



TWE Responsible Procurement Code

Treasury Wine Estates Limited (“**TWE**”) 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 its supplier’s workforce to adhere to the below outlined standards at a minimum:

Human Rights

- Be committed to respecting human rights and support and uphold the principles within the [United Nations Universal Declaration of Human Rights](#), the United Nations Guiding Principles on Business and Human Rights, the ILO 1998 Declaration on Fundamental Principles and Rights at Work and Modern Slavery Acts.
- Support TWE in our understanding that it is the diversity of our people that makes us unique and in line with TWE’s principles, demonstrate a professional and safe working environment where respect for human rights is the cornerstone of the culture and where everyone can make a contribution and feel included.
- Share in TWE’s belief that human rights recognise the inherent value of each person and encompass the basic freedoms and protections that belong to every single one of us. Our business and people can only thrive when human rights are safeguarded.

Employee Benefits, Working Conditions, and Working Hours

- The personal health and safety of its workforce is the number one priority.
- 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 national legal standard or local industry standards, whichever is the higher, to protect workers from working excessive hours.
- 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 into 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 they have a Health and Safety system and processes that meets TWE Health and Safety requirements, and that risks associated with the procurement of their goods and services are identified, effectively controlled and communicated to all relevant stakeholders.
- Ensure their Health and Safety system meets legal requirements in all jurisdictions.

Third Party Risk Centre

- Comply with the requirements of TWE's Third Party Risk Centre, which is compulsory for all Third Party relationships with TWE.
- Register as a vendor with TWE's [Third Party Risk Centre](#).
- Comply with the audit obligations as defined through the registration process of TWEs Third Party Risk Centre.

Environmental Impacts

- Have a means to measure, manage and reduce environmental impacts that are most material to the supplier's business &/or industry.
- Maintain or develop an ability to track and report on the sustainability characteristics of products and/or services that are provided to TWE.
- Commit to working with TWE to better manage water, carbon, energy and recycling-related opportunities and risks within TWE's value chain.
- Maintain compliance obligations through adherence to all applicable environmental laws and regulations.
- Ensure that it develops and maintains appropriate internal business processes to work towards the objectives of [TWEs Environment Policy](#), which is updated from time to time.

Whistle Blower Policy

- Ensure adoption of [TWEs Whistle Blower Policy](#), including access to the Whistle Blower Hotline, which is accessible to all Suppliers

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: Sustainable Winegrowing Australia; Sustainable Winegrowing New Zealand; Certified California Sustainable Winegrowing, Napa Green/Green Land and Fish Friendly Farming (USA); Wine Sustainability (Italy); and Haute Valeur Environnementale – HVE (France).

Review and Compliance

In the supplier procurement selection and onboarding process, TWE evaluates potential new suppliers to ensure they understand, and demonstrate a commitment to comply with the Code. All suppliers must re-confirm their commitment to comply with the Code on an annual basis.

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

TWE expects our suppliers to monitor their compliance, and their suppliers' compliance with our Supplier Code of Conduct and to correct any identified deficiencies in a timely manner. TWE also requires our suppliers to notify us if they become aware of an actual breach or reasonable likelihood of breaching of the Code.

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. TWE will work with our suppliers to assess whether they are meeting the Code in a variety of ways including governance meetings, reports, questionnaires and audits. The approach will be based on the nature of the risks, and the category of the goods or services being provided.

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.