA 5

Effectiveness Assessment

We are establishing a review process to better track the effectiveness of actions we take to manage modern slavery risk and ensure we are making tangible progress towards achieving our goals and actions.

Our effectiveness review process includes measures taken to develop internal capabilities and iteratively improve our systems and processes on a continuous basis.

Our modern slavery risk management action plan and due diligence processes will continue to be reviewed as part of our corporate commitments to ethical sourcing and risk management.

As we implement our Modern Slavery Action Plan, we will assess the effectiveness of our actions against the following quantitative and qualitative indicators.

Area of Focus	Activity	Qualitative Indicators	Quantitative Indicators
Governance & due diligence	<ul style="list-style-type: none"> • Integrate modern slavery related policies, standards and processes across operating areas • Formalise modern slavery governance framework • Practical implementation and enforcement of relevant policies 	<ul style="list-style-type: none"> • Standing item in regular SLT meetings • Modern slavery included in relevant company policies and procedures • Engagement of internal staff and other priority stakeholders 	<ul style="list-style-type: none"> • Number and type of modern slavery and human rights issues raised, or questions asked in management meetings • Percent policies reviewed and updated
Risk Management	<ul style="list-style-type: none"> • Communicate and integrate modern slavery into corporate risk management systems and processes • Develop understanding of existing modern slavery risks and emerging threats within our business / industry sector 	<ul style="list-style-type: none"> • Modern slavery included on board risk appetite statement • Enhanced internal understanding and discussion of modern slavery risks and expectations to manage risk amongst internal and external stakeholders 	<ul style="list-style-type: none"> • Number of modern slavery and human rights issues and risks identified and documented • Number of risk mitigation actions implemented including the application of remedy to identified victims
Procurement & supply chain	<ul style="list-style-type: none"> • Supplier risk assessments (focusing on potentially high risk suppliers) including mapping Tier 2 suppliers • Risk management requirements incorporated into new supply agreements and contract renewals 	<ul style="list-style-type: none"> • Engagement and education of suppliers • Enhanced due diligence of high-risk suppliers including self-assessment questionnaires (SAQs) • Issues and opportunities identified in SAQ responses and Corrective Action Plans. 	<ul style="list-style-type: none"> • Percent suppliers engaged and trained • Percent supplier responses to SAQs and number of documents provided as evidence • Modern slavery risk dashboard profile • Percent of supplier contracts with modern slavery clauses
Human resources, training & recruitment	<ul style="list-style-type: none"> • Board, SLT and staff engagement and training • Awareness raising and engagement of all stakeholders regarding modern slavery issues and opportunities. 	<ul style="list-style-type: none"> • Enhanced internal awareness and knowledge of modern slavery risks • Engagement of suppliers and other key stakeholders regarding risk management 	<ul style="list-style-type: none"> • Percent Board, SLT and staff trained • Number of Board / SLT papers, engagements and discussions per annum. • Number of key suppliers trained
Grievance and reporting	<ul style="list-style-type: none"> • Reporting channels (whistleblower) reviewed, updated and communicated • Modern Slavery Statement published on Commonwealth Register 	<ul style="list-style-type: none"> • Grievance mechanisms and reporting channels actively communicated to internal and external stakeholders • Modern Slavery Statement approved and submitted on time. 	<ul style="list-style-type: none"> • Total number of modern slavery or related issues raised via reporting channels • Percent issues effectively addressed



Continuous Improvement

Addressing modern slavery risk is complex and challenging and in 2023 we continued to expand our understanding of our operational and supply chain risks and opportunities.

Our Working Group, supported by our Board and SLT, will strive for continuous improvement as we continue to integrate modern slavery risk management into all aspects of our operations and purchasing decisions.

Our approach continues to evolve over time as our understanding of the risks and impacts of modern slavery deepens and our capabilities to manage current and future threats evolve.

REPORTING CRITERIA 6

Process of consultation with entities owned or controlled

SMYA is a wholly-owned subsidiary of San Miguel Yamamura Packaging International, Ltd. ('SMYPIL'). SMYPIL is owned by 2 packaging leaders, San Miguel Holdings Limited, and Nihon Yamamura Glass Co., Ltd..

We are working closely with our 4 partner members (COSPAK, Vinocor, JMP Retail, and SANECTOR) and internal teams to ensure a harmonised approach to managing modern slavery risk across the organisation and identify opportunities to share learnings from our program through:

- Representatives of all entities participating in our Working Group.
- Regular communications between members of the Working Group, including seeking information on risks, policies, codes of conduct and other information from their respective business units.
- Opportunities to provide input into our Modern Slavery Statement, policy reviews and other relevant documentation.

Composition of our Working Group may change and adapt to the needs of our business as our modern slavery risk management program matures.

REPORTING CRITERIA 7

Other Information

At SMYA, we appreciate that all life on earth is under threat of extinction, and we recognise we have a broader stewardship role to play in environmental protection and conservation. The work we do to respond to sustainability risks and opportunities will be one of SMYA's biggest contributions to society.

Our Sustainability Promise focuses on propelling positive change in 6 areas to create a better world for tomorrow:

- Sustainability Strategy;
- Our People and Communities;
- Our Customers;
- Energy and Emissions Management; and
- Sustainable Supply Chains Compliance.

A better future is a world that works for all humanity and the planet. We play a vital role in helping the communities and economies in which we operate transition to a more sustainable and liveable future.

We are proud to hold the following certifications across our businesses.



ISO 9001:2015 QUALITY MANAGEMENT



AUS QUAL ORGANIC



BRC GLOBAL STANDARD



AFIC AUTHORITY AUSTRALIA



ISO17025 STANDARD



OU KOSHER CERTIFICATION



AUS QUAL HACCP



FOOD SAFETY ISO 22000
SAI GLOBAL



GOOD ENVIRONMENTAL CHOICE AUSTRALIA CERTIFIED



DQS IFS STANDARD



AUSTRALIAN CERTIFIED ORGANIC



USDA ORGANIC