

# MODERN SLAVERY STATEMENT 2020



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THIS STATEMENT IS APPROVED BY COCA-COLA AMATIL'S BOARD OF DIRECTORS AND GROUP LEADERSHIP TEAM. IT SETS OUT THE STEPS THAT WE, COCA-COLA AMATIL, HAVE TAKEN ACROSS THE AMATIL GROUP TO ADDRESS THE RISKS OF MODERN SLAVERY IN ANY PART OF OUR BUSINESS, OPERATIONS OR SUPPLY CHAINS.

**TOGETHER WE WILL.  
EVERY EMPLOYEE AND SUPPLY PARTNER  
PLAYS A ROLE IN ENSURING WE RESPECT AND  
UPHOLD HUMAN RIGHTS, AND MAKE A POSITIVE  
CONTRIBUTION TO THE WORLD.**

LEARN MORE IN THIS STATEMENT ON [CCAMATIL.COM](http://CCAMATIL.COM)

# EXECUTIVE SUMMARY

At Coca-Cola Amatil (“Amatil”) we seek to make a positive and distinctive contribution to the communities and markets in which we operate. Ensuring that our business respects and upholds human rights is fundamental to this. We recognise the importance of our obligation to observe and promote internationally recognised human rights in the way we conduct our business. We acknowledge that the risk of modern slavery may exist throughout our operations and supply chains and this, our first Modern Slavery Statement, sets out the steps we are taking to identify and manage those risks. This Modern Slavery Statement covers calendar year 1 January 2020 to 31 December 2020.

Our commitment, which also extends to our supply chain partners, is set out in Amatil’s Human Rights Policy and Responsible Sourcing Guidelines (RSG) and equivalent policies of The Coca-Cola Company (TCCC), our major brand partner and a significant shareholder. Combined, these policies and guidelines aim to provide the foundations for a workplace for our people that is safe, diverse, respectful and reflects our expectation that our supply chain partners operate in the same way. Further they enhance internal awareness of human rights – with a focus on Supply Chain, Procurement, Legal, Risk, Public Affairs & Communications and People & Culture.



Amatil’s Code of Conduct further embeds the principles set out in these policies and guidelines to ensure that our business practices are ethical, legal and align with one of our core values of being straightforward and open.

At Amatil we are committed to continually improving our operations, and those of our partners, by identifying, preventing and mitigating modern slavery risks. While we have made good progress, we recognise this is a journey and we will continue to enhance and implement the policies, frameworks and world class practices which underpin them, across every aspect of our business and supply chains.

Every employee, and supply partner plays a role in making that a reality.

## OUR FRAMEWORK

We have a comprehensive framework in place to identify and mitigate modern slavery risks across our business operations and supply chain and recognise this is a process of continual improvement.



# A MESSAGE FROM OUR GROUP MANAGING DIRECTOR, ALISON WATKINS

Human rights are a fundamental priority to Amatil, our people and our partners across all of our countries of operation. We recognise that as a large regional manufacturer, distributor and seller of beverages, we have a responsibility to lead by example.

Management of human rights makes good business sense as it directly affects our company's social licence to operate and grow and failing to anticipate and address Human Rights contraventions represents a major safety, business and reputational risk. At Amatil we are building a culture of relentlessly assessing and anticipating risk within our operations and supply chain, and modern slavery is at the forefront of this. This is not something that Amatil can lead on alone; we recognise the importance of partnerships with NGOs, supply partners and other stakeholders in enabling us to address these issues.

At Amatil we have developed our People Pact, a clear statement of the mutual commitment between Amatil and our people. It is a statement of what and how we will achieve together. Our People Pact is structured around the things that matter most to their engagement and our organisational success, these include: Our Vision and Strategy, Our Values, Leadership, Our Contribution and Our Brands.

Our People Pact works alongside our Values by outlining the collective behaviours and actions to ensure we perform at our best and achieve our Vision and Strategy. Our Amatil Values form the basis of how we operate and they guide our behaviours and our decisions every day.

At Amatil we take the initiative and own the outcome – we are responsible for our actions and when we see an opportunity, we make it a reality. We are straightforward and open in our communication – we are transparent in our facts, aim to simplify communication and provide an environment where everyone is comfortable to speak up. We focus on today and tomorrow – we never compromise on our values for a short-term win.

Our commitment to the human rights of all workers within our business and across our supply chains underpins our Values and the standards and behaviours we expect of our partners. The Amatil Board of Directors recognise the importance of identifying, remediating and mitigating the risk of Modern Slavery throughout our businesses and supply chains and regularly challenges Management on our actions towards delivering on our commitment.

Whilst there has been no evidence of modern slavery in our business and supply chains during 2020 we did identify processes that required addressing with some suppliers in Indonesia and we have worked with our partners to improve the way work hours are recorded and documented. We know that this is a process of continual improvement, engaging with our business and supply chain partners, to reduce the vulnerability of workers in our supply chains and deliver on our commitment to respect human rights.

This Statement was approved by the Board of Coca-Cola Amatil Group Ltd.



**ALISON WATKINS**  
GROUP MANAGING DIRECTOR



Amatil's People Pact launched in 2016.



# OUR BUSINESS

Coca-Cola Amatil Limited is an Australian Securities Exchange-listed company and operates across Australia, New Zealand, Indonesia, Papua New Guinea, Fiji and Samoa. As a brand owner and partner to a range of iconic businesses, we prepare, distribute and sell drinks including sparkling beverages, water, sports, energy, fruit juices, iced tea, flavoured milk, coffee, beer, cider and spirits. Through our relationships with more than 630,000 active retail customers, our products have the potential to reach more than 270 million consumers across the region.

