



# Brambles

## Modern Slavery Statement

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Financial Year Ending  
30 June 2020

Brambles Limited (ABN 89 118 896 021)  
Financial Year Ending 30 June 2020

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## Modern Slavery Statement 2020

Brambles Limited (ABN 89 118 896 021), on its behalf and on behalf of its Group Companies (collectively, “**Brambles**,” “**we**” or “**our**”) makes the following joint Modern Slavery Statement on slavery and human trafficking, addressing the risks of Modern Slavery<sup>1</sup> in any part of our business, operations or supply chains.<sup>2</sup> This statement is set out in the following 8 parts:

- Business and Organizational Structure
- Brambles’ Policy Framework
- Brambles’ Workforce and Supply Chain
- Risks of Modern Slavery in Brambles Operations’ and Supply Chains
- Actions to Assess and Address the Risks of Modern Slavery
- Assessing the Effectiveness of Our Actions
- Looking Forward
- Consultation with Our Group Entities

The reporting entities covered by this joint Modern Slavery Statement are Brambles Limited and CHEP Australia Limited.

### BUSINESS AND ORGANISATIONAL STRUCTURE

As a pioneer of the sharing economy, Brambles is one of the world’s most sustainable logistics businesses. Our circular business model facilitates the “share and reuse” of the world’s largest pool of reusable pallets and containers. This allows Brambles to serve its customers while minimizing the impact on the environment and improving the efficiency and safety of supply chains around the world.

Brambles primarily serves customers in the fast-moving consumer goods (e.g., dry food, grocery, and health and personal care), fresh produce, beverage, retail, automotive and general manufacturing industries, counting many of the world’s best-known brands among its customers. Brambles provides supply-chain logistics services to these customers, based upon its longstanding expertise in the management of reusable unit-load equipment such as pallets, crates containers and kegs.

#### Overview of Brambles’ Organizational Structure

Brambles carries out a supply-chain logistics business operating primarily through the CHEP brand. Brambles Limited, the ultimate holding company of the Brambles Group, is listed on the Australian Securities Exchange, and its registered office is located in Sydney, Australia. Brambles also has a corporate office in London, UK. Brambles operates in more than 60 countries, with its largest operations by headcount in Australia, the UK, the USA and South Africa.



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<sup>1</sup> Modern Slavery is based on the definition set out in the *Australian Modern Slavery Act 2018* (Cth) and includes trafficking in persons, slavery, servitude, forced marriage, forced labor, debt bondage, deceptive recruiting for labor or services, and the worst forms of child labor where children are subjected to slavery or similar practices or engaged in hazardous work.

<sup>2</sup> A list of Brambles’ principal entities is set out on page 115 of Brambles’ [2020 Annual Report](#).

Overview of Brambles' Operations

Brambles operates primarily through the CHEP brand and manages its businesses within the following operating segments:

|   |  |
|---|--|
|    | <p>CHEP specializes in the pooling of unit-load equipment and associated services, focusing on the outsourced management of pallets, crates and containers to customers globally.</p> <p>CHEP's circular business model is based on the concept of "share and reuse," also known as pooling. With the CHEP pooling system, customers rent pallets from CHEP and transfer them to the next user, without the need to return them to CHEP first. This share and reuse model makes CHEP's customers' supply chains more efficient and more sustainable.</p> <p>CHEP manages the administrative procedure, conditioning and quality assurance of the equipment, and in some cases the logistics of delivery and collection of equipment, allowing customers to focus on their core business.</p> |
|  | <p>BXB Digital leverages innovative digital and IoT technologies to deliver data-driven, end-to-end visibility and collaboration for Brambles' supply chains services worldwide.</p> <p>Our experienced supply chain and technology experts bring together a wealth of knowledge and experience from across the logistics management and asset tracking industries to provide global sustainable business solutions.</p> <p>Our complete, end-to-end supply chain management solutions are purpose built to address today's operational, quality, sustainability and business challenges for the perishable, frozen, fresh and consumer packaged goods industries.</p>   |
|  | <p>Kegstar rents, tracks, collects, maintains and repairs a pool of smart kegs to customers in Australia, New Zealand, the United Kingdom and Ireland, the Netherlands, and the USA.</p>   |

In each of these operating segments, Brambles rents, tracks, and maintains equipment, including pallets, crates, containers and kegs, and in some segments, Brambles leases facilities, including approximately 750 service centers where our pallets, crates, containers and kegs are repaired or washed, and may own or lease fleets to

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transport equipment to customers. Brambles also owns 10 pine timber farms and a sawmill and pallet manufacturing plant in South Africa. In each of these operating segments, Brambles employs workers, consistent with all applicable labor and employment laws and regulations.

