

MODERN SLAVERY STATEMENT

This statement is made pursuant to the *Modern Slavery Act* 2018 (Cth) (the **Act**) and relates to the reporting period of 1 January 2025 to 31 December 2025. This statement sets out the steps that Suntory Beverage & Food Australia Pty Ltd ABN 73 060 091 536 (**SBFA**) and Suntory Beverage & Food New Zealand Ltd (**SBFNZ**) have taken and are continuing to take to seek to ensure that modern slavery is not taking place within our operations or our supply chains.

Criteria 1 and 2 (s16(1)(a),(b)): *Our identity, structure, operations and supply chains*

Suntory Holdings is the parent company in our corporate structure, which is a non-listed holdings company. It owns 100% of Suntory Global Spirits (**SGS**), which has its headquarters in the United States of America. SGS is not a reporting entity or the parent company of a reporting entity but is mentioned in this statement for completeness sake. Suntory Holdings and SGS together with their subsidiaries produce and distribute various popular brands of beverages. Suntory Holdings has 100% ownership of both SBFNZ and SBFA together referred to as **SBF Oceania**. On 1 July 2024, SBFA and SBFNZ underwent a name change, previously the names of these legal entities were Frucor Suntory Australia Pty Limited and Frucor Suntory New Zealand Limited. In this statement we refer to all subsidiaries of Suntory Holdings as **the Suntory Group**.

In 2024, SBFA and SBFNZ entered into a partnership and SBF Oceania was formed. This consolidated end-to-end manufacturing, sales and distribution of both our licenced and non-alcoholic portfolios. SBF Oceania manufactures products in both Australia and New Zealand. Both SBFA and SBFNZ carry on the entirety of the business, including contracting, property management and all other operations. SBFA and SBFNZ share management and employees. Certain expertise or roles will be based in either Australia or New Zealand, and employees may travel between the two jurisdictions regularly. We are confident that SBFA is a reporting entity under the Act and have chosen to also report on SBFNZ given the close nature of these two entities and the likelihood that SBFNZ may also be seen to be carrying on business in Australia for the purpose of the Act. As such, SBFA and SBFNZ are joint reporting entities for the purpose of this statement under section 14 of the Act.

By December 2025, SBF Oceania had 1,364 permanent employees of which 11 casual employees. We also have a further 109 staff (additional to the 1,364 employees) who are contractors providing services in the areas of human resources, facilities management, information and technology, logistics, plant equipment, operation supplies and sales. SBF Oceania in the reporting period had 7 employees who were working in an arrangement where their visa was tied to their employment. Neither SBFA nor SBFNZ own or control any other entities. SBFA and SBFNZ's operations take place in Australia and New Zealand. SBFA and SBFNZ have

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only two investment holdings including our new manufacturing facility in Swanbank, Queensland, Australia and our manufacturing facility in Wiri, New Zealand.

SBF Oceania manufactures and distributes non-alcoholic and alcoholic beverages. SBF Oceania's key brands are Jim Beam, Suntory Minus 196, Maker's Mark, Canadian Club, Hibiki, Roku, Basil Hayden, Knob Creek, Laphroaig, Toki, Yamazaki, V Energy, Boss Coffee, Maximus, Celsius, Just Juice, Mountain Dew and The Real McCoy. Customers include local wholesalers, retailers and consumers. We also manufacture and distribute a range of third-party beverages including Pepsi, Gatorade and Rockstar.

Previously SBFA's products were primarily manufactured by SBFNZ. However, the introduction of SBF Oceania was accompanied by the establishment of a new manufacturing facility in Queensland, Australia. This represents an expansion of SBF Oceania's operational scope. Around 90% of our manufacturing currently occurs at both in-house facilities. The Australian facility manufactures ready-to-drink alcohol products (with New Zealand only distributing these products, rather than manufacturing same). For the remaining 10% we work with third parties who produce a quantity of our products in Australia and New Zealand. Our products are distributed through a mix of internally operated and outsourced models which vary by country/channel.

