



Modern Slavery Statement 2024

About this Statement

This Statement covers the activities of Winning Appliances Pty Limited (ABN 94 002 193 688), a company incorporated in Australia, and each of its related entities, including Appliances Online Pty Limited (ABN 19 151 833 546), Winning Services Pty Limited (ABN 34 152 213 039), Home Clearance Pty Limited (ABN 55 615 069 095), Andoo Pty Limited (ABN 49 115 622 172), Spence & Lyda Pty Limited (ABN 43 094 430 574 and ORA Restaurant Pty Limited (ABN 42 649 181 340) (collectively, the Winning Group) for the financial year commencing 1 July 2023 and ending 30 June 2024 (FY24 Statement Period).

This Statement sets our commitment to assisting in the prevention, response, and remediation of modern slavery in all business activities and within our supply chains. It outlines the steps we have taken to ensure compliance with the Modern Slavery Act 2018 (Cth) (MSA).

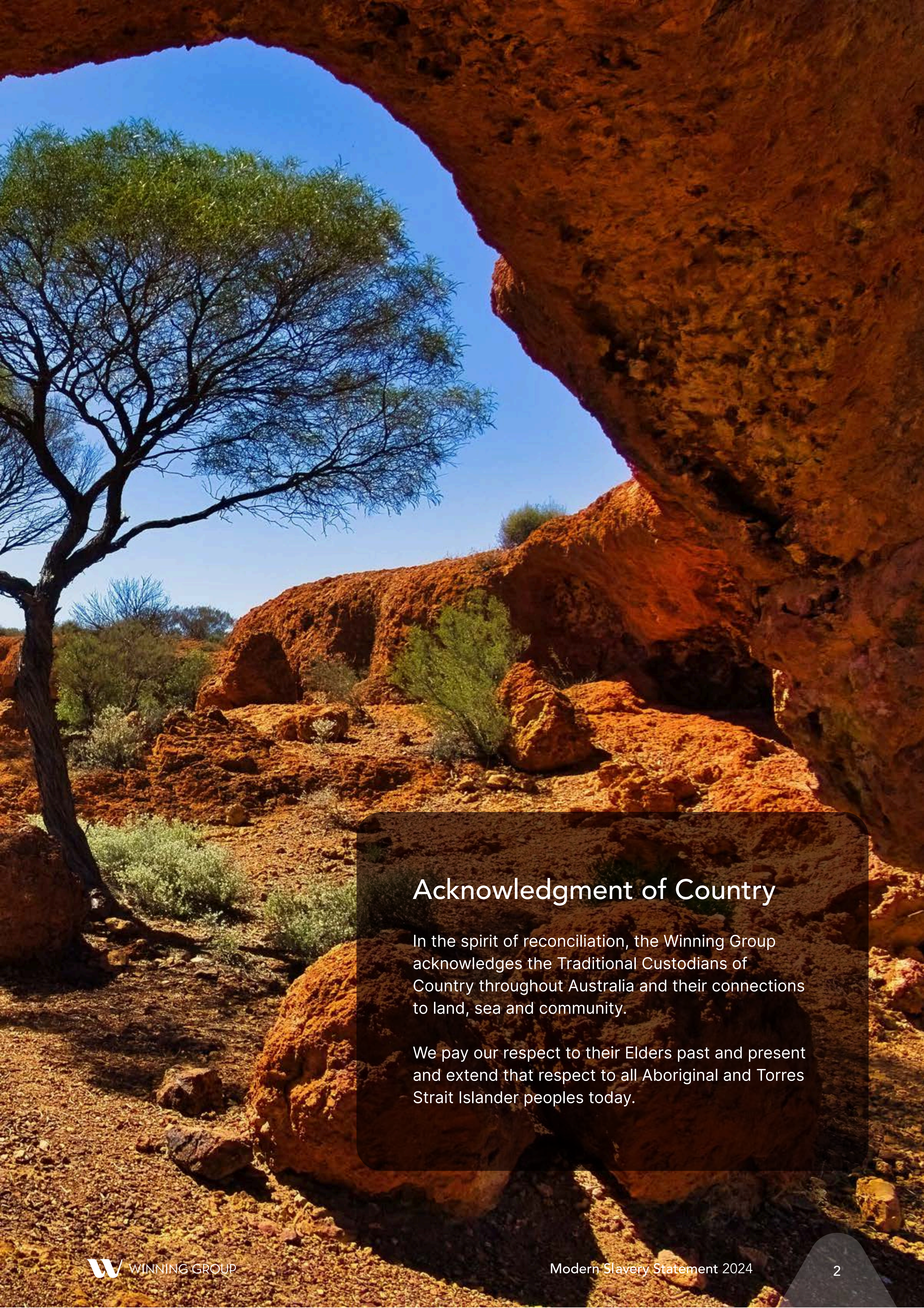
Speak-Up Hotline

Winning Group values the vigilance and feedback of our stakeholders to uphold our commitment to high standards of conduct and behaviour. If you have concerns about modern slavery or potential human rights issues in our operations or supply chain, we encourage you to reach out to us through our partner, Core Integrity. Your voice is important, and we are here to listen. You can contact us using the information below and can choose to remain anonymous when communicating with us.