Operating around the world, Brambles strives to create Better Communities and, amongst other things, supports food banks with volunteer hours, corporate donations and sponsorships and in-kind donations, allowing a seamless flow of platforms to receive food donations from brands and retailers, many of whom are Brambles' customers, for re-distribution. For more information about Brambles' commitment to Better Communities, please see Brambles' [2020 Sustainability Review](#).

### BRAMBLES' POLICY FRAMEWORK

Brambles has a robust policy framework, beginning with our Code of Conduct. Our Code sets out our commitment to responsible business practices and good governance, making clear that we are committed to doing what is right each and every day, and is supported by and references a range of Group policies, including our Human Rights Policy, our Zero Harm Charter, our Speak Up Policy and our Supplier Policy. Our Code of Conduct and these policies are available at [www.brambles.com](http://www.brambles.com).

#### The Code of Conduct

Brambles' Code of Conduct provides the ethical and legal framework for all employees in the conduct of Brambles' business. It sets out how Brambles relates to its customers, employees, shareholders, suppliers and the community. The Code applies to everyone working for Brambles and requires all its employees to comply with all applicable legal requirements, including all prohibitions against forced, bonded or compulsory labor, human trafficking or other kinds of slavery, at all times.

#### Human Rights Policy

Brambles' Human Rights Policy, which is incorporated in the Code of Conduct, was approved and adopted by the Brambles Limited Board of Directors in November 2016 and reviewed and updated in January 2020. This Policy, which articulates in a single, stand-alone document the various human rights principles advanced throughout Brambles' Code of Conduct, is guided by international human rights principles encompassed in the Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights. Amongst others, it prohibits—in Brambles' operations as well as those of its suppliers—the use of forced, bonded or compulsory labor, human trafficking or other kinds of slavery.

As a demonstration of its commitment to these principles, Brambles is a signatory to the United National Global Compact (UNGC) and continues to support the UNGC's Ten Principles in the areas of human rights, labor, environment and anti-corruption. Brambles' annual Communication on Progress can be found under Sustainability at [www.brambles.com](http://www.brambles.com). Further, in September 2016, Brambles signed the CEO Statement of Support for the United Nations Sustainable Development Goals, which includes a set of goals to end poverty, fight injustice and inequality, and protect the planet by 2030.

Brambles participates in Australia's Global Compact Network Modern Slavery Community of Practice, which allows Australian businesses to navigate new developments and share Modern Slavery learnings.

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### Zero Harm Charter

Brambles has also adopted a Zero Harm Charter. It sets out Brambles' commitment to achieving zero injuries, zero environmental damage and zero detrimental impact on human rights. The principles set out in the Zero Harm Charter, which is available on Brambles' website, include that every Brambles employee will care for the human rights of those affected by its operations.

### Speak Up Policy

Brambles encourages anyone to report suspected breaches of the Code of Conduct or any other policy, including the Human Rights Policy and the Zero Harm Charter. These complaints may be made through various channels, including the Brambles Speak Up Hotline. The Brambles Speak Up Hotline is a confidential hotline, operated in local language by an independent company, available to all employees and their families and all suppliers, suppliers' employees and their families at no charge 24 hours a day, 7 days a week.

All complaints are assessed and investigated as necessary consistent with Brambles' Speak Up Investigative Procedures.

### Supplier Policy

Brambles' Code of Conduct also provides that Brambles is committed to working with suppliers to develop more efficient, safer and sustainable supply chains by abiding by the principles and values outlined in the Code of Conduct. To that end, in 2013, Brambles adopted a Supplier Policy, which requires its suppliers to, amongst others:

- Conduct their businesses in accordance with the laws and regulations of the countries in which they are located;
- Show respect for the diverse range of people and cultures with whom Brambles work and their human rights;
- Abide by the same minimum working age requirements outlined in the human rights statement in the Code of Conduct; and
- Follow the principles in Brambles' Zero Harm Charter.

