

# MODERN SLAVERY

2021 STATEMENT

*"The concept of human slavery is against everything the core values of Pernod Ricard stands for. As Createurs de Convivialite we must take a clear stance against it" – Bryan Fry, CEO and Chairman, Pernod Ricard Winemakers*



Pernod Ricard Winemakers

ABN 75 007 870 046

*Our purpose is simple. We create moments of connection. Moments for conversations to start. Moments that create strong relationships and mutual respect.*

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# A MESSAGE FROM BRYAN FRY, CEO OF PERNOD RICARD WINEMAKERS

Modern slavery is a violation of fundamental human rights and we are committed to upholding respect for human rights and continue to take steps to ensure modern slavery is identified and addressed. As part of that commitment, this is Pernod Ricard Winemakers' second Modern Slavery Statement, which reports on our progress to identify, manage, and mitigate risks of modern slavery in our operations and supply chain.

People are at the heart of everything we do. Our responsibility is to respect and support those partners that we work with in line with the Pernod Ricard Code of Conduct. We are committed to sharing our knowledge and to working with our partners to create shared values in our supply chain, ensuring our activities are safe, respectful and responsible. It's an approach that is driven by our Sustainability and Responsibility (S&R) 2030 Roadmap, Good Times from a Good Place, and aligned to the [United Nations Sustainable Development Goals](#). Our 'Valuing People' pillar focuses on the respect for all those we work with, fostering a diverse and inclusive work environment and vigilant to ways we can reduce risks in our operations and supply chain. We are embedding sustainability in all procurement and business processes including risk management, sourcing, supplier performance management and costing. Over the past year, despite additional pressures on business and the supply chain as a result of the pandemic, we have remained committed to making progress in this area. As such, in the last year we have:

- Introduced a professional alert system (Speak Up) designed for employees to report on any violation of the Pernod Ricard Code of Conduct, or another concern they may have about ethics and compliance
- Continued to improve our responsible procurement process that aims to engage our suppliers to the Group S&R commitments and encourage them to improve their direct impact on people and our environment across five themes: Labour & Human Rights, Health & Safety, Environmental Impact, Integrity & Fair Business Practices, Responsible Drinking
- Delivered supplier training to educate on risks around hiring undocumented workers, underpayment and the importance of transparency when engaging labour hire contractors.



Following internal reporting, we can confirm that no specific instances of modern slavery have been identified for the financial year 2020-2021. However, this does not mean our job is done and we remain committed to continuously improve our ability to identify and remedy risks.

## KEY HIGHLIGHTS



Established a Modern Slavery Working Committee.



Provided training to suppliers in high-risk sectors.



Introduced Speak Up, a confidential reporting hotline.



Recognised by the Workplace Gender Equality Agency as an Employer of Choice for Gender Equality.



Certified as a Family Friendly Workplace.

This Statement was approved by the Pernod Ricard Winemakers Pty Ltd Board of Directors on 16/12/2021

**BRYAN FRY**  
Chairman & CEO

A handwritten signature in black ink, appearing to read 'Bryan Fry', over a white rectangular background.



# STRUCTURE, OPERATIONS & SUPPLY CHAINS

## STRUCTURE

Pernod Ricard Winemakers Pty Ltd is a world-renowned premium wine subsidiary of French wine and spirits producer Pernod Ricard. With iconic brands across Australia, New Zealand, Spain and the USA, Pernod Ricard Winemakers grows, crafts and markets award winning products to consumers in every continent. Pernod Ricard Winemakers also imports, markets, and sells champagne, wine, and spirits from the individual affiliates of the global Pernod Ricard group for the Australian Domestic Market.

Under the authority of Pernod Ricard, Pernod Ricard Winemakers directs business activities and ensures that global policies are applied. Our strategy towards modern slavery applies to all persons working for Pernod Ricard Winemakers or in any way related to its operations or acting on its behalf in any capacity, including employees, directors, contractors, external consultants and business partners.



### Pernod Ricard Headquarters

Headquarters defines and coordinates the overall company strategy, ensuring affiliates comply with corporate policies.

Responsibilities include governance (strategy, mergers & acquisitions, sustainability, and responsibility, etc.), dissemination of best practices and cross-functional initiatives with high added value (digital marketing, luxury, innovation, etc.), and support functions (supply chain, IT, etc.).