In 2020, Amatil's group revenue was valued at around A\$4.7 billion, this was a decrease 6.1% on the prior year with volumes down 8.4% and net profit after tax down 13.6%. The full year results reflected the challenges of operating through the COVID pandemic during the year.

In conducting our business, we are committed to building a sustainable future, fostering growth and delivering long-term value to our shareholders and the broader community. By way of example, in Australia, seven out of every ten of our plastic bottles are made from recycled material, and we play a central role in container deposit schemes in South Australia, New South Wales, Queensland, Western Australia, the ACT and the Northern Territory. We continue to make real progress towards our goal to reduce sugar in our drinks with a target of 20% by 2025. In line with the Voluntary Tax Transparency Code, Amatil publishes a detailed report which discloses the tax contributions that we make to Australian State and Federal governments each year.

## OUR REGIONAL FOOTPRINT

We employ around 12,000 people and create thousands more jobs in the communities in which we operate. Across this team we work as one, united by a shared purpose and common values.

### IN AUSTRALIA

- Amatil has 3,400 employees
- 9 production facilities
- 32 production lines
- 11 warehouses

### IN INDONESIA

- Amatil has 5,800 employees
- 8 production facilities
- 37 production lines
- 14 warehouses

### IN FIJI

- Amatil has 300 employees
- 1 production facility
- 4 production lines
- 2 warehouses

### IN NEW ZEALAND

- Amatil has 1,000 employees
- 4 production facilities
- 11 production lines
- 2 warehouses

### IN PAPUA NEW GUINEA

- Amatil has 825 employees
- 2 production facilities
- 5 production lines
- 7 warehouses



## REPORTING ENTITIES COVERED BY THIS STATEMENT

Our ability to perform, deliver and achieve our growth aspirations is underpinned by a Strong Organisation with strong, accountable businesses, a One Amatil mindset led by the Group Leadership Team, and a lean Group centre that safeguards and shapes our future.

Coca-Cola Amatil Limited and its subsidiaries (referred to as 'Group') includes three business: Australia, Pacific (including New Zealand, Fiji and Samoa), and Indonesia and Papua New Guinea ('PNG'). These businesses prepare, bottle, distribute, market and sell a broad and exciting portfolio of beverages to more than 270 million consumers.

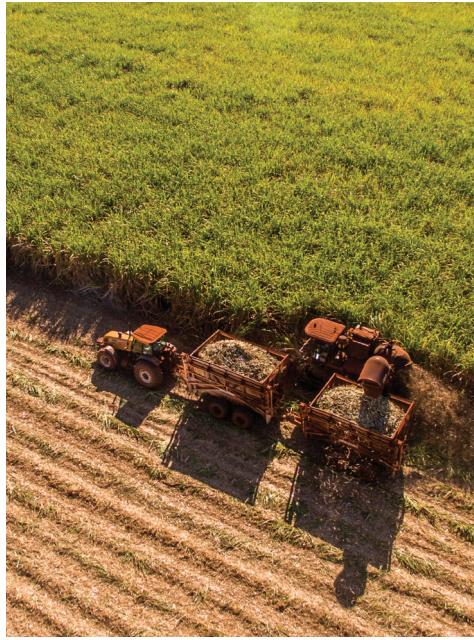
This is a statement of Coca-Cola Amatil (Aust) Pty Ltd for the purposes of the Modern Slavery Act (Commonwealth) 2018. Other than Coca-Cola Amatil (Aust) Pty Ltd, no other Group entity meets the reporting entity criteria under the Modern Slavery Act (Commonwealth) 2018. However, this statement also represents Amatil's approach and expectations across the Group.

A complete list of the entities in the Group as at 31 December 2020 (including ownership percentages) is set out in Amatil's 2020 Financial and Statutory Reports, which is available at [www.ccamatil.com.au/Investors/Financial-Reporting](http://www.ccamatil.com.au/Investors/Financial-Reporting).

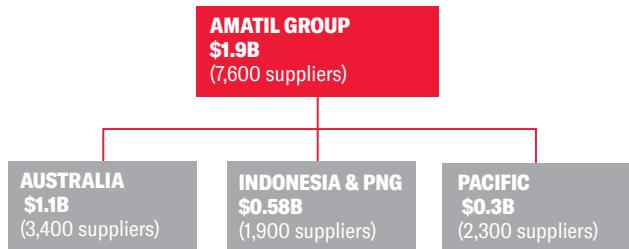
## CONSULTATION WITH CONTROLLED ENTITIES

Where Coca-Cola Amatil held a "controlling interest" in an entity during FY20 we met with the appropriate organisational representative to raise awareness of our policy framework and to ensure they are taking the appropriate steps in mitigating modern slavery risks within our business and supply chains. During FY21 we will work to ensure we have a similar process in place with entities where Coca-Cola Amatil holds a minority equitable interest, this will include communicating our expectations and providing policy documentation outlining our expectations and offering support as required.

# OUR SUPPLY CHAIN



Amatil's suppliers are critical, and committed, partners to our business. We source products from over 7,000 suppliers from across 20 countries and spent A\$1.9 billion with them in 2020. Approximately 90 per cent of our spend is with 20 per cent of our suppliers.



We believe that together with our suppliers we can drive positive and lasting social, environmental and economic improvements and outcomes. We recognise that we have a broad range of suppliers from around the world and it is up to us to practice responsible procurement practices, and to maintain a focus on human rights.

