


# Accolade Wines

SUPPLIER CODE OF CONDUCT





Accolade Wines' vision is  
to be the wine company our  
consumers, customers and  
partners want to engage  
with the most

## A WORD FROM OUR CEO

Since crushing our first grapes over 165 years ago, we have continued to draw on a proud heritage as a leading global wine company producing some of the world's best known and loved brands. Today Accolade Wines delivers approximately 30 million cases of wine to 140 countries worldwide every year.

As a global, vertically integrated wine business, our expertise extends from the grape to the glass. We are focused on excelling in the core activities of grape growing and sourcing, winemaking and production, and sales and marketing. We have a focus on health, safety and sustainability across everything we do.

Accolade Wines is committed to working collaboratively with its suppliers and growers to ensure we achieve mutually beneficial outcomes for all. As a global business, we work with thousands of organisations that share our values and principles and help ensure we deliver quality wines competitively, sustainably, ethically and safely.

This Code of Conduct establishes our expectations of our suppliers and their supply chain when providing goods and services to Accolade Wines, ensuring that we are aligned.

*Robert B. Foye*

**ROBERT FOYE**  
CEO

## CONTENTS

**0 4**

ETHICS

**0 5**

ANTI-CORRUPTION

HUMAN RIGHTS

**0 6**

MODERN SLAVERY

**0 7**

ENVIRONMENT

QUALITY STANDARDS

**0 8**

BUSINESS CONTINUITY

COMMUNITY

**0 9**

HEALTH & SAFETY

**1 0**

RESPONSIBLE  
CONSUMPTION

MONITORING THIS CODE





# CODE OF CONDUCT



## ETHICS

Accolade Wines has a reputation for high standards of ethical and legal conduct. Our employees, company officers and directors observe the Accolade Wines Code of Business Conduct & Ethics as well as local policies and procedures.

In addition, Accolade Wines promotes an open and transparent culture where employees and suppliers are encouraged to call out unethical behaviour. We have a global whistleblower policy and training and engagement programmes in place. From this we build trust by acting with integrity and accountability.

Our whistleblower policy can be found on our website:  
<http://www.accoladewines.com/whistleblower-policy/>

### **We expect our suppliers will:**

- Ensure their management is accountable for maintaining a high level of corporate ethics
- Comply with the letter and spirit of all relevant laws; regulations and codes of conduct
- In conducting business with Accolade Wines and its supply chain –act with integrity
- Manage risk, governance and compliance appropriately, ensuring fiduciary responsibilities are being upheld
- Apply necessary care and skill in performing their duties
- Respect the confidential nature of the commercial arrangement between the supplier and Accolade Wines
- Respect the rights of their employees, customers, suppliers, shareholders and the community
- Foster a culture of inclusivity and diversity
- Promote internally an open and transparent culture where their employees are encouraged to call out unethical behaviour, including having an up to date whistleblower policy and training of employees.

*"Accolade Wines promotes an open and transparent culture"*

# ANTI-CORRUPTION

Accolade Wines has a zero tolerance policy in relation to the payment or receipt of bribes; and tax evasion or the facilitation of taxation evasion.

Corruption is harmful to societies and economies, and the World Bank and the Organisation for Economic Co-operation and Development have identified corruption as one of the most serious obstacles to economic and social development, particularly in developing economies. Bribery and corruption are also poor business practices.

Accolade Wines will not conduct business with suppliers who are in breach of its Anti-Corruption Policy and may terminate any existing contracts.