Channel	Details
Web and Online	https://www.clearviewconnects.com/#/
Email	speakup@coreintegrity.com.au
Phone	1800 324 775
Mail	Speak Up, P.O. Box 730 Milsons Point NSW 1565



For more detail refer to our Whistleblower Policy which can be found www.winninggroup.com.au/speak-up-policy



Acknowledgment of Country

In the spirit of reconciliation, the Winning Group acknowledges the Traditional Custodians of Country throughout Australia and their connections to land, sea and community.

We pay our respect to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today.



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A Message from our CEO

At the Winning Group, Responsible Sourcing remains a cornerstone of our Sustainability Strategy and is key to achieving our mission to create the best experiences in the world, for the world, for our customers, our people, our communities and the planet. We believe that the purpose of our Modern Slavery Statement extends beyond compliance with the Modern Slavery Act; it serves as an important platform for educating and informing our customers, teams, partners, and the broader ecosystem about modern slavery, empowering them to make more informed choices.

Upskilling our team members, suppliers, and customers with knowledge is essential to mitigating risks, and driving meaningful impact. Throughout the FY24 reporting period, we have continued to build awareness and enhance the capacity of our stakeholders to increase supply chain transparency. I am pleased to report that 85.8% of our team members completed the Modern Slavery Learning Module, and we provided tailored training for key team members and suppliers.

In our commitment to transparency, we reassessed our existing suppliers to gain insight into the measures they have implemented to identify, mitigate, and manage modern slavery risks within their operations and supply chains. This year, through the issuing of our new Modern Slavery Self-Assessment Questionnaire (MSSAQ) we have increased our visibility beyond Tier 1 suppliers into Tiers 2 and 3, enabling us to better understand the complexities of our supply chain through the disclosure of non-conformances and shared audit reports. I am pleased to share that 85.1% of our in-scope trade suppliers were assessed against the new FY24 MSSAQ.

We are grateful for the continued support of our supply partners and team members as we strive to uphold the highest standards of integrity and social and environmental responsibility in our business practices.



John Winning
CEO, Winning Group

Summary of Key FY24 Actions



Governance, Systems and Processes

Modern Slavery Committee members attended 91.6% of all quarterly meetings from each functional area and Business Unit (BU).

Monitored adherence to internal responsible sourcing policies and processes.



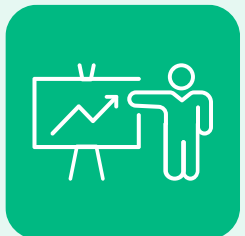
Risk Management and Due Diligence

Issued updated Modern Slavery and Sustainability Questionnaire (MSSAQ) and Supplier Code of Conduct to key existing and new suppliers.

85.1% of in-scope trade suppliers assessed against the new FY24 MSSAQ.

100% of tier 1 high-risk own-brand suppliers have been independently audited.

Increased accessibility and visibility of our grievance mechanism to logistics and cleaning sub-contractors through posters in discrete locations across the Group.



Training, Awareness and Engagement

85.8% of team members completed the Modern Slavery Learning Module.

Customised training developed and conducted with buying, commercial, trade and retail teams.



Continuous Improvement and Innovation

21% increase in sales products featured in our 'Most Efficient Row' highlighting more water and/or energy-efficient product choices to customers, whilst incentivising suppliers to achieve a 'progress beyond general compliance score' in their MSSAQ.

Increased opportunity for communication and promotion of sustainable attributes of brands and suppliers.



Monitoring and Reporting

Published compliant FY24 Modern Slavery Statement.

Our Structure, Operations and Supply Chains

For the purpose of this Statement, our key operating entities, operations and associated supply chains during the FY24 Statement period were as follows:



Our Locations

- 2 country locations (Australia and New Zealand)
- 1 head office
- 17 stores
- 6 distribution centers and 6 hubs
- 796 employees. Full-time: 681, Part-time: 60, Casual: 55. Male: 502, Female: 294
- 206 contractors



Our Supply Chain



Suppliers

- 1 Products we buy to resell
- 2 Products we buy to operate our business
- 3 Services we procure to operate our business