#### Brand Companies

Responsible for developing the overall strategy for their respective brands and for production and management of their products and industrial facilities.



#### Pernod Ricard Winemakers

#### Market Companies

Linked to a region and tasked with implementing the Group's strategy and key policies. Their role is to activate the Group's international strategies at the local level and manage local and regional brands.



#### Pernod Ricard Pacific



#### Pernod Ricard Australia

*We Bring It to You*



*We Craft It*



*We Grow It*



# STRUCTURE, OPERATIONS & SUPPLY CHAINS

## SUPPLY CHAIN & LOGISTICS

Our supply chain activities incorporate all processes to plan, produce and distribute our finished goods both locally and globally, and to distribute imported products from other affiliates within the Pernod Ricard Group to customers locally within Australia and New Zealand. To uphold our excellence in customer service, it is vital all our supply chain partners and activities are aligned in terms of planning and execution.

## GRAPE GROWING & SOURCING

We source our grapes from a combination of company owned and leased vineyards, grower vineyards and the bulk wine market. Our volumes and methods of sourcing and procuring vary between regions and products.

## WINE PRODUCTION & PACKAGING

We produce and package award winning wines under our wholly owned and operated brands; including Jacob's Creek, St Hugo, Brancott Estate and Stoneleigh, as well as providing third party packaging services to external beverage organisations.

## MARKETING, SALES & DISTRIBUTION

We market, sell and distribute our products and brands globally, exporting to more than 70 countries, and distribute our affiliate brands for the Australian domestic market.

## PROCUREMENT

We procure both direct and indirect goods from our suppliers. Direct goods represent the inputs of our production including dry goods (cartons, corks etc.) and wet goods (ingredients, grapes etc.). In addition, we procure supplies of indirect goods and services including marketing, IT, logistics, corporate and consulting.

## LEADERSHIP TEAM

Pernod Ricard Winemakers Leadership Team serves as Pernod Ricard Winemakers' management committee and is comprised of 10 members, including the chairman and managing directors of each organisational department. The Committee meets regularly to discuss the strategy and align the business with Pernod Ricard Headquarters and other affiliates, including human rights and modern slavery.

### HUMAN RIGHTS GOVERNANCE

Our Group governance approach.



#### Pernod Ricard Headquarters

Responsible for providing oversight and approval of the Groups' sustainability strategy including human rights.



#### BRYAN FRY

Chairman and Chief Executive. Accountable for managing human rights risks.



#### MANAGEMENT COMMITTEE

Managing directors of each organisational department. Aligns the business with legal and ethical obligations.



#### MODERN SLAVERY COMPLIANCE MANAGER

Primary responsibility for implementing the Modern Slavery Policy and monitoring effectiveness.



#### MODERN SLAVERY COMMITTEE

Responsible for creation of Modern Slavery Statements and embedding Modern Slavery compliance in the business.

# MANAGING RISKS

Our success is strongly linked to the way we do business and this includes acting responsibly throughout the supply chain and our operations. We rely on many suppliers, from farming and manufacturing through to distribution and merchandising, and view our suppliers as an extension of our business. We acknowledge that, together, we have an impact on society and the environment. We continue to monitor our risk through a combination of internal and third-party risk assessments, audit trends, grievances raised, team member insights, industry commentary and other due diligence methods. A combination of these due diligence methods helps with identifying and assessing the most prominent human rights risks, including modern slavery. The term 'modern slavery' is used in the *Modern Slavery Act 2018 (Cth)* to describe situations where coercion, threats or deception are used to seriously exploit victims and undermine or deprive them of their freedom. The MS Act defines modern slavery as including eight types of serious exploitation, including, trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; the worst forms of child labour; and deceptive recruiting for labour or services.

## RISK ASSESSMENT

Pernod Ricard HQ has developed a digital platform, Partner Up, that conducts online evaluations of a third-party supplier and their reputation before Pernod Ricard enters a contract with them.



