

MODERN SLAVERY STATEMENT FY24



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Introduction & executive note

Country Road Group is committed to building a better future by embedding ethical sourcing practices into the way we do business. Our vision is to be the most admired Australian house of brands – operating responsibly in partnership with our teams, suppliers and partners. In doing so, we seek to evolve and strengthen our approach to mitigating human and labour rights risks across our value chain.

Acknowledgement of Country

Country Road Group acknowledge the Traditional Owners and Custodians of the lands on which our Support Centre, distribution centres and stores are located, Australia’s First Nations people. We acknowledge the rights of First Nations people to their traditional knowledge and cultural expressions and commit to working collaboratively and ethically to increase First Nations inclusion in our business and the Australian fashion and lifestyle industry.

This statement is published by Country Road Group Pty Ltd (**Country Road Group, CRG**) as a joint statement on behalf of itself and seven other related entities. All eight reporting entities covered by this statement have common directors, the same registered office address, use the same policies and processes, operate in the same sector, and share many of the same suppliers. Therefore, this joint statement provides a single consolidated description of their actions to assess and address modern slavery risks. Details of each reporting entity covered by this statement are listed in Appendix 1.

This is Country Road Group’s fifth modern slavery statement under Australia’s Modern Slavery Act 2018 (Cth) (**MSA**) and sets out the actions we have taken to understand and mitigate our modern slavery risks during the 2024 financial year from 1 July 2023 to 30 June 2024 (**FY24**).

FY24 was a period centered in engagement and partnership.

Internally, we focused on building greater understanding and capacity through dedicated awareness sessions with supplier facing roles and external training for ethical sourcing team members.

Progress and milestones achieved in FY24

- ✓ Completed and evaluated a Worker Sentiment Survey, as part of our assessment of effective worker voice and grievance mechanisms
- ✓ Conducted a modern slavery awareness session for diverse internal teams, supporting their awareness of and understanding of modern slavery risks within the supply chain
- ✓ Participated in a pilot program coordinated by International Accord and RMG Sustainability Council to expand the scope of the current worker grievance mechanism to cover key topics related to human rights and modern slavery
- ✓ Continued to progress our engagement with the Ethical Trading Initiative, working towards achieving full membership by the end of FY25
- ✓ Supported ethical sourcing team members to attend external training opportunities to build team capacity on modern slavery topics

This work built on the development and launch of a company-wide e-learning module in FY23 and supports our team members to identify modern slavery risk indicators.

Externally, collaborations with advisory service providers and multi-stakeholder initiatives saw us test additional mechanisms for worker voice. Hearing directly from workers has emphasised the role strong supplier partnerships play in creating ethical and safe work environments through our supply chain. While some of these programs are still in flight, we continue to monitor their progress and reflect on improvement opportunities they may present for our program.

Alongside our parent company, Woolworths Holdings Limited (**WHL**), we have also continued to progress our efforts to achieve full membership status with the Ethical Trade Initiative (ETI) by FY25. Guiding best practice, ETI has allowed us to consult with global experts and peers to strengthen the foundations of our ethical approach.

In preparing this statement, CRG has consulted with the relevant leadership and office holders of the reporting entities listed in Appendix 1, who have agreed on the actions taken against modern slavery as set out in this statement.

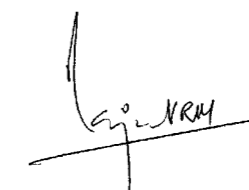
This statement was approved by the board of Country Road Group on 11 December 2024. CRG board member, Ramana Murthy Raju

Vuppalapati, is also the sole director and principal governing body of Country Road Clothing Pty Ltd, Witchery Australia Holdings Pty Ltd, Witchery Holdings Pty Ltd, Witchery Fashions Pty Ltd, and Mimco Pty Ltd. Therefore, the board of Country Road Group approved this statement on behalf of Country Road Group, as well as each of these subsidiaries. The board of Country Road Group also approved this statement on behalf of Country Road Group Holdings Pty Ltd and Woolworths International Australia (Pty Ltd). The principal governing bodies of these entities did not approve this statement because they are holding companies which do not have outward facing operations or undertake external procurement.

This statement is signed by



Ramana Murthy Raju Vuppalapati
Chief Executive Officer
Country Road Group





STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Country Road Group

Country Road Group consists of some of Australia's most iconic and most loved fashion retail brands – Country Road, MIMCO, POLITIX, Trenergy and Witchery.

Our structure

Country Road Group Pty Ltd is an Australian company (ACN 006 759 182) operating in the apparel, accessories and homewares retail sector and headquartered in Melbourne, Victoria.

There have been minimal changes to Country Road Group's subsidiary structure and entities during this period from that reported in our previous statement. Country Road Group's ultimate parent company remains Woolworths Holdings Limited, a South African business listed on the JSE (which is not a reporting entity for the purposes of this statement). The highest reporting entity in our Australian corporate structure remains Country Road Group Holdings Pty Ltd.

Country Road Group comprises five customer-facing brands operated by the following wholly owned subsidiaries of Country Road Group:

- Country Road Clothing Pty Ltd (ACN 005 419 447) trading as **COUNTRY ROAD** and **TRENERGY**
- Witchery Fashions Pty Ltd (ACN 006 897 230) trading as **WITCHERY**
- MIMCO Pty Ltd (ACN 067 573 291) trading as **MIMCO**
- Cicero Clothing Pty Ltd (ACN 614 757 327) trading as **POLITIX**

With the exception of Cicero Clothing Pty Ltd, these entities are all reporting entities for the purposes of the MSA. In addition, Country Road Group and the entities listed here own, control and operate various Australian, New Zealander and Singaporean subsidiary entities who are non-reporting entities under the MSA. These subsidiary entities undertake a range of functions such as warehousing, logistics and property.

“In FY24, we operated over 600 retail and concession stores across Australia and New Zealand consisting of over 300 stores for individual brands and over 300 concession arrangements.”

Our operations

Headquartered in Melbourne, our operational activities range from creating initial fashion and marketing design concepts through to warehousing and fulfilling customer orders, either instore, from our Omni Fulfilment Centre (OFC)¹ which we own and operate or from our third-party logistics provider. Country Road Group does not directly manufacture goods, but rather engages with a range of suppliers for the manufacture of goods, sold under our five retail brands, including apparel, footwear, homewares and other accessories.

In FY24, we operated over 600 retail and concession stores across Australia and New Zealand consisting of around 300 stores for individual brands and over 300 concession arrangements (i.e. stores within David Jones or Myer stores).

Orders received online are fulfilled through the combined services of our warehouses and retail stores. Our team members' roles include retail services, design, production, IT, customer service, merchandising, retail operations, marketing, e-commerce, sourcing, sustainability, legal, risk, finance, and executive management. These team members are directly employed on either a full-time, part-time, or casual arrangement under Enterprise Bargaining

Agreements, relevant Awards or Individual Employment Contracts depending on their position and work location.

