

Modern Slavery Statement 2024.

1 July 2023 to 30 June 2024



Contents.

Chair's Message	2
Our Structure, Operations And Supply Networks	3
Modern Slavery Risk Areas	10
Actions Taken To Address Modern Slavery Risks	12
Effectiveness Of Actions Taken	15
Consultation Within The Group	16
Looking Forward	16

Statement of the reporting entity.

Kogan.com Limited (the Company; Kogan.com; ASX:KGN; the Group) has prepared this Modern Slavery Statement in accordance with the Australian Modern Slavery Act 2018 (the Act) and with regard to the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities (the Guidance) in relation to the financial year ending 30 June 2024.

This Statement outlines the measures taken by the Company during the financial year ended 30 June 2024 to reduce the risk of modern slavery¹ occurring in the Company's businesses or its supply networks.

Kogan.com opposes modern slavery in all its forms.

1. Modern slavery, as defined in the Guidance, is used to describe situations where coercion, threats, or deception are used to exploit victims and under-mine or deprive them of their freedom; it refers to serious exploitation of people.

Chair's message.



"Modern slavery is a grave injustice that has no place in our world. At Kogan.com Ltd, we believe that businesses have a responsibility to protect human rights and eliminate any risk of exploitation within their organisations and supply chains. We are committed to achieving a future where dignity, fairness and human rights are protected for all."

Modern slavery is a pervasive and urgent global issue, affecting an estimated 1 in every 150 people worldwide, according to the Global Slavery Index 2023 published by Walk Free. These practices, which include forced labor, human trafficking, child labour, and deceptive recruitment, rob individuals of their freedom and dignity, often through manipulation, threats, and violence.

At Kogan.com Ltd, we take our responsibility to combat modern slavery seriously. We understand that its various forms can be deeply embedded in complex supply chains, posing significant challenges to detection and eradication. Nevertheless, we are steadfast in our commitment to taking meaningful steps to ensure that our business and partnerships operate free from exploitation.

Our Supplier Code of Conduct establishes clear expectations for ethical labour practices, including prohibitions on forced labour and human trafficking. Once again this year we performed a number of supplier site visits and engaged SGS to perform audits, ensuring compliance with our Supplier Code of Conduct and Ethical & Sustainable Sourcing Policy. We also visited our customer care service providers in the Philippines to observe firsthand, their operations and confirm that our values align. These measures are outlined in this, our fifth Modern Slavery Statement, prepared in accordance with the Modern Slavery Act (Cth) 2018 (Modern Slavery Act).

We continued our employee training to raise awareness of modern slavery indicators and foster a culture of vigilance and accountability. These efforts aim to create a robust framework that protects our operations and supply networks from exploitation.

While we are proud of the progress we have made, we acknowledge that the fight against modern slavery is far from over. Continuous improvement, collaboration, and innovation remain at the heart of our efforts to uphold human rights and dignity in every aspect of our operations.

To our shareholders, employees, customers, and partners, thank you for your continued support as we strive to make a lasting impact. Together, we can build a future where every individual lives with dignity and freedom.

This statement covers Kogan.com Ltd, the holding company, including all its subsidiaries (**Kogan.com**), and has been approved by the Board of Kogan.com.

Greg Ridder
Chair
December 2024

Our Structure, operations & supply network.

Our structure & operations

Kogan.com first commenced in 2006, and later listed on the ASX in 2016. Since launching, we have become synonymous with price leadership through digital efficiency. The Group is focused on making in-demand products and services more affordable and accessible.

Kogan.com is headquartered in Melbourne, Australia and operates across both Australia and New Zealand. Our team consisted of approximately 165 team members in Australia and 320 team members (being a combination of permanent, part-time and casuals/contractors) in New Zealand as at 30 June 2024.

Kogan.com is a portfolio of retail and services businesses consisting of 5 well known brands:

kogan
.com

 **MIGHTYape**

dick smith

BROSA

MATT BLATT

In 2016, Kogan.com acquired Dick Smith, one of Australia's premier consumer electronics brands and a pioneer of the consumer electronics industry in Australia.

In May 2020, Kogan.com acquired Matt Blatt, one of Australia's premier furniture and homewares brands and a pioneer of the online furniture industry in Australia.

In December 2020, Kogan.com acquired Mighty Ape, one of New Zealand's largest online retailers with a focus on gaming, toys and other entertainment categories.

In December 2022, Kogan.com acquired Brosa, one of Australia's leading online furniture retailers, out of administration. For further details on this acquisition, please refer to the ASX announcement on 22 December 2023 titled Kogan.com Acquires Brosa.

