



MODERN SLAVERY STATEMENT 2019/20

This statement is made pursuant to the Modern Slavery Act 2018 (Cth). This statement constitutes the slavery and human trafficking statement for Specsavers Pty Ltd (“Specsavers”) for its financial year 2019/2020. The board of directors of Specsavers have approved this statement.

INTRODUCTION

Slavery remains a reality in the modern world and takes place across the globe, hidden from view. It can affect anyone, of any age, gender or nationality and is not restricted by borders. Specsavers is committed to acting responsibly and trading ethically, and ensuring that the people involved in providing our products and services to the public are safe, healthy and free from human right abuses.

As part of the Specsavers group of companies, of which Specsavers International Healthcare Limited is the parent company (known as the “Specsavers Group”), Specsavers remains committed to playing its part locally towards preventing and mitigating risks of modern slavery throughout the entire Specsavers business and supply chain.

This is the first statement published by Specsavers in accordance with the Modern Slavery Act 2018 (Cth) in Australia. It follows on from Specsavers International Healthcare Limited’s 2019/20 Modern Slavery statement in relation to the Specsavers Group made pursuant to the modern slavery laws in the United Kingdom.

OUR BUSINESS AND GLOBAL SUPPLY CHAIN

The Specsavers Group includes subsidiaries which are, or support, optical retail outlets, audiology businesses and domiciliary partnerships throughout the UK, Republic of Ireland, Northern Europe, Australia and New Zealand as well as Specsavers Group-owned manufacturing and distribution sites.

The Specsavers Group has 37,000+ employees across Guernsey, UK, Republic or Ireland, Netherlands, Denmark, Finland, Sweden, Norway, Spain, Australia, New Zealand, Shanghai and Hong Kong.

As a retailer, the product supply chains are extensive and global; the Specsavers Group source in excess of 3,500 products from more than 19 countries.

The global supply chain is predominantly managed out of the Specsavers Group's UK and Hong Kong operations on behalf of the entire Specsavers Group (including its Australian supply chain). Approximately 95% of the Australian product portfolio is sourced by the global supply chain which therefore requires a global and consistent approach to tackling modern slavery risks and changing demands. A dedicated team of experts (the Regulatory and Compliance teams) supports risk assessment and due diligence activities for supplies to Specsavers.

OUR APPROACH

Focusing on specific action that makes a difference remains a priority within the ongoing business plans for the Specsavers Group. The Specsavers Group is committed to the global ethical trading objectives identified, including ensuring that regular, independent audits of all major suppliers who do not operate in globally recognised regulatory environments are undertaken. Wherever possible, strong, long-term relationships with suppliers continue to be developed so that it can work in partnership with the suppliers and provide best value eye care and hearing care to everyone.

Amongst other things, the Specsavers Group's audit program is designed to identify, monitor and assess that employment is freely chosen, working hours are not excessive, conditions are safe and hygienic, child labour is not used and there are no other occurrences of discriminatory or illegal practices which violate the rights of individuals working within the Specsavers supply chain.

There is no place for illegal, unethical or unprofessional conduct within the Specsavers business. We encourage all employees to speak up and report, if they become aware of any activity that is not consistent with the Specsavers vision and values. The Specsavers Group has reported on activity relating to reducing Modern Slavery risk, the business plans and progress in the Specsavers Annual Review since 2011. As part of this reporting and commitment, practices and procedures to progress and enhance the ethical trading activities and improvement of the transparency of reporting within in each region continue to be developed.

IDENTIFYING AND MANAGING RISKS

POLICIES AND CONTROLS

The Regulatory and Compliance teams are focused on combatting unethical practices within the Specsavers business, including its product sourcing categories. Product sourcing includes (but is not limited to) frames, ophthalmic lenses, hearing aids, contact lenses and solutions, eye drops, uniforms, unitary and equipment. As some of Specsavers' suppliers are in medium-risk countries, procedures are in place that actively monitor the treatment of employees and adherence to associated regulations within those medium-risk regions.

Contractual protections are put in place to ensure suppliers in high risk categories are bound by warranties and representations in relation to modern slavery risks within their business. Suppliers are required to adhere to Specsavers' Global Ethical Trading Policy and Specsavers has the right to independently audit compliance with these principles and requirements. New suppliers in the product sourcing category are subject to approval processes, which includes an audit and several compliance checks by the Regulatory and Compliance teams, which the supplier must pass before orders are placed for product. A successful audit result is a prerequisite of the vendor selection process. Functional leaders

are supported by the Regulatory and Compliance teams to embed compliance activity into their commercial decisions and supplier performance discussions.