## We expect our supplier will:

- Not engage in bribery; corruption; tax evasion; or facilitation of tax evasion in any form
- Have in place an anti-corruption policy prohibiting its employees, suppliers and customers from engaging in bribery; corruption; or any form of tax evasion
- Maintain a gifts and hospitality database with appropriate approval mechanisms in place
- Comply with Accolade Wines Anti-Corruption Policy as amended from time to time
- Provide any details required by Accolade Wines to conduct due diligence checks
- Notify Accolade Wines if they become the subject of an investigation with respect to allegations of improperly involving bribery, money laundering, or anti-kickback laws, or taxation evasion
- Promote internally an open and transparent culture where their employees are encouraged to report any acts of corruption or tax evasion, including having appropriate reporting mechanisms and training of employees



# HUMAN RIGHTS

Accolade Wines is committed to providing a workplace that is free from discrimination, harassment and bullying and promotes diversity. We respect and support the human rights set out in the UN Universal Declaration of Human Rights and work towards building a supportive culture of respect and equity. The driving force behind the strength of our business lies in the expertise, passion and professionalism of our people. With over 1,700 employees across the globe it is important to Accolade Wines that we ensure equal employment opportunity; fair and flexible working arrangements; and a safe work place.

We drive an inclusive, diverse and collaborative culture.

We want to work with suppliers that share our vision for a workforce of passionate and professional experts.

## We expect our suppliers will:

- Have in place equal employment opportunities and flexible working arrangement policies
- Encourage an open and transparent culture, where employees feel they can voice concerns around human rights violations
- Promote a diverse and inclusive workforce

## MODERN SLAVERY

Accolade Wines will not tolerate any activity of modern slavery in its operations or supply chain. Neither Accolade Wines nor any of its suppliers will engage in any form of modern slavery and further, we expect our suppliers will influence the policies and actions of its own supply chain to meet ethical and legal responsibilities in regards to modern slavery.

Accolade Wines regularly reviews its risks of modern slavery that have the potential for Accolade Wines to cause, contribute to, or be directly linked to modern slavery through its operations and supply chain. Accolade Wines complies with the Australian Modern Slavery Act 2018 (Cth) and UK Modern Slavery Act 2015, including preparing and publically sharing modern slavery statements for the respective regions.



### **We expect our suppliers will:**

- Not engage in any conduct that would constitute modern slavery and conduct risk assessments to reduce its potential to cause, contribute to or be directly linked to modern slavery
- Provide information requested by Accolade Wines to allow it to undertake due diligence
- Undertake its own due diligence on its supply chain, including, at a minimum its second and third tier suppliers
- Comply with any reporting obligations under the legislation it is governed by
- Ensure that all its employees and or its labour hire are being paid their salary and other benefits in accordance with the law



# MODERN SLAVERY IN THE SUPPLY CHAIN



# ENVIRONMENT

Accolade Wines has a long-term obligation to managing our business in an environmentally responsible manner at all levels, from our vineyards through to our production facilities and distribution networks. We are also highly aware of the environmental risks to our industry generated by climate change, resourcing challenges and security of supply.

We are particularly proud of The Banrock Station Environmental Trust established in 1995 to re-invest profits from the sale of wines from Banrock Station into environmental projects around the world. Our commitment to date exceeds AUD6m for more than 130 projects in 13 countries.

We are a signatory to the Australian Packaging Covenant. We also have transferred 50% of our energy requirements to internally-generated wind power at Accolade Park in the UK.

**We expect our suppliers will:**

- Be pro-active in engaging in activities to improve sustainability of its activities, products and services
- Work with Accolade Wines to minimise environmental impacts associated with its and Accolade Wines activities, products and services, including by assessing and utilising technological advances or alternative materials
- Prevent waste and manage waste in line with the principles of waste hierarchy



# QUALITY STANDARDS

Our award winning brands are enjoyed in more than 140 countries. Accolade Wines has some of the most highly awarded winemakers who have excelled in their field for many decades. Worldly experience, attention to detail, passion, and commitment combine to ensure all our wines are treated with care and respect and are of high quality. Our skilled global production workforce and award-winning facilities enhance the quality of the wines we produce.

Accolade Wines strives to create conditions where all stakeholders, including employees, management, suppliers and distributors, share our collective responsibility for maintaining the highest standards of safety and product quality, whilst simplifying processes to drive results.