Country Road Group employs staff within stores, at our head office support centre in brand-specific and shared services roles and at our OFC. The brand “Country Road” employs the largest number of employees with 2,937 (52%) of 5,608 employees groupwide in Australia and New Zealand.²

Most team members are employed in Australia (5,269 employees, representing 94%), with 339 employees based in New Zealand (6%). Almost 50% of team members are employed on a “casual” basis.

¹ Omni Fulfilment Centre is a distribution center which receives and distributes merchandise.

² Country Road Group products are also sold via concession and standalone stores in South Africa. The staff employed in these stores are engaged by a South African based entity on South African employment terms, and the stores are managed by Country Road Group's parent company, Woolworths Holdings Limited.

“Country Road Group employs staff within stores, at our head office support centre in brand-specific and shared services roles and at our OFC.”

Country Road Clothing Pty Ltd, Witchery Fashions Pty Ltd, Mimco Pty Ltd, and Cicero Clothing Pty Ltd are our retail operating companies, engaging in the design, developing, and purchasing of products, goods and services, and are responsible for the retail activities at our branded stores, concession pads (in David Jones and Myer stores) and via our e-commerce channels.

Each of these entities employ staff, lease and operate retail stores, design and develop products that we sell, and partner with suppliers of goods and services to support our operations. All these entities operate in a similar manner and are collectively reported on throughout this statement.

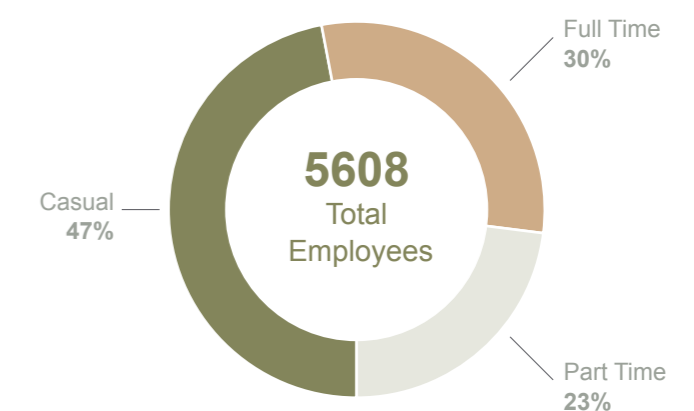
Our operations also include the use of indirect workers engaged via third-parties to provide services to support the ongoing activities of our operations. These indirect workers may include labour-hire in our OFC, or cleaning and security services across our store and support centre sites. More information about these services is included in the following section about our supply chains.

Employees by Employing Entity*

Retail Employees	No of Employees	
	Australia	New Zealand
Country Road	2691	246
Witchery	1032	56
Mimco	605	0
Politix	491	14
Trenerly	308	23
CRG Logistics (OFC)	142	0

* As at 30 June 2024

Employees by Contract Type*



Our supply chain

Our supply chains span the globe and can be widely varied and complex. Country Road Group partners with suppliers with a range of different capabilities in our product supply chains for the manufacture and supply of merchandise for retail. This includes apparel, accessories, footwear and homewares. We also engage in the “non-trade” procurement of goods and services (such as cleaning services for offices and stores) to support the operation of our businesses. This section describes both of these elements of our supply chain.

Country Road Group Operations model



Our merchandise supply chain

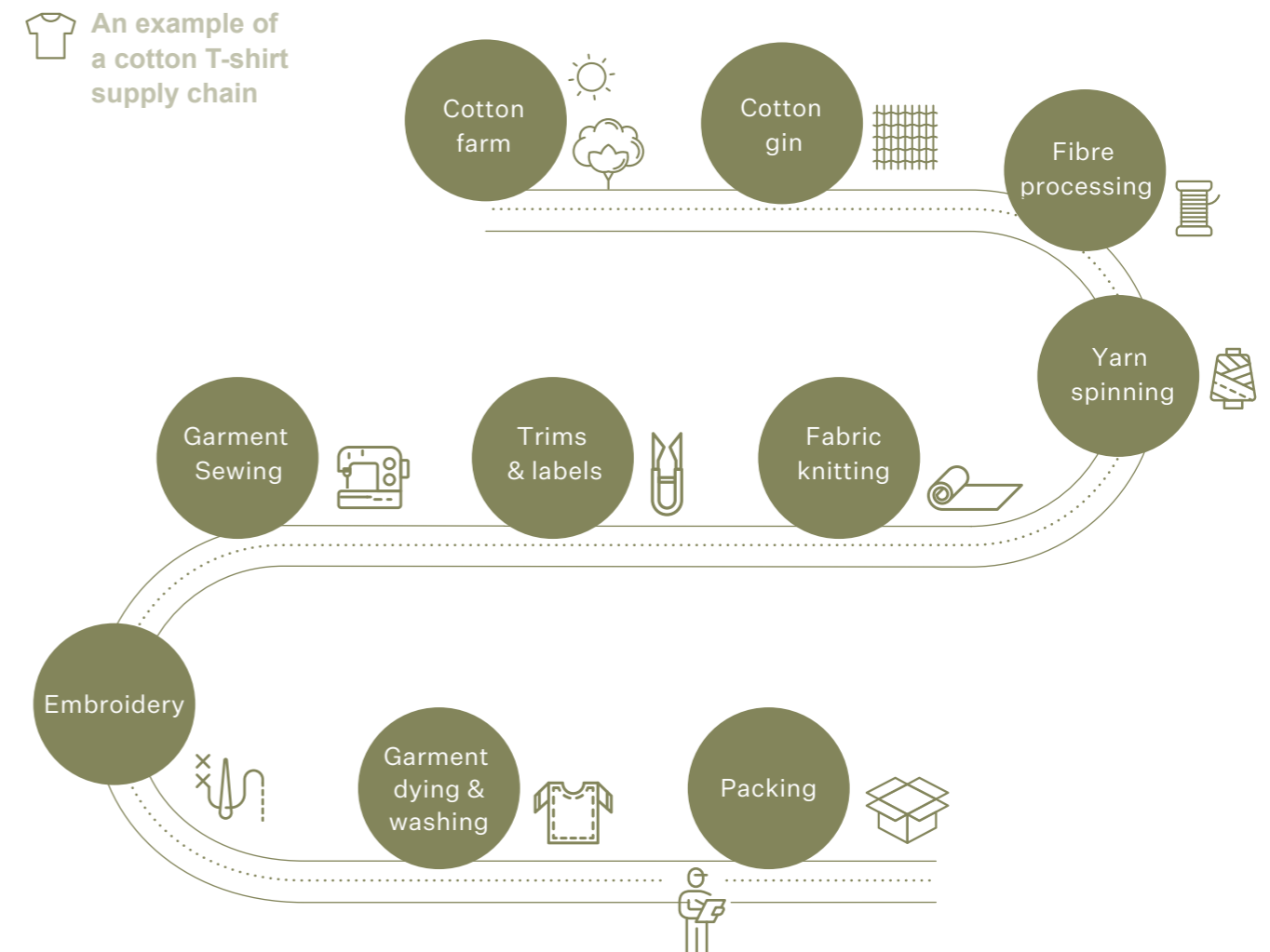
In FY24, our merchandise sourcing footprint covered 14 countries, where we partnered with 151 suppliers to manufacture our branded products in 218 finished goods factories and contributed to the employment of over 75,000 workers at these sites. These suppliers may own the finished goods factory that makes our products, or they may sub-contract to factories approved by Country Road Group to complete the final production. The product range includes apparel, footwear, fashion accessories and homewares. Materials used in these products include natural textile fibres (e.g. cotton, wool, and linen), man-made cellulosic fibres (e.g. viscose, lyocell and acetate), synthetic textile fibres (e.g. polyester and nylon) and non-textile materials (e.g. leather, timber and glass).