SBF Oceania sources materials from various regions around the world and acknowledges that many different people are impacted by what we do. We have a range of relationships with our suppliers depending on spend and the risk profile. Contract duration on average can vary from one to five years. We have collated a list of all the suppliers in tier 1 of our supply chain i.e. all suppliers that SBF Oceania directly contracted with in 2025. For SBF Oceania there is a total of 501 suppliers in this list providing a range of goods and services including: ingredients and raw materials (such as juices, concentrates, colours, flavours, chemicals, ethanol, sugar, fruits, rum); waste and recycling services; water treatment services; laundry, uniforms and PPE; merchandise, design, labels and signage; barcoding technology; glass, cans, containers, and packaging; security services; cleaning and maintenance services; transport/freight/fleet/port/shipping and logistics goods and services; customs services; warehouse, display, storage and refrigeration goods and services; food and catering; telecommunications; postage and courier services; project management; accounting, payroll, legal and consultancy services; recruitment agencies; utilities; human resources services; health, safety and environmental services; manufacturing services; information and technology goods and services; and sales, research and marketing. We have identified that 94.22% of our suppliers are based in Australia or New Zealand. The remaining suppliers are based in Switzerland, Germany, Japan, Ireland, the United Kingdom, Singapore, the United States of America, China, Poland, Thailand, Malaysia, Cyprus, India and the United Arab Emirates.

Criteria 3 (s16(1)(c)): *The Risks of Modern Slavery in our operations and supply chains*

SBF Oceania acknowledges that every entity has modern slavery risks in its operations and supply chains. We are aware of the risks of modern slavery within the beverage industry, and we are committed to implementing and enforcing effective systems and controls to ensure that they are not taking place anywhere in our own business or in any of our supply chains. We are in the process of continually building the knowledge base that we have as to where our own risks may lie, so that we can better assess and address those risks.

SBF Oceania products are primarily manufactured in Australia and New Zealand which are low-risk geographic locations per the 2023 Global Slavery Index data around prevalence of modern slavery per 1,000 people. We also work with third parties who produce a quantity of our products in Australia and New Zealand and we acknowledge that this reduces our oversight to a degree, heightening the risks of modern slavery. Transport of our products occurs partially through internally operated models which is relatively low risk, but also through outsourced models depending on the country/channel which we understand heightens the risk of modern slavery.

We are confident that production of the majority of our beverages in Australia and New Zealand is low risk, however we understand that our suppliers have their own suppliers whose products and services contribute to the creation of our beverages, and they are also part of SBF Oceania's supply chain (beyond tier 1). We are still in the process of investigating beyond tier 1 of our supply chain and properly understanding any risks posed further along, together with how such risks can best be avoided or otherwise managed.

The vast majority, 94.22%, of our supply chain is based inside of Australia or New Zealand, which we consider to be a factor that reduces the risks of modern slavery occurring in our supply chain. However, we acknowledge that the remaining 5.78% of our suppliers are based overseas and understand that 1.99% are based in countries identified as having a higher prevalence of modern slavery, being China, Poland, Thailand, Malaysia, Cyprus, India and the United Arab Emirates.

Goods and Services we procure that we know are generally considered to present higher risks include manufacturing services, raw materials, packaging, uniforms, merchandise, transport/freight/port and logistics, security services, cleaning/maintenance services, stationery, food/catering, recruitment agencies and information and technology goods and services. We have detailed under Criteria 4 the action we are taking in response to any potential risks in our operations and supply chains.

We have also carefully considered the more indirect ways in which we may contribute or become linked to modern slavery in our operations and supply chains and have detailed under Criteria 4 the action we are taking in response to any potential risks in our operations and supply chains.

