

Responsible Sourcing Program Supplier Guidelines

Introduction

Endeavour Group is committed to upholding and respecting the human rights of workers in its supply chain. We have developed a Responsible Sourcing Policy that outlines our requirements of suppliers in respect of their human rights practices.

This document has been produced to help Endeavour Group’s suppliers understand their requirements under our Responsible Sourcing Program.

Responsible Sourcing Program

The Responsible Sourcing Program is the means through which we monitor our suppliers’ compliance with the Responsible Sourcing Policy. Suppliers falling **‘in scope’** of the Responsible Sourcing Program have additional compliance requirements. These requirements are designed to demonstrate to Endeavour that the supplier effectively manages the human rights risks in its own operations.

‘In scope’ suppliers

While the Responsible Sourcing Policy applies to all Endeavour direct suppliers, these guidelines outline the requirements of suppliers deemed ‘in scope’ of our Responsible Sourcing Program. In scope suppliers are required to undertake additional compliance obligations to satisfy and demonstrate to Endeavour compliance with our Responsible Sourcing Policy.

Supplier type	Definition	Requirements
Retail suppliers		
Own Brand	<p>Suppliers producing brands owned by Endeavour - That is, brands trademarked or registered to Endeavour Group. This includes products that are brand trademarked or registered to Endeavour Group but are not widely recognisable as an Endeavour brand.</p> <p>Suppliers producing licensed product – This would include where we are legally authorised (licensed) by the</p>	Page 3

	<p>brand owner to use the brand on the product we are developing.</p> <p>Products designed/developed exclusively for us – Where we have directed the design or development of the product composition or ingredients or packaging, the product is considered Own Brand.</p>	
Exclusive	Supplier branded products that are exclusively sold by Endeavour Group.	Page 4
Non-retail suppliers		
Cleaning	Suppliers offering cleaning services to any Endeavour-owned site, such as our retail stores, hotels, offices, bottling facilities and wineries.	Page 6
Security	Suppliers offering security services to any Endeavour-owned site, such as our retail stores and hotels.	Page 6
Temporary labour	Suppliers offering temporary labour services, such as contractors and labour hire providers on our vineyards.	Page 6

Requirements for Retail Suppliers

Own Brand Suppliers

New Own Brand Suppliers - steps for compliance with Endeavour Group's Responsible Sourcing Program:

1. A new Own Brand supplier to Endeavour Group will be required to sign up to Sedex and complete a site profile for the facility(ies) that will be producing products for Endeavour.
2. The supplier will need to link their profile to Pinnacle Drinks by initiating a new relationship on Sedex.
3. As part of the onboarding process, Endeavour will review the supplier's human rights risk rating using the Sedex country/region and sector risk tool.
4. Endeavour will assess the risk and advise the supplier if they are required to undertake a social compliance audit prior to commencing supply.

If the supplier is required to undertake an audit:

5. If Endeavour determines that the supplier is required to undertake an audit, the supplier will need to book, pay for and undertake the social compliance audit, as well as close any non-conformances identified during the audit, before they will be approved to supply Endeavour under these Guidelines. Please see the 'accepted audit formats' section below for information about accepted social compliance audit formats.
6. Once the audit is completed, uploaded to the Sedex platform by the auditor, and all non-conformances have been closed, the supplier will be approved to commence supply under these Guidelines.
7. Within two weeks of commencing supply to Endeavour, the supplier must complete the Sedex Self-Assessment Questionnaire.

If the supplier is not required to immediately undertake an audit:

8. If Endeavour determines that the supplier does not need to undertake an audit prior to supply, they are approved to commence supply under these Guidelines, provided they comply with the following steps and 'requirements for ongoing supply' detailed below.
9. Within two weeks of commencing supply to Endeavour, the supplier must complete the Sedex Self-Assessment Questionnaire.

Existing Own Brand suppliers - requirements for ongoing supply:

1. The supplier must complete and maintain their Sedex Self-Assessment Questionnaire (**SAQ**) to 100% at all times while supplying Endeavour.
2. Endeavour will routinely review the supplier's SAQ and any audit history to determine if the supplier requires a social compliance audit at any time during their supply to Endeavour.

3. Endeavour will advise the supplier if an audit is required at any time and provide reasonable timeframes and support to ensure the supplier is able to book, pay and undertake their audit.
4. If the supplier undertakes a social compliance audit at any time while supplying Endeavour, whether requested by Endeavour or not, **the supplier must remediate any non-conformances identified during the audit within the auditor-given timeframes.**
5. If a business critical breach is identified through an audit, Endeavour reserves its contractual rights to suspend orders until the breach is remediated.