**We expect our supplier will:**

- Strive to deliver a consultative process between them and Accolade Wines with a view to maintaining management systems that promote continuous improvement
- Ensure work practices and procedures are adopted that comply with or exceed the requirements of all Acts, Regulations, Standards and Accolade Wines' specifications applicable to the goods or services being supplied
- Comply with all relevant food safety legislation
- Obtain and maintain any required accreditation





## BUSINESS CONTINUITY

Amongst other reasons, to ensure we can always deliver on the promises we make to our customers; act with speed; and be the partner of choice for our customers, Accolade Wines takes a holistic approach to business continuity and recovery.

We work with our management, employees and suppliers collaboratively to ensure we are able to respond quickly and safely in the event of a major incident affecting supply.

### **We expect our suppliers will:**

- Have appropriate public liability and business continuity insurance in place with a reputable insurer
- Have a documented and up to date business continuity plan that is regularly tested
- Have a clear process in place to communicate with Accolade Wines in the event its normal operations are disrupted in a way that may affect Accolade Wines supply
- Have a program of continuous improvement and innovation
- Think through decisions, but act with speed, action and results

## COMMUNITY

As custodian of some of the world's most known and loved wines, we recognise we have a responsibility to work with and contribute to the community. We do this in various ways including:

- our contribution through the Banrock Station Environmental Trust;
- our relationship with over 850 grape growers in Australia;
- and creating job opportunities in areas such as Bristol in the UK and the Riverland in rural South Australia.

### **We expect our supplier will:**

- Engage with its community and build and foster relationships with them
- Consult with its community on projects that may directly affect them







## HEALTH & SAFETY

Accolade Wines strategic approach to preventing loss, damage and injury is to make safety an essential and integral part of management accountability.

This includes every employee and contractor on company premises accepting that safety is a key responsibility and therefore a prerequisite in the planning of all activities.

Accolade Wines ensures that targets for all work groups and appropriate managers are counted as part of overall performance evaluations, alongside mandatory training in safety management systems. Accolade Wines is dedicated to ensuring it and its supply chain meet their chain of responsibility responsibilities in regards to the use of heavy vehicles.

### We expect our suppliers will:

- Comply with all relevant work health and safety acts and regulations
- Provide all workers with a safe and hygienic work environment, taking into account the specific industry hazards
- Personal protective equipment is available for use by workers and that workers are trained in the use of it
- Responsibility for health and safety is assigned to a senior manager
- Comply with the Heavy Vehicle National Law and Accolade Wines' Chain of Responsibility Management Plan Standard
- Comply with all instructions from Accolade Wines' personnel when on an Accolade Wines' site
- Provide information required by Accolade Wines to demonstrate the appropriate measures are in place to protect the safety of its employees and Accolade Wines' employees when on its site
- Ensure appropriate training and awareness campaigns are run with employees

# RESPONSIBLE CONSUMPTION

Accolade Wines is committed to encouraging the responsible consumption of alcohol.

In Australia we are active supporters of DrinkWise. In the UK we support Drinkaware, as well as the national 'Why Let Good Times Go Bad?' smarter drinking campaign.

Accolade Wines also funds Alcohol in Moderation's education programme.

## We expect our suppliers will:

- Encourage the responsible consumption of alcohol at work-organised events; or client/supplier hosted events.
- Develop any marketing collateral for Accolade Wines in accordance with the Accolade Wines' Code for Responsible Practices for Alcohol Advertising, Marketing and Digital Media.

Get the facts **DrinkWise.org.au**

**drinkaware.co.uk**  
for the facts about alcohol

## MONITORING OF THIS CODE

Accolade Wines will work closely with its suppliers to ensure they are aligned with and comply with this Code of Conduct. We may from time to time conduct assessments of the practices of our suppliers, including the request for self-assessment or audits which require supporting documentation or site visits. We will always work with our suppliers to identify opportunities for improvement and provide support where appropriate.

Accolade Wines looks forward to working with the thousands of organisations we purchase from around the world that share our values and principles and help ensure we deliver quality wines competitively, sustainably and safely.