Across these 5 platforms, Kogan.com operates Kogan Retail, Kogan FIRST, Kogan Marketplace, Kogan Mobile, Kogan Internet, Kogan Insurance, Kogan Money, Kogan Cars and Kogan Energy.

kogan
marketplace

kogan
retail

Kogan Retail & Kogan Marketplace

Kogan.com is part of a 'Next Generation' of online retailers. Kogan.com's technology and sourcing driven business model is more than just a disruptive, low cost distribution platform. In combining the data analytics, systems and culture with the deep technological expertise of its management and team, Kogan.com has created a vertically integrated business model with a market leading Exclusive Brands capability. This is complemented by a compelling range of in-demand Third-Party Brands, supporting website traffic and cash generation.

kogan
FIRST ✓

Kogan FIRST

Kogan FIRST loyalty program was launched in the last quarter of FY19, and grew to over 502,000 subscribers at 30 June 2024, representing over 25% growth YoY. Kogan FIRST Subscribers are offered exclusive deals on top of everyday discounts on the platform, Kogan FIRST Reward Credits, free shipping, double Qantas Rewards points, entries to win major prizes and priority Customer Care.

kogan
mobile

Kogan Mobile

Kogan Mobile Australia launched in October 2015 offering pre-paid mobile phone plans online. We partner with part of TPG to deliver this amazing vertical. The strong value offered on our plans resulted in strong growth in FY24. The unique model means that TPG is responsible for operations, while Kogan is responsible for branding, marketing and customer acquisition.

Our Structure, operations & supply network.



Kogan Insurance

Kogan Insurance launched in August 2017 to offer general insurance, covering home, contents, landlord, car and travel insurance, with a focus on value for money. Similarly to our other Verticals, Kogan.com provides branding, marketing and customer acquisition for all insurance offerings.



Kogan Internet

Under an expanded partnership with part of TPG that was announced in June 2017, Kogan Internet launched in April 2018, providing fixed line NBN plans.



Kogan Mobile New Zealand

Kogan Mobile New Zealand launched in 1HFY20 in partnership with One NZ, offering telecommunications services in New Zealand. One NZ is New Zealand's largest mobile network operator.



Kogan Energy

Kogan Energy offers competitive power and gas deals and was launched in September 2019 in partnership with part of Shell Energy Operations Pty Ltd.



Kogan Money Credit Cards

Kogan Credit Cards, in partnership with NAB, is a credit card with uncapped Kogan reward points, no annual fee, complimentary Kogan FIRST membership, and competitive rates and fees. It was launched in October 2019.

Our team.



Our team is the cornerstone of our success, and we recognise that a productive workplace begins with the health, safety and well-being of every team member. We are committed to fostering an environment where everyone feels supported, valued and empowered to perform at their best, both professionally and personally. To achieve this, we provide a range of programs, resources, and initiatives tailored to promote physical and mental well-being.

The Health & Wellness @ Kogan.com program offers opportunities for team members to prioritise their fitness and overall health. Weekly yoga classes every Tuesday morning provide a space for mindfulness, relaxation, and physical activity, while Bootcamp sessions on selected Fridays and corporate discounts to gym memberships encourage strength building and camaraderie among colleagues. These initiatives are open to individuals of all fitness levels, ensuring inclusivity and a shared commitment to well-being.

To further support mental and emotional health, Kogan.com partners with Converge International to deliver an Employee Assistance Program (EAP). This confidential service gives team members access to professional resources, guidance, and counselling to navigate personal and workplace challenges. With a dedicated online support portal and a 24/7 helpline, this program ensures that help is always within reach. Our focus on health and safety extends to proactive measures, including the First Aid Crew and Fire Warden Crew, ensuring a secure and responsive workplace.

Beyond wellness, we encourage continuous learning and development through resources such as the Learning & Development budget, Lunch & Learns, Tech Meet Ups and performance reviews that empower individuals to grow within their roles.

At Kogan.com, we understand that when our people succeed, the Company succeeds. By prioritising health, safety, and growth, we create a workplace culture that supports and celebrates each team member, ensuring a positive, balanced, fulfilling experience for everyone.

Governance & policies.

Kogan.com is committed to maintaining strong governance practices, overseen by its Board and Audit and Risk Management Committee. The Committee operates under the approved Audit and Risk Management Charter and plays a key role in ensuring the company's risk management systems are effective in identifying and addressing critical risk areas.

In FY24, the Committee held three meetings, meeting its minimum requirements. Attendance specifics for these meetings are detailed in the Director's Report of the 2024 Annual Report. The Committee has implemented a Risk Management Policy and maintains a Risk Register, both subject to an annual review by the Board.

