



AUSTRALIAN FAMILY OWNED SINCE 1968

BUNDABERG BREWED DRINKS GROUP MODERN SLAVERY STATEMENT 2024

INTRODUCTION

This Modern Slavery Statement (**Statement**) has been prepared by Bundaberg Brewed Drinks Pty Ltd and its associated entities (**Group**) pursuant to the *Modern Slavery Act 2018* (Cth) and the Modern Slavery Act 2015 (UK) (collectively, the **Acts**).

The Acts establish modern slavery reporting requirements for reporting entities and submission of an annual modern slavery statement. The Group is required to comply with the Acts and other similar legislation or requirements, including, but not limited to, *Transparency in Supply Chains Act 2010* (California) and *Child Labour Due Diligence Law 2019* (Netherlands) (collectively, **Other Regulations**).

This Statement has been prepared to satisfy the requirements of reporting entities under the Acts and may satisfy requirements of Other Regulations, by setting out the actions the Group takes to assess and address modern slavery risks in its global operations and supply chains during the reporting period commencing 1 July 2023 and ending 30 June 2024 (**Reporting Period**).

The Group recognises that modern slavery occurs in many forms, such as slavery, servitude, trafficking in persons, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting for labour or services.

The Group is fully committed to operating responsibly and establishing and adhering to the highest ethical standards. The Group will not tolerate any forms of modern slavery in its business.

WHO WE ARE

The Group is made up of Australian family-owned companies known for their 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," the Group craft brews their drinks for up to seven days to capture the refreshing taste of real ingredients inside every brew.

The Group distributes and supplies its premium drinks to over 55 countries and employs over 240 employees worldwide.

OUR OPERATIONS AND SUPPLY CHAIN

The Group has a significant supply chain and sources significant quantities of goods and services, including ginger, agricultural raw ingredients and materials, glass, aluminium, cardboard, and major machinery.

The Group recognises that the risk of modern slavery is influenced by factors such as vulnerable populations, goods and service categories, industry and geographic location.

A comprehensive supply chain map has been developed to better demonstrate the geographic location and nature of goods and services sourced. In FY24, the Group worked with 200 suppliers globally, with

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most of its annual supplier spend occurring with Tier One suppliers primarily located in Australia, followed by the United Kingdom and New Zealand. The Group has assessed its risk to modern slavery as low taking into account the nature of the goods and services and the regions and industries the goods and services are sourced from.

Although the Group's risk of modern slavery is low, the Group recognises that the risk of modern slavery may be higher further down the supply chain as a result of the countries where raw materials are sourced from or equipment is manufactured by its suppliers.

The Group acknowledges that its systematic approach, procurement processes, practices and dealings with suppliers are essential elements of progressing the eradication of modern slavery and improving human rights globally.

ASSESSMENT AND MITIGATION OF MODERN SLAVERY RISK

The Group's management of modern slavery risk in its operation and supply chain, is guided by the Ethical Sourcing and Modern Slavery Policy as endorsed by the Group's Board (**ESMS Policy**).

The ESMS Policy outlines the steps that the Group has taken to assess and mitigate the risk of modern slavery in its supply chain including the due diligence process and remediation process.

DUE DILIGENCE

The ESMS Policy sets out the following due diligence process for the Group:

- establishment and implementation of a due diligence process for suppliers that consists of:
 - issuing a questionnaire to the top 50 suppliers to ascertain their level of risk of modern slavery, the steps taken by suppliers to manage their risk of modern slavery, including providing supporting documents;
 - ensuring due diligence is carried out with new suppliers by issuing new suppliers with a questionnaire to ascertain their level of risk of modern slavery, the steps taken by supplier to manage their risk of modern slavery, including providing supporting documents;
 - annually issuing updated detailed questionnaires to suppliers to continue to ascertain their level of risk of modern slavery, to identify any developments in managing their risk of modern slavery and to identify if they or their suppliers have experienced any breaches of the Acts;
- embedding an agenda item and topic of conversation in relation to modern slavery in regular account management meeting cycles with suppliers in an attempt to strengthen supplier's policies and procedures to reduce the risk of modern slavery including, but not limited to, workers' labour and payroll conditions, supplier risk and best practice due diligence;
- ensuring all new or renewed supplier agreements contain a clause requiring suppliers to comply with the Act/s, to provide warranties that they have not been convicted of any offence involving modern slavery, to implement due diligence procedures for its own suppliers, to notify the Group