Our largest spend category is concentrates and syrups which are supplied by our brand partners and other third parties. Our largest Amatil-managed spend category is packaging materials and represents 31% of the balance of Amatil's yearly spend. This category consists of direct materials including aluminium cans, glass bottles, PET resin, closures and bag in box. It is complemented by our secondary packaging portfolio which includes corrugated and carton board, shrink and stretch film. Currently ~80% of Amatil's packaging requirements are manufactured locally with approximately ~40% of inputs sourced overseas from countries including the US, Vietnam, Taiwan, Thailand, Korea and China. Our second largest managed category is logistics services and accounts for 18% of our spend with the majority of this being road transportation services provided within Australia and our other markets of operation

followed by ocean freight and local freight requirements. Our third largest category is raw materials (which represents 12% of our spend) with Sugar representing 70% of this spend and Juice accounting for 13%. Almost 90% of Amatil's sugar is sourced via responsible Bonsucro and BMP Smartcane, which are globally recognised accreditation schemes and almost 60% of our juices are sourced under the TCCC Sustainable Agriculture Guiding Principles (SAGP).

Amatil manages its suppliers within a supplier framework called Partner for Growth. The framework segments our entire supply base and allows us to invest time and effort appropriately. The audit and assessment processes required of our suppliers reflect their position as a partner, strategic or tactical supplier to Amatil.



AMATIL'S SUPPLIER NETWORK IS MANAGED USING THE PARTNER FOR GROWTH FRAMEWORK

Strategic suppliers play a key role in Amatil's continued effort to be leaner and more agile. They have a proven track record of high performance and an excellent reputation for quality goods and services. The focus is on long term high performance and driving productivity initiatives to deliver effective, efficient relationships. Examples of strategic goods and services include packaging, ingredients, logistics and cold drink equipment.

Tactical suppliers make up the balance of our supplier base. The focus is on short term performance, with great quality, service and value as minimum requirements.

Irrespective of size, all our suppliers are expected to operate in accordance with Amatil's responsible sourcing guidelines which includes our expectations on mitigating modern slavery.

# OUR GOVERNANCE FRAMEWORK

Amatil's Human Rights Policy and Code of Conduct are approved and regularly reviewed by the Amatil's Risk and Sustainability Committee of the Board.

Amatil's Risk and Sustainability Committee of the Board and Group Leadership Team are focused on achieving the highest standards of corporate governance in the implementation of our Human Rights Policy. This includes monitoring the outcomes of regular assessments of human rights risks and issues via independent audits, with remediation and preventative actions noted and tracked. Amatil provides annual reporting on its responsible sourcing activities across the supply base, including specific issue monitoring.

Our expectation is that our governance framework is applied consistently across all markets. Visit [ccamatil.com](http://ccamatil.com) to read our 2019 Corporate Governance Statement.

## CODE OF CONDUCT

Amatil's Code of Conduct - How We Do Business ("Our Code") sets our expectations for anyone and everyone who works with or for us. We aspire to continue to create millions of moments of happiness and possibilities for all our stakeholders and build a strong, sustainable Amatil that we can continue to be proud of.

Our Code is not intended to be all encompassing, it is a set of principles which complement the policies, procedures, standards and guidelines in place across our businesses.

## OUR HUMAN RIGHTS POLICY

At Amatil, we are committed to an inclusive workplace with equal opportunity. We do not tolerate discrimination based on race, gender, colour, national or social origin, religion, age, disability, sexual orientation, gender identification or expression, or political opinion. We are committed to ensuring that people are treated with dignity and respect.

Amatil's Human Rights Policy is guided by international human rights principles encompassed in the Universal Declaration of Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact, the United Nations Permanent Forum on Indigenous Issues and the United Nations Guiding Principles on Business and Human Rights.

Our Human Rights Policy further outlines our commitment to supporting human rights and provides a consistent approach to ensuring our workplace, our supply chain and our community are safe, lawful, and diverse – respectful and responsible everywhere, every day. We are committed to identify, prevent, and mitigate adverse human rights impacts resulting from or caused by our business activities, before or if they occur, through human rights due diligence and mitigation processes.

Employees and managers are empowered to recognise and address human rights risks and issues as they conduct their work and this extends to the

arrangements we agree with worker and trade unions, membership of which is always fostered by Amatil. Amatil also commits to regular assessments of human rights risks and issues through independent audits which are reported to the Risk and Sustainability Committee of the Board and remediation and preventative actions are noted and tracked.

We are also committed to working with and encouraging our partners and suppliers to uphold the principles in this Policy and to adopt similar policies within their businesses.

## OUR RESPONSIBLE SOURCING GUIDELINES

At Coca-Cola Amatil we recognise the importance of ethical and sustainable procurement practices that support our business and sustainability goals. We believe we can play an active role in driving positive social, environmental and economic improvements in our supply chain that create benefits for our communities and society as a whole.

We recognise that we have a broad and diverse range of suppliers from around the globe and therefore it is imperative that we require of them the highest ethical and professional standards. In our endeavours to work closely with our suppliers, we aim to work only with those that adhere to or exceed our Responsible Sourcing Guidelines (RSG). Irrespective of size, all Amatil suppliers are expected to operate to the standards outlined in our policy framework.

These guidelines, along with The Coca-Cola Company's Supplier Guiding Principles, provide our suppliers with the framework of standards and procedures we expect them to adhere to.

## SUPPLIER GUIDING PRINCIPLES

The Coca-Cola Company Supplier Guiding Principles (SGPs) set out the minimum requirements we expect of our suppliers in areas such as workplace policies and practices, health and safety, human rights, environmental protection and business integrity.



It is a minimum contractual requirement that suppliers over a specified spend level and/or those who are considered from a high-risk category, undertake a physical SGP audit prior to supplying Amatil, and throughout the contract term in accordance with relevant risk levels.

## SUSTAINABLE AGRICULTURE GUIDING PRINCIPLES

In recognition of the increased risk of Modern Slavery in the agricultural supply chain we have developed Sustainable Agriculture Guiding Principles (SAGP), in partnership with The Coca-Cola Company. The SAGPs cover the Coca-Cola System's key agricultural ingredients and define the standards we expect our agricultural ingredient suppliers to adhere to in terms of human and workplace rights – including prohibitions on modern slavery and child labour, the environment, and management systems. We apply these common SAGPs to the key agricultural ingredients that we purchase – which includes sugar, juices, as well as tea and coffee.