We utilise many raw materials in our operations. The price of raw materials can be affected by weather patterns, crop failures, epidemics, strikes, manufacturing problems, transportation issues and other events that are difficult to predict. These events can create undue cost, performance and time pressures on our suppliers. We acknowledge that the presence of these pressures can increase the risk of modern slavery occurring. We acknowledge that for these reasons and in accordance with the existing research, raw materials are a high-risk product in regard to modern slavery and that SBF Oceania's use of these materials may mean that we are linked to modern slavery through the activities of our suppliers. We source the majority of our raw materials from New Zealand or Australia which are both countries that have a low risk and prevalence of modern slavery, however we note the agricultural industries in both countries are known to have a higher risk of modern slavery.

We note as referred to above, the SBF Oceania transition to manufacturing locally in Australia that has occurred during the last two reporting periods. We consider that this lowers the risk of modern slavery

occurring in our manufacturing process, however, note that this has led to some changes in our supply chain as a result. Our underlying procurement practices, supplier onboarding processes and governance frameworks remain in place of course.

The beverage and food industries are also highly susceptible to changes in consumer preferences. This means SBF Oceania at times must be reactive and nimble when it comes to changing appeal. This may require rapid response through the introduction of new products, reduction of prices or increasing promotional activities rapidly. Once again, these activities place both performance and cost pressures on our operations and supply chains, providing an environment where modern slavery may be more likely to prosper. We consider that there is a risk that SBF Oceania, like any business in this industry, may inadvertently contribute to modern slavery practises by placing pressures on our suppliers that may facilitate or incentivise modern slavery.

Being a beverage and food manufacturer, the safety of our products is crucial, and we are subject to stringent regulations and laws that must be complied with. This again can place inflexible time and performance pressures on our operations and supply chains. We realise that if these pressures are not appropriately managed, they may manifest in poor practices and therefore pose a risk that SBF Oceania may contribute to modern slavery practises. For this reason, we also have our own strict standards and controls in our operations.

SBF Oceania understands that whilst the COVID-19 pandemic is no longer a global health emergency, the effects of it on society and business around the world linger. We are also aware that various international conflicts and uncertainty geopolitically are present. We understand that a trickle-down effect of these factors is the increase in the vulnerability of people including those seeking employment and those already employed. As such, we understand modern slavery risks in all forms continue to be heightened and are mindful of this.

SBF Oceania endeavours to continue to build our knowledge base in relation to the risks of modern slavery in our operations and supply chain. We see great utility in identifying these risks as doing so allows us to more accurately build and strengthen our approach to modern slavery.

Criteria 4 (s16(1)(d)): *Actions Taken to assess and address risks, including due diligence and remediation processes*

SBF Oceania is committed to helping lead positive change in the Australian and New Zealand beverage markets. SBF Oceania is committed to ensuring that there is transparency in our own business and in our approach to tackling modern slavery throughout our operations and supply chains. We note however that the Suntory Group operates under a One Suntory notion – with all policies and practices required to be implemented by all entities in the group. In the 2025 reporting period, we have taken the following steps with a view to strengthening our due diligence in this area and also reforming our remediation processes:

- **Code of Business Ethics (the Code)** - the Code outlines the principles, policies and laws that govern the activities of the Suntory Group. The Code was revised in the relevant reporting period (2025). The ethos behind the Code is “*doing business the right way*” which we define as not only complying with all applicable laws,

regulations and standards but also conducting our business activities with fairness and integrity. The Code applies to all directors, officers and employees of the Suntory Group. We request that any third party acting on behalf of the Suntory Group also complies with the Code. The Code is distributed to all employees at the time of commencing their employment through an online portal, and they are required to read and sign it. SBF Oceania acknowledges that its employees play a crucial role in its ability to promptly identify and respond to risks of modern slavery in its business and supply chain.

The Code requires adherence to local laws and the highest ethical standards including around integrity and fairness; having respect for culture, customs and traditions in all locations; fair competition; bribery and corruption; conflicts of interest; organised crime, money laundering and trade controls; financial record keeping; contributing to communities; environmental conservation; privacy and confidentiality; whistleblowing and many other topics.

In recent years the Suntory Group has amended the Code to create a specific focus on human rights. This section speaks to discrimination and harassment; freedom of association; positive, healthy safe working environments; open and inclusive work culture and more. It also specifically prohibits the use of child labour, forced or involuntary labour or other illegal labour practices.