Our contractual trading arrangements are primarily with our direct merchandise suppliers that own or engage factories to produce merchandise. We have contractual arrangements with some nominated fibre and fabric suppliers beyond these merchandise suppliers.

However, we do not have direct relationships with every entity involved in the complex supply chains of our products.

Across the range of products that we design, each of the steps involved in manufacturing are often different and nuanced depending on the product type, design and style, or the materials used. The range of activities involved in our fashion supply chain may include:

- Cultivation of raw materials (e.g. cotton or linen)
- Processing of raw materials into fibres, yarn, or hides,
- Weaving, knitting, or bonding of the fibres into fabrics
- Wet processing including dyeing, washing, and tanning
- Finished product assembly (including sewing, knitting, linking, and moulding)
- Other value-add processes (such as embroidery, trims, hardware, and printing)
- Packaging, labelling, packing and shipping



The relationship between participants in each phase of the production supply chain are often complex. Each stage of production may occur in singular or multiple countries and regions. Fibres may be grown in one country, shipped to another for converting into yarns before being woven into fabrics elsewhere. Some factories are vertically integrated and conduct multiple stages of production within the one facility. However, many supply chain participants specialise in certain aspects of production and act as component or service providers to other supply chain actors.

Our commitment to improving the transparency of our supply chains continues to be a major focus for our business. A list of factories where we produce our products is publicly available on **CRG's website**. In addition to this list, some of our individual brands continue to build greater supply chain transparency on their

brand websites, which can include additional information on the manufacturers, farmers, raw material sources and the processes involved in the production of goods³.

Our non-trade goods & services supply chain

Non-trade goods and services that we procure for the support of the operation of our business activities were obtained primarily from 97 different suppliers across eight major categories of non-trade procurement throughout the reporting period. These 97 suppliers represented 80% of the total non-trade spend for the Country Road Group in FY24.

Most of these suppliers have their businesses incorporated and located in Australia, however the non-trade goods and services that we procure may involve both domestic and international activities.

The four key categories (by spend) of goods and

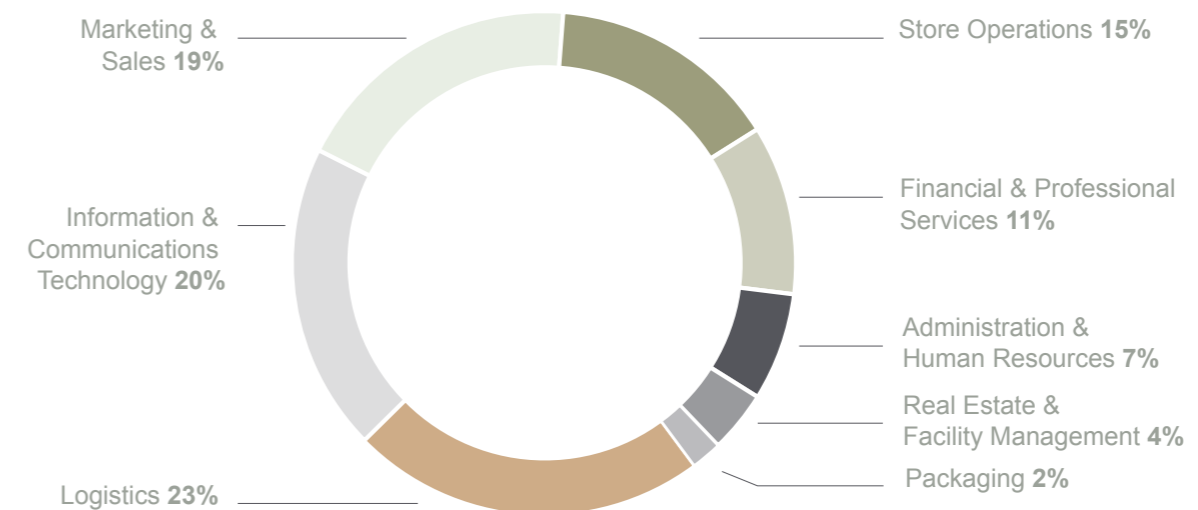
services that we procure within our Non-Trade categories include:

1. Logistics services, including merchandise freight and distribution (23%);
2. Information and communications technology (ICT), including computers, digital applications, and telecommunications equipment and services (20%);
3. Marketing materials and services, such as

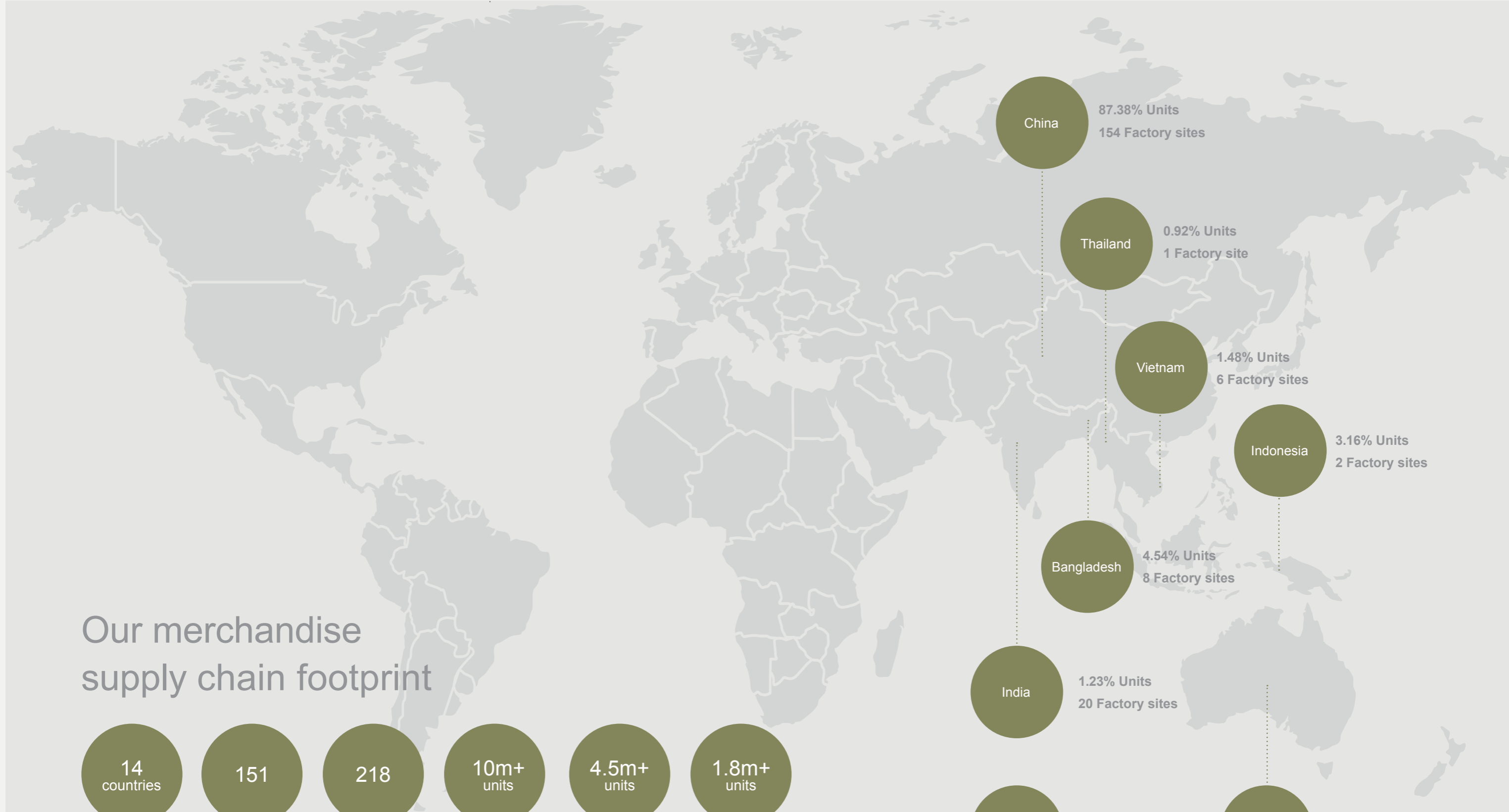
creative advertising services and photography services (19%); and