## SUPPLY CONTRACTS

Amatil's standard supply contracts impose specific anti-slavery obligations on suppliers, including the express undertaking that the product or services provided by the supplier, or suppliers' supplier, are not the product of modern slavery practices or contraventions of any human rights. Where we find evidence of modern slavery or have cause for concern we will take action to remediate with our supply partner. Failure to respond to this action could result in supply suspension or termination.

## REMEDIATION

We review the findings of all our supplier audits including both physical and online platforms. Where concerns are identified we work with the supplier to agree a course of corrective actions to address the findings and this includes both timings and scheduling a follow up audit.

Expectations of suppliers are available under the Supplier Information section of [ccamatil.com](http://ccamatil.com).



# IDENTIFYING RISKS

## OUR APPROACH

We recognise the risk of modern slavery existing within our own business operations and throughout our supply chain. At Amatil, we have zero tolerance for work practices or other activities which:

- contravene the human or other legal rights of any person we employ, contract or who is otherwise connected with our supply chain; and
- are not representative of “doing business the right way” and in accordance with our Code of Conduct.

Amatil recognises that review and management of human rights risks across our organisation and within our supply chain is an ongoing process.

In evaluating our business operations and supply chains we have identified our highest modern slavery and human rights risks and implemented a framework to manage them. Our major sources of risk are across contract labour, both within our own and supplier sites, raw material supply and packaging raw materials.

The table below provides examples of our sources of risk and the frameworks we have in place to outline our expectations of how workers are treated within our supply chains and the actions we take to identify and mitigate modern slavery.

EXAMPLE	DOWNSTREAM (TIER 2+)	SUPPLY CHAIN (TIER 1)	OUR BUSINESS
<b>Source of risk</b>	Packaging feedstock	Raw materials	Contract Labour
<b>Governance</b>	Human Rights Policy RSG	Human Rights Policy RSG	Human Rights Policy Code of Conduct RSG
<b>Mitigation</b>	SGP Audits Ad Hoc Audits	Supplier Onboarding RSG Signatory SAGP/SGP Audits Ecovardis* Human Rights Training	Supplier Onboarding RSG Signatory SGP Audits Supplier Site Audits Ecovardis* Human Rights Training

\*Third party sustainability assessment platform

## OUR PERFORMANCE

The TCCC SGP framework involves a physical site audit of 169 sites across the Amatil network of operations and supply chains, each audit is on a 3 year cycle. Despite COVID, during 2020 Amatil continued to assess the risk of modern slavery both within our operations and supply chains and whilst no evidence of modern slavery was identified, we did identify some areas of concern in relation to the recording of work hours where we are taking action to improve supply chain knowledge of processes and local legislation.



## OUR BUSINESS

Of the in-scope Amatil sites auditable under the SGP framework, all had a valid audit in place and a 93% compliance level was achieved. Areas for improvement across two Amatil sites in Indonesia included greater rigour around management of on-site third-party labour and improved awareness of changes to local employment conditions and laws. Steps were taken to increase education on local employment laws on our sites with additional training planned for Q1 2021.

## OUR SUPPLY CHAIN

Of the Amatil supplier sites applicable for audit under the SGP framework, all bar one had a valid audit in place and this unaudited site reflects changes to demand in Australia which will remove the requirement for goods and services to be supplied from this site beyond 2020.

In Indonesia and PNG, whilst no evidence of modern slavery was identified, opportunities for improvement were identified including improving the rigour around which employee rostering by third party service providers is managed and improving supplier awareness of changes to local employment conditions. Wherever issues or opportunities for improvement are identified, Amatil initiates plans to address the concerns raised with the supplier and these sites will be subject to follow up audits during 2021. To drive a process of continuous improvement across the supplier community, training is planned in Q1 2021 with all Indonesian suppliers to improve understanding of local law requirements and compliance.

A further 251 suppliers have undertaken assessment via the Ecovardis platform, this is 100% of in-scope suppliers and during 2020 no areas of concern have been identified.

# IDENTIFYING RISKS

## OUR WORKFORCE

At Amatil, 69% of our team members are employed directly and on permanent contracts. We understand the risks related to those team members operating through a third-party labour provider, and we are committed to ensuring our work environments are safe and compliant.

When selecting third party labour providers, for example, for contractors, labourers or security services, we evaluate a range of factors including their organisational structure, labour structure (i.e. permanent), employment tenure and require that each supplier undertakes an Amatil nominated third party assessment (SGP). Each of these steps provide greater visibility of the culture and relationship between an organisation and employee.

In line with our Value of being straightforward and open, we encourage our employees to report any potential or perceived human rights risk. In 2019 we began a mandatory Human Rights Policy training program across the Amatil Group.

A next step, in addition to continuing training, is to prioritise a more in-depth risk assessment in Indonesia, Papua New Guinea, Fiji and Samoa to evaluate consistency of application across all of Amatil's operations.



## CASE STUDY



## CONTINGENT LABOUR

Contingent labour is used by different functions across the Amatil Group, although the majority is within our supply chain function to support the seasonality of our operations. We recognise there is a higher risk of modern slavery within the contingent labour services we engage. Work is ongoing across all Amatil territories to ensure that contingent labour is engaged appropriately to enable business right-sizing and workforce flexibility whilst mitigating supply and modern slavery risk.