The audits focus on risks associated with modern slavery and human trafficking, including the occurrence of passport retention, illegal documentation, the right to work, illegal deduction of wages, child labour, forced labour, excessive hours of work and illegal subcontracting. Where product suppliers outsource major components to a second-tier supplier, that supplier is required to comply with policy and monitoring. All reasonable steps are taken to work with suppliers, their subcontractors and any other member of our supply chain to adhere to the Specsavers Global Ethical Trading Policy.

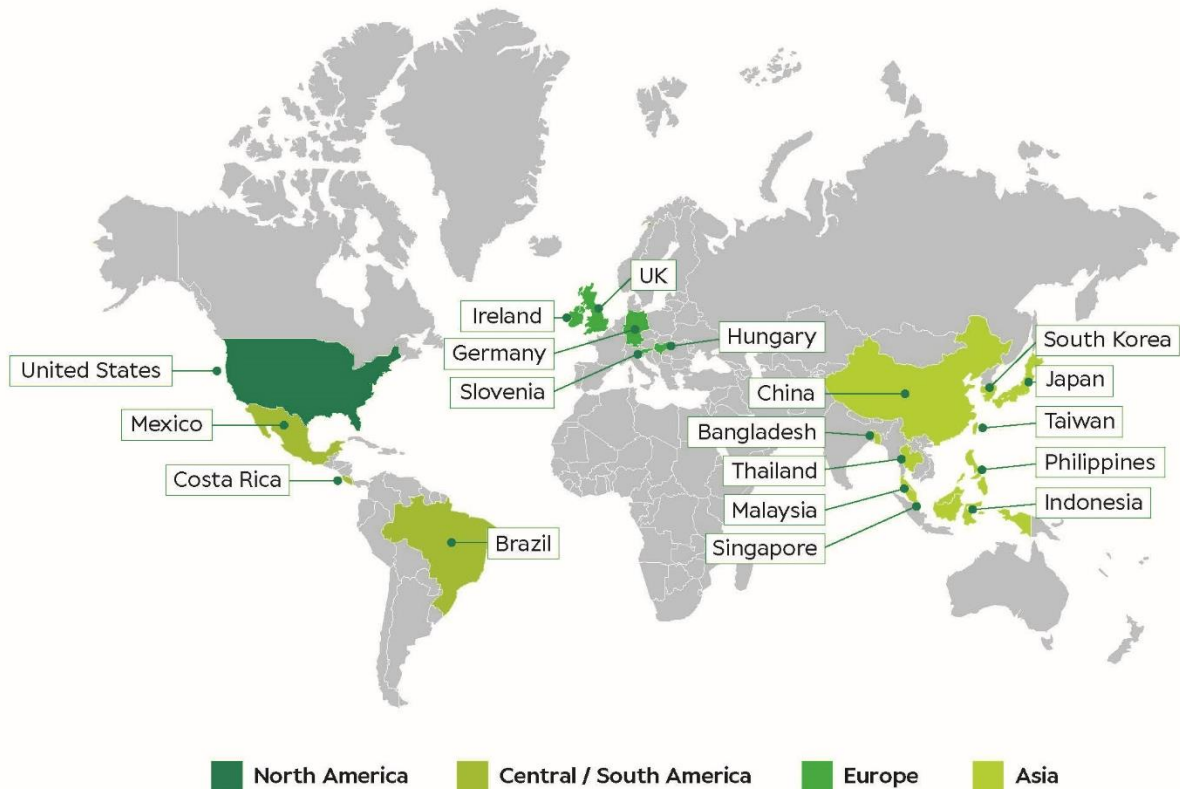
After an initial audit, new suppliers join the Specsavers Group's monitoring programme and are each audited every two years (as a minimum) by an independent third-party auditor.

Where there is a concern as a result of an audit, the supplier is given a tailored corrective action plan and a timetable within which to take remedial action. The corrective action plan is determined by the Regulatory and Compliance teams to be adequate to address the specific concerns taking into account the particular area/s of concern and level of risk. If the supplier fails to take the required remedial action, approval of working with this supplier is withheld.

INCREASING TRANSPARENCY

The Specsavers Group is focused on increasing transparency across its supply chain and overall business. The Specsavers Group works with over 70 suppliers and 200 factories in 19 countries and is committed to delivering the highest standard of products to every single Specsavers customer. Therefore, understanding where products are sourced and made, and the risks inherent across the supply chain operations, is an essential part of due diligence undertaken.

