Modern Slavery Act 2015: slavery and human trafficking statement

Accolade Wines is committed to preventing slavery and human trafficking within it business activities and its global supply chain.

Accolade Wines' Global Business

Accolade Wines is the number one wine company in Australia and the United Kingdom by volume and the fifth largest wine company in the world. Drawing on a proud heritage with one of the first wineries established in Australia, Accolade Wines has evolved into a global wine company. Accolade Wines has a comprehensive portfolio of market leading brands which are sold across over 140 countries.

Accolade Wines is a privately owned group of companies with its head office located in Australia and employs over 1,600 employees across 12 countries. Further information regarding Accolade Wines' global footprint can be accessed at http://www.accolade-wines.com/our-company/about/

Accolade Wines' principal business activities consist of the following:

- Grape growing and sourcing: Accolade Wines sources its grapes through vineyards it owns and leases, and from contracts with third party growers.
- Wine production and sourcing: Accolade Wines produces and bottles wine at its own production facilities in Australia, Chile, USA, South Africa, New Zealand and the UK, and also sources bulk wine from third party suppliers around the world.
- Marketing and sales: Accolade Wines markets and sells its products via its own dedicated marketing and sales teams and through appointed distributors and agents.

Preventing Modern Slavery and Human Trafficking

As part of Accolade Wines' initiative to identify and mitigate the risk of slavery and human trafficking in its business activities and supply chain it has engaged independent third parties to:

- undertake an ethical audit at its UK production and warehousing facility, which included a detailed review of
 its working practices and payroll procedures;
- identify key risks in its global supply chain, to review its existing environmental, social and governance
 activities and to assist with establishing its Environmental, Social and Governance (ESG) reporting
 framework. The ESG reporting on risk and compliance is reported into the Executive Risk Committee
 (ERC), which then provides reporting and recommendations to the Board of Directors of Accolade Wines on
 a quarterly basis.

The ESG reporting is conducted by representatives from the following departments:

- Risk and Quality Assurance
- Legal
- Corporate Affairs
- Human Resources
- Supply Chain and Operations

Further information is contained within the ESG Statement.

Employees and Agency Workers:

Accolade Wines operates under a range of global and local policies, processes and procedures that ensure its workplaces comply with local laws and ethical standards.

Accolade Wines complies with all local labour laws and when it has the need to use agency workers at its sites it ensures reputable agencies are used and those agencies warrant compliance with all local laws. Further information is contained within the ESG Statement.

Whistleblowing or Confidential Reporting of Criminal or Illegal Acts Policy

In order to ensure full compliance with the law regardless of locality of the relevant employees, and to protect employees' freedom to act within the law, Accolade Wines established a procedure to be followed by employees throughout its business where they feel the need to report a criminal wrong-doing or illegal act. The procedure has been developed primarily to allow employees to report illegal acts concerning Accolade Wines, however, calls will also be accepted from employees' family members, suppliers, customers, retailers or the general public.

Broader Supply Chain

Accolade Wines already has within its procurement contracts and terms of purchase standard clauses which explicitly require compliance with local laws. In order to enhance compliance with the Modern Slavery Act and any equivalent local legislation, these standard clauses will be updated to specifically refer to anti-slavery and human trafficking laws.

Further Steps

Accolade Wines intends to take the following further steps to combat slavery and human trafficking:

Training:

To ensure a high level of understanding of the risks of modern slavery and human trafficking in its business operations and broader supply chains Accolade Wines is rolling out training to its staff beginning with Human Resources, Legal and Procurement teams.

Corporate Social Responsibility:

Accolade Wines is currently developing its global Corporate Social Responsibility strategy and commitments. Accolade Wines will incorporate into that strategy tasks designed to build upon steps already taken to identify and mitigate the risk of slavery and human trafficking in its business activities and supply chain.

Review:

Accolade Wines will review this statement at least annually.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Accolade Wines Group's slavery and human trafficking statement for the financial year ending 30th June 2016.

Michael East Chief Executive 22 December 2016