

Alcohol Policy

A Treasury Wine Estates Limited Policy



TREASURY
WINE ESTATES

1. STATEMENT OF INTENT

Millions of adults around the world enjoy drinking our wines and, as a producer of alcoholic beverages, Treasury Wine Estates (TWE) recognises its role in encouraging the responsible consumption of its products.

Our wines, and how they are intended to be consumed, provide the opportunity for social interaction and engagement. TWE recognises that the majority of its people drink responsibly.

As a representative of TWE, others judge us by how we behave at work, and in non-work related social settings on whether we consume alcohol responsibly. Poor, inappropriate and unsafe behaviour can influence and negatively impact TWE's overall corporate reputation.

We all have the opportunity to act as ambassadors for our brands and, through our behaviour, we demonstrate the importance of the responsible consumption of alcohol. Through education and awareness, we can create an appropriate wine experience for ourselves, our colleagues, friends and family, and the community at large.

Signed on behalf of Treasury Wine Estates by

Paul Rayner – Chairman

Michael Clarke – Chief Executive Officer

Effective: 1 July 2019

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2. PURPOSE

The purpose of this Policy is to:

- a) Provide clear guidance as to TWE's expectations regarding the responsible consumption of alcoholic beverages whilst at work, when representing TWE at functions or events (at either TWE or non-TWE sites), and during non-work time; and
- b) Outline disciplinary action(s) which may be taken should there be a breach of this Policy.

3. WHO THIS POLICY APPLIES TO

This is a group-wide policy and applies to all people who represent TWE, including directors, employees, contractors and consultants of TWE (**TWE People**).

This Policy also applies to all visitors whilst attending TWE sponsored events or occasions, whilst visiting TWE sites or whilst acting on behalf of TWE (**TWE Visitors**).

4. ROLES & RESPONSIBILITIES

TWE Board of Directors

The TWE Board fully endorse this Policy and is responsible for its annual review. Directors of TWE are also required to understand and comply with this Policy.

TWE Executive Leadership Team

The TWE Executive Leadership Team (ELT) is responsible for:

- Setting a culture of responsible alcohol consumption that supports the health, safety and wellbeing of all TWE People;
- Ensuring that appropriate training, support and awareness programs are made available to TWE People to ensure they are clear on expectations and obligations described by this Policy; and
- Enforcing this Policy.

TWE People Managers

TWE People Managers are responsible for ensuring TWE People are capable of performing their role safely. Where the Manager believes the individual may be affected by alcohol, they should not allow them to commence or continue working until the matter is investigated. TWE People Managers should also support team members who may be dealing with problem alcohol consumption, in conjunction with their HR business partner, health and safety representative and EAP services.

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TWE People and TWE Visitors

All TWE People and TWE Visitors are responsible for understanding and agreeing to honour the spirit and the letter of this Policy, and for immediately raising with their Manager where they are concerned that a work colleague may be in an 'unfit condition' to act safely due to intoxication.

People & Communications

The Chief People and Legal Officer is designated Policy Owner and is therefore responsible for its implementation.

5. CORE EXPECTATIONS

TWE has established a set of core expectations regarding the safe and responsible consumption of alcohol. Our core expectations fall into three key categories:

(a) Drinking at work

5.1 If consuming alcohol at work, you are expected to drink responsibly, as well as at work related functions and at any time when you are representing TWE outside of work.

5.2 All TWE hosted functions must adhere to responsible service guidelines.

5.3 Consumption of alcohol in the workplace should only occur in appropriate areas (such as wine tasting rooms, cellar doors and onsite bars) and must not occur in close proximity to production plant and equipment.

(b) Workplace Safety

5.4 Consumption of alcohol, whether it occurs in or away from the workplace, becomes a workplace health and safety issue if an employee's ability to exercise judgment, coordination, motor control, concentration and alertness at work is impaired. Accordingly, you must not perform your work or operate any plant, machinery or equipment if your performance or judgment is impaired by the consumption of alcohol.

5.5 The likelihood of risk to an employee's health and safety due to impairment from alcohol use increases in workplaces that are 'high risk'. Accordingly, you must not perform any work that is 'high risk' if you are under the influence of alcohol, regardless of the legal limit. Work that is 'high risk' includes operating machinery, handling hazardous substances or dangerous goods or working in an environment that is high risk (e.g. working at heights).

(c) Responsible marketing

5.6 TWE does not promote the consumption of alcohol to those below the legal drinking age in any market. The sales, marketing and promotion of our wines is governed by the Responsible Marketing Guidelines. All TWE People must familiarise themselves with the Guidelines as part of their broader awareness on TWE's responsible alcohol consumption practices.

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6. IMPLEMENTATION

This Policy is supported by the Alcohol Policy Guidelines which explain in greater detail the supporting processes that facilitate its implementation throughout TWE. Specific communication, education and awareness materials on responsible alcohol consumption are also available to all TWE People and TWE Visitors. All TWE People must familiarise themselves with the Guidelines as part of their broader awareness of TWE's responsible alcohol consumption practices.

7. CONSEQUENCES FOR BREACH OF THIS POLICY

TWE People are encouraged to raise concerns or potential breaches of this Policy with their 1-up manager or relevant HR Business Partner.

A breach of any of the provisions of this Policy may constitute a disciplinary offence and will be dealt with in accordance with TWE's disciplinary procedures, up to and including dismissal from your employment, or the suspension or termination of any relevant contract or relationship.

Reputational damage as a result of other alcohol-related matters may also constitute a breach of this Policy and will be dealt with in the same way.

Drink Driving Related Breaches

Driving whilst under the influence of alcohol, or in excess of legal blood alcohol levels, poses a significant risk to those driving, the community and TWE's reputation. Consequently, TWE People found to be in control of a TWE owned or leased vehicle or driving for company business with a blood alcohol level in excess of any applicable road use law may have their employment terminated, and be liable for any associated costs.

As a drink-driving incident could negatively impact TWE's reputation, you may also be subject to disciplinary action, up to and including termination of your employment, if you are involved in a drink-driving incident outside of work, regardless of who owns the vehicle.

If you are apprehended for drink-driving in any circumstances you are required to inform your manager at the earliest possible opportunity.

8. RELATED TWE DOCUMENTS AND FURTHER INFORMATION

This Policy should be read in conjunction with TWE's Alcohol Policy Guidelines, Code of Conduct, Whistleblower Policy, Social Media Policy, the Motor Vehicle Policy, the Occupational Health & Safety Policy, Employing Minors Policy and the Responsible Marketing Guidelines.

Any questions in relation to this Policy should be directed to your one-up manager, your relevant HR Business Partners or submitted via email to alcoholeducation@tweglobal.com.

Anonymous help is available through the Employee Assistance Program (EAP) if you believe you or a family member may have a problem with excessive drinking or alcohol dependence. Refer to the [Vintranet](#) for details.

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9. REVIEW and VARIATION HISTORY

This Policy is subject to Annual Review and sign off by TWE's Board.

VERSION CONTROL

Last Edited by:	Policy Owner:	Last Reviewed:
Katie Hodgson, Senior HR Director ANZ and Global Talent & Capability	Megan Collins, Chief People & Communications Officer	April 2018
Katie Hodgson, General Manager People and Capability	Linnsey Caya, Chief People and Legal Officer	April 2019

Treasury Wine Estates reserves the right to amend, cancel or extend policies. All policies filed to the Treasury Wine Estate's portal are current. If you are referring to a hard copy, please ensure that it is the most recent version.