4. Instore fixtures and fittings, including racks and trolleys used for moving & managing merchandise (15%).

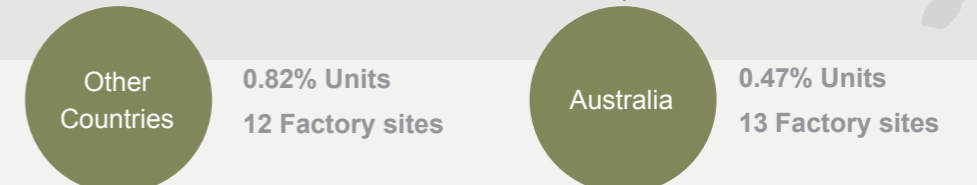
Spend breakdown (%)



³ <https://www.countryroad.com.au/stories/a-story-of-australian-craft-robert-gordon.html>
<https://www.countryroad.com.au/stories/the-future-of-denim-with-saitex.html>
<https://www.countryroad.com.au/stories/50years-towards-circularity.html>
<https://www.countryroad.com.au/stories/weaving-a-tasmanian-legacy-with-waverley-mills.html>
<https://www.trener.com.au/tailored-fit-italian-cotton-poplin-shirt-60291683-141>
<https://www.trener.com.au/italian-check-tweed-cropped-jacket-60296230-4227>



Our merchandise supply chain footprint





MODERN SLAVERY RISKS

Identifying modern slavery risks

The Country Road Group takes an holistic, Group-wide approach to identifying and assessing modern slavery risks in our operations and supply chains.

Modern slavery describes ‘situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom’⁴. The MSA defines modern slavery as including eight forms of serious exploitation, which are explained in Appendix 2. Consistent with the United Nations’ ‘Guiding Principles on Business and Human Rights’ (UNGPs) and the Australian Government’s official guidance about the MSA, we understand modern slavery risks to mean the risk that we may ‘cause’, ‘contribute to’ or be ‘directly linked to’ modern slavery (see table opposite).

We recognise that modern slavery does not occur in isolation and can often be connected to other breaches of human rights, including failure to provide decent work or situations of substandard working conditions. We are committed to understanding and addressing our modern slavery risks as part of our broader efforts to respect human rights, including by integrating our assessments, actions and responses to modern slavery within our ethical sourcing and human rights approach.

Key term	Explanation	Hypothetical example relevant to the fashion sector
Cause	A business may cause an adverse human rights impact, such as modern slavery, where it causes the impact through its own activities or omissions.	For example, a logistics company could cause modern slavery by exploiting its workers used to crew shipping vessels.
Contribute to	A business may contribute to an adverse human rights impact, such as modern slavery, where its actions or omissions facilitate or incentivise the impact to the extent that it would have been unlikely to occur without them.	For example, a fabric wholesaler could contribute to modern slavery where it requires its suppliers to reduce costs to a level that could only be achieved by using exploited workers.
Directly linked to	A business may be directly linked to an adverse human rights impact where its operations, products or services are connected to the impact through the actions of another entity with which it has a business relationship (such as a supplier) but the business has not caused or contributed to the harm.	For example, a fashion company could be directly linked to modern slavery where its supplier manufactures garments made using raw materials produced by a third supplier who exploits its workers.

⁴ https://modernslaveryregister.gov.au/resources/Commonwealth_Modern_Slavery_Act_Guidance_for_Reporting_Entities.pdf

“We use a number of methods, levers, tools and resources to assess our modern slavery risk profile.”

How we identify risk

During the FY20 reporting period, we undertook a risk assessment with an expert third-party organisation (LRQA, formally ELEVATE) to identify potential areas of modern slavery risk within our trade and non-trade supply chains. We recognise that external factors over the past 4 years have had an influence on this risk profile, and we are committed to updating this risk assessment in FY25 and conducting more regular reviews moving forward.

We use a number of methods, levers, tools and resources to assess our modern slavery risk profile.

These include:

- Monitoring global news regarding human rights, forced labour and modern slavery issues,
- Connecting with industry peers, NGO's, and multi-stakeholder initiatives to stay abreast of the ever-changing risk landscape and best practice mitigation strategies,
- Engaging with risk screening and monitoring technology partners (such as LRQA's EiQ and Sentinel supply chain screening tools, and Supplier Ethical Data Exchange's (SEDEX) Radar risk tool), and
- Identifying trends in factory social audits completed and Self-Assessment Questionnaires (SAQs).

Our risks / Salient risks

Applying information gathered from our risk assessment approach, we consider the following modern slavery risks to be the most at risk of having been caused, contributed to, or directly linked to Country Road Group in FY24:

- Forced labour
- Bonded labour (recruitment fees)
- Deceptive recruiting
- Child labour⁵

⁵ The MSA specifies that modern slavery includes only “the worst forms of child labour”, however this reference to “child labour” in this statement refers to more general child labour risks.

Underlying factors and indicators that drive these risks may include:


- Use of migrant labour or unskilled labour in supply chains (including the production of raw materials) where workers are more vulnerable to exploitation,
- Use of industries and geographies largely dependent on human labour,
- Unauthorised subcontracting which could lead to unknown actors involved in the provision of goods or services who may be engaged in modern slavery,
- Potential involvement of children in extended supply chains, including in hazardous or harmful work, such as the production of raw materials,
- Extreme working conditions such as excessive overtime hours or lack of rest days,
- Underpayments of wages or social insurances, and
- Lack of transparency and willingness to collaborate.