### WE TAKE IMPORTANT STEPS ACROSS EACH OF OUR BUSINESSES TO ENSURE WE:

- rebalance the number of contractors engaged to better align to the operational needs of the business
- develop processes and systems to track and review the contingent workforce to ensure compliance with local laws and international requirements, such as Human Rights
- complete checks and audits and implement corrective actions to safeguard our people have a continued focus on building awareness, education and tools to assist business leaders to understand risks when engaging contingent labour and adopt best practice
- maintain partnerships with trade unions and continue to bargain in good faith to produce and maintain industry leading Enterprise Agreement outcomes that deliver benefits for employees and Amatil whilst safeguarding the business.

### NEXT STEPS AND RECOMMENDATIONS:

- We will continue to implement the risk mitigation plans that are in place
- We will continue to undertake self-reviews of our contingent labour on a regular basis in addition to the annual Supplier Guiding Principles audit
- We will continue to monitor the industrial landscape of each region to enable a proactive approach to risk mitigation and best practice.

# IDENTIFYING RISKS

## OUR SUPPLY CHAIN

Our Responsible Sourcing Guidelines (RSGs) set out the requirements that all suppliers, direct or indirect (e.g. suppliers of our suppliers) and approved sub-contractors must abide by. Our expectation is that all suppliers and approved sub-contractors comply with the following in order to do business with Amatil and implement the necessary governance processes to ensure compliance with our standards:

- All suppliers are required to sign Amatil's RSG Signatory;
- Complete an EcoVadis assessment (if annual spend >AUD\$200K); or
- Complete The Coca-Cola Company (TCCC) Supplier Guiding Principles (SGP) audit (if a TCCC packaging or ingredient supplier with annual spend over AUD\$60K) or SAGP if supplying agriculturally based products.

An external auditor was engaged to conduct a pre-assurance audit on Amatil's 2020 progress against our sustainability goal of screening 80 per cent of supplier spend using responsible sourcing criteria and validated a result of over 90% (this total excluded PNG, Fiji and Samoa). This result was delivered through 53 per cent of spend assessed via SGP, 23 percent assessed via Ecovadis and the balance assessed via local business RSG.

These physical and non-physical assessments enable Amatil to identify potential risks and take corrective action to address them.

## CASE STUDY PLASTIC

In 2019 an SGP audit of an international plastic packaging supplier detected a modern slavery finding within their supply chain relating to recruitment and service fees.

A corrective action plan was developed with the supplier and the issues were corrected expediently, this included repayment of funds and education of local employment laws. A follow up audit was completed to confirm resolution of the issue and appropriate mechanisms were introduced to avoid a similar issues in future.



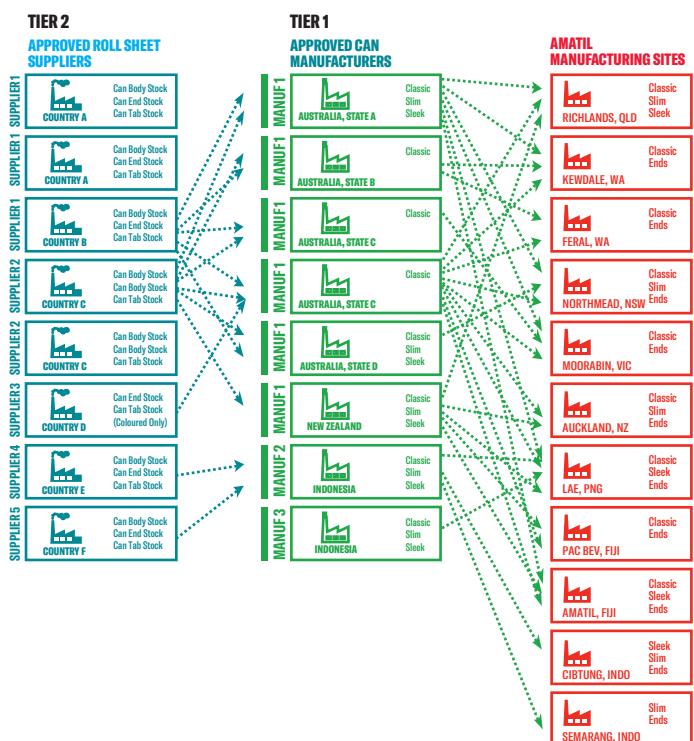
Furthermore, the supplier was placed onto a more frequent audit plan to enable close monitoring of future performance. This event demonstrated the effectiveness of Amatil's current processes to identify modern slavery within our supply chain enabling us to take action to address concerns.



## SUPPLY CHAIN MAPPING

Historically Amatil's assessment framework has been driven by supplier spend. During 2020 a supply chain mapping process was undertaken across major supply categories to understand Amatil's supply chain beyond our tier 1 supplier base. Through this process our Procurement team has been able to overlay Amatil's modern slavery risk framework by country and category, to identify additional audit requirements as a result of heightened modern slavery risk. Whilst no additional physical audit requirements were noted over and above the planned audit schedule, this will be an annual exercise to continually monitor in future.

### AMATIL'S ALUMINIUM SUPPLY CHAIN MAPPING



# IDENTIFYING RISKS

## ENCOURAGING OUR PEOPLE TO SPEAK UP

Amatil's Whistleblower Protection Policy has been established to provide a safe and confidential environment where concerns regarding unethical, illegal or inappropriate behaviour may be raised without fear of reprisal. It is a confidential process with details available on both Amatil's Intranet and external website, [www.ccamatil.com](http://www.ccamatil.com). Details of Amatil's Whistleblower Protection Policy are also included in tender processes undertaken with external suppliers.

When a report is made under the Whistleblower Protection Policy, a confidential four-step process is undertaken by one of Amatil's Whistleblower Protection Officers (WPOs) to investigate the disclosure and protect the whistleblower's anonymity. Amatil's Risk & Sustainability Committee of the Board receives quarterly reports on all active whistleblower matters, including investigations and follow up matters.