## BRAMBLES' WORKFORCE

Brambles employs approximately 12,000 employees globally. All employees are covered by the Brambles Code of Conduct and related policies such as the Human Rights Policy, Zero Harm Charter, Speak Up Policy and Supplier Policy, described above, and are expected to abide by their principles. These principles are reinforced through induction Code of Conduct training and refresher Code of Conduct training, which occurs every two years, to enable employees to understand what is expected of them and what to do in the event they suspect wrongdoing.

## BRAMBLES' SUPPLY CHAIN

Brambles purchases goods and services from more than 7,000 suppliers across the globe within the following categories:

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- Direct or Raw Materials
- Transportation
- Indirect Procurement
  - Real Estate
  - Plant Equipment
  - Professional Services
  - IT and Telecommunications
  - Human Resources Services and Resourcing
  - Facilities Management
  - Maintenance, Repair and Operation supplies
  - Fleet
  - Material Handling Equipment
  - Utilities
  - Travel
  - Marketing
  - Learning and Development
  - Office Services
  - Packaging

Direct materials, or materials used in our pooling equipment, are critical to Brambles' operations. Lumber, our primary direct material, represents the greatest proportion of our annual direct spend.

Brambles relies on sustainably sourced lumber and, in Financial Year 2020, we purchased 100% of our wood from certified sustainable lumber providers, whose forest management practices were certified by either the Forest Steward Council (**FSC**) standard or the Program for the Endorsement of Forest Certification (**PEFC**) standard (and locally endorsed standards). Before these certifications can be issued, these lumber suppliers must demonstrate, amongst others, that they protect and promote workers' rights and abide by applicable law. To maintain these certifications, the lumber suppliers must satisfactorily pass third party audits on an annual basis.

### **RISKS OF MODERN SLAVERY PRACTICES IN BRAMBLES' OPERATIONS AND SUPPLY CHAINS**

Brambles has adopted a risk management framework, which incorporates effective risk management as a part of Brambles' strategic planning process, requiring business operating plans to address the effective management of key risks and to embed a strong risk management culture. As a part of that framework, Brambles' headquarters and each of its businesses has a risk and control committee (**RCC**). Each RCC conducts an in-depth review on a regular basis of the risk profile of the relevant business unit, or of Headquarters, as the case may be, including their respective material economic, environmental and social sustainability risks and identifies and assesses the effectiveness of mitigants for those risks. Brambles also has established a Sustainability Risk Committee (**SRC**). The role of the SRC is, amongst others, to identify, assess, monitor and report on Brambles' exposure to sustainability risks, determining whether Brambles has a material exposure to any sustainability risks and monitoring new and emerging sustainability risks.

As the RCC and the SRC focus on risks to Brambles, in Financial Year 2020, Brambles also established a Human Rights Working Group (**HRWG**), which is comprised of members from Human Resources, Procurement, Legal and Compliance, and Sustainability, to assess Brambles' potential to cause, contribute to or be directly linked to Modern Slavery through its operations or its supply chains. This HRWG met with RCCs, the SRC, and each regional business unit and functional groups (including the Global Supply Chain team) to carry out a global

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Modern Slavery Risk Assessment to assess the risk of slavery and human trafficking in Brambles' operations and supply chains (**Assessment** or **Modern Slavery Risk Assessment**). Brambles believes, based on this Assessment, that the following Modern Slavery risks are the most relevant to our global operations and supply chains:

|   |   |  |   |
|---|---|--|---|
| <b>Human Trafficking</b><br>Bringing a person into a situation of exploitation through a series of actions, including deceptive recruitment | <b>Forced Labour</b><br>Any work which people are not doing voluntarily and which is extracted under a threat or form of punishment | <b>Bonded Labour</b><br><u>Labour</u> demanded as a means of repayment of a debt or loan | <b>Child Labour</b><br>Where children under the age of 18 are engaged in hazardous work |
|---|---|--|---|

### Modern Slavery Risk Assessment: Brambles' Operations

Brambles' personnel are employed directly by a Group Company. This, along with our policies, compliance training and internal hiring procedures consistent with our policies, lowers the risk of Modern Slavery in our own operations.