The Board of Directors is responsible for overseeing and approving all company policies and addressing key risks identified through annual external audits. This includes actively monitoring potential exposures based on regular reporting from senior leadership, including the Chief Financial Officer, Chief Operating Officer, and Executive Director.

Kogan.com's Senior Management Team plays a pivotal role in establishing and maintaining systems, processes, and controls to manage risks at an acceptable level. Regular assessments of emerging risks and opportunities ensure that team members can respond proactively to evolving challenges.

To reinforce accountability, Kogan.com follows a comprehensive governance framework that clearly defines policies, procedures, and expectations for Directors, Senior Management, and team members. This ensures everyone remains aligned in their day-to-day responsibilities and behaviours.

In FY24, Kogan.com further demonstrated its commitment to Environmental, Social, and Governance (ESG) transparency. For further information on Kogan.com's ESG progress, please visit esg.kogan.com.

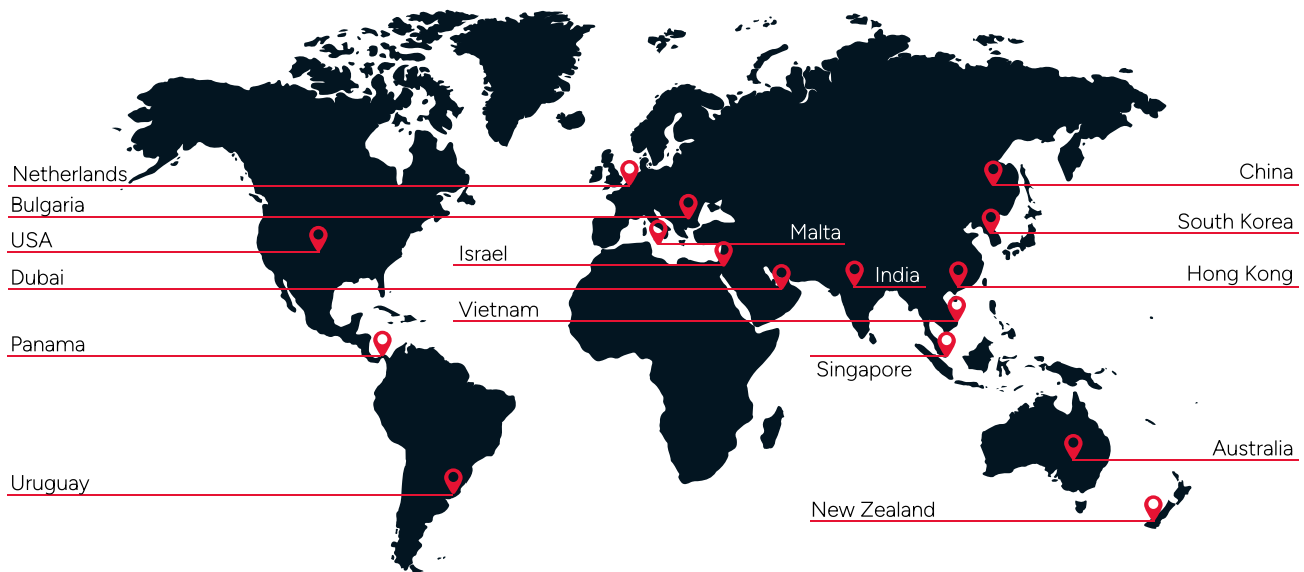
Finally, Kogan.com has identified key documents that are most relevant to reducing modern slavery risks within the business, as outlined below:

Statement / Policy / Procedure	Purpose
Corporate Governance Statement	Explains Kogan.com's compliance with the Corporate Governance Principles and Recommendations relevant to ASX-listed entities, outlining the Board's accountability for the Group's corporate governance
Board Skills Matrix	Outlines the criteria for skills, knowledge, experience, personal attributes and other relevant criteria that Kogan.com seeks in its Board Members. The Board is composed of individuals with diverse skills, knowledge, and experience, ensuring effective governance and direction for the Group.
Process for Evaluation of Performance	Outlines the procedure for overseeing and assessing the performance of the Board, its Committees, and individual Directors to impartially evaluate and actively promote improved effectiveness in the Board, Committees, and individual Directors.
Shareholder Communication Policy	Explains the methods through which Kogan.com guarantees that Shareholders, regulators, and the broader investment community receive timely and effective information about significant developments impacting the Group. This includes the communication of updates on operations and supply chains.
Code of Conduct	Describes Kogan.com's expectations for the behaviour of team members toward each other and within the broader Kogan Community. The Group is dedicated to adhering to all relevant laws and regulations while conducting itself in a manner aligned with principles of honesty, integrity, fairness, and respect.

Governance & policies.