- an officer or employee of Amatil, including permanent, part-time or secondments;
- a supplier of products and services to Amatil, whether paid or honorary, including contractors, consultants, agents;
- an associate of Amatil or
- a parent, grandparent, child, grandchild, sibling, spouse or partner.

### 5.1 WHAT MAY A PROTECTED DISCLOSURE BE?

We encourage people to make disclosures about a broad range of issues, including:

- conduct that amounts to a criminal offence or contravenes a law of the Commonwealth or State;
- conduct that is a Commonwealth criminal offence, possibly involving conduct, such as fraud, theft, corruption, bribery and/or corruption;
- fraud, money laundering or misappropriation of funds;
- reckless, negligent or misleading conduct of health and safety, environmental, financial or operational nature;
- conduct that poses a significant risk to public safety;
- any conduct that may indicate a serious issue in relation to any business behaviour and practices that may cause damage to the reputation of Amatil;
- conduct that appears to be in breach of environmental policies;
- conduct that violates health and safety laws;
- other misconduct concerning corporate governance, in engaging in or threatening to engage in detrimental conduct, or in the handling of confidential information;
- unauthorised use of Amatil's confidential information;
- anti-competitive behaviour;

### 5.2 PERSONAL WORK-RELATED GRIEVANCES

A personal work-related grievance means a grievance that is experienced by an employee, whether it relates only to their inclusion (but are not limited to):

- conduct that amounts to a protected disclosure under section 4(1)(a) of the Policy;

### 5.3 Examples of eligible disclosures include:

- conduct that amounts to a criminal offence or contravenes a law of the Commonwealth or State;
- conduct that is a Commonwealth criminal offence, possibly involving conduct, such as fraud, theft, corruption, bribery and/or corruption;
- fraud, money laundering or misappropriation of funds;
- reckless, negligent or misleading conduct of health and safety, environmental, financial or operational nature;
- conduct that poses a significant risk to public safety;
- any conduct that may indicate a serious issue in relation to any business behaviour and practices that may cause damage to the reputation of Amatil;
- conduct that appears to be in breach of environmental policies;
- conduct that violates health and safety laws;
- other misconduct concerning corporate governance, in engaging in or threatening to engage in detrimental conduct, or in the handling of confidential information;
- unauthorised use of Amatil's confidential information;
- anti-competitive behaviour;

### 5.4 Examples of eligible disclosures include:

- conduct that amounts to a protected disclosure under section 4(1)(a) of the Policy;

### 5.5 Examples of eligible disclosures include:

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### 5.23 Examples of eligible disclosures include:

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# RISK MITIGATION

To manage our human rights obligations, risks, and the actions required to mitigate those risks, Amatil has implemented a strong governance framework.

It is recognised by Amatil that all our employees and supply partners have a role in identifying and mitigating the risks of modern slavery across our business. Our governance framework has been designed to drive compliance at all levels of our organisation.

Ownership starts within each of our businesses who drive implementation and compliance to our policies and frameworks.

At regular intervals, Amatil's Risk & Sustainability Committee of the Board and Group Leadership Team have strong visibility of the risks of modern slavery within our business operations and supply chain from across the Amatil business.

## OUR SUPPLY CHAIN

It is now a minimum requirement for any new supplier to Amatil to self-assess their operations against our RSG prior to commencing supply to Amatil. To support our Procurement team across Amatil in the management of supply chain modern slavery risk evaluation, reporting has been automated through a central 'Responsible Sourcing Dashboard' allowing Amatil to monitor compliance levels in real time. The dashboard is easy to navigate and enables category managers across the businesses to identify suppliers that are non-compliant and implement a corrective action plan to address this non-compliance.

In 2020, further steps have been taken to increase compliance with Amatil's Governance Framework, including the introduction of binding measures in all new contracts, and market tender documentation for the Australia businesses incorporating responsible sourcing clauses. As a condition of participation in any tender process, all new suppliers must acknowledge and sign a copy of Amatil's RSG. Work is underway to ensure a consistent approach is applied across each market in which we operate.