The assessment requires the completion of an internal and external questionnaire, rating the supplier low, medium or high risk. For direct and tier one suppliers (over a spend threshold) a further risk management assessment is mandatory and identifies if a further audit, completed by a global risk and sustainability solutions provider, is required. Partner Up is a global web-based tool, creating a shared database of third parties for Pernod Ricard users around the world to conduct due diligence to check that no compliance red flags specifically relating to corruption are raised.

We utilise two external global risk and sustainability solutions providers to assess the risk levels of our Direct & Tier one suppliers:



An internationally recognised standard, EcoVadis provides global benchmarks, which are essential for measuring and improving performance of our global value chain. The EcoVadis rating is based on an evidence-based assessment which has been adapted to hundreds of business categories and considers relevant industry labels and certifications as well as local laws in 160 countries. EcoVadis is aligned with global standards such as the UN Global Compact and relies upon international corporate social responsibility standards based on 21 criteria, divided into 4 categories: environment, labour and human rights, ethics and sustainable procurement.



The Supplier Ethical Data Exchange (Sedex) is a not-for-profit membership organisation for businesses committed to the continuous improvement of ethical performance within their supply chains. The Sedex Members Ethical Trade Audit (SMETA) was developed through multi-stakeholder consultation by the Sedex Associate Auditor Group (AAG), to provide a best practice reference framework for social auditing and reporting. It draws from practices defined by Sedex members and by the Global Social Compliance Programme (GSCP).

# MANAGING RISKS

## OUR OPERATIONS

### DIRECT

The majority of Pernod Ricard Winemakers workforce are employed directly over several employee contract types, including casual, fixed-term, permanent and international assignment contracts. Employment terms and conditions are set out in employment contracts governed by the Australian employment laws and relevant industrial bodies. Our employment framework complies with local laws and covers core employment conditions such as minimum wages, hours of work and leave entitlements.

## STRENGTHENING AWARENESS & CONTINUOUS IMPROVEMENT

We reduce risks of modern slavery in our own operations through our comprehensive [Modern Slavery Policy](#), [Whistle-blower Policy](#), monitoring and extensive grievance tools (including our internal confidential and anonymous reporting tool, Speak Up). Educating our new team members is a major component of our continuous improvement approach. We deliver a host of online induction courses for our new direct employees within the first month of joining. The courses include numerous topics including, but not limited to:

- Modern Slavery Compliance Training
- Code of Business Conduct
- Alcohol and Responsible Drinking
- Quality, Safety and Environment
- Inappropriate Behaviour
- COVID-19 Safe Access and Workforce Policy Awareness
- Site Specific COVID-19 Site Inductions + Generic Site Inductions.
- Gift, Hospitality and Anti-bribery

### INDIRECT

We acknowledge that indirect labour potentially carries a higher risk of modern slavery. Indirect labour presents higher risk due to a workforce that is often characterised by a higher proportion of migrant and unskilled workers who may be less aware of applicable rights, laws, and available protections. There is less visibility and control over how workers are engaged and higher prevalence of subcontracting and independent contracting, which make these categories more susceptible to modern slavery.

At Pernod Ricard Winemakers we have a small component of indirect labour that is employed through third-party labour hire. Our indirect labour consists of outsourced operational services and indirect labour hire including facilities, information technology, agricultural labour and administration. For such services, commercial contracts are put in place which expressly state our requirements that any contractor provided is engaged in accordance with local statutory employment requirements. Furthermore, such arrangements and compliance thereof are regularly reviewed as part of our third-party contracting arrangements.

Our Indirect Labour agreements contain these explicit conditions relating to modern slavery:

*“The Service Provider must ensure that its obligations under this Agreement are performed in accordance with the Modern Slavery Act 2018 (Cth) and must notify Pernod Ricard Winemakers as soon as it becomes aware of any breach or potential breach of the Modern Slavery Act 2018 (Cth) by the Service Provider or its agents, employees and subcontractors”*



# MANAGING RISKS

## OUR OPERATIONS

### STRENGTHENING AWARENESS

Through completing a risk analysis of the indirect labour within the sector in relation to modern slavery the below have been identified as possible areas of risks. The analysis requires further investigation in relation to Pernod Ricard Winemakers operations.