Operations

- 1 Head office
- 2 Retail stores
- 3 Distribution centres
- 4 Workforce



Customers

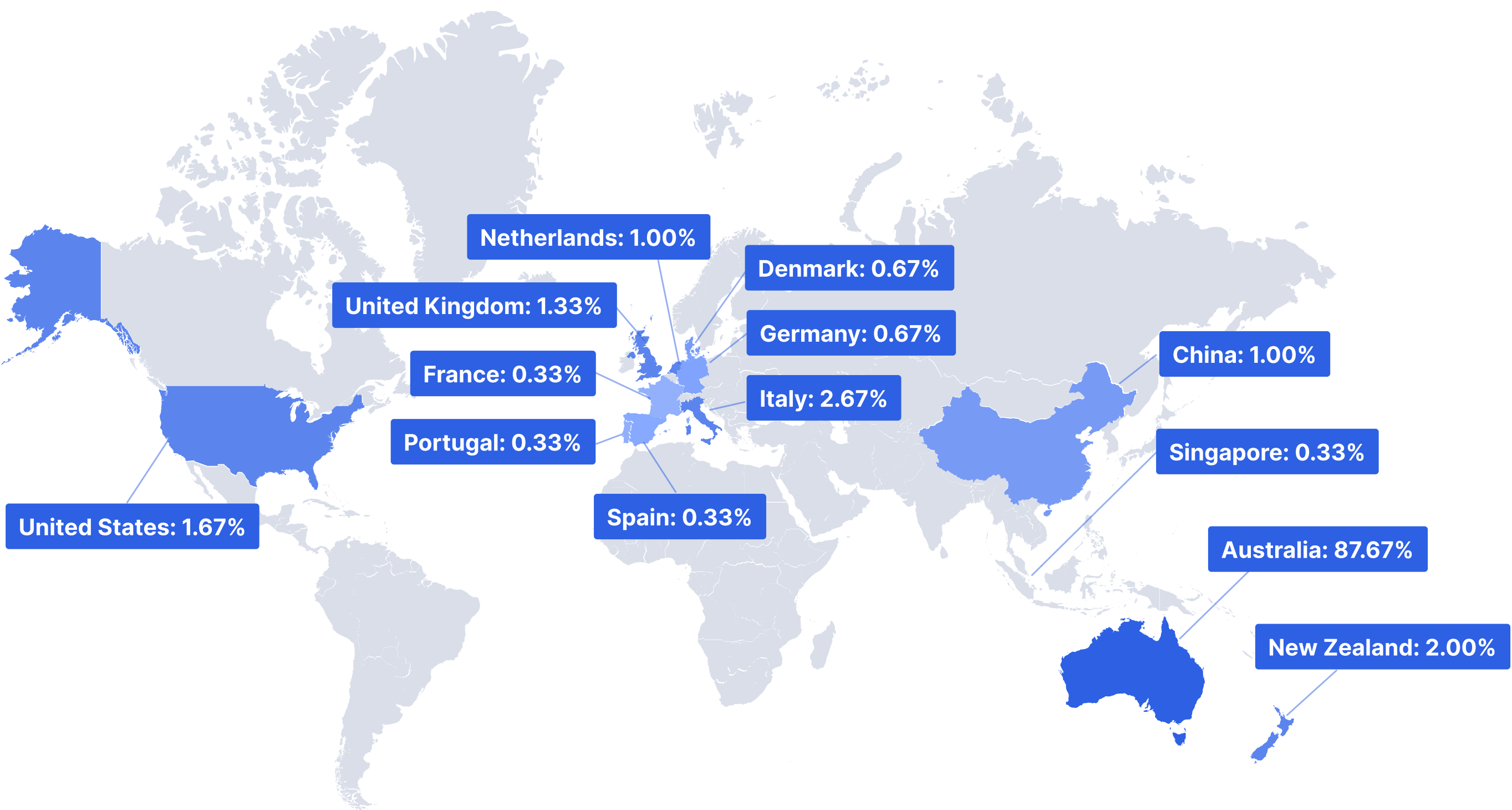
- 1 Retail customers
- 2 Commercial business customers

Supply Chain Mapping

In FY24 we had direct relationships with 301 active trade suppliers and procured services from 1423 suppliers. Our trade supply chain accounted for 83.21% of our overall spend and the services we procured accounted for 16.79%.