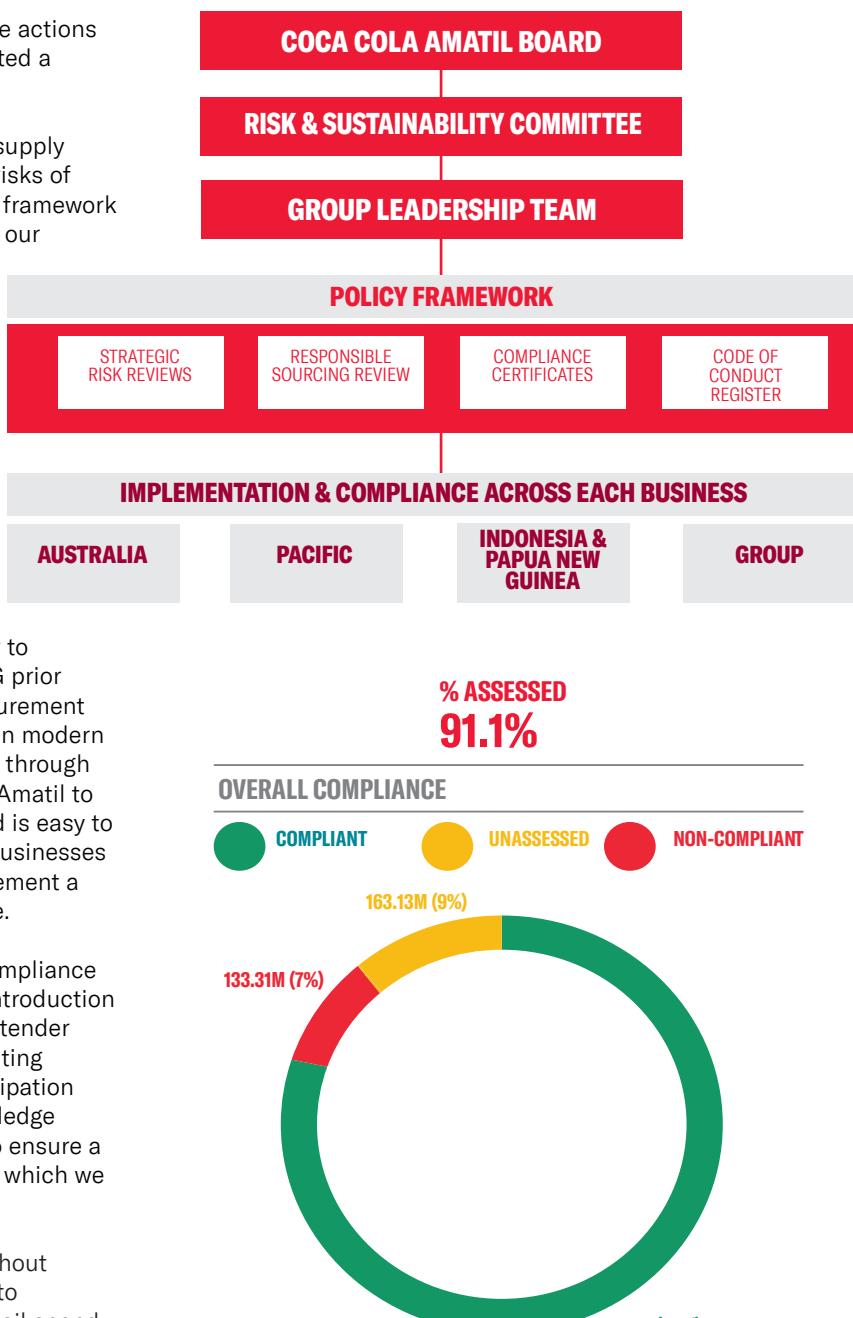
We recognise the risk of modern slavery exists throughout our supply chain. An opportunity for improvement is to improve our understanding of the risk in our smaller, tail spend suppliers. Work is underway in 2021 to further automate our risk management processes with plans to increase visibility of modern slavery risk across all our suppliers.

### CASE STUDY SUPPLY CHAIN - JUICE



A modern slavery risk for Amatil is in the supply chain of agricultural products – including the procurement of fruit and vegetables for juice.

In 2020, Amatil completed an assessment of its juice supply sources and identified 56 per cent of the suppliers of oranges, lemons, and apples are all SAGP compliant, and the balance, largely supplying orange juice, are SGP compliant.



Supplier spend data includes Papua New Guinea

Our Procurement team has undertaken detailed mapping of our juice supply chains across each of our businesses with sources including Australia, New Zealand, South America, Asia and the Middle East. As we continue to review supply partners within this category, we will work with our suppliers to transition to SAGP compliance.

# IMPACT OF COVID

We acknowledge the impact of the COVID-19 pandemic on the global community and we are concerned about the increased vulnerability of workers in local and global operations and supply chains. Along with the support of our partners, we continue to closely monitor how the response to the pandemic amplifies modern slavery risks (for example: sudden loss of income; excessive overtime and how we can help to prevent this:

- **Our Business** – Our priorities during COVID-19 have been to protect our people, support our customers and community and protect our future.
- **Our Supply Chain** – The impact of COVID on international business travel has impacted a small number of physical supplier audits. Until travel is resumed, the majority of these audits has been replaced by an Ecovadis desktop assessment. COVID-19 has reinforced to us the importance of our supply chain mapping work and the need for greater visibility of our supply chain to identify and respond to areas of risk that arise.



## CASE STUDY



## HOW WE'VE FACED COVID-19, TOGETHER

Protecting the health and safety of our people and those we work with is our overriding priority. During the COVID-19 pandemic our focus has been on the physical, mental and financial health of our people. To deliver this we:

- implemented physical distancing, sanitisation and hygiene routines
- introduced the Amatil Care program providing advice on financial support, crisis housing and accommodation. This was in addition to our 24/7 Employee Assistance Program which was also extended to employees' family, friends and customers in Australia
- found redeployment opportunities for team members whose roles were impacted by the pandemic
- conducted a review of all 'at-risk' workers and designed tailored plans with them to ensure their personal safety and wellbeing
- enabled and supported working from anywhere strategies in accordance with government guidelines – including a 'Work it Remotely' resource and online event program
- communicated with our people in the ways they preferred, including daily updates via a dedicated COVID-19 Workplace channel, and COVID-19 Intranet Site
- tailored resources and online training for our people and leaders including Leave guides, managing wellbeing in times of change, and work from anywhere tools
- launched a 'We're Listening' tool where team members could reach out to Amatil's Group Leadership Team to raise issues or concerns anonymously, or otherwise.

To ensure we were meeting the needs of our people through this challenging time, we conducted a pulse survey to guide our approach to the safety and mental health and wellbeing of our people and our results in (month) 2020 were:

**92%** of our people thought that Coca-Cola Amatil has been effective in managing the COVID-19 crisis.

**94%** said their manager genuinely cares about their health, safety and wellbeing in the current situation.

**87%** said they were having regular conversations about re-prioritising work resulting in positive redeployment opportunities.

# EFFECTIVENESS

At Amatil, measuring the effectiveness of our Modern Slavery Framework is important to us. In 2019 we engaged a third party to conduct an initial human rights risk assessment. This involved review of Amatil's policies and procedures, interviews of different Amatil management stakeholders and an internal workshop to identify and assess key human rights risks. The assessment identified various Amatil policies and processes that form part of our human rights due diligence, as well as recommended improvements to better address the key human rights risks, including for risks of modern slavery.