Statement / Policy / Procedure	Purpose
Anti-Discrimination and Harassment Policy	Outlines Kogan.com's expectations that all team members and stakeholders treat each other with respect and courtesy. Any form of discrimination or harassment is not tolerated at Kogan.com.
Workplace Bullying Policy	Outlines Kogan.com's expectations that all team members and stakeholders interact with one another in a respectful and courteous manner. Any instance of discrimination or harassment is not accepted at Kogan.com.
Whistleblower Policy	Guarantees that individuals disclosing wrongdoing can do so securely, confidently, and with assurance of protection and support. Kogan.com acknowledges the importance of transparency and accountability in its operations to foster best practices in Corporate Governance. The company is dedicated to upholding the highest standards of conduct and ethical behaviour across all its business activities within the Group.
Kogan Vendor Selection and Master Data Process (VSMDP)	Describes Kogan.com's process for onboarding and managing vendors/suppliers, which includes the necessity for third-party audits by the Business Social Compliance Initiative (BSCI) for key suppliers.
Ethical & Sustainable Sourcing Policy	Kogan.com places significant importance on collaborating with ethical suppliers. This policy outlines the essential and preferred criteria for engaging with Kogan.com.

Supply networks.



Our Kogan Retail division is proud to operate a dynamic and highly efficient supply chain that spans 16 countries across the globe. Our supply network ensures seamless movement of products from manufacturers to customers, delivering exceptional value, reliability, and speed. With a strong focus on operational excellence and sustainability, our supply chain has been carefully designed to adapt to global conditions, ensuring the consistent availability of high-quality products for our customers.

Our network of suppliers stretches across key regions, including Australia, New Zealand, China, South Korea, Hong Kong, India, Vietnam, Israel, Malta, Dubai, Panama, Uruguay, the USA, the Netherlands, and Bulgaria. By tapping into these strategically located regions, we are able to source a wide range of products, from electronics, technology products, office essentials, homewares and apparel, ensuring we deliver diverse and innovative solutions to meet the evolving needs of our customers.

At the core of Kogan Retail's global supply chain is our unwavering commitment to ethical sourcing and responsible business practices. We recognise the importance of eradicating modern slavery and human trafficking across supply chains and take active steps to ensure that our operations remain transparent and exploitation-free.

Each supplier in our global network is rigorously vetted to confirm their alignment with our ethical standards. This comprehensive onboarding process evaluates suppliers based on their labour practices, sustainability commitments, and overall integrity in business operations. We collaborate closely with each of our partners to ensure compliance with our ethical sourcing guidelines, which maintains a benchmark for fairness, accountability, and responsibility within the supply chain.

Sustainability is also an integral part of our approach to global sourcing. We work with partners to implement responsible manufacturing practices, reduce environmental impact, and ensure that sustainable initiatives are integrated into our operations.

By working with global suppliers and partners who share our values, we ensure that quality, integrity and transparency remain at the centre of every product we deliver. Kogan Retail's commitment to ethical sourcing and supply chain excellence reflects our broader mission to create a better, fairer and more sustainable future for all stakeholders.