● No/Low Risk ● Medium Risk ● High Risk

Department	Indirect Labour Type	Risk Status
Information Technology	Consulting	●
Information Technology	Technical Support	●
Site Services	Gardening	●
Site Services	Cleaning	●
Site Services	Front of House/Chefs	●
Agricultural/Winery	Vintage Hand	●
Production	General Hand	●
Production	Forklift Driver	●
Production	Electrician	●
Production	Trade Assist	●
Office	Administrative	●

#### THE PERNOD RICARD MANIFESTO

### CRÉATEURS DE CONVIVIALITÉ

True to our founding spirit, we've been bringing people together, inviting them to share authentic experiences and making new friends every day through our world-class portfolio of premium wines and spirits.

#### We are passionate hosts ...

a family of exceptional people who are committing to fighting alcohol misuse and creating a better way to live and work together, to bring good times today and for generations to come.

#### We are respectful guests ...

who care for and strive to protect and nurture the terroirs and environments in which we live. We partner with local farmers and respect local communities to benefit our planet, our consumers and our business.

**We bring good times from a good place, to create a more convivial world, a world without excess.**

## PRE-VINTAGE MEETING

As highlighted above, agricultural labour services present the highest probability of modern slavery risk. To communicate to our grape suppliers, this year we conducted a "pre-vintage" communication meeting with grape growers to notify them of the heightened modern slavery risk in agricultural supply chains.

Key areas that were covered include:

- Hiring undocumented workers
- Underpaying contract labourers
- Engaging with labour hire contractors with track records of poor treatment of workers (i.e., confiscating passports, not paying wages, forcing work in poor conditions, etc.).





# MANAGING RISKS

## MODERN SLAVERY E-LEARNING MODULE

This financial year we developed a modern slavery e-learning module intended to raise awareness on the issues of modern slavery and Pernod Ricard Winemakers approach and commitment to eradicating modern slavery risks within the business. The training includes information and the completion of mandatory questions, comprising:

- Modern slavery legislative requirements.
- Defining and identifying modern slavery with practical examples.
- Pernod Ricard Winemakers' responsibilities and reporting requirements.
- The process we have implemented to manage risks.
- Staff roles and responsibilities in relation to modern slavery risk identification and management.

In FY21 the module was rolled out to selected employees in Procurement, Human Resources, Grower Relations and Legal. It has been identified that in FY22 training is to be rolled out to all managers across all departments and all key staff members of Sales, Human Resources, Procurement, Legal and Grower Relations departments. A timeframe of completion and reminder emails has been arranged to have a 100% completion rate and an action for the Modern Slavery Committee to monitor training commitment.