All staff complete annual compliance training on the Code. The Suntory Group's Global Risk Management Committee and Board of Directors approved of the Revision of the Code in 2025.

- **Supply Chain Mapping** - SBF Oceania maps its supply chain each year by categorising all tier 1 suppliers based on geographic location and the types of goods/services procured and then conducting specific modern slavery risk analysis. We believe that better understanding our supply chains will enable us to take more meaningful action in response to any risks identified.

Staff Training – the Suntory Group has several online training courses which are compulsory for all staff to complete annually including on the topics of Anti-Bribery and Anti-Corruption, Conflicts of Interest, our Code of Business Ethics, and a topic entitled Doing The Right Thing. These topics all contribute to creating a culture of good and ethical governance which we believe will produce an environment that prevents and deters modern slavery.

- **Human Rights** – the Suntory Group in 2019 formulated a Human Rights Policy to further strengthen our commitment and promote human rights due diligence as well as engage employees and suppliers. The details are at this link. We held expert dialogues in 2019 and 2020 with representatives from global organisations such as Human Rights NPOs (CRT), the IHRB, the Danish Institute for Human Rights and the UNDP. We utilised information in those dialogues to further our due diligence approaches and as a result in 2021 we conducted third-party interviews of migrant workers in a Japanese based Suntory company Izutsu Maisen. In 2023, the Suntory Group engaged in a dialogue with Human Rights Watch (**HRW**), to discuss assessment of human rights risks and responding to human rights issues. In 2023, we also received advice from human rights experts regarding the need to review the steps we are taking in light of the proposed Directive on Corporate Sustainability Due Diligence in the European Union. In 2025, we carried out assessment activities at principal domestic and international business plants utilising Sedex's new assessment.

- **Supplier Evaluation Framework** – SBF Oceania also monitors and conducts due diligence on its supply chain through a Supplier Evaluation Framework involving six key performance criteria. This Framework is utilised approximately once a year for each supplier. As part of this process we undertake a monthly Sedex review. SBF Oceania is working with Sedex to continuously assess risks existing in its global supply chain and conducting appropriate measures to mitigate those risks. The majority of SBF Oceania’s suppliers are already registered Sedex Members.

This criterion also includes considering whether a supplier has an ethical supply chain, including whether it sources from high-risk countries, whether it has signed up to any code of conduct, whether it has publicly available ethical supply chain goals, and whether it is an active contributor and partner to ethical supply chain practices.

We otherwise have the following actions in place:

- **Modern Slavery Awareness Training** - In further acknowledgment of the crucial role each of our employees play in upholding our modern slavery approach, we have provided specific training to employees on identifying modern slavery risks in operations and supply chains, proper due diligence and remediation, and on our obligations under the *Modern Slavery Act 2018* (Cth). Training on modern slavery is provided on an ongoing basis through the Code of Business Ethics. In 2015, we established Suntory University, a platform that encompasses all of our talent development programs. There is a Modern Slavery course on this platform which is optional for all staff to complete.
- **Sedex Sustainability Award** – The Suntory Group was pleased to have won a Sedex Global Sustainability award in the category of Data and Insights in 2023 after becoming a Sedex member in 2019. Sedex is an organisation that provides an online platform for companies to manage and improve working conditions in global supply chains including in the area of supply chain transparency, risk assessment and ethical data exchange. This gives all within SBF Oceania motivation to keep collaborating with different stakeholders in order to promote human rights in our supply chain.
- **Global Child Forum** – The Suntory Group was also recognised as a Top 2 Company by the Global Child Forum. This forum has acknowledged us as a leader in our responses to Children’s Rights in comparison with 832 other global companies and when benchmarked against 27 indicators.
- **Sustainability Awards** - In 2021, SBFA achieved a Level 5 Beyond Best Practice Award from the not-for-profit Australian Packaging Covenant Organisation (**APCO**) as assessed against a Packaging Sustainability Framework. We believe our efforts to reduce the impact of packaging on the Australian environment demonstrate values consistent with reducing harm to people.
- **Voluntary Declaration toward Consumer Orientation** – The Suntory Group has a policy of Consumer Orientation which has been handed down since the company’s foundation. This declaration enshrines our philosophy to offer products and services of the highest quality that enrich the lives of people around the world and contribute to a sustainable environment with a focus on being a good

corporate citizen. The declaration can be found [here](#). The results of initiatives and improvements made to activities based on this philosophy are published on an annual basis. The Suntory Group has won multiple awards for good practice of consumer oriented management as a result.