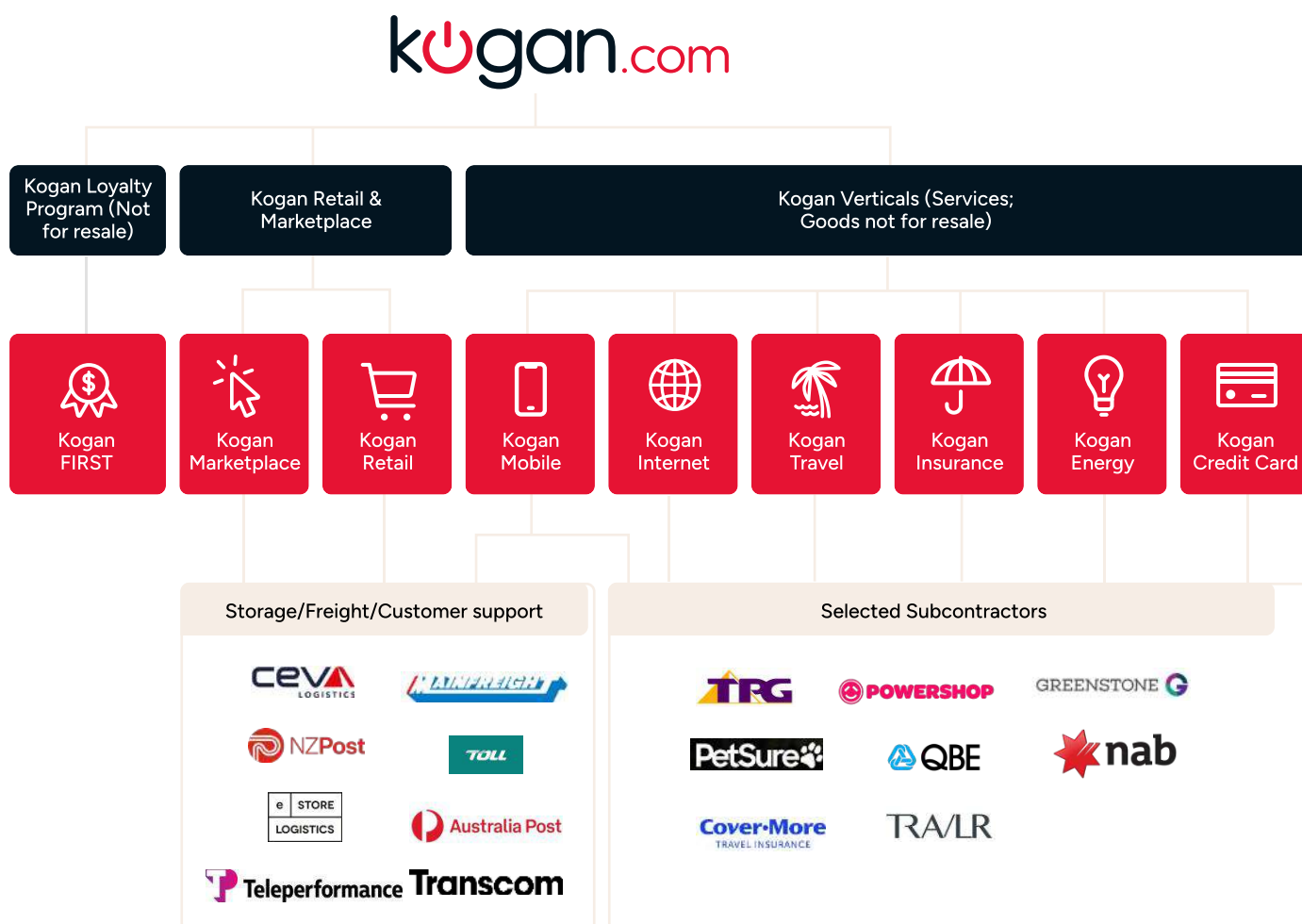
Supply networks.

Kogan.com also offers a suite of essential services under its Kogan Verticals division. Kogan Verticals provides customers with affordable and reliable solutions for their everyday needs.

These essential services are delivered through strategic partnerships with market leaders. For instance, trusted providers like Powershop, Cover-More, TPG and NAB work alongside Kogan.com to ensure high-quality offerings across energy, insurance, telecommunications and financial products.