We have assessed the risks of modern slavery occurring in our direct operations (including our retail stores, head office support centre and the direct employment of our staff) as low. This reflects the controls we have in place, as detailed on pages 18 and 19.




As set out in the accompanying table, we recognise that elements of our operations and supply chains, including engagement of service providers to support our activities, may pose potential modern slavery risks.

Additional human rights and environmental risks also sit outside of the above noted modern slavery risks. We continue to monitor broader risks in our businesses and value chain; for more information, please refer to WHL's latest Good Business Journey report.

Risk areas in our operations

Context	Potential hypothetical examples
 <p>Industry risk factors</p> <p>We engage service providers to support our operations from industries recognised as having higher modern slavery risks, including logistics, cleaning, security and labour hire for our stores & OFC.</p>	<ul style="list-style-type: none"> • Logistics service providers or their subcontractors could exploit workers providing services on Country Road Group sites. • Labour hire workers engaged through third parties to work in our OFC could be exploited by the labour hire provider

Risk areas in our supply chain

Context	Potential hypothetical examples
 <p>Geographic risk factors</p> <p>We source and procure merchandise and goods that are not-for-retail from a range of countries, including countries which may have a higher vulnerability to modern slavery due to factors such as poor rule of law.</p> <p>We recognise the extended impacts of COVID on workforces globally: With labour shortages in all regions of supply leading directly to reductions in production capacities. This increases the risk of excessive overtime being used to fulfill order commitments and to creating environments within which modern slavery risks may appear.</p>	<ul style="list-style-type: none"> • Workers producing raw materials in our extended retail supply chain could be subject to exploitation. • Workers involved in manufacturing activities in our extended retail supply chain (such as factory workers) could be exploited by factory managers. • Logistics workers involved in the warehousing and distribution of products (including seafarers) could be subject to exploitation. • Workers involved in the manufacturing of not-for-retail products such as IT equipment could be subject to exploitation (including workers involved in the sourcing of raw materials).
 <p>Industry risk factors</p> <p>The garment and footwear sector are recognised as a high-risk sector for modern slavery globally, including due to the widespread use of migrant labour and high levels of subcontracting. There are also risks associated with the transport and logistics sector, including in relation to the warehousing and shipping of merchandise and other products.</p>	
 <p>Commodity risk factors</p> <p>Key agricultural commodities have been widely documented to be of higher risk of potential modern slavery. This includes the harvesting and cultivation of cotton, and the collection of PET bottles used to make recycled polyester.</p>	



ASSESSING AND ADDRESSING RISKS

Addressing modern slavery risks

Governance

Human rights responsibilities (including in relation to modern slavery) are managed at the highest level across our companies and are integrated into our governance framework.

The Board of Country Road Group is responsible for overseeing our approach to assessing and addressing modern slavery risks, including our reporting obligations under the MSA. WHL also has direct oversight on modern slavery through the WHL Social and Ethics Committee, which meets three times per annum.

The Country Road Group Executive Team retained “Modern Slavery” (as a subset of our “Good Business Journey”) within the Corporate Risk Register. This places our Good Business Journey on the highest-level agenda for our companies and continues to elevate the voice of human rights (including in relation to modern slavery) within our business. Through being on the Corporate Risk Register, we will continually review the existing risks and mitigation strategies at a more granular level to assess the effectiveness of current controls and identify opportunities for improvement.

Management of human rights risks is held by the Chief Sourcing and Supply Chain Officer (merchandise supply chain), Chief People Officer (our team members), and Chief Financial Officer (non-trade supply chain).

On a day to day basis, modern slavery risk monitoring is performed by our Ethical Sourcing function. Reporting to the Chief Sourcing and Supply Chain Officer, this team is also responsible for the implementation of our Approved Factory Program (AFP).



“We take an integrated approach to assessing and addressing modern slavery risks across our House of Brands.”

Policy controls

Country Road Group has a clear set of codes, policies, and protocols with which our people and suppliers are required to adhere. These codes and policies operate equivalently and consistently across the full group, including owned and controlled entities.

This suite of documents helps to effectively manage modern slavery and broader human and labour rights risks by articulating our expectations and ways of working to our team members and suppliers.

The following documents are most relevant to our modern slavery approach:

Policy, Protocol or Mechanism	Description
Employment contracts	Formal legal agreements between Country Road Group and employees which clearly specifies each party's responsibilities including regarding adherence to laws, our codes, and policies
Award/Enterprise agreements	Formal agreements setting out our terms and conditions of employment, wage rates, overtime rules and leave arrangements
Employee Code of Conduct	Details the standards of behaviour and ethical conduct expected of employees
Workplace Behaviour and EEO Policy	Sets out obligations to behave appropriately in the workplace and provides guidelines on accessing support and how to resolve a complaint
Discrimination, Harassment and Bullying Policy	Establishes prohibited behaviours in the workplace and provides guidelines and processes for resolution of concerns in relation to workplace behaviour
Whistleblower Policy	Provides guidance on how improper or criminal conduct (such as instances of modern slavery) can be confidentially disclosed and will be investigated
Ethics Hotline Procedure	Details the procedure by which complaints or tip-offs made to the Ethics Hotline via phone, email or submitted to the website will be received, escalated and managed
Grievance and Dispute Resolution Policy	Designed to raise awareness about, and provide a fair and just working environment, by ensuring that team members have access to processes for the resolution of genuine personal grievances relating to the workplace
Supplier agreements	Formal legal agreements between Country Road Group and suppliers which clearly specifies each party's responsibilities including regarding adherence to laws, our codes, and policies
Supplier Code of Labour Practice	Included in all supplier agreements, this Code sets out the expectations of our suppliers in relation to health and safety, human rights and labour rights.

“ETI membership provides a global best practice framework to support us in continuing to refine and strengthen our ethical sourcing and human rights programs.”

Partnerships and memberships

Modern slavery is a systemic global challenge that requires broad engagement and collaboration to shift the needle. We actively engage or partner with a number of key groups to keep our approach up to date and to leverage industry-scaled advocacy:

- Ethical Trading Initiative (ETI)
- SEDEX
- LRQA
- International Accord
- UNGCNA (MSCoP)
- NRA ESG Committee

We indirectly encouraged improved social outcomes deeper in our supply chain through our responsible sourcing program. Many of our products contain third-party certified responsibly-sourced materials, whose bodies monitor and promote improved environmental and social impacts.

Ethical trading initiative

As a member of the Ethical Trading Initiative, alongside our parent company WHL, through FY24 we have continued to progress towards graduating from Foundation Member to Full Member. This has involved engaging with ETI teams to identify areas for improvement and applying their feedback and learnings from training sessions to our existing policies and practices. Our full ETI membership will provide a global best practice framework and ability to network with other members, to support us in continuing to refine and strengthen our ethical sourcing and human rights programs. CRG is currently on track to achieve full membership by the end of FY25.