Exclusive Suppliers

All Exclusive suppliers - steps for compliance with Endeavour's Responsible Sourcing Program

1. An Exclusive supplier to Endeavour is required to sign up to Sedex and complete a site profile for the facility(ies) that will be producing product for Endeavour.
2. The supplier will need to link their profile to Pinnacle Drinks by initiating a new relationship on Sedex.
3. The supplier must complete and maintain their Sedex Self-Assessment Questionnaire (**SAQ**) to 100% at all times while continuing to supply Endeavour.
4. Endeavour may require the supplier to undertake a social compliance audit at any time during the period of supply.
5. If the supplier undertakes a social compliance audit at any time while supplying Endeavour, whether requested by Endeavour or not, the supplier must remediate any non-conformances identified during the audit within the auditor-given timeframes.

Accepted audit formats

Endeavour will accept any of the below audit formats, provided the audit was completed within 12 months of commencing supply to Endeavour:

- Sedex Members Ethical Trade Audit (**SMETA audit**)
- Amfori Business Social Compliance Initiative audit (**BSCI audit**)
- Fair Farms audit
- Social Accountability 8000 (**SA8000 audit**)
- Fair Farms certification
- NZGAP Social Practice Add-on
- Global Good Agricultural Practice Risk Assessment

Endeavour will try to ensure that suppliers are not required to complete multiple audits for different customers. If a supplier has undertaken an alternative social compliance audit not listed above, the supplier can send the full report to Endeavour to apply for acceptance

under mutual recognition. Endeavour will accept the alternative audit format wherever possible, provided it meets Endeavour's minimum standards.

Requirements for non-retail suppliers

New cleaning and security suppliers

As part of the tender process for new cleaning or security suppliers, potential suppliers must complete a “Modern Slavery Questionnaire.” Suppliers are required to detail the policies, systems and processes in place to mitigate risks of human rights offences occurring in their operations, including subcontractor monitoring.

Suppliers’ answers to this questionnaire will be reviewed by Endeavour’s Human Rights team to ensure adequate management controls are in place prior to being awarded business.

New temporary labour service suppliers

New temporary labour service suppliers must review and sign our Temporary Labour Services Agreement prior to commencing temporary work on our sites.

Existing cleaning, security and temporary labour suppliers

Endeavour will, from time to time, request to see existing cleaning and security suppliers’ records for the purpose of establishing that their workers, who are carrying out work on Endeavour’s own sites, have valid Australian working rights and are paid in accordance with all applicable laws, awards and regulations.

Suppliers are required to keep and maintain accurate records including but not limited to:

- **Timesheets:** recording the actual hours worked by each employee for the pay period to which their payslip relates.
- **Payslips:** maintain a record of, and provide all employees with, payslips in accordance with relevant Fair Work obligations. This includes details of hours worked, pay per hour, tax contributions, superannuation contributions, and details of any legal deductions. If employees do not speak or read English, suppliers must provide employees with payslips translated into their own language.
- **Rights to work:** a copy of each employee’s proof of Australian citizenship, or a copy of their VEVO check if the employee is not an Australian citizen.

Endeavour or auditors conducting social compliance audits on behalf of Endeavour will request these records from time to time to establish legal compliance. [Note that Endeavour will not keep or maintain records of sensitive personal information of employees, but will conduct spot checks to sight this information.]

Non-compliance with these Guidelines

Suppliers are encouraged to reach out to humanrights@endeavour.com.au with any questions or concerns they may have in respect of these Guidelines or Endeavour's Responsible Sourcing Program generally. Endeavour will take all reasonable measures to support suppliers to achieve compliance with its Responsible Sourcing Program.

If a supplier is unwilling to comply with Endeavour's Responsible Sourcing Policy, Standards or Guidelines, Endeavour reserves its contractual rights to suspend, cancel or otherwise alter future orders until the supplier completes any outstanding requirements or remediates any issues.

If a supplier is found to be in serious violation of Endeavour's Responsible Sourcing Policy, including if cases of actual or reasonably suspected modern slavery are identified, Endeavour may immediately suspend supply while the issue is investigated.

Reporting potential human rights violations

If you suspect an actual or potential breach of Endeavour's Responsible Sourcing Policy, or are concerned about any human rights practices occurring in our supply chain, please utilise Endeavour's Whistleblowing service to raise a complaint:

Telephone: 1800 952 910

Online: www.endeavourwhistleblowing.deloitte.com.au