- **Health and Safety Committee** - The Suntory Group has a committed Health and Safety Committee, which includes employee representatives, and is aimed at maintaining good working conditions for all of our employees – promoting positive motivation at work, and excellent mental and physical health. In 2016, we set forth a Health Management Declaration and have been implementing various measures since. We have also introduced a Nurse in Charge system where nurses are assigned to all business locations to support all employees. We also have an Employee Assistance Program providing free counselling to staff and a Doctor Consultation Service also.
- **Supplier Management** - SBF Oceania introduced in 2021 a Supplier Segmentation Framework with the objective of managing suppliers based on their overall risk profile and the degree to which they can help us achieve our strategic objectives. Our strategic imperatives include improving our focus on safety and wellbeing and increasing the internal and external focus on sustainability. We look at the supply chain complexity of those we procure from, to understand how remote/distant the end source is. We also look at stability and predictability noting that volatility is connected to higher risks of modern slavery. We are looking to review tier 1 and 2 suppliers through this Framework.
- **Modern Slavery & Human Trafficking Policy** – This Suntory Group policy is applicable to all subsidiaries, including SBF Oceania and enshrines the ethical standards we set ourselves in relation to modern slavery and human trafficking risks. It is acknowledged that the Suntory Group operates in various markets around the world and many different people are impacted by what we do. The Policy explains to our staff that we know because of the prevalence and nature of these crimes, modern slavery is happening across the markets we operate in right now. The Policy educates staff on signs of modern slavery and how to report any issues safely. It also details our mandatory training on these topics and that any employee who breaches the Policy will face disciplinary action.
- **Human Rights Risk Assessment** – the Suntory Group has also conducted a potential risk assessment in collaboration with Verisk Maplecroft, a global risk consulting company, for the countries in which our 90 factories are located, using general country and industry data, results available [here](#).
- **Whistleblowing** - If an employee has concerns with wrongdoings at work, including any concerns regarding modern slavery or other human rights issues in SBF Oceania’s operations or supply chain, we encourage them to voice these concerns through a confidential, independent whistleblowing system, which is available to employees via email or a telephone hotline 24 hours a day, 7 days a week. SBF Oceania acknowledges that identifying risks of modern slavery can be a sensitive exercise for employees and encourages open reporting through this retaliation free hotline. In 2022, the Suntory Group introduced a new online Whistleblower reporting system called Speak Up, internally available to staff. We have regular workplace messaging around our Speak Up culture. We also launched an incident reporting application called Myosh, allowing staff to raise and report concerns in respect of health, safety and wellbeing and diversity, equity & inclusion (in particular in the

LGBTIQA+ space). Myosh is confidential and not accessed by management. Our Australian Risk and Governance teams as well as Japanese and Asia-Pacific Governance teams review and investigate any reported cases.

- **Senior Leadership and Ownership** – The importance of ensuring the prevention, detection, and combatting of modern slavery has been agreed at a senior level within SBF Oceania, including SBF Oceania's Executive Leadership Team, and Supply Chain Leadership, Internal Risk and Compliance, the members of each of which have confirmed their commitment.
- **Supplier Guidelines** - SBF Oceania is also eager to identify, assess, and address risks of modern slavery within its supply chain. As such, it has in place Supplier Guidelines (the **Guidelines**) that set the principles for the network of suppliers to the Suntory Group. These Guidelines are accessible on our website at this link and contain our commitment to act with integrity. The first step of the approval process before any commitment with the Suntory Group is to commit to follow these Guidelines. To comply with these requirements, suppliers are expected to engage with their own partners, supply chain and subsidiaries and to require compliance with the Guidelines. For many years now these Guidelines have used the terminology 'continuous improvement approach', encouraging suppliers to strive to push their approach beyond one of legal compliance.