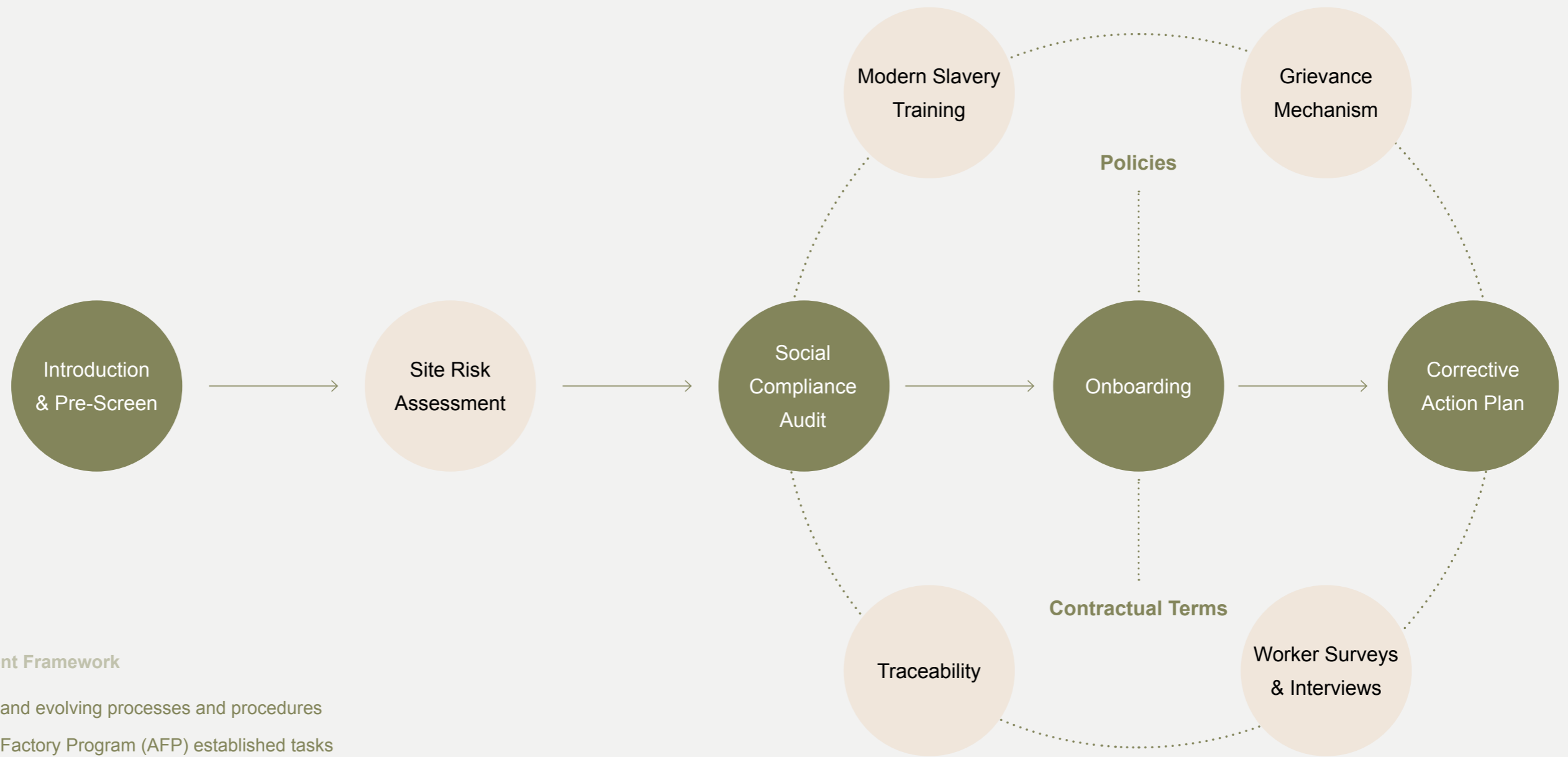
Addressing risks in our operations

We consider the risk of modern slavery in our directly employed team members as low.

The majority of our team members are employed directly, with employment contracts aligned with either an Enterprise Bargaining Agreement, relevant Award, or Individual Employment Contract as regulated by Australian and New Zealand employment laws.

We also comply with relevant workplace laws, including the Australian Fair Work Act 2009 (Cth). Our people team regularly review our employment agreements and our internal people policies to ensure that they meet, and where possible exceed, legal requirements.

Addressing risks in our merchandise supply chain



Our approved factory program

We understand that our supply chain operates in an environment with a higher risk of potential labour-related issues due to geographical and industry risk factors. Our AFP continues to be our primary management tool for identifying, preventing, and mitigating any violations of human rights, including forms of modern slavery.

Our AFP involves suppliers' factories being assessed against our updated Supplier Code of Labour Practice, which is aligned to the ETI Base Code. Assessments are carried out through a range of methods, including self-assessment questionnaires and on-site social compliance audits conducted by independent certified third parties that identify and assess actual and potential human rights risks.

Factories are assessed to identify workplace indicators that may lead to, or be a flag for, modern slavery. We have also established a right to compel suppliers to take clear corrective action plans as a result of these social compliance audits to verify, remedy and close non-compliance issues.

Our Approved Factory Program captures all Tier 1 factories (i.e. those involved in the production of finished goods), as these are the supply chain actors where we have the greatest ability to influence change. Sites in-scope for social audits are required to undertake a third-party social audit.

Factory assessments are monitored by our Ethical Sourcing Team based in Melbourne.

The most serious non-compliances⁶, where immediate interventions are required, are escalated to relevant stakeholders and our Executive Team for awareness, consultation and approval of actions to address issues. Resolution may include termination of supplier relationships where required, but our aim is always to work with suppliers to resolve issues where possible. We recognise that remediation is the best option to resolve these issues in the best interests of the workers affected.



⁶ Defined as zero-tolerance or Business Critical in accordance with the Sedex SMETA guidance

“Our Ethical Sourcing team assessed 67 social compliance audits conducted over FY24, and no instances of modern slavery were identified during this reporting period.”

Outcomes of social compliance auditing

Our Ethical Sourcing team assessed 67 social compliance audits conducted over FY24.

No instances of modern slavery were identified through social compliance audits during this reporting period. However, 30 instances of critical non-conformances (NCs) were identified across 16 sites, which related to health and safety (worker health, PPE, building maintenance, fire safety), overtime hours, site permits and licenses and record keeping. As at the end of FY24, 11 of the 30 critical non-compliances had been confirmed as closed.

We require our suppliers to be active members of the platform SEDEX as part of our AFP, providing increased visibility of risk profiles and enabling active management of non-compliance and audit renewal schedules. In FY24 we achieved 79% of active factories with active SEDEX membership as at 30 June 2024.

In accordance with the principles outlined in the risk assessment completed by ELEVATE in FY20, we continue to investigate new controls to improve monitoring and management of modern slavery risks, including risk assessment tools available through the SEDEX platform.

Summary of our Approved Factory Program for FY24

67

On-site factory audits conducted and assessed

79%

Total sites with active SEDEX membership (as at 30 June 2024)

30

Critical instances on non-compliance found.

