



Ethical Sourcing and Modern Slavery Policy

July 2023

POLICY STATEMENT:

Helen & Joey Estate and Re'em Yarra Valley are committed to upholding human rights for our team members and the team members of our supply chain. Our ethical sourcing and modern slavery policy outlines requirements we require from our suppliers and contractors, and we encourage our suppliers to consult with us about any challenges they face with regard to this so we can assist with ongoing improvements.

This policy relates to all countries where the supply chain takes place and is not limited by the supplier or contractors' country of origin.

Helen & Joey Estate and Re'em Yarra Valley endorses the UN Guiding Principles on Business and Human Rights and is committed to incorporating these principles into our business. In cases where there are inconsistencies between this policy and the current UN guiding principles and national/state laws, the principle or law with the greater protection would apply.

Modern slavery is a term used to refer to a range of exploitative practices including slavery and slavery-like practices/conditions (such as debt bondage, servitude, forced marriage, forced labour, and human trafficking - also referred to as trafficking in persons). Helen & Joey Estate and Re'em Yarra Valley understands that prevalence of modern slavery in Australia is comparatively low, however, it is understood that modern slavery may exist in the supply chains for goods and services sold in Australia and by Australian companies.

Helen & Joey Estate and Re'em Yarra Valley has a zero-tolerance approach to all forms of modern slavery and human trafficking within its business and within its supply chain. Helen & Joey Estate and Re'em Yarra Valley are committed to acting ethically and with integrity in all its business dealings and relationships.

Helen & Joey Estate and Re'em Yarra Valley provide safe and fair working conditions for all its team members and ensures that no child labour is employed, in line with Australian minimum age laws.

Helen & Joey Estate and Re'em Yarra Valley is committed to implementing and enforcing effective systems and controls to ensure unethical sourcing of modern slavery and human trafficking is not taking place in its own business or within any of its supply chains. Helen & Joey Estate and Re'em Yarra Valley will only do business with organisations who fully comply with this policy.



Where appropriate, Helen & Joey Estate and Re'em Yarra Valley will engage directly with new and existing suppliers in respect to the Anti-Slavery Policy in order to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own business. Our expectation is that any company supplying to Helen & Joey Estate and Re'em Yarra Valley, hold their own suppliers and supply chain to the same standards.

Helen & Joey Estate and Re'em Yarra Valley reserves the right to terminate any contractual arrangement if there is a breach of this policy.

Helen & Joey Estate and Re'em Yarra Valley will conduct annual risk assessments to determine which areas within our supply chains (if any) are most at risk from modern slavery.

Helen & Joey Estate and Re'em Yarra Valley, supplier and contractor activities shall comply with National/State environmental laws and regulations. Disposal of production waste will be reviewed regularly to try to eliminate or minimise the impact on the environment. Hazardous environmental activities shall be documented and managed according to legal requirements with the goal of reducing the impact on the environment.

The supplier or contractor will advise of any environmental compliance breach to Helen & Joey Estate and Re'em Yarra Valley at the earliest opportunity.

PROCEDURES:

To demonstrate the commitments laid out in this policy, all team members are required to follow the processes below:

- a. All managers must confirm adherence to this policy with all suppliers and contractors they seek to use. Any concerns relating to a supplier or contractor's adherence to this policy must immediately be escalated to the Venue Manager and Managing Director.
- b. Team members are encouraged to raise concerns about any modern slavery likely in any parts of Helen & Joey Estate and Re'em Yarra Valley's supply chains or in any supplier tier at the earliest possible stage.
- c. Team members are obligated to notify the Venue Manager and Managing Director as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.
- d. Complaints or reported violations of this policy will be kept confidential and will be dealt with appropriately.



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- e. If a team member is unsure about whether a particular act or the treatment of workers constitutes any of the various forms of ethical sourcing and modern slavery, it should be raised with their Direct Manager.
- f. Helen & Joey Estate and Re'em Yarra Valley is committed to ensuring no team member suffers any detrimental treatment as a result of reporting in good faith their suspicion that unethical sourcing or modern slavery may be taking place in any part of its business or supply chains.
- g. The Venue Manager and Managing Director will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.