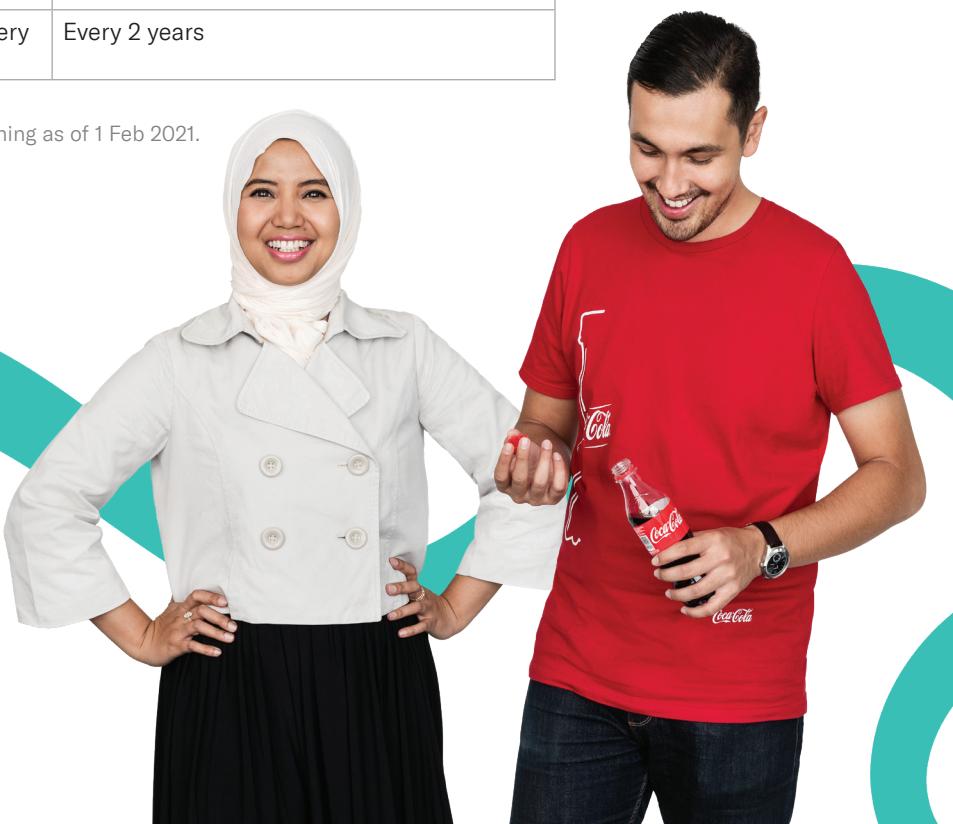
To ensure we continue to understand the effectiveness of this Framework and grow our culture of continuous improvement, we have put the following actions in place:

OUR ACTION		OUR PROGRESS
<b>1</b>	Reporting and review by Risk & Sustainability Committee of the Board visibility	Monthly, Quarterly and Annual reporting across policy framework
<b>2</b>	To have a comprehensive policy framework in place	Reviews of framework effectiveness undertaken every two years
<b>3</b>	Employee training on Amatil's Human Rights Policy	91.5% employees trained
<b>4</b>	Supplier spend <sup>1</sup> assessed against responsible sourcing criteria	Over 90% spend assessed
<b>5</b>	Employee Engagement Survey	68% employees comfortable speaking up about unethical behaviour without fear of reprisal
<b>6</b>	Whistleblower Protection Policy with reporting framework to Amatil's Risk & Sustainability Committee of the Board	22 issues raised, investigations undertaken and closed out during 2020
<b>7</b>	Employee training on Amatil's Whistleblower Protection Policy	74% of employees trained <sup>2</sup>
<b>8</b>	Internal risk assessment of Human Slavery Risk	Annual
<b>9</b>	Third party risk assessment of Human Slavery Framework	Every 2 years

<sup>1</sup> Supplier spend data excludes PNG, Fiji and Samoa.

<sup>2</sup> Proportion of employees that had completed the training as of 1 Feb 2021.

**91.5%**  
OF TEAM MEMBERS  
HAVE BEEN TRAINED  
ON AMATIL'S HUMAN  
RIGHTS POLICY.  
AS AT 31 DEC 2020.



# FUTURE FOCUSED



Identification and management of modern slavery risks form a core part of our Value Proposition and our sustainability ambitions and we will continue to increase our focus on identifying and mitigating modern slavery across Amatil's businesses and broader supply chains.

A third-party evaluation into our human rights and modern slavery frameworks recommended that we focus on improving our understanding and application of all internationally recognised human rights, and ensure they are embedded within our Human Rights Policy, which we have made progress on and recognise we have further room to improve.

We commit to continually improving our identification and management of modern slavery risk across all our operations and to evaluate risk by spend and category and continue to deep dive into higher risk supply throughout our supply chain.

This statement is made pursuant to section 13(1) of the Modern Slavery Act (Commonwealth) 2018. It constitutes the statement of Coca-Cola Amatil (Aust) Pty Ltd for the year ended 31 December 2020 and has been approved by the Board of Coca-Cola Amatil (Aust) Pty Ltd.

## JOIN THE CONVERSATION

For more information on Amatil's management of Modern Slavery within our business and our supply chains visit [ccamatil.com](http://ccamatil.com) and refer to our 2020 Annual Report and Sustainability Fact Sheets.

**HUMAN RIGHTS**  
2020 FACT SHEET

**RESPONSIBLE SOURCING**  
2020 FACT SHEET

**AT COCA-COLA AMATIL WE MAKE A DISTINCT AND POWERFUL CONTRIBUTION TO THE WORLD WE LIVE IN AND RESPECT HUMAN RIGHTS IS FUNDAMENTAL TO THIS**

**2020 ANNUAL REPORT**  
Celebrating 117 years of history

## CONTACT US

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