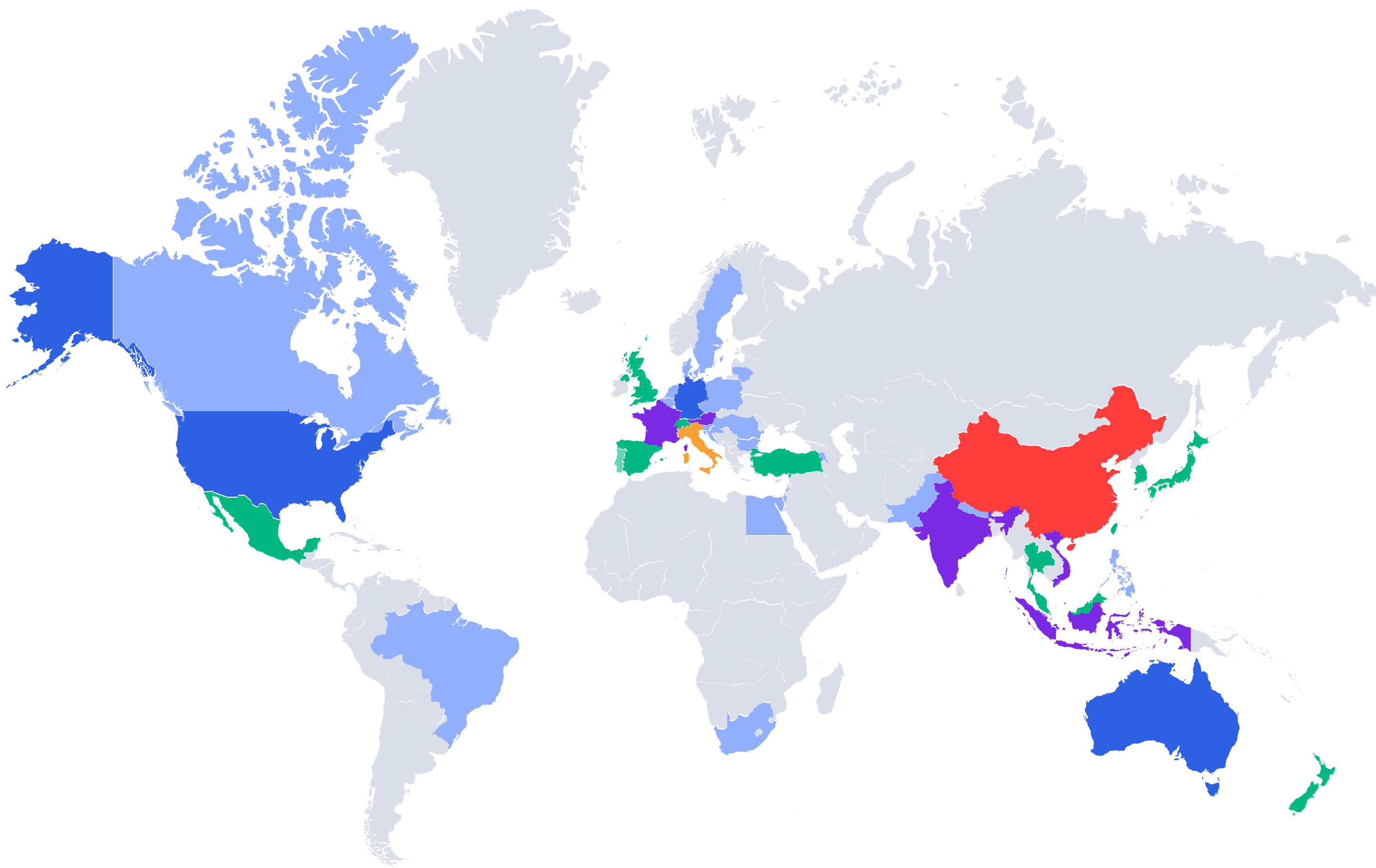
Tier 1 Supplier Locations

Winning Group contracts directly with suppliers located in:



Our Supply Chain

Tier 2-4 Suppliers Locations

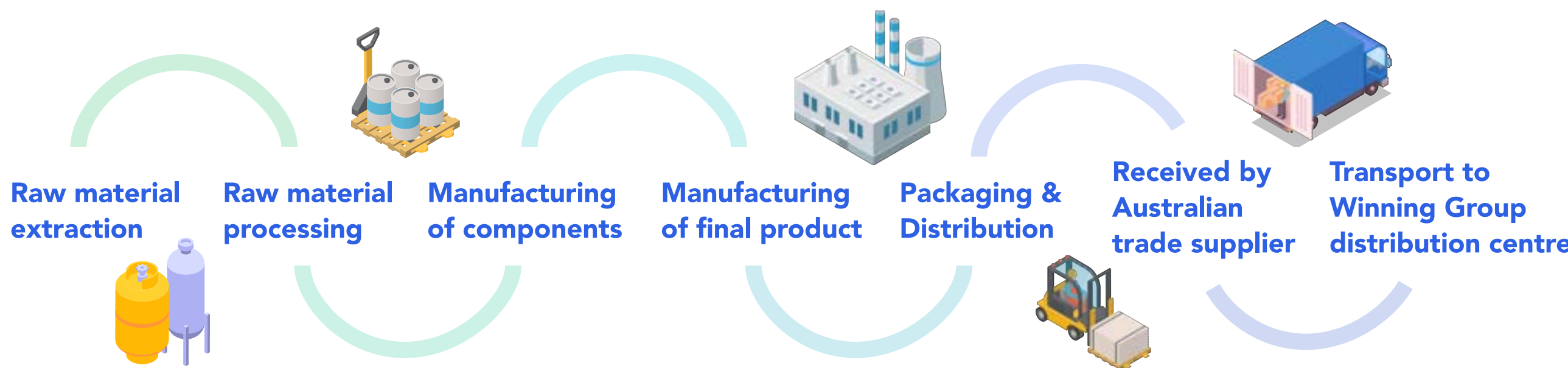


Map Legend

<div></div> 100 - 30%	<div></div> 30 - 20%	<div></div> 20 - 10%	<div></div> 10 - 5%	<div></div> 5 - 1.5%	<div></div> 1.5 - 1%	<div></div> > 1%
<div></div> China23.46%		<div></div> France1.85%		<div></div> Canada0.93%		<div></div> Egypt0.31%
<div></div> Italy10.49%		<div></div> Japan1.85%		<div></div> Romania0.93%		<div></div> Hong Kong0.31%
<div></div> Australia8.64%		<div></div> Portugal1.85%		<div></div> Slovenia0.93%		<div></div> Hungary0.31%
<div></div> Germany7.41%		<div></div> Mexico1.54%		<div></div> Belgium0.62%		<div></div> Israel0.31%
<div></div> United States5.56%		<div></div> South Korea1.54%		<div></div> Brazil0.62%		<div></div> Lithuania0.31%
<div></div> Türkiye4.01%		<div></div> Switzerland1.54%		<div></div> Croatia0.62%		<div></div> Nepal0.31%
<div></div> Thailand3.70%		<div></div> Viet Nam1.54%		<div></div> Czechia0.62%		<div></div> Pakistan0.31%
<div></div> Malaysia2.47%	<div></div> Austria1.23%		<div></div> Netherlands0.62%		<div></div> Philippines0.31%	
<div></div> New Zealand2.47%	<div></div> India1.23%		<div></div> Poland0.62%		<div></div> South Africa0.31%	
<div></div> Taiwan2.47%	<div></div> Indonesia1.23%		<div></div> Armenia0.31%		<div></div> Sweden0.31%	
<div></div> United Kingdom2.47%	<div></div> Spain1.23%		<div></div> Bulgaria0.31%			

