



FOLEY WINES LIMITED
(“FWL”, “the Company”)

MODERN SLAVERY AND WORKER EXPLOITATION POLICY

1. Introduction

Foley Wines Limited (“FWL”, “the Company”, “we”, “us”, “our”) is committed to upholding the highest standards of ethical conduct and respect for human rights in all aspects of its operations. This policy outlines our commitment to preventing modern slavery and worker exploitation within our organisation and supply chains.

2. Policy Statement

FWL condemns all forms of modern slavery, including forced labour, human trafficking, child labour, and other exploitative practices such as debt bondage and forced and compulsory labour. We are committed to ensuring that our employees, contractors, and suppliers are treated with dignity and respect and are afforded fair and safe working conditions.

3. Compliance with Laws and Regulations

- a. FWL will comply with all relevant laws and regulations related to modern slavery and worker exploitation in New Zealand, including the Crimes Act 1961 and the Employment Relations Act 2000.
- b. We will also adhere to international standards and guidelines, such as the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights.

4. Due Diligence

As part of our initiative to identify and mitigate risk we will:

- Identify and assess potential risk areas in our supply chains and with suppliers.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers (Refer to FWL Code of Ethics Policy for further information on whistle blower protection and support).
- Where appropriate, carry out due diligence checks against individuals and corporate entities.

5. Transparency and Accountability

FWL will promote transparency and accountability in our operations and supply chains by providing stakeholders with information about our efforts to prevent and address modern slavery and worker exploitation.

6. Training and Awareness

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training for relevant staff (i.e supply chain, those dealing with large supply of contract labour, etc.) on what modern slavery is, how to identify it and how to take measures to report and eliminate it.

Training on this Policy, and on the risk of our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and ongoing training and/or updates will be conducted (as necessary) at regular intervals.

7. Reporting Mechanisms

a. FWL encourages employees, contractors, and other stakeholders to report any concerns or suspicions of modern slavery or worker exploitation promptly. You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

b. Reports of modern slavery or worker exploitation will be investigated promptly and thoroughly, and appropriate remedial action will be taken if necessary. FWL will not tolerate retaliation against individuals who report violations of this policy in good faith.

8. Continuous Improvement

FWL is committed to continuous improvement in our efforts to prevent and address modern slavery and worker exploitation. We will regularly review and update this policy and associated procedures to reflect changes in laws, regulations, and best practices.

9. Conclusion

FWL reaffirms its commitment to combating modern slavery and worker exploitation and promoting ethical labour practices throughout our operations and supply chains. By working together with our employees, contractors, suppliers, and other stakeholders, we can create a workplace where every individual is treated with dignity and respect.