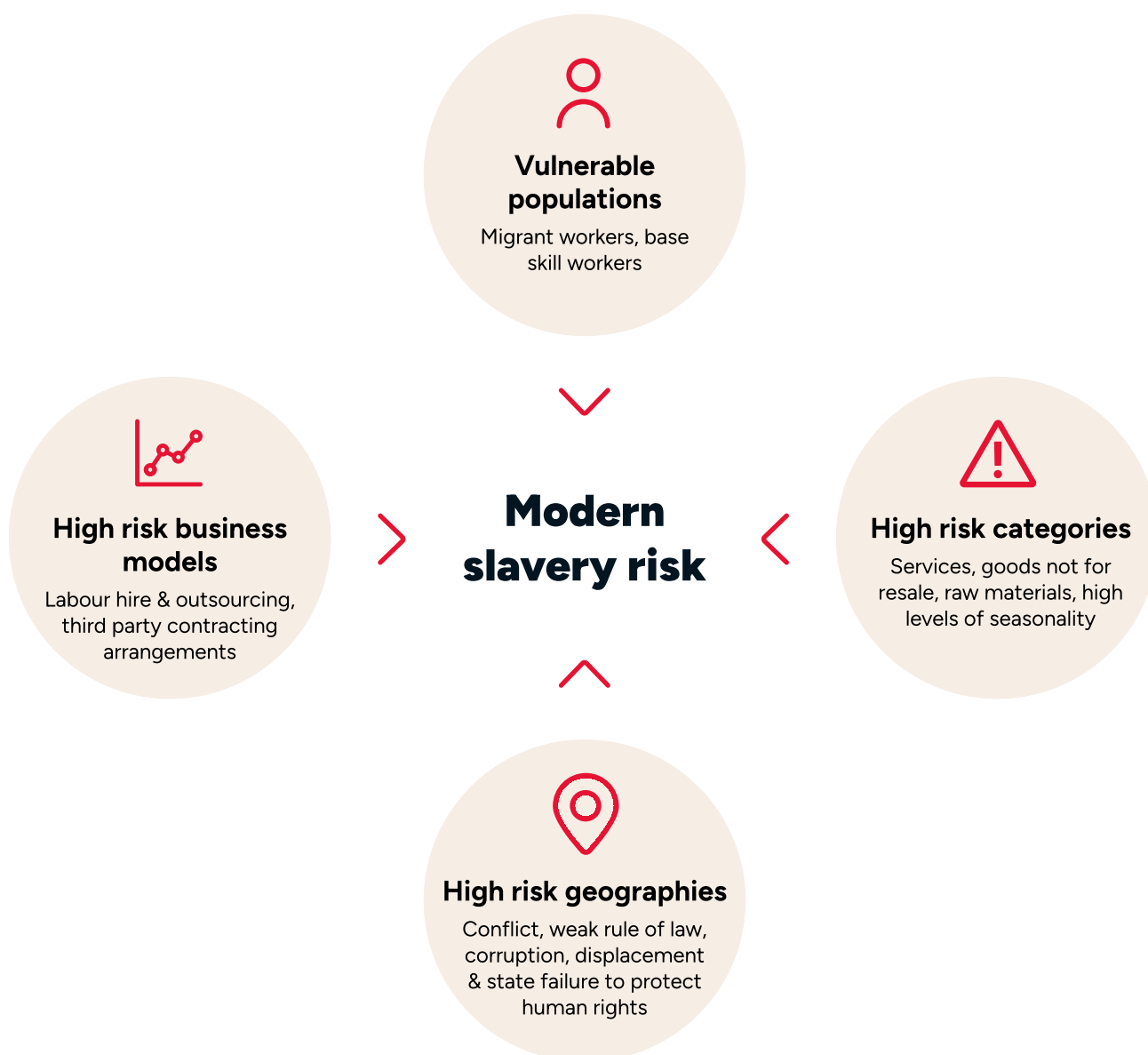
Operational excellence is also a key driver of Kogan.com's success, which is why strategic arrangements have been put in place with storage, freight and customer support providers. Industry leaders such as CEVA Logistics, Toll, Australia Post, NZ Post and Mainfreight play a critical role in ensuring smooth and efficient fulfillment, from warehousing to timely delivery of products to customers.

By partnering with these industry experts, Kogan.com ensures scalability and operational efficiency while maintaining its commitment to customer satisfaction.



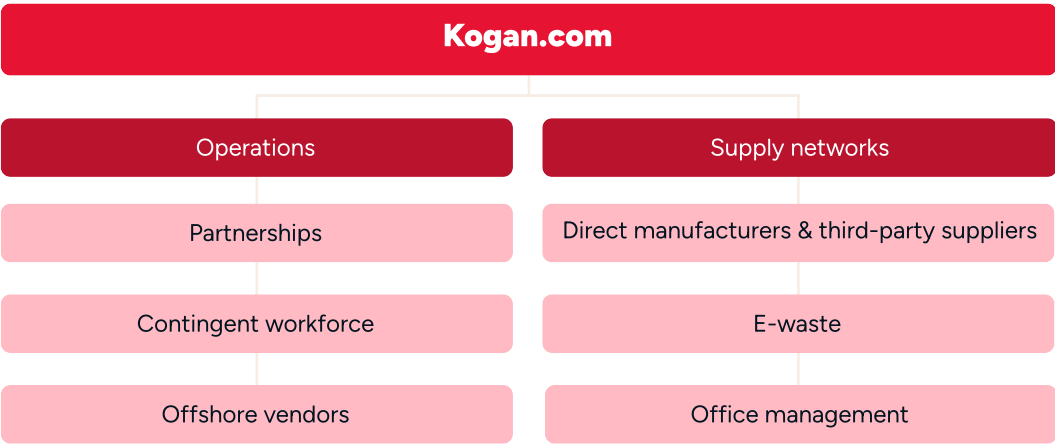
Modern Slavery risk areas.

Kogan.com examined four critical elements that heighten the risk or perception of potential modern slavery. When multiple factors associated with modern slavery risk coincide, the likelihood of actual harm increases. These four key factors have remained unchanged since our previous statement and will continue to undergo an annual review.



Modern Slavery risk areas.

Considering these risk factors, along with the operations and supply networks of Kogan Retail and services, the following potential risks have been identified:



Operations

Partnerships

The companies that Kogan.com works with could have processes and practices that are not aligned with Kogan.com's expectations, requirements, and good practice in relation to identifying and managing modern slavery risk.

Contingent workforce

Kogan.com's contingent workforce scales in line with peak sales periods through the year. These workers are considered base-skilled workers, primarily working on repeatable administrative and clerical services. Base-skilled workers can be at higher risk of modern slavery due to increased vulnerabilities.