The product origins for the Specsavers Group are represented on the sourcing map below. Primarily the products come from globally recognised regulatory environments or factories situated in low and medium-risk countries. The activity in the countries which the Specsavers Group source product from is continually monitored to ensure that slavery and human trafficking does not exist in the Specsavers supply chain.



GOVERNANCE

As part of the approach to global supply chain governance, the Specsavers Group has developed monthly reporting tools, to enable directors within the Specsavers Group to review results and identify risks in relation to modern slavery and ethical compliance across the global business, and to support continuous improvement activity. The Procurement and Supply Chain Commercial Operations Director is responsible for reporting to the global Specsavers Supply Chain Operating Board on implementation progress, supplier compliance and remediation activities on a monthly basis and working with risk teams regionally to map and manage risks across our supply chain and sites. Regular onsite factory visits are conducted by key members of the Specsavers Supply Chain team which in turn, are reported to the supply chain operating board. This reporting is an opportunity to reinforce agreed due diligence processes, review progress against Specsavers' commitments, escalate risks within and between categories and drive Specsavers' vision to ensure the business remains committed to protecting and preserving the rights of all workers across our supply chain.

TRAINING AND AWARENESS RAISING

We recognise the importance of training, raising awareness and embedding knowledge and understanding of human rights, ethical standards and risks across business functions. The Specsavers Group has developed training tools for its employees, to reinforce the risks of modern slavery, which will be rolled out by Specsavers across Australia and New Zealand during 2020/21. Through forming strong relationships and partnerships with suppliers, the Specsavers Group continues to raise awareness and

undertake discussions as to the continued implementation of preventative measures including audit processes, improved policies and agreeing on the standards expected.

OUR PROGRESS

During 2019 and 2020 the Specsavers Group continued to invest in, and develop, the Regulatory and Compliance teams to ensure appropriate skills and resources are in place to deliver the Strategic Plans in relation to regulation and compliance. The Specsavers Group:

- completed 77 supplier audits, for suppliers across the product categories. These audits ensure compliance with our social and environmental standards and adherence to regulatory requirements, enabling long-lasting improvements to be achieved;
- continued to keep policies and practices concerning anti-bribery updated;
- continued the development of educational resources for suppliers and employees across the business to further increase knowledge of modern slavery issues and awareness;
- introduced regular detailed compliance reviews on supplier corrective actions, ensuring they are addressed and closed in a timely manner; and
- worked with suppliers to accept, where appropriate, audit reports which are equivalent to Specsavers standards i.e. SMETA

OUR 2020/21 PLANS

In 2020/21:

- global ethical trading policies will be reviewed and enhanced;
- risk measurement and management methods for suppliers and countries that Specsavers trades in, to ensure a robust and dynamic risk approach is taken and measured against will be enhanced;
- business compliance audit approach based on the level of risk of the suppliers will be enhanced.
- Specsavers Group's audit criteria will be assessed and a process against internationally recognised standards with a view to enhancing the audits and where necessary increase or expand to the highest possible standard will be developed;
- visibility of data to support the business category managers to have conversations with suppliers to ensure they understand the importance Specsavers places on preventing Modern Slavery will be increased.

MEASURING OUR PROGRESS

The Specsavers Group has committed to adhering to the following key performance indicators to measure the effectiveness of steps taken to tackle modern slavery and human trafficking in the global business:

- all scheduled audits completed;
- declarations of conformity held for all core suppliers of goods for resale based in recognised regulatory environments;
- a revised Anti-Bribery policy issued to and acknowledged by suppliers and internal supply chain members; and

- regular board reporting on identified risks of modern slavery and ethical compliance.


RESPONSE TO COVID-19

During the Coronavirus pandemic, Specsavers remains committed to continuing to identify and address risks of modern slavery in our operations and supply chains. Within our operations, we have adopted COVID-Safe plans, to help manage the risks posed by COVID-19 and remain committed to creating a safe environment for all workers, customers and essential visitors. We have reviewed operations, enhanced our safety response measures, which include government regulations regarding social distancing, and ensuring our workers have the relevant PPE available as well as how to manage a suspected or confirmed case. We continue to support our suppliers by paying for orders already in production, to reduce the risk of non-payment of workers. We expect all suppliers to continue to adhere to our ethical trading standards, and our audit programme will continue during 2020/2021 subject to any necessary changes for Covid-19 restrictions. Onsite visits have been paused however where possible are conducted virtually.

This statement is made pursuant to the Modern Slavery Act 2018 (Cth) for Specsavers Pty Ltd.

The board of directors of Specsavers Pty Ltd have approved this statement.

Signed

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Director

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