

# Modern Slavery Policy (Global)

## Introduction

This policy sets out Accolade Wines' zero-tolerance approach to modern slavery within its business and supply chains and incorporates the legislative requirements of modern slavery reporting.

Neither Accolade Wines nor any third parties who act on the company's behalf will engage in acts of modern slavery in any form. In addition, Accolade Wines will seek to influence the policies and actions of the company's supply chain so they too meet their ethical and legal responsibilities in regards to modern slavery.

## Objectives

The objectives of this policy are:

- to complement the Accolade Wines Code of Conduct and Supplier Code of Conduct, ensuring Accolade Wines acts ethically and with integrity in all business dealings and relationships;
- to implement systems to ensure modern slavery is not taking place anywhere in Accolade Wines' business or in our supply chains;
- to ensure there is transparency in Accolade Wines operations and supply chain in the approach to tackling modern slavery consistent with the company's disclosure obligations under relevant legislation.

<b>People:</b>	Contribute to a high performance organisation
<b>Brand:</b>	Build global brands of scale
<b>Core Markets:</b>	Protect and grow
<b>Asia:</b>	Unlock growth
<b>Customers:</b>	Drive engagement and growth
<b>Operating Models:</b>	Drive effectiveness and efficiency
<b>Behaviours:</b>	Ownership, Focus, Innovate, Results, Leadership

## Scope

This policy applies to all Accolade Wines' employees globally, and any third parties who have agreed to comply with this Policy.

**Version Number:** 1 (Uncontrolled when printed)

**Subject:** Anti-Slavery Policy

**Policy Owner:** Chief Supply Chain Officer

**Distribution:** Global

**Last Revised Date:** December 2020

## Modern Slavery

Modern slavery is a crime or violation of fundamental human rights where the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain occurs. Modern slavery includes human trafficking; slavery; slavery-like offences and child labour. It can take many forms including, reducing a person to slavery; possessing a slave; engaging in slave trading; servitude; deceptive recruiting; and debt bondage.

Accolade Wines will not tolerate any activity of modern slavery in its operations or supply chain.

**"Operations"** means activities undertaken by Accolade Wines to pursue its business objectives and strategy.

**"Supply Chain"** does not mean just Accolade Wines tier one 'direct' suppliers; it refers to, at the least, its second and third tier suppliers that contribute to Accolade Wines operations.

Accolade Wines will comply with all local laws in regards to child labour, including age criteria and working hours.

## Upholding our Commitment

When engaging a supplier, contractor or labour hire, employees must ensure they are using the approved channels. Employees must take steps to know how the services are being provided and by whom and that these organisations or people share our commitment to slavery and human trafficking.

### Always:

- conduct due diligence on companies supplying labour to Accolade Wines;
- respect employees' rights to negotiate their terms and conditions of employment;
- act in good faith and be constructive when negotiating; and
- report any evidence of child or forced labour.

### Never:

- engage a supplier who refuses to commit to our requirements on slavery and human trafficking;
- use labour Accolade Wines may suspect is forced; and
- force anyone who works with Accolade Wines to join or not join a legally recognised trade union or representative organisation.

## Identifying Modern Slavery

Victims will not always understand they are the subject of modern slavery and are entitled to help and support, Accolade Wines encourages all employees to report modern slavery (see the section on Reporting Modern Slavery in this Policy). The below are some key signs indicating someone may be a victim of modern slavery:

- the person has indicated they do not feel they can leave work freely or leave the place of employment freely;
- the person's residence or a significant debt is tied to their employment and they have indicated they do not feel free to leave their employment;
- the person is not in possession of their passport or travel documentation;
- the person is withdrawn or appears frightened;
- the person allows others to speak for them when spoken to directly, or is acting as though they have been coached on what to say by someone else; or
- the person does not seem to be able to contact friends or family freely.

The above identifiers are not intended to be exhaustive, likewise a person may exhibit a number of the indicators above but may not necessarily be a victim of modern slavery.

## Undertakings

1. It is a breach of this Policy for an employee of Accolade Wines to undertake any activity that would constitute violation of another person's fundamental human rights, including reducing a person to modern slavery.
2. At least once a year, Accolade Wines undertakes to:
  - review 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;
  - identify actions and implement action plans to address those identified risks; and
  - submit modern slavery statement in accordance with the relevant global legislation.
3. Accolade Wines will ensure all future supply chain contracts require suppliers to comply with modern slavery laws and with Accolade Wines' Supplier Code of Conduct.

## Reporting Modern Slavery

If an employee of Accolade Wines has reason to believe that modern slavery is occurring at Accolade Wines or in its supply chain, they must immediately report it to either the Head of Legal, the Chief People and Communications Officer, or the Chief Supply Chain Officer. If they do not feel comfortable reporting directly to one of these people, they should report the modern slavery under the Whistleblower Policy.

## Breaches of this Policy

A breach of this Policy is grounds for disciplinary action up to and including immediate dismissal or, in the instance of a supplier to Accolade Wines, termination of the supply contract.

A breach of this Policy may also be a violation of the law and may result in civil or criminal penalties for Accolade Wines, the supplier and/or any individual.

## Further Information

For further information please contact your local Legal Department representative.

## Reference Documents

- Procurement Policy
- Supplier Code of Conduct
- Employee Code of Conduct
- Whistleblower Policy