**Modern Slavery**

[START COURSE](#) [DETAILS](#) ▾

**SLAVERY  
STILL**

  
Pernod Ricard Winemakers

# MANAGING RISKS

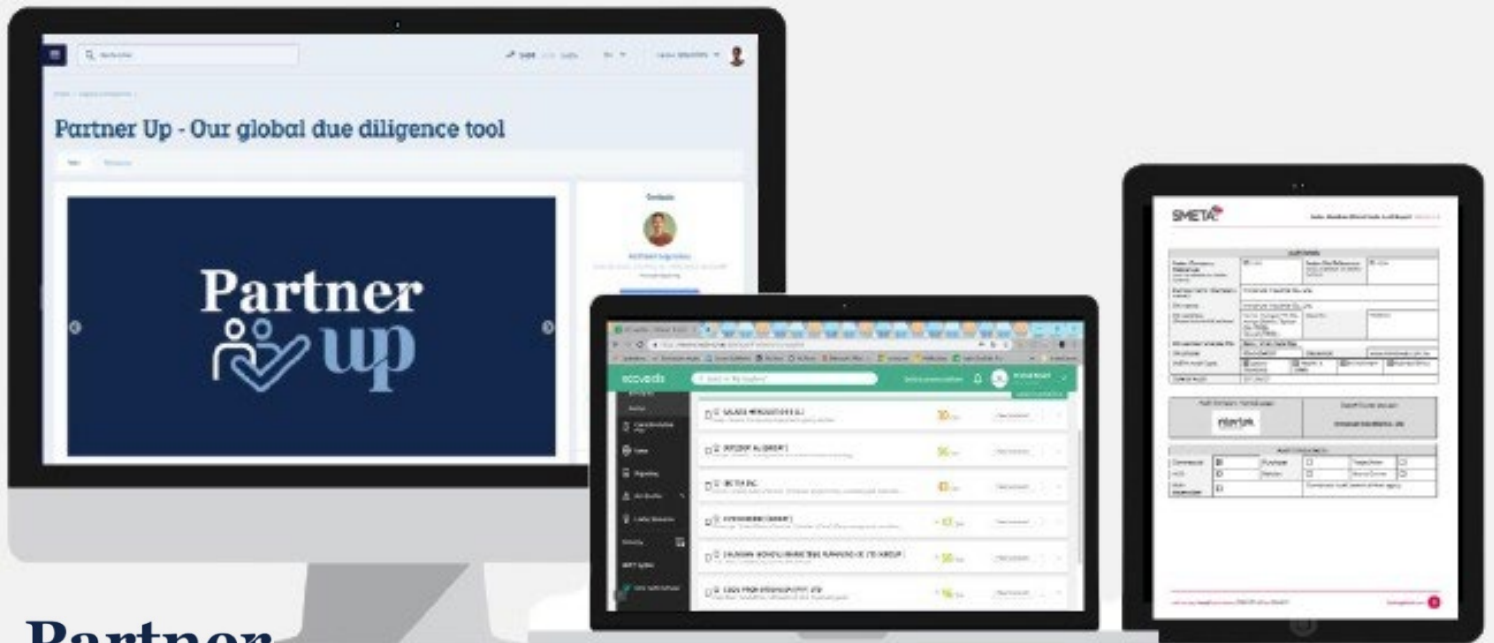
“ Minimizing our business impacts (goods and services we buy and the products we sell) by increasing diversity and fairness for all our people and empowering people across our supply chain. ”

## OUR SUPPLY CHAIN

Responsible Procurement is of extreme importance globally at Pernod Ricard and is embedded in our [2030 S&R Roadmap](#). We are practicing responsible procurement for many reasons, most notably:

- Mitigate and prevent sustainability and responsibility risks of our business on strategic sources of supply
- Help improve lives and working conditions of people we work with
- Reduce our impact on the environment
- Comply with international and local laws and regulations
- Meet the expectations of all Pernod Ricard stakeholders

During the reporting period we reviewed all our Direct and POS/VAP suppliers, including local and global dry goods, wet goods and merchandising suppliers via our responsible procurement process, Blue Source. The reviewing process included entering suppliers in Partner Up for an online assessment, requiring two internal questionnaires to evaluate corruption and S&R risks, as well as an external questionnaire completed by the supplier, identifying low, medium, or high-risk suppliers. Those suppliers deemed a potential risk were referred to EcoVadis for evaluation or Sedex for an audit. Upon completion of the Sedex or EcoVadis evaluation, suppliers receive feedback and a corrective action plan is provided by Pernod Ricard Winemakers to at-risk suppliers. Pernod Ricard Winemakers will continue working together with these suppliers to assist with implementing corrective action plans and in improving their performance.



Internal supplier evaluation tool



External web-based CSR evaluator



External on-site CSR audit



# ADDRESSING THE RISK

## REMEDIAL ACTION

Pernod Ricard Winemakers takes a proactive approach to preventing modern slavery risks within our supply chain and our internal operations. This action is underpinned by our global policies and programs, including risk assessment processes that are designed to identify potential issues and adopt preventative measures.

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### **Key Remedial Actions Completed in FY21**

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Developed a modern slavery working committee to implement and further develop the policy and strategy.

Addition of a Compliance Officer to action and manage Pernod Ricard Winemakers responsible procurement processes.

Communicated with, monitored and supported suppliers in higher risk sectors, including grape growers, through pre-vintage/pre-harvest communications.

Introduced a confidential reporting process to deliver a channel for employees, direct and indirect suppliers, their families and others to raise concerns.

Raised awareness for key staff to detect and prevent modern slavery practices.

Finalised the design and implemented the dedicated modern slavery e-learning module.