Trade Supply Chain

We define trade supply chain as the products we buy from suppliers to resell to customers, this consists largely of local and international brands. Our trade supply chain accounted for approximately 83% of our total FY24 spend. We can further segment our trade supply chain into wholesale and branded suppliers, versus own-brand and direct import supply chain arrangements.



Wholesale and Branded Suppliers

99.67% of trade supply chain spend
295 suppliers



Own-Brand and Direct Import

0.33% of trade supply chain spend
6 suppliers



Non-Trade Suppliers

We define our non-trade supply chain as the services we procure from suppliers to operate our business. Our non-trade supply chain accounted for approximately 16.79% of our total FY24 spend.

1423 Non-Stock Suppliers

Key Locations: Australia, New Zealand, United States, India, Philippines

- » Cleaning service providers
- » Uniforms and work attire
- » Property rental
- » Delivery and install contractors
- » Customer service repair agents
- » Waste and recycling service providers
- » Forklift and equipment hire
- » Insurance
- » Temporary labour hire
- » Office consumables
- » Technology (hardware, software and cloud services)
- » Utilities
- » Professional services and consulting
- » Agriculture and seafood

Our Modern Slavery Risks

Winning Group recognises that our businesses' operations and supply chains are exposed to human rights and modern slavery risks that we may have caused, contributed to or be directly linked to. We are firmly committed to conducting business in an ethical, legal and sustainable way.

The MSA is aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs), which have become the global standard for addressing and preventing human rights impacts associated with business activity.

The UNGPs set out three separate concepts — cause, contribute, and directly linked — which form guiding principles to assist companies in assessing their connection to a negative impact and subsequent duty to provide a remedy.

Cause

A business may cause modern slavery (or other human rights harm) where its actions or operations directly result in modern slavery practices.

We could cause modern slavery in a limited range of circumstances; for example, if we required young workers to engage in hazardous work or perform overtime hours.

We have internal human resources procedures and controls to ensure all Winning Group employees are subject to relevant awards or industrial instruments and subject to the National Employment Standards under the *Fair Work Act 2009* (Cth). Wages and benefits meet or exceed all legal requirements.

Contribute

A business may contribute where its actions or omissions facilitate or incentivise modern slavery.

We could contribute to modern slavery if we placed unrealistic cost requirements or delivery timeframes on our services or goods suppliers, which would likely encourage the use of modern slavery practices, or if we knowingly ignored evidence that a supplier is engaging in modern slavery.

Our businesses regularly engage with our suppliers and maintain strong relationships. These relationships are pivotal to ensuring a continuous dialogue where practical expectations can be properly understood and addressed.

Directly Linked

A business may be directly linked to modern slavery through its services, products or operations. This includes situations where modern slavery may occur in a business's extended supply chain.

The greatest risk of modern slavery for Winning Group sits with our extended supply chain. For example, the Winning Group could be directly linked to modern slavery if we were to purchase goods from a supplier with a manufacturing site that exploits its workers.

Aligned to the UNGP's, we leverage our due diligence frameworks and supplier relationships to understand, influence and improve the actions taken by our suppliers to manage and mitigate modern slavery risks.

Operational Risks

During FY24, the potential for modern slavery risks occurring within Winning Group's direct operations remained low.

Our workforce is primarily located in Australia and New Zealand. We have robust recruitment and onboarding processes that are implemented and adhered to by our dedicated teams, ensuring we comply with all relevant laws and candidates match our values and culture. Our in-house management of recruitment allows us to directly monitor, control and govern the process. Additionally, our Code of Conduct, Equal Employment Opportunity, Recruitment Policy, and Speak Up/ Whistleblower Policy serve as additional policies that communicate and reinforce our expectations.

While the risk of us causing modern slavery in our directly controlled operations is low, we acknowledge that there is a risk we may be contributing to, or are directly linked to, human rights issues in our operations due to subcontracting of services including transport, logistics, and cleaning, as well as services that may be sent offshore. These issues may include underpayment, indentured workers, and exploitation of migrants in contracted and subcontracted services, such as transport and logistics.

Structure of Supply Chain Arrangements

We have a range of supplier agreements in place, both exclusive and non-exclusive, long-term and short-term. The management of our supply chain arrangements falls under the responsibility of the relevant commercial entities within the business that are overseen by Winning Group's internal centralised legal department, so that all relevant laws are complied with, including those relating to the MSA. While the risk of modern slavery varies for each supplier, our contractual arrangements with them contain explicit provisions, warranties and obligations concerning modern slavery and relevant requests for information that the supplier must comply with. Winning Group places significant importance on transparency and open communication regarding supplier's products, sourcing and associated risks.