These Guidelines speak to business integrity, bribery, corruption, retaliation-free reporting mechanisms, wages and benefits, working hours, anti-discrimination, freedom of association, health and safety and many other topics. The Guidelines specifically require the prevention of all child labour, involuntary labour, and any form of human trafficking as well as compliance with applicable child labour laws. The threat or use of physical, verbal, psychological and sexual abuse and discipline is prohibited, and suppliers' employees must be provided with a right to remedy through an accessible and fair grievance process.

Our Guidelines also allow us the right to access our suppliers' factories/premises to check human rights and ethical compliance assisting in due diligence and remediation. The Guidelines require that suppliers are open and provide all information related to their business with the Suntory Group.

We added a schedule to our standard Master Services Agreement that provides further details and requirements relating to modern slavery specifically in addition to the Guidelines. This schedule provides a definition and examples of modern slavery so that we may educate our suppliers and increase their awareness. It also provides for our commitment to ensuring there is transparency in our operations and approach to tackling modern slavery and to preventing, detecting and reporting on the risk of modern slavery in our operations and supply chains.

The schedule requires that suppliers comply with the Guidelines and all applicable modern slavery laws which include, but are not limited to:

- a) *Fair Work Act 2009 (Cth)*;
- b) *Modern Slavery Act 2018 (Cth)*;
- c) *Modern Slavery Act 2018 (NSW)*;

- d) *Criminal Code Act 1995 (Cth)*, specifically, Division 270 or 271 of the Criminal Code, extending to conduct in and outside of Australia;
- e) Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework;
- f) Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children; and
- g) ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour.

We also require that our suppliers take steps to prevent, mitigate and remediate the risk of modern slavery occurring in their operations and supply chain and further that they comply with any reasonable requests we may make for assistance and information to aid in the review of their compliance. We provide for reporting mechanisms and notification of any breaches.

The Guidelines and schedule to the Master Services Agreement ensure that all suppliers on boarded ethically align with SBF Oceania and its approach to Modern Slavery. These documents set clear expectations and therefore encourage the building of meaningful relationships with our suppliers so we can work collaboratively on our modern slavery approaches now and into the future.

- **Supply Agreement** - SBF Oceania further strengthens its approach to identifying, assessing and addressing modern slavery within its supply chains via its Supply Agreement, which our procurements team has implemented with several key suppliers. The Supply Agreement requires suppliers to adhere to basic principles, which more or less mimic those within the Guidelines described above. The Supply Agreement requires that Suppliers shall comply with the Guidelines and as such enact the Guidelines in a more mandatory format, providing SBF Oceania with contractual rights in the event of noncompliance. We are moving to making modern slavery clauses mandatory for inclusion in our contracts, whether in clauses or as a schedule.
- **Outsourced Manufacturing Assessments** - Only 10% of SBF Oceania's manufacturing is outsourced. Where we engage with external third parties to manufacture for us, we conduct thorough commercial and quality assessments upfront, as well as ongoing reviews of their performance against the agreed standards and expectations. We utilise some outsourced models for transportation of our goods but we regularly review these models to ensure any outsourced arrangements meet our stringent selection and performance criteria, which includes ethical considerations.
- **United Nations Global Compact** – the Suntory Group is a signatory to the United Nations Global Compact which contains ten principles in the areas of human rights, labour, the environment and anti-corruption. The ten principles are available [here](#) and are derived from the Universal Declaration of Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention against Corruption. Our commitment to the UN Global Compact is detailed within the Suntory Supplier Guidelines.
- **Employee Rights** - In SBF Oceania's operations we strive to ensure that all employees have freely

chosen their employment through the various mechanisms described above. We have a clear zero tolerance policy regarding any form of child, forced, bonded or involuntary labour. SBF Oceania utilises our employment contracts to try and ensure that all employees are able to leave their employment after reasonable notice and our compliance and human resources teams work to ensure we comply at all times with all applicable laws regarding wages and benefits for our workers.