Tracing our supply chain to identify risks

Knowing your supply chain is the first step in identifying the risks, assessing the risks, and putting actions in place to address and remedy the risks.

We regularly collect data from our Tier 1 factories through AFP audit procedures, but also through more targeted information gathering activities such as a supplier sentiment survey or a grievance mechanism survey. Critical information is collected to identify potentially vulnerable people in our supply chain.

Some of the data includes:

- Total worker numbers at each factory site,
- Gender ratios within each factory site, and
- Percentage of international migrant workers at each site.

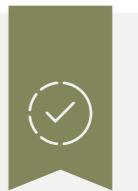
Training, capacity building and collaboration

We continue to identify new opportunities for training and awareness building within our operations and supply chains. As part of our actions to address modern slavery, we look to build the capacity of our employees and suppliers via training, collaboration with industry groups and supporting long-term relationships with our suppliers.

Actions in the reporting period included:

- Team members attending seminars and webinars on modern slavery and broader human rights issues,
- Our Ethical Sourcing Team completed ETI Human Rights Essential Training.

How are we making progress?



CASE STUDY

**Empowering Our Team:
A Modern Slavery Awareness Session**

Building on our e-learning program on the introduction to Modern Slavery, launched in FY23, we hosted an internal modern slavery awareness session. Team members who regularly engage with our trade suppliers - including sourcing, product development, production, shipping, quality assurance, and sustainability – were invited to participate.

The session covered the complexities of modern slavery, offering participants a better understanding of its various forms. It included interactive discussions on the definition and typologies of modern slavery, examining its prevalence across different industries, geographical regions, commodities, and sectors.

The session also included an exploration of the policies and processes that underpin our human rights risk management approach. By ensuring that team members are aware of Country Road Group's ethical standards, we are reinforcing our collective responsibility to combat modern slavery within our supply chain.

Worker sentiment; worker voice

To continue assessing and addressing modern slavery risks, we must engage with and promote the voices of the most vulnerable workers who may be at risk of modern slavery.

Remediation processes

In line with the UNGPs, we are committed to participating in remediation where we identify we have caused or contributed to human rights harm such as modern slavery. We also understand we may play a role in remediation where we identify we are directly linked to human rights harm.

We maintain both internal and external grievance channels for any of our staff or workers in our supply chain to raise concerns, which could include modern slavery related issues.

Concerns relating to modern slavery or broader human rights risks such as the 'physical conditions of work' can be raised by Country Road Group staff directly with our Human Resources Team as outlined in our "Grievance and Dispute Resolution Policy".

Concerns can also be raised anonymously by staff through a whistleblower hotline run by a third-party which is accessible by phone and email. Grievances that are raised through this mechanism are investigated confidentially.

These policies and processes are communicated to our staff during induction, through our intranet and social workplace platforms and through communications at Governance Week: a company-wide initiative held annually where principles of good governance are promoted to all employees via seminars, Q&As and articles.

Through FY24, we actively engaged with different stakeholders to deepen understanding of effective worker grievance and dispute resolution approaches.

Our initiatives included:

- Engaging LRQA to conduct a Worker Sentiment Survey,
- Participating in ETI Human Rights Essentials Training to enhance our understanding of grievance and remediation standards and practices, and
- Collaborating with the International Accord MSI to broaden the scope of grievance mechanisms and advance worker rights.



"These scores indicate a strong level of satisfaction among workers regarding their working conditions and the effectiveness of grievance mechanisms."

How are we making progress?



CASE STUDY

Advancing Worker Well-Being: Insights from the FY24 Worker Sentiment Survey

Across FY23 and FY24, CRG collaborated with LRQA to design and implement a worker sentiment survey pilot, trialing an effective grievance mechanism for workers. Our aim was to provide a direct, anonymous channel for workers to share their feedback, enabling deeper insight into worker experiences within our supply chain.

The survey was designed to gather worker insights and sentiment on the following key areas:

- Grievance Mechanisms
- Wages
- Work Atmosphere
- Safety and Productivity
- Workforce Stability
- Workforce Demographics

Five of our strategic suppliers in China participated in the worker sentiment survey, conducted in September 2023. Surveys were open for a minimum of seven days, allowing workers to respond at their convenience. They were delivered via QR codes, which could be scanned using workers' own mobile phones or through web URLs, and participation was entirely voluntary.

We received the final report from LRQA in November 2023. The overall feedback was positive, with 731 responses and all five factories achieving an A-rated score of between 92 – 97 (out of 100). These scores indicate a strong level of satisfaction among workers regarding their working conditions and the effectiveness of grievance mechanisms. Results indicated that our scores were generally higher than the sector average benchmark, which includes a global comparison with the apparel, footwear, and textile industries across various nations.

While the scores were generally higher compared to sector averages, they did not consistently exceed the national benchmarks for the region. This highlighted specific improvement opportunities, including site environmental performance, working hours and trust amongst male workers.

We are now reviewing the results in line with wider strategic sourcing reviews, to address the areas for improvement identified in each of the five factories and to refine how we engage with suppliers and their workers to ensure access to effective grievance mechanisms.



How are we making progress?



CASE STUDY

Expanding Worker Protections through the Accord Pilot Program

We continue to support initiatives that prioritise worker safety and rights, recognising that effective grievance mechanisms are essential to maintaining ethical and sustainable supply chains.

In FY24, CRG furthered our commitment to advancing worker rights by participating in International Accord and RMG Sustainability Council's (RSC) Comprehensive Complaints Mechanism (CCM) pilot. The initiative aimed to broaden the scope of workplace complaints management in the Bangladesh Ready-Made Garment (RMG) industry, to encompass a wider range of critical issues affecting workers.

Launched in March 2024 and set to run through August 2024, the pilot program includes a select group of 100 lead brands and 503 of their suppliers, alongside 33 other brands connected through shared supply chains. The expanded scope now addresses complaints related to: freedom of association and collective bargaining; child labour; forced labour; discrimination; minimum wages benefits and leave; human resources; unfair employment contracts; separation; and environmental concerns.

Leveraging an industry-wide grievance mechanism such as RSC's CMM provides a single platform for Bangladeshi workers, reducing duplication of programs and simplifying the complaints resolution process for both workers and brands.

International Accord and RSC will share the outcomes of this pilot with Country Road Group and other brand participations in FY25.

Monitoring and measuring our effectiveness

The Country Road Group continually monitors its actions to assess and address modern slavery risks using a combination of both quantitative and qualitative measures. We also appreciate that these measures need to be reviewed and adapted as our actions mature and as our understanding of modern slavery continues to develop and evolve.

The following table sets out the measures and indicators we utilise to measure our effectiveness at assessing and addressing modern slavery risks across all our reporting entities and operating subsidiaries.