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if it becomes aware of any actual or suspected modern slavery concerns within its business operations and allow for termination of the agreement if there are any breaches of the relevant clause;

- providing specific training and support to team members who manage and interact with suppliers;
- providing training to all team members and building awareness of the risk of modern slavery within the Group.

In implementing the ESMS Policy, the Group has integrated the due diligence process for suppliers in its TACCP and VACCP review process within its BRCGS Quality Assurance System.

GRIEVANCES AND REMEDIATION PROCESS

The Group is committed to the protection and respect of human rights across its business and supply chain. In cases where the Group identify impacts that it may have caused, or to which it may have contributed to or be directly linked, the Group will seek to address this in line with the guidance provided under the Acts.

The ESMS Policy sets out the framework for grievances and remediation of modern slavery risks.

The Group has established reporting procedures and mechanisms where employees and third parties can report any concerns regarding unethical or illegal conduct, including concerns relating to risks of modern slavery. Employees can report concerns to their manager or nominated persons identified in the Policy and Procedure for Protection of Whistleblowers (**Whistleblower Policy**), or, if they wish to remain anonymous, employees and third parties can report concerns through the Group's independently operated Whistleblower system, via phone, email or an online portal. The EMSM Policy and the Whistleblower Policy have been communicated throughout the Group.

The Group will investigate concerns reported and if substantiated, the Group will take appropriate action.

If a risk of modern slavery is identified within a supplier, the Group will work with the supplier to resolve or substantially mitigate the risk of modern slavery, rather than immediately ending the relationship with the supplier due to the potential adverse effects on the livelihood of the supplier's employees and supply chain and in taking steps to help eradicate modern slavery. The Group acknowledges that its suppliers may take time to comply with and implement policies and procedure to comply with the Act, however the Group is committed to working with its suppliers and supporting its suppliers to eradicate modern slavery from its supply chain.

MEASURING EFFECTIVENESS AND NEXT STEPS

The Group reviews the ESMS Policy and this Statement annually. As part of the review process, the Group:

- assesses how effective its actions are;
- reviews the actions taken by other industry leaders in complying with the Act;

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- compares its risk of modern slavery to previous years; and
- updates or amends the ESMS Policy or implements new policies and procedures to address any concerns or gaps it may find resulting from the review.

As part of its continued commitment to operate responsibly and establish and adhere to the highest ethical standards, the Group's next steps are:

- continue to embed the ESMS Policy into procedures within the Group;
- issuing updated detailed questionnaires to existing suppliers to continue to ascertain their level of risk of modern slavery or whether they, or their suppliers have experienced any breaches of the Acts;
- carry out a review of its due diligence process to identify opportunities to improve its due diligence process;
- establish a supplier Code of Conduct;
- offer assistance to any suppliers who may appreciate assistance to comply with the Act;
- consider how the proposed amendments to the Act will affect the Group and how best to ensure ongoing compliance.

The Group will publish this Statement on its website and intranet site.

CONSULTATION

During the Reporting Period, the Board of the Group actively engaged and consulted with Bundaberg Brewed Drinks Pty Ltd and all associated entities in the development and implementation of this Statement. The Board of the Group reviewed the requirements of the Acts, including the reporting requirements, the actions the Group took in addressing the requirements of the Acts and this Statement.

This Statement was approved by the Board of the Group.

Signed,

A handwritten signature in black ink, appearing to read "Terry O'Brien".

Terry O'Brien
Chairman