Nevertheless, some of our operations utilize contracted or third-party labor. As some contracted or third-party labor in our plants or service centers are immigrants, temporary migrant workers, or other vulnerable groups who may be less aware of their rights and, by extension, may be susceptible to exploitation, we focused our Modern Slavery Risk Assessment on these arrangements. Our Assessment examined the inherent risks, considering:

- Nature of the work: job requirements and corresponding skillset
- Geography: country reports on human rights practices and country condition reports
- Recruiting processes: labor recruitment policies and practices and transparency

This Assessment led us to conclude that our highest Modern Slavery risk in our operations was in plant operations, where some equipment builders or repair operators were engaged through staffing companies or third party labor providers which employ vulnerable populations. In response, and in addition to controls already in place as described on pages 10-12, we updated our Third Party Due Diligence Program (see the *Policies* section on page 11 below) so that any third parties providing such services to our operations underwent an enhanced form of due diligence, executed compliance terms and conditions, which include Modern Slavery provisions, and implemented a policy and standard operating procedure to guide Brambles' engagement of staffing companies or third party labor providers which utilize vulnerable populations. This procedure documents Brambles' onboarding approach to assessing staffing companies and includes checks to address the following criteria:

- Staffing company workers are not indebted or coerced to work or required to pay to work;
- Staffing company workers are free to move, and amongst other things, they are not forced to leave identity papers with their employers;

In Financial Year 2020, 22 staffing companies underwent risk-based due diligence consistent with Brambles Third Party Due Diligence Standard Operating Procedures. All successfully completed enhanced due diligence and were onboarded.



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- Staffing companies do not employ children under the age of 15 or children under the age of 18 in hazardous conditions;
- Staffing company workers have the right to enter or terminate their employment freely and without fear of retaliation. To this end, they receive employment agreements written in their native language; and
- Additionally, where staffing companies provide housing accommodation for workers, inspections are regularly carried out and the results, including recommended actions, are documented.

Once a staffing company worker commences work at a Brambles plant, our procedure also requires that they receive training, including safety, human rights and Speak Up training, and have or are provided personal protective equipment at no charge.

This procedure has launched in our operations in Malaysia and Thailand, and in Financial Year 2021, we aim to extend this standard operating procedure to additional operations.

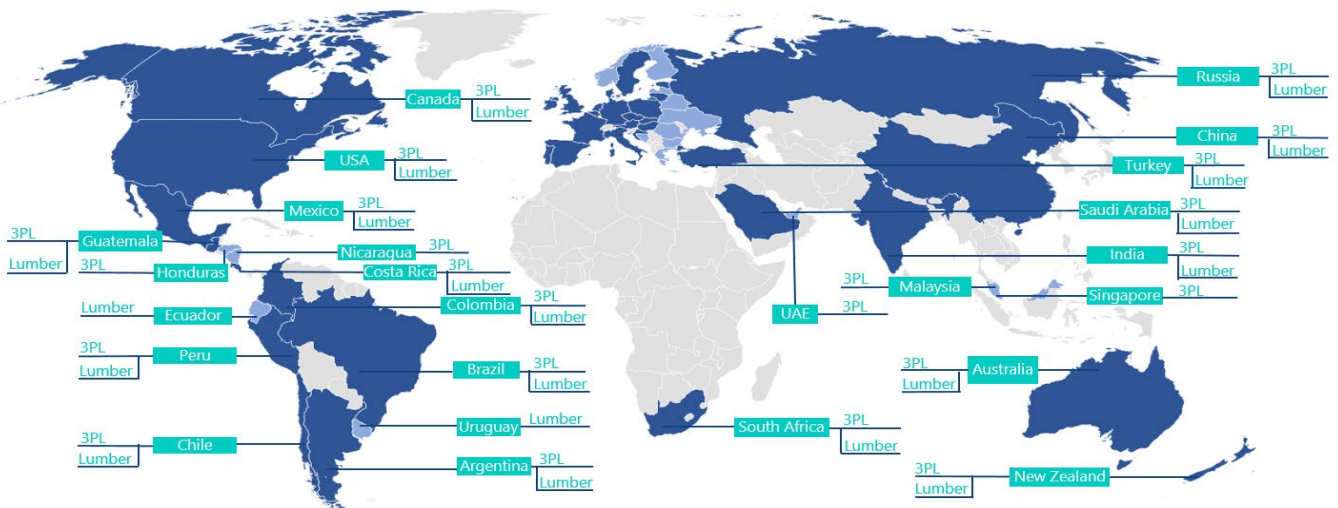
### Modern Slavery Risk Assessment: Brambles' Supply Chains