Area	Objectives	Effectiveness indicators
Policies and contractual controls	<ul style="list-style-type: none"> • Ensure policies set clear expectations around preventing and addressing all forms of modern slavery across our operations and supply chains • Ensure policies are meaningfully implemented 	<p>Current</p> <ul style="list-style-type: none"> • Policies reviewed on regular basis (internal and external) • Percentage of suppliers and staff covered by agreements/ contracts and our codes • Percentage of factories audited against compliance with relevant policies • Staff have ready access to policies related to modern slavery • Suppliers have ready access to policies related to modern slavery
Risk assessments	<ul style="list-style-type: none"> • Understanding and monitoring our exposure to modern slavery risks 	<p>Current</p> <ul style="list-style-type: none"> • Number of supply chain actors traced <p>Future</p> <ul style="list-style-type: none"> • Number of risk assessments conducted • Number of supplier sites in high and extreme risk ratings
Awareness raising and capacity building	<ul style="list-style-type: none"> • Modern slavery awareness training for internal staff and suppliers to ensure appropriate staff have knowledge of risks, prevention, and remediation • Improve external awareness and transparency relating to modern slavery risks 	<p>Current</p> <ul style="list-style-type: none"> • Number of staff trained on modern slavery and broader human rights risks • Number of suppliers trained on modern slavery and broader human rights risks <p>Ad-hoc</p> <ul style="list-style-type: none"> • External public assessments of our public reporting through NGO's or multi stakeholder initiatives (MSI's)
Audits and issue monitoring	<ul style="list-style-type: none"> • Supply chain monitoring and assurance (through Approved Factory Program) • Ensure quality and effectiveness of audit types • Audit corrective actions undertaken, improved, or closed (including remediation of any actual modern slavery findings) 	<p>Current</p> <ul style="list-style-type: none"> • Percentage of factories approved in our auditing program • Number of critical issues identified • Number of modern slavery issues identified • Number of audit issues remediated in line with Approved Factory Program criteria • Remediation of any actual modern slavery instances <p>Future</p> <ul style="list-style-type: none"> • Number of Non-Trade Procurement (NTP) suppliers who publish modern slavery statements
Worker voice and remediation processes	<ul style="list-style-type: none"> • Access to effective grievance mechanisms for workers in our operations and in our supply chains • Grievances effectively remediated • Required actions taken against actual modern slavery violations 	<p>Future</p> <ul style="list-style-type: none"> • Number of grievances raised by workers in our operations and our supply chains, by topic • Number of worker grievances resolved, and within what timeframe

Process of consultation

This statement has been prepared in consultation with each of the reporting entities listed in Appendix 1 and all owned and controlled entities of Country Road Group.

Each of the reporting entities covered by this statement, as well as all entities owned or controlled by those reporting entities:

- Have common directors
- Share the same registered office address
- Use the same policies and processes
- Operate in the same sector
- Use many of the same suppliers, and
- Report to the same executive team.

Senior management, executives and the directors of the reporting entities, and owned and controlled entities, have been consulted and informed of the actions taken throughout this reporting period, and development of this statement has occurred through:

- Face-to-face meetings with Directors
- Email correspondence
- Consultation on actions throughout the year, and
- Board meetings.



Looking forward

Country Road Group is committed to the people within our operations and supply chains and as a responsible business we aim for continuous improvement of our actions in our response to our modern slavery risks.

As we look to improve our approach to tackling modern slavery, we have broadly set out the below goals:

- Ongoing review and improvement of policies, in particular CRG's Code of Labour Practice
- Continue to provide training to our CRG teams on the topics of modern slavery and responsible purchasing practices
- Develop an ongoing traceability program to extend our supply chain mapping and human rights due diligence beyond our tier 1 factories
- Strengthen our human rights risk assessment processes for new supplier screening and extend due diligence to our non-trade suppliers
- Further develop our systems for measuring the effectiveness of our efforts to assess and address modern slavery risks
- Continue to progress our Living Wage Roadmap
- Maintain ongoing engagement with industry partners, including making progress toward becoming a full member of ETI



Appendices

Appendix 1

All entities that are reporting entities and included in this joint statement:

Country Road Group Holdings Pty Ltd	(Holding company)
Woolworths International (Australia) Pty Ltd	(Holding company)
Country Road Group Pty Ltd	(Parent company)
Country Road Clothing Pty Ltd	(Operates as COUNTRY ROAD and TRENER)
Witchery Australia Holdings Pty Ltd	(Holding company)
Witchery Holdings Pty Ltd	(Holding company)
Witchery Fashions Pty Ltd	(Operates as WITCHERY)
Mimco Pty Ltd	(Operates as MIMCO)

Appendix 2

Definitions of modern slavery⁷

Type of modern slavery	Definition
Trafficking in persons	Describes the recruitment, harbouring and movement of a person for exploitation through modern slavery.
Slavery	Describes situations where the offender exercises powers of ownership over the victim, including the power to make a person an object of purchase and use their labour in an unrestricted way.
Servitude	Describes situations where the victim's personal freedom is significantly restricted, and they are not free to stop working or leave their place of work.
Forced marriage	Describes situations where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.
Forced labour	Describes situations where the victim is either not free to stop working or not free to leave their place of work.
Debt bondage	Describes situations where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.
Deceptive recruiting for labour or services	Describes situations where the victim is deceived about whether they will be exploited through a type of modern slavery.
The worst forms of child labour	Describes situations where children are: <ul style="list-style-type: none"> • exploited through slavery or similar practices, including for sexual exploitation or • engaged in hazardous work which may harm their health, safety, or morals or • used to produce or traffic drugs.

⁷ Definitions taken from the Australian Commonwealth's Guidance for Reporting Entities: http://modernslaveryregister.gov.au/resources/Commonwealth_Modern_Slavery_Act_Guidance_for_Reporting_Entities.pdf

Appendix 3 Statement Criteria Index

MDA mandatory reporting criteria	Location of response to mandatory criteria within this statement
16.1.a Identify each reporting entity covered by the joint statement	<ul style="list-style-type: none"> • Introduction & Executive Note • Appendix 1
16.1.b Describe the structure, operations and supply chains of each reporting entity covered by the joint statement	<ul style="list-style-type: none"> • Structure, Operations and Supply Chain
16.1.c Describe the risks of modern slavery practices in the operations and supply chains of each reporting entity covered by the joint statement and any entities that each of those reporting entities owns or controls	<ul style="list-style-type: none"> • Modern Slavery Risks
16.1.d Describe the actions taken by each reporting entity covered by the joint statement and any entities that each of those reporting entities owns or controls to assess and address these risks, including due diligence and remediation processes	<ul style="list-style-type: none"> • Introduction & Executive Note • Addressing Modern Slavery Risks • Worker sentiment; Worker voice • Training, capacity building and collaboration
16.1.e Describe how each reporting entity covered by the joint statement assesses the effectiveness of actions being taken to assess and address modern slavery risks	<ul style="list-style-type: none"> • Monitoring and measuring our effectiveness
16.1.f Describe the process of consultation with each reporting entity covered by the joint statement and with any entities that each of those reporting entities owns or controls	<ul style="list-style-type: none"> • Introduction & Executive Note • Addressing Modern Slavery Risks • Process of consultation
16.1.g Any other relevant information	<ul style="list-style-type: none"> • Looking forward



COUNTRY ROAD GROUP

COUNTRY ROAD MIMCO POLITIX TRENERY WITCHERY