Offshore vendors

Kogan.com has service agreements in place with several offshore vendors who provide BPO services, tax-related services and IT services. Kogan.com has identified that some of the countries from which these services are provided are at higher risk of potential modern slavery practices based on their geography and the presence in some cases of high-risk business models, high-risk categories, and population vulnerabilities.

Supply networks

Direct manufacturers and third-party suppliers

Kogan.com sources items for resale from across the globe. We have identified that, based on the geographical locations involved, there is the potential risk for forced labour, child labour, deceptive recruitment and bonded labour.

E-waste

The disposal of electronic waste (e-waste) is notoriously difficult to track, however research and reporting linked e-waste items from Australia to offshore waste facilities where child labour and hazardous work conditions are prevalent. Kogan.com uses E-Cycle Solutions for its e-waste processing.

Office management

Kogan.com procures various categories of services including cleaning, information technology and maintenance services. Subcontractors in these fields can be from populations with heightened vulnerability to modern slavery, including base-skilled workers and workers from migrant, low socio-economic or culturally and linguistically diverse backgrounds.

Actions taken to address Modern Slavery risks.

Managing risks through supplier agreements and audits

Kogan.com's contracting process with direct suppliers is a key element of its strategy to mitigate modern slavery risks in the global supply chain. Suppliers are evaluated to identify the potential risks associated in their operations against Kogan.com's Ethical & Sustainable Sourcing Policy.

Kogan.com partners with reputable commercial organisations known for high-quality products to further mitigate modern slavery risks. The Company employs the Vendor Selection and Master Data Process (VSMDP) and mandates supplier adherence to the Kogan.com Supplier Agreement and Ethical & Sustainable guidelines.

Our Compliance Team actively collaborates with stakeholders across all categories and ensures all relevant accreditations and certifications documents are available and valid. Additionally, our Purchasing team visits a number of our suppliers premises to verify audit reports, confirming working conditions were as described and in line with expectations.

Extract from our Supplier Agreement

The supplier warrants to Kogan.com that, at all times:

1. Has taken all steps necessary to ensure there is no Modern Slavery in its supply chains or the supply chains of its subcontractors;
2. Has implemented, reviewed and amended (as necessary) due diligence procedures for its own suppliers and subcontractors to ensure that there is no Modern Slavery in its supply chains or the supply chains of its subcontractors;
3. Will notify Kogan.com immediately if it becomes aware of any actual, or suspected, Modern Slavery in its supply chains, or the supply chains of its subcontractors; and
4. Will maintain complete, accurate and up-to-date records in relation to its supply chains and the supply chains of its subcontractors including in respect of its Modern Slavery due diligence procedures.

Violations to any of these may result in further investigation, penalties and/or termination of the agreement.

Kogan.com utilises a risk-based approach in determining which due-diligence processes to follow for new and existing suppliers.

Independent third-party audits, dated within 12 months from a respected auditing provider, are required of suppliers who will supply products in excess of a predetermined threshold.

Engagement and relationships.

Kogan.com values the importance of collaborating with industry-wide initiatives, government and non-government organisations in managing modern slavery risks. The Company supports the declarations, objectives and principles of the International Labour Organisations (ILO) and the Ethical Trading Initiative (ETI) which are based on the principles of the United Nations Universal Declaration of Human Rights.

Case study - Customer support partners in the Philippines



In January 2024 Kogan.com completed a visit to the Philippines to meet with its trusted customer service partners, Teleperformance and Transcom. As part of Kogan.com's commitment to operational excellence and ethical practices, this visit aimed to strengthen relationships, review operations, and ensure alignment with the Company's high standards for customer experience and ethical business conduct.

Both Teleperformance and Transcom are globally recognised leaders in the business process outsourcing (BPO) industry, providing customer support services for Kogan.com. During the visit, the Kogan.com team observed the strong levels of professionalism, efficiency, and care demonstrated by the customer service teams. These interactions reaffirmed that both partners are aligned with Kogan.com's values.

The visit highlighted the strong operational frameworks in place, including comprehensive staff training programs, employee engagement initiatives, and a clear focus on providing a positive, fair, and respectful workplace environment. These measures reflect the shared commitment of Kogan.com, Teleperformance, and Transcom to responsible and ethical operations. The trip not only solidified confidence in the partnership but also strengthened collaboration for future improvements.

Engagement and relationships.

Case study - Addressing modern slavery risk in e-waste

Kogan.com recognises e-waste as a significant modern slavery risk area, particularly when electronic waste is not responsibly disposed of in Australia, as it can end up in offshore facilities where modern slavery risk factors are prevalent.