As set forth above, Brambles utilizes more than 7,000 suppliers from across the globe, presenting different Modern Slavery risks. In Financial Year 2020, and after considering the nature of the work provided by the suppliers, their geography, the transparency of their operations and the potential for recruiting processes, our Modern Slavery Risk Assessment has focused on two categories of suppliers: lumber providers and third party plant operators (**3PLs**). As described above, lumber providers supply the wood, from certified sustainable forestry operations, used to build or repair pallets. Third party plant operators, on the other hand, are third party suppliers who run some plants or service centers where our pallets are repaired. This necessarily requires that they employ and manage service center workers, some of whom may come from vulnerable populations.

Our lumber providers and third party plant operators are located in the countries shown in the three maps below:

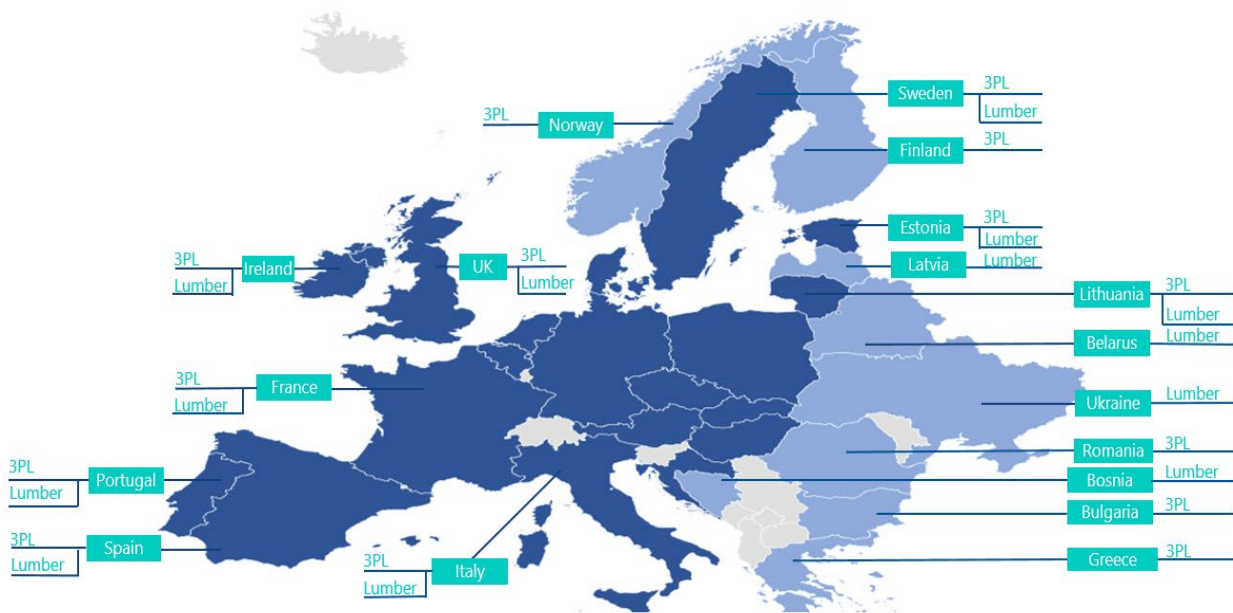
## Lumber Suppliers and Third Party Plant Operators