In 2020 and 2021, we also introduced for our employees a Cultural Diversity Team, a Flexibility/Hybrid working Policy and a Parental Leave Policy. We believe the stronger the rights of our employees the better our culture can deter and prevent modern slavery risks.

Criteria 5 (s16(1)(e)): *Assessing the Effectiveness of the actions we are taking*

SBF Oceania is adopting a continuous improvement approach to modern slavery, aiming to build on and refine its current capabilities in the future. We acknowledge that we cannot improve if we do not review our progress along the way.

The Code of Business Ethics (**the Code**) requires all staff to report on any suspected violations of the letter or spirit of the Code. We also, within legal requirements, keep a record of any reports made through our whistleblowing hotline which can also be reviewed and analysed. Our modern slavery related training within the annual training on the Code for all staff is ongoing and as such we will be able to receive feedback and adjust the training and our broader approach accordingly in the future.

Our Supplier Guidelines (**the Guidelines**) require suppliers' compliance with any requests for information relating to modern slavery that we may make. This allows us the ability to review individual suppliers' compliance on an ongoing basis to understand whether they are following the Guidelines or whether the Guidelines are not as effective as intended.

We will continue to update our Code and Guidelines to ensure there is a clear and relevant articulation of our commitment to combatting modern slavery.

In 2024, the Suntory Group reviewed some of the existing Human Rights frameworks as detailed above and captured at this link.

We utilise our Supplier Evaluation Framework on an annual basis, meaning that we are live to any issues arising with our suppliers including whether our Guidelines are effective, and that we also become aware of any new risks of modern slavery arising that we may cause us to adapt our approach. Our Supply Agreements typically operate for a term of one to five years. This means that at the end of that term, the contents and relationship are reviewed, and SBF Oceania has the opportunity to consider whether any amendments are required to our expectations of suppliers.

SBF Oceania takes full responsibility for ensuring we meet the standards that we have set ourselves, with support of our Executive Leadership, Suntory Group and others across the business, and we encourage all of our people to engage with, and fulfil, our values. SBF Oceania is aware of potential changes in New Zealand in the modern slavery space that may apply to our business in future.

As part of our commitment to tackling modern slavery and human trafficking, we will continue to look for ways to improve upon our existing policies, procedures, ways of working and in promoting awareness with our employees and our suppliers. We will continue to expect that our suppliers and our partners share our commitment to tackling modern slavery and human trafficking and that they will seek to ensure that their suppliers do the same.

Criteria 6 (s16(1)(f)): Consultation

As stated above, neither SBFA or SBFNZ owns or controls any entities. SBF Oceania has consulted with external counsel in order to build our understanding and capabilities surrounding modern slavery.

Criteria 7 (s16(1)(g)): Other

SBF Oceania would like to take this opportunity to state that we believe in fairness, respect and diversity and we are committed to keeping this at the heart of our culture, both now and in the future. As a business, we are committed to having a positive impact on the lives of our employees and consumers. We are equally committed to fairness and respect across our work force and within our supply chain.

Our brands and our products are trusted everywhere we operate, and our business is built on this foundation of trust. Modern slavery is a crime and a violation of human rights. As a business committed to acting ethically, honestly and transparently, SBF Oceania has a zero-tolerance approach to modern slavery and human trafficking.

SBFA and SBFNZ share a Board of Directors which we consider to be the principal governing body for the purpose of the Act. SBFA and SBFNZ make this statement in accordance with section 14 of the *Modern Slavery Act 2018* (Cth). This modern slavery statement was considered and approved of by the Board of Directors of SBFA and SBFNZ and signed by:



Daisuke Minato
Chief Executive Officer

Responsible member of SBF Oceania's Board of Directors and Principle Governing Body

Date: 17 June 2026