

# TWE Responsible Procurement Code

---

Treasury Wine Estates Limited (“**TWE**”) is a signatory to the United Nation’s Global Compact and is committed to conducting business in accordance with the highest ethical standards and internationally proclaimed human rights. TWE’s Responsible Procurement Code (the “**Code**”) outlines its expectation, of all of its suppliers, to comply with the following standards in relation to the conduct of, and expectations placed on, its officers, employees and contractors (the supplier’s “**workforce**”).

TWE requires all of its suppliers to:

## Human rights

- Uphold basic human rights, including those set out in this Code, which are informed by international standards and conventions such as the [Universal Declaration of Human Rights](#).

## Employee Benefits, Working Conditions, and Working Hours

- Ensure its workforce receives legally mandated benefits in the form of a relevant minimum wage; and that it represents equal remuneration for work of equal value done by both men and women.
- Ensure working hours comply with local laws and do not require its workforce to work excessive hours to a degree that may impact personal health and safety.
- Treat its workforce fairly and provide them with workplaces free of discrimination, harassment, abuse, intimidation, and corporal punishment.
- Ensure its workforce is appropriately authorised and permitted to perform the work that they are engaged to do.
- If providing the workforce with accommodation, uphold minimum standards of living adequate for the health and well-being of the workforce, including access to food, water, medical care and other necessary social services.

## Forced Labour

- Not use forced, prison or slave labour in any form and ensure that the workforce has entered in to employment freely and at their own choice.
- Not restrict the movement of any part of the workforce through withholding remuneration or identification documents, or through threatening the safety of the workforce or their family.

## Child Labour

- Act in accordance with all legislative and ratified International Labour Organisation conventions relevant to children and not employ anyone under the minimum legal working age.
- Ensure members of its workforce under the age of 18 are not prevented from accessing education as a result of the supplier’s work practices.
- Ensure members of its workforce under the age of 18 are protected from working conditions that are harmful to their health and safety, or are likely to hamper normal development.

## Discrimination

- Comply with all relevant laws in relation to discrimination of any kind on the basis of race, gender, sexual orientation, disability, language, religion, political or other opinion, national or social origin, property, birth, marital or other status.

## Freedom of Association

- Allow employees the freedom to join a trade union or engage in other forms of collective bargaining if they so choose, to the extent permitted by law.

## Employment Practices, Subcontractors and Homeworkers

- Provide recognised employment relationships, and not use labour-only contract arrangements, consecutive short-term contracts, and/or false apprenticeship schemes to avoid fulfilling its obligations to personnel under applicable laws regarding labour and social security.
- Ensure that subcontractors/homeworkers conform to all requirements of this Code and ask subcontractors/homeworkers to report regularly about their progress in implementing the requirements of this Code.

## Health and Safety

- Ensure a Health and Safety program exists that aims to reduce hazardous working conditions and work related injury and illness.
- Ensure that a Health and Safety culture, processes, and procedures exist, and that at a minimum these comply with local laws.

## Environmental Impacts

- Have a means to manage and reduce environmental impacts that are most material to the suppliers business &/or industry.
- At a minimum, comply with local environmental laws.
- Ensure that it develops and maintains appropriate internal business processes to work towards the objectives of [TWE's Environment Policy](#), which is updated from time to time.

Note: The following sustainability programs are considered **best practice** by TWE. We strongly encourage all grape/wine suppliers to participate in the program relevant to their region: Entwine (Australia); Sustainable Winegrowing New Zealand (New Zealand); Sustainability in Practice – SIP, Certified California Sustainable Winegrowing – CCSW, and Napa Green, Napa Green Land and Fish Friendly Farming (USA); and Wine Sustainability (Italy).

## Review and Compliance

In the supplier procurement selection process, TWE evaluates potential new suppliers to ensure they understand, and demonstrate a commitment to comply with the Code.

In order to demonstrate continuous improvement, suppliers will allow an authorised representative of TWE to review and discuss their compliance to the Code at a mutually agreed time, if requested by TWE.

TWE will monitor supplier performance against the Code's standards by incorporating this Code in its contractual agreements with suppliers. If a review with a supplier reveals that they are not in compliance with the Code, TWE will work with the supplier in order to identify the reason and provide the supplier with an opportunity to rectify the issue.

With an extensive and varied supply chain, TWE acknowledges that some suppliers will need support to improve standards, however, if a supplier refuses to implement corrective actions to address concerns, and subsequent reviews continue to reveal non-compliance, TWE may elect to stop working with the supplier and engage with an alternative supplier who can sustain compliance with our Code.