### Global (Other than Europe)



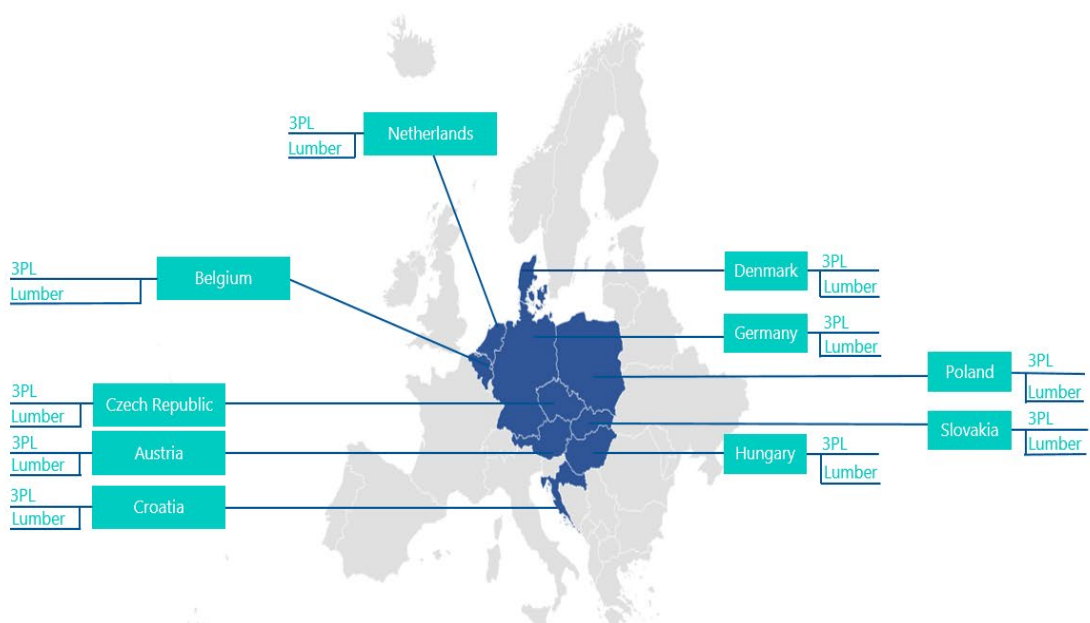
## Lumber Suppliers and Third Party Plant Operators

Europe (Western and Eastern)



## Lumber Suppliers and Third Party Plant Operators

Europe (Central and Northern)



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To help us complete this Assessment, all lumber providers and third party plant operators were asked to undergo enhanced due diligence consistent with our Third Party Due Diligence Standard Operating Procedures. This enhanced due diligence not only examined the suppliers' existing policies and procedures and required that they sign compliance terms and conditions, which incorporate Modern Slavery-specific provisions, but required in some cases that they undergo an inspection carried out by an independent third party.

In Financial Year 2020, Brambles launched enhanced due diligence on 102 lumber suppliers and 370 third party plant operators. 39 lumber suppliers (38%) and 96 third party plant operators (26%) have since completed this program. Brambles anticipates completing enhanced due diligence on all remaining lumber suppliers and third party plant operators and, by extension, continuing its Modern Slavery assessment of these two supplier categories in Financial Year 2021. It also will expand this assessment to other Tier 1 categories, including labor suppliers, in Fiscal Year 2021.

### ACTIONS TO ASSESS AND ADDRESS THE RISKS OF MODERN SLAVERY

Robust policies, training, due diligence, compliance terms and conditions and monitoring are our key controls to assessing and addressing the risks of Modern Slavery in our own operations and in our supply chains.

#### Policies

Brambles has implemented a comprehensive suite of policies and procedures that set out the ethical and legal framework in which we operate, ensuring that we build a more sustainable future consistent with our shared values and that we act with integrity and respect for our people, the supply chain, our company, the environment and the communities in which we do business. The following are the most relevant to preventing Modern Slavery in our own operations and in our supply chains:

| Policy                                 | Description  |
|--|--|
| Code of Conduct                        | Provides the ethical and legal framework for all employees in the conduct of Brambles' business  |
| Human Rights Policy                    | Prohibits the use of forced, bonded or compulsory labor, human trafficking or other kinds of slavery in Brambles' operations and supply chains   |
| Zero Harm Charter                      | Establishes Brambles' commitment to achieving zero injuries, zero environmental damage and zero detrimental impact on human rights   |
| Corporate Social Responsibility Policy | Outlines Brambles' commitment to providing a safe working environment for all workers and to engaging suppliers which comply with applicable laws, including all applicable labor, employment, human rights, wage and hour, environmental and health and safety laws |
| Diversity Policy                       | Recognizes the importance of inclusion and diversity throughout Brambles' operations   |
| Global Dignity at Work Policy          | Establishes Brambles' commitment to creating a work environment free from harassment, bullying   |

