



AUSTRALIAN FAMILY OWNED SINCE 1968

BUNDABERG BREWED DRINKS GROUP MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2022

INTRODUCTION

This is the second 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 2021, to evolve our learnings from the delivery of our first Modern Slavery Statement, we plan to further engage our people and relevant stakeholders and embed conversations around the reduction of Modern Slavery Risks into our day-to-day dealings with stakeholders.

OUR OPERATIONS AND SUPPLY CHAIN

The Bundaberg Brewed Drinks Group sources significant quantities of goods and services, including ginger, agricultural raw materials, glass, aluminium, cardboard, and major machinery. In FY22, 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 progressively developing 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

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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.

Steps that we have taken to assess and mitigate risk in our supply chain include:

- Embedding Modern Slavery conversations in our account management meeting cycles with suppliers to strengthen their internal policies and procedures; including, but not limited to, workers' labour and payroll conditions, supplier risk and best practice due diligence,
- Ensuring all new or renewed Supplier contracts contain a Modern Slavery clause, and
- Issuing a detailed questionnaire to our top 50 suppliers to ascertain and substantiate the existence of policies and procedures they follow, obtaining data on their supplier's attributes such as geographic location, their compliance protocols and any instances of Modern Slavery encountered, the training provided internally and any audit protocols in place to verify compliance.

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 onboarding of new Suppliers, as well as renewing Suppliers, are subjected to the due diligence process that we have embedded into our standard contracts. We have integrated 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.

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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 Whistle blower 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 Australian legislation designed to protect vulnerable workers under the Fair Work Act, the Modern Slavery Act and Whistle blower Protection Act, has been communicated throughout the Bundaberg Brewed Drinks Group and awareness of what to look for has been raised.

MEASURING EFFECTIVENESS

The monthly review cycle with our Tier One Suppliers now has a standard agenda item including discussions relating to Modern Slavery, ensuring Modern Slavery Risks are front of mind for ourselves and our partners. Responses from the survey of our partners indicated that none of the respondents had encountered any instances Modern Slavery in their supply chains. All the respondents had a policy and procedures in place to prescribe the actions they would take should any Modern Slavery breaches be found.

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

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