Risk Assessment Methodology

In FY21 we engaged a specialist human rights and social procurement consultancy to assist with assessing the risk of our supply chain and operations based on a social 'Life Cycle Assessment' approach, looking at inherent risks based on country of origin, industry, product, commodity, and spend level. This included an analysis of practices such as child labour, forced labour, excessive working time, exploitation of migrant labour, gender equality, legal systems, and corruption issues using the following:

- Social Hotspots Database (SHDB).
- Exiobase indicators on the proportion of unskilled labour.
- Global Slavery Index's Prevalence and Vulnerability data.
- Child Rights Index and country due diligence response score.
- Evidence of modern slavery issues cited in an extensive literature review.

The prevalence of these factors are key triggers related to the risks of modern slavery. The data was then converted into a heatmap, showing the location of risk. The risk baseline continues to underpin the Winning Group's approach. The opening of ORA restaurant in FY22, added the additional potential high-risk category of 'seafood' to our overall profile, prompting further risk controls, supplier engagement, and due diligence requirements, which we outlined in the FY22 statement.

In FY24, our overarching risk profile based on manufacturing processes, sourcing locations and product categories has remained consistent with the FY21 baseline. However, we recognise that the prevalence of modern slavery and vulnerability associated with countries, industry sectors, and at-risk people continues to change due to factors such as tightening economic and evolving geopolitical situations, such as the war in Ukraine and the Israel-Hamas conflict. The literature and channels referenced in FY21 are continuously reviewed and monitored each year to ensure that our approach accurately reflects the changing risk landscape.

Supply Chain Risks

Approximately 99.67% of our trade supply chain is wholesale, leading to reduced visibility and understanding, and direct control of risks in this supply chain, compared to supply chains with a high percentage of own-label brands or direct import models. Complex and lengthy supply chains result in poor visibility and control over recruitment and employment practices of tier 2-4 suppliers and their subcontractors that may operate in multiple high-risk countries with low-regulated environments, low levels of education and public awareness, and high levels of corruption.

Based on our assessment, we have identified that the following categories of products and services pose risks associated with modern slavery:

	SOURCING CATEGORY	RELATIONSHIP TO RISKS	KEY RISK FACTORS
VERY HIGH RISK	Seafood	DIRECTLY LINKED	The fishing industry is often characterised by isolated work environments where workers are reliant on their employer for a broad range of needs including shelter, food, security, and return transport to their home port. These contexts heighten risks such as limitations on freedom of movement, poor working conditions, and limited communication with family. Deceptive recruitment practices are common, which can lead to debt bondage and forced labour, particularly in contexts where workers are trafficked across borders. The transient nature of fishing vessels and limited oversight increase vulnerability to excessive working hours, physical and mental abuse, and the denial of basic rights. ¹
	Bathroom Furniture	DIRECTLY LINKED	The manufacturing and extraction industries for timber, metal, plastic, ceramic, and leather products involve complex global supply chains, often situated in regions with comparatively lax labour laws and weak regulatory oversight. This creates risks such as child labour, poor working conditions, and health and safety violations. Workers may face deceptive recruitment practices, debt bondage, and forced labour, particularly in lower-tier suppliers where oversight is minimal. Additionally, the use of excessive overtime in meeting high production demands is a common issue, exacerbated by weak enforcement of labour rights. ²
	Wash Basins, Bathtubs		
	Furniture, Leather Furniture		
HIGH RISK	Tapware	DIRECTLY LINKED	
	Appliances	DIRECTLY LINKED	In the electronics and metal product supply chains, the extraction of raw minerals and the manufacturing processes often take place in regions with known risks of labour rights abuses and a higher prevalence of poor working conditions. Risks include forced labour, child labour, and unsafe working conditions ³ , particularly in the context of mineral extraction, which can also fund armed conflict in some areas. ⁴ Deceptive recruitment practices are common, which can result in excessive working hours and poor health and safety outcomes, especially in electronics manufacturing hubs with significant pressure to meet global demand.
MEDIUM RISK	Mattresses	DIRECTLY LINKED	The textile and metal manufacturing involved in mattress production faces significant risks due to limited traceability compared to industries with higher consumer awareness and rigorous oversight, such as fashion or electronics. This reduced focus on traceability increases the risk that both fibres (like cotton) and metals (used in springs) sourced from higher-risk regions with known issues of forced labour may enter the supply chain. The prevalence of labour exploitation in cotton production and poor working conditions in metal extraction, as well as in the manufacturing process of components and composite mattresses, are exacerbated by weaker regulatory environments and lower consumer awareness, creating vulnerabilities throughout the supply chain. These factors heighten the overall risks of child labour, excessive working hours, and unsafe conditions in the production of mattress components.
	Equipment Hire	DIRECTLY LINKED	The machinery and equipment manufacturing sector involves raw material extraction and production in countries where labour rights are weakly enforced. This sector faces risks of poor working conditions, particularly in hazardous environments, and health and safety issues due to inadequate oversight. Workers may be subject to poor labour rights protections and unsafe work environments, exacerbated by the complexity of global supply chains and outsourcing.
LOW RISK	Delivery and Install Contractors	CAUSE CONTRIBUTE	The logistics and transport sectors, often relying on migrant and unskilled labour, are exposed to risks of underpayment, indentured servitude, and exploitation, particularly in cases where migrants lack bargaining power or legal protections. Workers are vulnerable to being trapped in exploitative conditions, with limited access to redress or safe working environments, due to the informal nature of labour contracting in this industry.
	Temporary Staff and Labour Hire	CAUSE CONTRIBUTE	In the subcontracted financial, administrative, and business services sector, risks arise particularly in offshored professional services such as IT, customer service, and finance. These services are often outsourced to countries where labour rights are poorly enforced, leading to risks of wage theft, deceptive contracts, and poor working conditions. The lack of direct oversight in offshored services increases vulnerability to exploitation.
	Property	DIRECTLY LINKED	
	Advertisement	DIRECTLY LINKED	