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|   |  |
|---|--|
|   | and victimization and ensuring all workers are treated, and treat others, with dignity and respect                                       |
| Anti-bribery and Anti-corruption Policy                 | Sets out our commitment to complying with anti-bribery and anti-corruption laws and regulations in the countries in which we do business |
| Third Party Due Diligence Standard Operating Procedures | Establishes risk-based due diligence procedures that must be followed before new suppliers are onboarded                                 |
| Lumber Due Diligence Standard Operating Procedures      | Establishes specific procedures that must be followed when engaging lumber providers, including the review of human rights practices     |
| Procurement Policy                                      | Sets out our expectations for ethical and responsible sourcing   |
| Speak Up Policy and Investigative Procedures            | Establish ways to raise concerns of wrongdoing, including human rights concerns, without fear of retaliation or retribution              |

### Training

Brambles' mandatory Know the Code training module is designed to help its employees understand the underlying principles set out in the Code of Conduct. This module includes a chapter devoted to human rights, offering specific guidance on how to identify and report suspicions of child labor and forced, bonded or compulsory labor, human trafficking or other kinds of slavery. This mandatory Know the Code training module is assigned to all employees during their induction and during bi-annual refresher trainings.

Moreover, procurement employees must complete periodic training, covering myriad topics on responsible sourcing. For example, in Financial Year 2020, all procurement employees completed targeted human rights training.

### Due Diligence and Supplier Acknowledgments

Before Brambles onboards a new supplier, it carries out risk-based due diligence. Under this due diligence program, new suppliers are assessed for human rights risk, amongst other risks. Suppliers that meet certain risk factors such as geographic or industry risk must undergo enhanced due diligence. This enhanced due diligence examines, amongst other things, the supplier's human rights policies and procedures and searches the internet and other media sources for any negative reports, including those relating to Modern Slavery. Due diligence is repeated periodically in accordance with the supplier's risk profile.

Suppliers are also asked to acknowledge the Supplier Policy, and Brambles' compliance terms and conditions (see below) or, alternatively, to certify compliance with, amongst others, Brambles' prohibition of child labor, forced, bonded or compulsory labor, human trafficking or other kinds of slavery. The certification is via a Supplier Acknowledgment Form which, amongst other things, asks suppliers to acknowledge that they "prohibit forced and child labor in [their] workforce and in those of [their] company's suppliers." It also asks them to acknowledge that they have reviewed and understood Brambles' Supplier Policy and Zero Harm Charter and that they will abide by the principles set out in both documents (as well as applicable laws and regulations) and require that their employees and suppliers do the same. It is mandatory for Brambles' high-risk suppliers to provide this form.

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Brambles reserves the right to terminate its relationship with a supplier if issues of noncompliance with the Supplier Policy or its principles are discovered and not addressed in a timely manner.

We also considered how we might modify or adopt our due diligence program in light of the COVID-19 pandemic during Financial Year 2020. We concluded that no changes were appropriate, particularly as we hired additional temporary workers through staffing companies throughout the year, and we determined that these staffing companies should go through enhanced due diligence. Instead, we reiterated the importance of the third party due diligence program, particularly as the demand for staffing companies and other high demand or high risk categories had the potential to increase the risk of Modern Slavery as well as fraud.

### Compliance Terms and Conditions

At the conclusion of onboarding, Brambles' new suppliers are asked to sign Brambles' compliance terms and conditions and all new high risk suppliers are required to do so. These compliance terms and conditions contain specific provisions which reference Brambles' Supplier Policy and make mandatory the obligation to comply with all applicable human rights laws and ensure that any suppliers with whom the new suppliers work do so as well.

### Risk Assessments

As set out on page 6 above, Brambles' HRWG commenced a Global Modern Slavery Risk Assessment. In Financial Year 2021, Brambles will look to expand this risk assessment program, utilizing surveys and questionnaires to strengthen its Modern Slavery risk analysis.

### Site Visits

We visit and inspect suppliers, particularly lumber and third party plant operators. While we recognize that these visits and inspections will not eliminate the risk of Modern Slavery, they do help us to identify red flags, which prompt further action. In Financial Year 2020, we conducted 7 such site visits where a human rights review was carried out. Unfortunately, these site visits were and continue to be interrupted by the COVID-19 pandemic; however, we anticipate that they will resume in Financial Year 2022.

### COVID-19 Response

Strict safety protocols were implemented throughout Brambles' operations, including the provision of appropriate protective gear, social distancing, regular disinfection of workspaces and, where possible, remote working arrangements. We recognize that the COVID-19 pandemic continues to have a serious impact on people's health and livelihoods around the world, and we remain vigilant and committed to the health and safety of our employees, customers and the communities in which we operate.

## ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

Brambles monitors the effectiveness of its efforts to combat Modern Slavery through multiple mechanisms, including Brambles' Board, RCC and SRC oversight, Key Performance Indicators (**KPIs**) and the review and assessment of questionnaires, inspections and audits.

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### KPIs

We have established KPIs to assess our effectiveness in combating Modern Slavery, including metrics which:

- Review the number of employees who have completed Code of Conduct and targeted human rights training;
- Review and assess the number of suppliers identified as being high, medium or low risk consistent with Brambles' Third Party Due Diligence program;
- Review and track the implementation of any controls required as a result of the Third Party Due Diligence Program;
- Review the number of completed Supplier Acknowledgment Forms;
- Review and assess the responses from supplier due diligence questionnaires in relation to Modern Slavery and other human rights practices;
- Review and assess the number of supplier sites physically inspected for human rights risks; and
- Review and assess the number of Speak Up complaints received, the findings and the resulting actions.

### Audits and Self Assessments

Brambles is a member of SEDEX, which promotes improvements in ethical and responsible business practices. Brambles also participates in Ecovadis, an organization which provides supplier sustainability ratings. Many of Brambles' sites undergo SEDEX audits and several business units complete Ecovadis' independent corporate social responsibility assessments on a regular basis. Brambles tracks the results of each, ensuring that where opportunities for improvement are identified, they are appropriately actioned.

### LOOKING FORWARD

Brambles is committed to identifying, assessing and addressing Modern Slavery risks in our own operations and in our supply chains. To that end, we will review and update, as necessary, our relevant policies, continue identifying and carrying out enhanced due diligence on our high risk suppliers, strengthen our Global Modern Slavery Risk Assessment program and raise awareness around Modern Slavery through targeted training. To address each of these areas, over the course of Financial Year 2021, Brambles has and will:

- Supplier Policy. Review and update the Supplier Policy.
- Enhanced Due Diligence Program. Brambles aims to complete enhanced due diligence on all lumber suppliers and third party plant operations and, after assessing the results of this due diligence as well as other risk indicators such as country risk reports, will continue to assess and address Modern Slavery risks as set out in this statement. It also will commence enhanced due diligence on all labor or staffing agencies which have not previously completed the program.
- Supplier Acknowledgment Forms. Brambles has launched a program which seeks to increase the rate of return of these forms.
- Supplier Self-assessments and Annual Certifications. In Financial Year 2021 Brambles will launch a supplier self-assessment and annual certification (**SAQ**) program. Under this program, potentially high-risk suppliers will be asked to submit annual SAQs covering environmental compliance, ethics and human rights and to acknowledge their continued compliance with the principles set out in Brambles' Supplier Policy, including the principles around Modern Slavery. The answers to these SAQs will then be reviewed for trends and any red flags, requiring follow up or investigation.

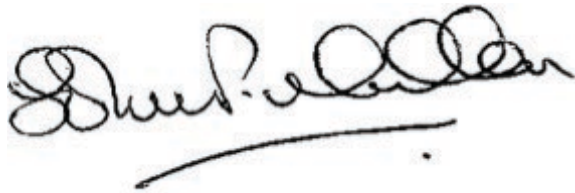
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- **Supplier Academies.** Brambles will launch a series of supplier academies in Financial Year 2021, where certain categories of suppliers will be invited to attend to learn more about Brambles' expectations of all suppliers as set out by the principles, including the human rights principles, set out in the Supplier Policy. While this training will cover all topics in the Supplier Policy, emphasis will be placed on human rights and Modern Slavery.

### CONSULTATION WITH OUR GROUP COMPANIES

Consistent with our Code of Conduct, this statement was prepared with input from all areas of our business, including Human Resources, Procurement and Global Supply Chain functions. The Australian and regional leadership teams in Asia Pacific, Europe, North America, Latin America and India, Middle East, Turkey and Africa have approved of this statement, ensuring that all entities and functions were represented and included in the review and consultation process.

This statement is made pursuant to the Australian *Modern Slavery Act 2018* (Cth) and has been approved by the Board of Directors of Brambles Limited on 25 February 2021.



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John Mullen  
Chairman  
Brambles Limited