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## KEY DOCUMENTATION

Pernod Ricard Winemakers has a comprehensive set of policies, standards, practices, and procedures that articulate our values, ways of working and expectations of our employees. This framework ensures that our employees clearly understand our expectations, and equally that they can recognise when they are being treated in a way that is inconsistent with these expectations and be free to raise grievances or complaints. The following documents support our efforts to address the risk of modern slavery: Anti-Bribery Policy, Responsible Procurement Policy, Whistle-blower Policy, Pernod Ricard Global Human Rights Policy, the Code of Business Conduct, Unacceptable Behaviour Policy, Modern Slavery Policy, and the Diversity & Inclusion Policy.



# ADDRESSING THE RISK

## GOVERNANCE MEASURES

At Pernod Ricard Winemakers we have three main tiers of governance to ensure we are complying with the legal and ethical obligations of the Modern Slavery Act:

### Board approval and responsibility

Pernod Ricard Winemakers' Management Committee has overall responsibility for ensuring that both the Modern Slavery Policy and our business comply with Pernod Ricard Winemakers' legal and ethical obligations. The Management Committee – comprising the board of directors - is also responsible for approving Pernod Ricard Winemakers' annual Modern Slavery Statement and ensuring compliance with the disclosure obligations under the Modern Slavery Act.

### Modern Slavery Compliance Manager

The Procurement Director (Modern Slavery Compliance Manager) has primary and day-to-day responsibility for implementing the Modern Slavery Policy, monitoring its use and effectiveness, and dealing with any queries about it.

### Management

Management is responsible at all levels for ensuring those reporting to them understand and comply with our Modern Slavery Policy and are given adequate and regular training on it and the issue of Modern Slavery in supply chains, including areas of our business and supply chains which are identified as at risk of such practices.

### Assess

- Supplier standards risk scoping
- Modern Slavery risk scoping

### Identify

- High risk supplier mapping
- Supplier due diligence

### Action

- Supplier onboarding and contract review
- Developing Modern Slavery Policies/Procedures
- Conducting Modern Slavery training & awareness
- Establishing Modern Slavery risk reporting channels

### Review

- Developing Modern Slavery KPIs
- Implementing external supplier audit program
- Conducting due diligence re high risk suppliers

### Report

- Drafting Modern Slavery Statement
- Reporting to Management Committee on Modern Slavery Statement

# MEASURING EFFECTIVENESS

We are working towards fully implementing key performance indicators to better understand the effectiveness and impact of the initiatives detailed in this Statement and our broader program. In FY21 we focused heavily on KPI training and capacity building as well as policy and procedure development. These are major KPIs and are important in laying the foundation of our modern slavery mitigation process. Through training stakeholders in utilising the internal tool, Partner Up, to assess the risk and reputation of suppliers allows a comprehensive and accessible due diligence process. Introducing a Modern Slavery Committee with recurring meetings allows modern slavery to be front of mind and will assist in KPI reporting as well as implementing actions and improvements.



● Complete ● On-going/Partially Completed ● Not Started

STATUS 2019 (BASELINE)	STATUS 2020	STATUS 2021	KPI	Related tasks undertaken/to be undertaken in the Reporting Period
<b>ASSESS &amp; IDENTIFY</b>				
●	●	●	Scoping exercise	Use of S&R Risk Mapping Tool to identify high risk suppliers.
●	●	●	Due diligence re high-risk suppliers	S&R Assessment of suppliers by EcoVadis; Scorecard Analysis conducted.
●	●	●		Corrective Action Plans issued and supported by PRW.
●	●	●		Specific certification for Grape Growers via Freshcare providing internationally recognised assurance standards for wine grape industries.
<b>ACTION</b>				
●	●	●	Training and capacity building	Train key staff in identifying and notifying of the risk of modern slavery practices and on MS Act compliance.
●	●	●		Participate in information sessions for suppliers involved in labour hire.
●	●	●		Participate in industry information sessions specific to labour hire and wages and facilitate information sessions for suppliers involved in grape growing.
●	●	●		Addition of Compliance Officer dedicated to actioning and managing the responsible procurement process.
●	●	●	Policy and procedure development	Development of Modern Slavery Policy; Review of Supplier Standards.
●	●	●		Incorporation of reporting under Modern Slavery Policy into PRW's Whistle-blower Policy.
●	●	●		Implementation of Modern Slavery Committee with quarterly meetings to discuss issues, actions and prepare yearly statement.