1. <https://www.walkfree.org/global-slavery-index/findings/spotlights/forced-labour-at-sea/>
2. <https://news.mongabay.com/2017/03/investigation-reveals-slave-labor-conditions-in-brazils-timber-industry/>
3. International Organisation for Migration, Submission 57, p. 3.
4. <https://www.verite.org/wp-content/uploads/2017/04/EO-and-Commodity-Reports-Combined-FINAL-2017.pdf>

How we Assess and Address our Modern Slavery Risks

Over the past four years, we have improved our capability and capacity to assess and address modern slavery risks associated with our operations and supply chains, embedding policies and processes as business-as-usual within key functions of our organisation.

During the reporting period, we focused on reassessing our existing suppliers to understand what measures they have taken to identify, mitigate and manage modern slavery risks within their own operations and supply chains since our initial assessment in FY21. As part of this process, we increased visibility beyond our Tier 1 suppliers to Tier 2 and 3, through the disclosure of non-conformances or sharing of audit reports by our wholesale suppliers. Building on our focus for FY23, we continued to prioritise capacity building and training of our team members and direct suppliers.

Governance

Our established governance structure ensures there is accountability across key functions within our business.

Our Board provides overall oversight and accountability for modern slavery governance, ensuring alignment with corporate values and regulatory compliance.

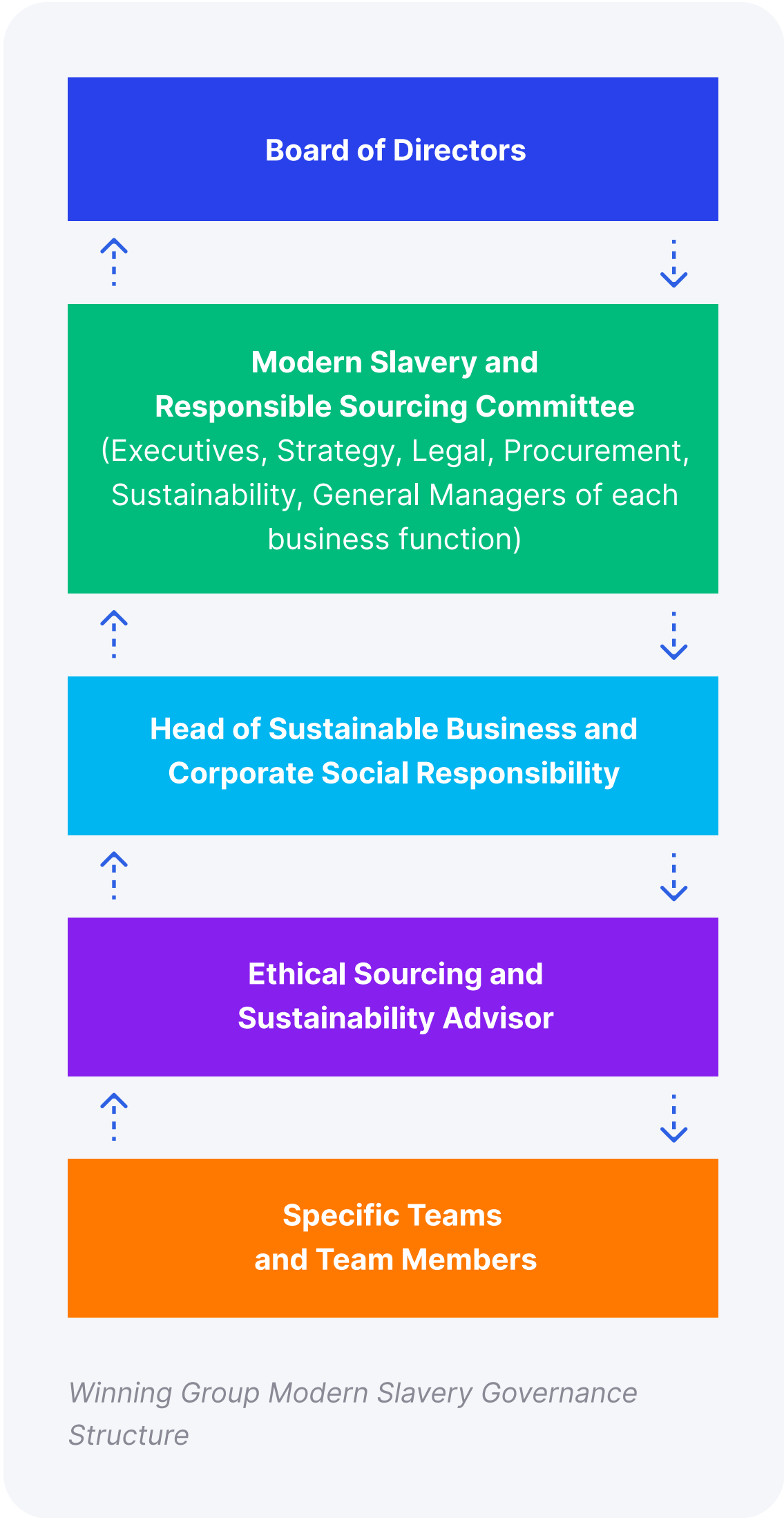
Our Modern Slavery Committee consists of representatives from our Executive Leadership Team, including Legal, HR, Procurement, Strategy, Commercial and General Managers of each key business unit. The Committee oversees the development and execution of specific policies and initiatives to address modern slavery risks within the supply chain.

