



AUSTRALIAN FAMILY OWNED SINCE 1968

BUNDABERG BREWED DRINKS GROUP MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2020

INTRODUCTION

This is the first Modern Slavery Statement for the Bundaberg Brewed Drinks Group, as informed by the Federal Modern Slavery Act 2018.

The purpose of this statement is to outline our approach to ensure that the Group has robust frameworks and processes in place to minimise the risk of Modern Slavery in our business operations and supply chain.

At Bundaberg Brewed Drinks, we recognise that Slavery and Human Trafficking can occur in many forms, as considered in the Act. This can include Slavery, servitude, Human Trafficking, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting for labour or services.

Bundaberg Brewed Drinks is fully committed to operating responsibly and establishing and adhering to the highest ethical standards across our Group. We will not tolerate any forms of Slavery or Human Trafficking in our business.

WHO WE ARE

Bundaberg Brewed Drinks is an Australian family-owned company known for its premium drinks, including Ginger Beer and other non-alcoholic beverages. For four generations, we've kept tradition at heart, brewing to traditional recipes, using time-honoured brewing methods, and the best quality ingredients. Guided by the rule, "If it's worth brewing; it's worth brewing well," Bundaberg craft brews their drinks for up to seven days to capture the refreshing taste of real ingredients inside every brew.

In 2020, to coincide with the delivery of our first Modern Slavery Statement, we plan to engage our people and relevant stakeholders on our approach to addressing the issue of Modern Slavery Risk.

OUR OPERATIONS AND SUPPLY CHAIN

The Bundaberg Brewed Drinks Group sources significant quantities of goods and services; including ginger, agricultural raw materials, glass, cardboard and major machinery. In FY20, the Group worked with 200 Suppliers globally, with most of our annual Supplier spend occurring with Tier One Suppliers primarily located in Australia, followed by the United Kingdom and New Zealand. We are aiming to progressively develop a more comprehensive supply chain map to better demonstrate the geographic location and nature of products and services sourced. The nature of the products, the regions they are sourced from and the industries associated are low in risk but have been risk

assessed as part of a systematic approach we take in all risk disciplines. This includes our procurement processes, practices and dealings with Suppliers, which we know is an essential element of progressing the global eradication of Modern Slavery and Human Trafficking.

ASSESSMENT AND MITIGATION OF MODERN SLAVERY RISK

Our management of Modern Slavery Risk, in our operation and supply chain, is guided by our Ethical Purchasing and Modern Slavery Policy as endorsed by the Bundaberg Brewed Drinks' Board.

The Group recognises that a Modern Slavery and Human Trafficking risk may be present in our organisation and extended supply chain. We know that the level of risk is influenced by factors such as vulnerable populations, product and service category, industry and geographic location. Accordingly, we have tailored our risk processes to ensure that we are focusing our efforts on those areas that present an elevated risk of exposure. We have assessed that of all the products and services we procure, those within the categories of agricultural products and people services, present an elevated risk of Modern Slavery.

Steps that we have taken to assess and mitigate risk in our supply chain include: working with Suppliers to strengthen their internal policies and procedures; including, but not limited to, workers' labour and payroll conditions; reworking our Supplier contracts to ensure a Modern Slavery Clause is present. Being our first Statement on Modern Slavery, we chose to also examine our top 50 Tier One Suppliers' Modern Slavery positions. With direct communication, we examined their statutory reporting obligations concerning the Modern Slavery Act, industry specific quality compliance such as Sedex and the existence of internal policies relating to Human Rights and Ethical Sourcing.

DUE DILIGENCE AND ASSURANCE

The Bundaberg Brewed Drinks Group takes a proactive approach to eradicating Modern Slavery Risk from our supply chain. Our risk-based due diligence process, constructed with reference to our Ethical Sourcing and Modern Slavery Policy, is part of our broader Supply Chain Assurance Program and is designed to identify and assess a range of potential risks in the supply chain, including Modern Slavery.

DUE DILIGENCE

As part of our Supply Chain Assurance Program, all new Suppliers, as well as renewing Suppliers, are subjected to the due diligence process that we have embedded into our standard contracts. We are working to integrate the risk assessment of Modern Slavery as part of the TACCP and VACCP review process within our BRC Quality Assurance System.

We favour working with Suppliers to resolve or substantially mitigate issues instead of ending the relationship with them because of the potential adverse effects on the livelihood of the Supplier's employees. Achieving this takes time, and the Bundaberg Brewed Drinks Group is committed to working with its Suppliers to eradicate Modern Slavery from its supply chain. Additionally, the Group shares its expertise to support Suppliers to build their capacity to meet international standards.

GRIEVANCES AND REMEDIATION PROCESS

We are committed to the protection and respect of Human Rights across our business and supply chain. In cases where we identify impacts that we may have caused, or to which we

may have contributed to or be directly linked, we will seek to address this in line with the guidance provided under the Modern Slavery Act.

We have established reporting procedures and mechanisms where employees and third parties can report any concerns regarding unethical or illegal conduct; including instances relating to Modern Slavery and Human Trafficking. Employees can report to their manager, or if they wish to remain anonymous, employees and third parties are able to report through our independently operated Whistleblower system, via phone, email or an online portal. Where issues are investigated and substantiated, we take appropriate action.

The Group has inaugurated internal grievance resolution guidelines which outline procedures and resolution options for our employees. The introduction of new Australian legislation designed to protect vulnerable workers under the Fair Work Act, the Modern Slavery Act and Whistleblower Protection Act, has been communicated throughout the Bundaberg Brewed Drinks Group and awareness of what to look for has been raised.

MEASURING EFFECTIVENESS

Being our first Modern Slavery Statement, our level of understanding of the nature of and risks pertaining to Modern Slavery has been elevated through the process of completing the Policy and risk assessments that have culminated in this Statement.

The annual review process with our Tier One Suppliers now has a requirement to include discussions relating to Modern Slavery, ensuring Modern Slavery Risks are front of mind for ourselves and our partners.

CONSULTATION

The Bundaberg Brewed Drinks' Board has adopted an Ethical Sourcing and Modern Slavery Policy and mandated that stakeholders throughout the Group understand and maintain awareness of the Policy through the annual training regime as required by the implementation of the group's Human Resource Information System.

This statement was approved by the Board of the Bundaberg Brewed Drinks Group.

Signed,



Terry O'Brien
Chairman