# MEASURING EFFECTIVENESS

ACTION			
●	●	●	Supplier contract review and revision
●	●	●	
●	●	●	Supplier onboarding
●	●	●	
●	●	●	
●	●	●	
●	●	●	Reporting channels established
●	●	●	
●	●	●	
REVIEW			
●	●	●	KPI assessment
●	●	●	Oversight
REPORT			
●	●	●	MS Statement

## PROGRESS ON KEY COMMITMENTS

STATUS	KPI TASK	COMMENT
●	Use of S&R Risk Mapping Tool to identify high risk suppliers.	Partner Up can easily assess the S&R risk of suppliers prior to entering a contract and provide an external audit and corrective action plan to high-risk suppliers.
●	Specific certification for Grape Growers via Freshcare providing internationally recognised assurance standards for wine grape industries.	Communicated and identified grape growers to be certified by Freshcare. Certifications to commence thus FY.
●	Train key staff on identifying and notifying of the risk of modern slavery practices and on MS Act compliance.	Leaders across numerous departments including Procurement, HR, and Agriculture services completed online training. Our aim is to have all employees in specific departments trained.
●	Addition of Compliance Officer dedicated to actioning and managing the responsible procurement process.	Hiring an extra resource to control and manage the Responsible Procurement Process.
●	Implementation of Modern Slavery Committee with quarterly meetings to discuss issues, actions and prepare yearly statement.	A cross-functional committee with responsibility for the preparation and initial review of the statement. Quarterly meetings have been introduced for FY22.
●	Employment of global online due diligence tool to measure risk of third parties.	Through Partner Up we can easily assess the corruption risk of suppliers prior to entering a contract.
●	Participate in information sessions for suppliers involved in labour hire.	Inclusion of modern slavery clause in Labour Hire contracts and informal discussion. Require a more formal approach.



# CONTINUOUS IMPROVEMENT

## CONSULTATION

Structured consultation and communication has been continued throughout FY21 in relation to preparing Pernod Ricard Winemakers' Modern Slavery Statement and analysing previous commitments. The cross-functional committee, convened by our Modern Slavery Compliance Manager, has been created to prepare and review our Modern Slavery Statement and commitments. In preparation for our FY22 statement we have committed to meet quarterly to monitor and assess our actions to decrease modern slavery risk. The committee was first fully briefed on our Modern Slavery Act compliance strategy and obligations under the Act, and was comprised of key stakeholders from the following teams:

- Procurement;
- Legal;
- Wine Supply / Grower Relations;
- Human Resources; and
- Communications.

Further consultation was then undertaken with Pernod Ricard Winemakers' Management Committee before the statement was finalised and submitted.

In preparation for our FY22 statement, we have committed to meet quarterly to monitor and assess our actions to further decrease modern slavery risk.

## COMMITMENT TO CONTINUOUS IMPROVEMENT

Over the next year Pernod Ricard Winemakers will continue to progress the work we have established in mitigating modern slavery risks throughout our business. Our priorities are:

- Quarterly meetings with our Modern Slavery Committee.
- Certify our Grape suppliers through a recognised sustainability assurance standard.
- Continue to train senior management, current and new employees within the Procurement, Legal, Commercial, Wine Supply/Grape Grower Relations and Human Resources with the modern slavery e-learning module.
- A further analysis of indirect labour risks.
- Implement Pre & Post vintage information sessions specific to modern slavery.
- Develop and provide training resources to suppliers to on-board about modern slavery.



## Index to the mandatory criteria under section 16 of the Modern Slavery Act

Criterion	Page Number in Statement
1. identify the reporting entity; and	2
2. describe the structure, operations and supply chains of the reporting entity; and	3-4
3. describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls; and	5-9
4. describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes; and	10-11
5. describe how the reporting entity assesses the effectiveness of such actions; and	12-13
6. describe the process of consultation with:	14
<ul style="list-style-type: none"> <li>• any entities that the reporting entity owns or controls; and</li> <li>• in the case of a reporting entity covered by a statement under section 14—the entity giving the statement; and</li> </ul>	
7. include any other information that the reporting entity, or the entity giving the statement, considers relevant.	14