

Delegat Group's FY20 Section 54 Modern Slavery Act Statement

Policy

Delegat Group's policy is a zero tolerance position to modern slavery.

Introduction

The Delegat Group is committed to robust practices to combat and eliminate slavery, forced and compulsory labour and human trafficking. We have implemented a Modern slavery policy and taken steps to comply with the Modern Slavery Act 2015 and to improve transparency in our supply chains and with contractors and any other organisations we work with. This statement is made under section 54 of the Modern Slavery Act 2015.

Organisation's structure

At Delegat Group we are building a leading global Super Premium wine company. Established and majority owned by the Delegat family, our business has grown more than eighteen fold since 2003. To support our future growth plans, the Group has invested in state-of-the-art wineries and world class vineyards in the prime grape growing regions of New Zealand and Australia. We focus exclusively on making the world's most sought-after Super Premium wines and brands. Our Super Premium brands are regarded as category benchmarks, sought out by aspirational wine lovers looking to experience the leading wines from the world's most recognised wine regions.

Scientifically and sustainably-led viticulture management of our own world-class vineyards in Marlborough, Hawke's Bay and the Barossa Valley, underpins the supply and consistency of quality of our renowned Super Premium wines.

Consistent Super Premium wine quality is achieved through our state-of-the-art wineries, regarded as some of the most technologically advanced winemaking operations in the world. Our distinctly regional wine styles are some of the most sought after in the world today.

With our own dedicated sales teams in the United Kingdom, United States, Canada, Australia, China and New Zealand, we directly partner with some of the world's most recognised wine retailers and venues to lead Super Premium category growth.

Delegat Group has been in business for over 65 years, employs more than 400 people and operates in over 15 countries around the world.

The Group has a global annual revenue of NZ\$278 million.

Our Business

The Delegat Group of companies includes:

- Delegat Limited
- Delegat Europe Limited
- Delegat Australia Pty Limited
- Delegat USA, Inc.
- Delegat Canada Limited
- Barossa Valley Estate Pty Limited
- Delegat (Shanghai) Trading Co. Limited

Our Supply Chains

Delegat takes a zero-tolerance approach to slavery, forced or compulsory labour and human trafficking. Our supply chains both in New Zealand and overseas are expected to act in a way that is consistent with the letter and spirit of our Code of Ethics Policy Statement.

The main Modern Slavery risk affecting Delegat is in relation to the use of contracted viticulture workers and overseas suppliers of raw materials. Delegat will ensure compliance through the use of specific modern slavery contractual terms, engaging in discussion and reviews around the issue with our key suppliers, performing regular site visits with our existing supply chain suppliers, carrying out due diligence prior to appointment of new suppliers and conducting regular or periodic reviews.

Our policies on slavery and human trafficking

We have implemented a Group-wide Modern Slavery Policy reflecting our commitment to act ethically and with integrity in all of our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Delegat has implemented a Whistleblowing Policy so that employees can confidentially report any suspected or actual legal or ethical wrongdoing.

On joining Delegat, employees are provided with access to our Code of Ethics, Modern Slavery and associated policies as part of their induction.

We will continue to seek to work in partnership with our suppliers and customers to support their own modern slavery initiatives.

Due diligence processes for slavery and human trafficking

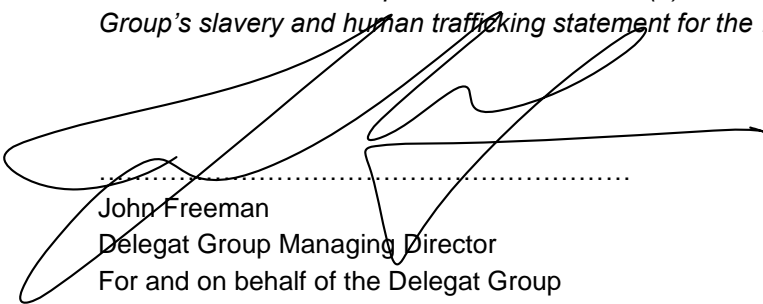
As part of our initiative to identify and mitigate risk we will:

- Identify and assess potential risk areas in our supply chains and with suppliers.
- Monitor potential risk areas in our supply chains.
- Protect whistleblowers.
- Where appropriate, carry out due diligence checks against individuals and corporate entities.

Training

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.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ended 30 June 2019.



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John Freeman
Delegat Group Managing Director
For and on behalf of the Delegat Group

Dated *23 June 2020*

Approved by the Board of Directors of Delegat Group on 23rd June 2020