



AUSTRALIAN VINTAGE LTD

**Australian Vintage Limited**

Modern Slavery and Human Trafficking Statement

**(Statement)**

**Introduction**

Australian Vintage Limited condemns modern slavery and is committed to ensuring that its global operations are free from all forms of modern slavery, such as forced labour, child labour and human trafficking.

This Statement applies to the financial year ended 30 June 2019.

**Purpose**

This Statement is published on behalf of Australian Vintage Ltd and its wholly owned subsidiary in the United Kingdom, Australian Vintage (Europe) Limited. All references to “**AVL**” include Australian Vintage Ltd and Australian Vintage (Europe) Ltd.

The Statement sets out information regarding:

- AVL's business and operations;
- AVL's policies and practices; and
- the steps taken by AVL to prevent modern slavery in its business and operations.

**AVL's Business & Operations**

AVL is a leading Australian wine business which owns, operates and manages vineyards and specialises in boutique and bulk wine production, packaging, marketing and distribution. AVL is a significant vineyard owner and manager in Australia and prides itself on producing quality wines.

AVL operates principally in Australia, with all owned vineyards and production facilities based in Australia. AVL also has sales and marketing offices in the United Kingdom and Hong Kong.

Further information regarding AVL's business and structure is contained in its Annual Report available <http://www.australianvintage.com.au/investors/>.

**AVL's Policies & Practices**

AVL believes in the fair treatment and remuneration of employees. It complies with all applicable employment legislation and industrial awards, and no employees are paid less than the minimum wage in their relevant jurisdiction. AVL also invests in the safety, health and wellbeing of its staff.

AVL seeks to do business with suppliers that have similar values, ethics and sustainable business practices, including those related to human rights. AVL expects the organisations it deals with



## AUSTRALIAN VINTAGE LTD

to have ethical workplace practices, where staff are treated fairly and equally and remunerated in accordance with the law.

AVL has certain policies in place to assist in ensuring that modern slavery is not taking place in its business or operations, as described in further detail below. Internal policies are available on the intranet for employees to access and peruse at their convenience and external policies are available <http://www.australianvintage.com.au/investors/corporate-governance/>.

- **Social Compliance Policy:** outlines AVL's commitment to core human and labour rights, fair compensation, the prevention of child and forced labour, freedom of association and other employment requirements and standards. The policy was implemented by AVL in order to comply with the Business Social Compliance Initiative, a leading supply chain management system designed to improve working conditions in factories and farms worldwide.
- **Ethics and General Conduct Code of Conduct:** describes AVL's principles of business conduct and basic legal and ethical obligations which bind the directors, officers and employees of AVL. The code provides guidelines for acceptable behaviour in ethical decision making, addressing issues such as compliance with laws and regulations and the reporting of unlawful and unethical behaviour.
- **Remuneration Policy:** is in place to ensure that AVL appropriately compensates employees for the services they provide to AVL, determines their remuneration in a way that ensures a level of equity and consistency across AVL and complies with all relevant legal requirements.
- **Equal Opportunity and Diversity Policies:** affirm AVL's commitment to treating employees and prospective employees fairly, irrespective of their personal characteristics, such as race, age, physical or mental disability and religion.

Other steps AVL takes to prevent and protect against modern slavery include the following:

- AVL negotiates Enterprise Agreements with the relevant operational sites and provides all employees with the right to bargain their employment terms;
- AVL seeks to ensure that its Services Agreements with service providers contain provisions with respect to the treatment of those service providers' employees; and
- AVL discusses the importance of its modern slavery requirements with key suppliers when negotiating or re-negotiating Supply Agreements and seeks to insert a provision on modern slavery which sets out the supplier's obligations and AVL's rights in the event of a breach of those obligations.

### **Monitoring & Management of Risk**

The Risk Management Committee (**Committee**), governed by the Risk Committee Terms of Reference and Charter (**Charter**), monitors and reviews the system of risk management which AVL has established to identify, assess and manage operational and compliance risks.



## AUSTRALIAN VINTAGE LTD

The Committee is responsible for, among other things, AVL's risk profile, overseeing and approving risk management strategy and policies and internal compliance. This includes monitoring compliance with applicable legislation and regulations and the aforementioned policies and ensuring procedures, controls and reporting mechanisms are in place to prevent breaches.

The Charter is available at <http://www.australianvintage.com.au/investors/corporate-governance/>.

Each division of AVL has its own set of risks and controls which are monitored and reported to the Committee throughout the year. This includes the Human Resources and Supply Chain functions.

There are mechanisms in place for risks and issues to be reported to the Risk Manager and the Committee.

### **Next Steps**

AVL is committed to continuous improvement with respect to its global supply chain. AVL considers it important to review and update its processes in order to minimise the risk of modern slavery occurring in its business and operations. As such, AVL's Supply Chain department will continue to review its functions on a regular basis and implement improvements, where appropriate.

### **Raising Concerns**

AVL takes modern slavery very seriously. The Human Resources department is available to discuss any concerns or queries with employees in relation to the employment policies and practices of AVL and the Supply Chain department is available to discuss any concerns relating to modern slavery in AVL's global supply chain. Any reported concerns will be addressed and action taken as required.

### **Approval**

This Statement has been approved by AVL's Board of Directors.

A handwritten signature in black ink, appearing to read 'Neil McGuigan'.

**Neil McGuigan**

**Chief Executive Officer, Australian Vintage Limited**