As a signatory to the National Television and Computer Recycling Scheme (NTCRS) since 2019, Kogan.com supports responsible recycling pathways for televisions, computers, and related accessories. Funded by manufacturers and importers, including Kogan.com, the NTCRS aims to reduce e-waste in landfills, recover valuable materials through recycling, and mitigate environmental harm from hazardous electronic waste. Partnering with E-Cycle Solutions, a co-regulator of the NTCRS, Kogan.com successfully collected and recycled over 9,650kg of e-waste in FY24.

Training and developing capability.

We recognise the importance of enhancing our teams' capabilities, by placing a strong emphasis on various training programs. Specifically, Kogan.com's Purchasing team, responsible for regular communication with suppliers, is well-versed in identifying and addressing potential indicators of modern slavery risks. Regular communications ensure that potential modern slavery risks are thoroughly discussed.

During the year Kogan.com organised training sessions for our Purchasing teams, focusing on Modern Slavery principles and their roles within the business. These sessions comprehensively covered diverse aspects of the Modern Slavery landscape, including risk identification and mitigation, continuous improvement, adherence to legal requirements under the Modern Slavery Act, and practical examples relevant to our business.

Grievance mechanism.

Kogan.com, through its Whistleblower, Anti-Discrimination and Harassment, and Workplace Bullying policies, has established reporting mechanisms and resolution processes. These procedures enable both team members and external parties to report concerns related to unethical or illegal activities, which may include human rights and modern slavery issues. The Company conducts a comprehensive review of grievance data to identify any discernible patterns, and through analysis, aims to determine the root causes of potential issues raised.

Remediation.

Where instances of non-compliance with Company policies or procedures are identified, the supplier must remediate the issue within an appropriate period of time, determined by the nature and severity of the instance. Kogan.com's audit process supports remediating supplier non-compliance by addressing any issues, which ultimately improves conditions for workers. If a supplier is not willing or able to address instances of non-compliance or it is considered too severe to remediate, the Company will no longer purchase from the supplier. In FY23, no such cases were brought to the attention of, or brought to the attention of, management.

Effectiveness of actions taken.

Kogan.com recognises the importance of measuring the effectiveness of different actions taken to assess and address modern slavery risks and compliance with relevant modern slavery laws.

For this reporting period, we have measured the effectiveness of actions taken as follows:

Area	Measurement of effectiveness
Governance	Kogan.com maintains strong governance by regularly overseeing processes and procedures. The Board and senior management discuss these matters with Executive Directors and during Board Meetings. The Committee conducts periodic reviews of the Group's risk profile and significant business risks. To address modern slavery risks, Supplier Agreements are regularly reviewed and updated for relevance. This demonstrates the Company's commitment to effective governance, risk management, and compliance with modern slavery regulations.
Third-party ethical and sustainability audit program	Following the Company's risk-based approach, Kogan.com verified key suppliers through third-party audits conducted via SGS. The audits were supplemented by a number of in-person visits by the Kogan.com Purchasing team, specifically in China. The audits conducted throughout the year did not reveal any modern slavery risk within Kogan.com's primary supplier network.
Education and training	Kogan.com conducted training for relevant team members regarding modern slavery risks. The Company is committed to ongoing efforts in developing and delivering education and training to both management and relevant team members.
Effectiveness of complaints or grievance mechanism	Kogan.com continued to provide strong company-based grievance mechanisms to detect and escalate potential issues in accordance with Kogan.com's Whistleblower Policy. Team members were actively encouraged to express their concerns without fear of retaliation, and complete confidentiality was ensured if needed. Throughout the year, no reports of modern slavery concerns were received.

Consultation.

Kogan.com undertook a thorough risk assessment process in the preparation of this Modern Slavery Statement. This process included collaboration with key stakeholders, such as senior leadership and affiliated entities, to identify and address potential risks. Oversight from the Audit & Risk Committee and the Board ensured the statement's accuracy and underscored the company's ongoing dedication to ethical and responsible business practices.

Looking forward.

This Modern Slavery Statement marks the fifth statement published by Kogan.com in line with the Modern Slavery Act. Kogan.com continuously reviews actions taken to identify and assess modern slavery risks, address any identified risks, and explore opportunities for improvement to strengthen its response to modern slavery challenges.

In FY25 the Company intends to join the Responsible Business Alliance (RBA) in order to implement new and best-practice training for our team members, and further improve the assessment of new suppliers as part of the onboarding process.

The Company also intends to continue collaborating and engaging with its suppliers and service providers, and take a risk-based approach to expanding the current due-diligence approach to reviewing existing suppliers.

kogan
.com