Our Head of Sustainable Business and Corporate Social Responsibility leads the company’s sustainability and ethical practices, ensuring modern slavery risks are managed as part of the broader corporate responsibility agenda.

Our Ethical Sourcing and Sustainability Advisor provides expert guidance and supports day-to-day implementation of ethical sourcing policies, with a focus on identifying and mitigating modern slavery risks in the supply chain.

Specific Teams such as Commercial, Procurement, HR, Facilities Management and Transport are responsible for complying with established ethical sourcing policies and supplier onboarding and assessment processes specifically developed to manage and mitigate the risk associated with their functions within the business.

Our Team Members are responsible for identifying and reporting potential modern slavery risks, complying with ethical sourcing policies, undergoing training as required and using grievance mechanisms to raise concerns about exploitation.



Policies and Processes

The policies and processes listed below are essential to ensuring that the controls we have implemented to identify, manage, and mitigate the risk of modern slavery and substandard working conditions in our operations and supply chains are embedded into our business.

TITLE	LINK TO MODERN SLAVERY	POLICY IMPLEMENTATION
Responsible Sourcing Roadmap	Our Responsible Sourcing Roadmap covers policy and governance, engagement and training, due diligence measures, and grievance mechanisms and provides us with a framework to continually deepen our capacity to assess and address modern slavery risks.	Updated annually by the Sustainability team with key actions, KPIs and outcomes which are discussed and governed by the Modern Slavery and Responsible Sourcing Committee. Details can be found in 'How we assess the effectiveness of actions'.
Supplier Code of Conduct	The Code of Conduct covers minimum expectations and standards in relation to labour, health and safety, environment, and ethics, and outlines our zero-tolerance position on all forms of modern slavery.	Referenced in supplier contracts and trading terms and applies to all suppliers of the Winning Group. The policy has also been made public through our group website and our brand websites such as Winnings and Appliances Online . Of the suppliers we reviewed during the period, 84.33% either signed the policy or provided an equivalent policy. For those that do not return a signed copy of our policy, we continue to engage until they have developed an equivalent policy.
Modern Slavery Self-Assessment Questionnaire (MSSAQ)	The MSSAQ is issued to assess modern slavery risks across our entire supplier base and produces risk ratings that help us identify suppliers where further investigation or support is required.	Managed by the Sustainability Team in conjunction with Buying Team members.
New Supplier Onboarding Process	Robust process that reviews supplier's governance processes, quality management, labour conditions, environmental impacts, and supply chain due diligence with additional audit requirements for high-risk suppliers.	Executed by the Sustainability Team in conjunction with Buying Team members.
Speak Up / Whistleblower Policy	Encourages the reporting of any actual or suspected wrongdoing or any other issues that may affect a team member's well-being at work or that may be affecting the Group, its customers or suppliers.	Accessible on the company intranet via our Policy Handbook and communicated to new team members during the onboarding process.
Human Rights and Modern Slavery Policy	Supports our actions to prevent and limit human rights violations and modern slavery in our business and supply chain.	Accessible on the intranet via our Policy Handbook and communicated to new team members during the onboarding process.
Modern Slavery Remediation Plan	To ensure each instance of suspected or actual case of modern slavery is investigated and appropriately addressed by the Group.	Accessible on the intranet via our Policy Handbook and communicated to new team members during the onboarding process.
Workplace Health and Safety	This policy and the various WHS procedures that exist are designed to ensure that workplace participants are not exposed to risks to their health or safety.	Accessible on the intranet via our Policy Handbook and communicated to new team members during the onboarding process.
Recruitment Policy and Onboarding Processes	The Recruitment Policy guides the selection of candidates complying with all relevant laws, while the onboarding process manages the integration of new team members, fostering a strong workforce aligned with our values and culture.	Available upon request from the Team Experience department.
Employee Code of Conduct	Outlines our expectations of team members and our company values to deter wrongdoing and promote honest and ethical conduct.	Accessible on the intranet via our Policy Handbook and communicated to new team members during the onboarding process.

Training, Awareness and Engagement

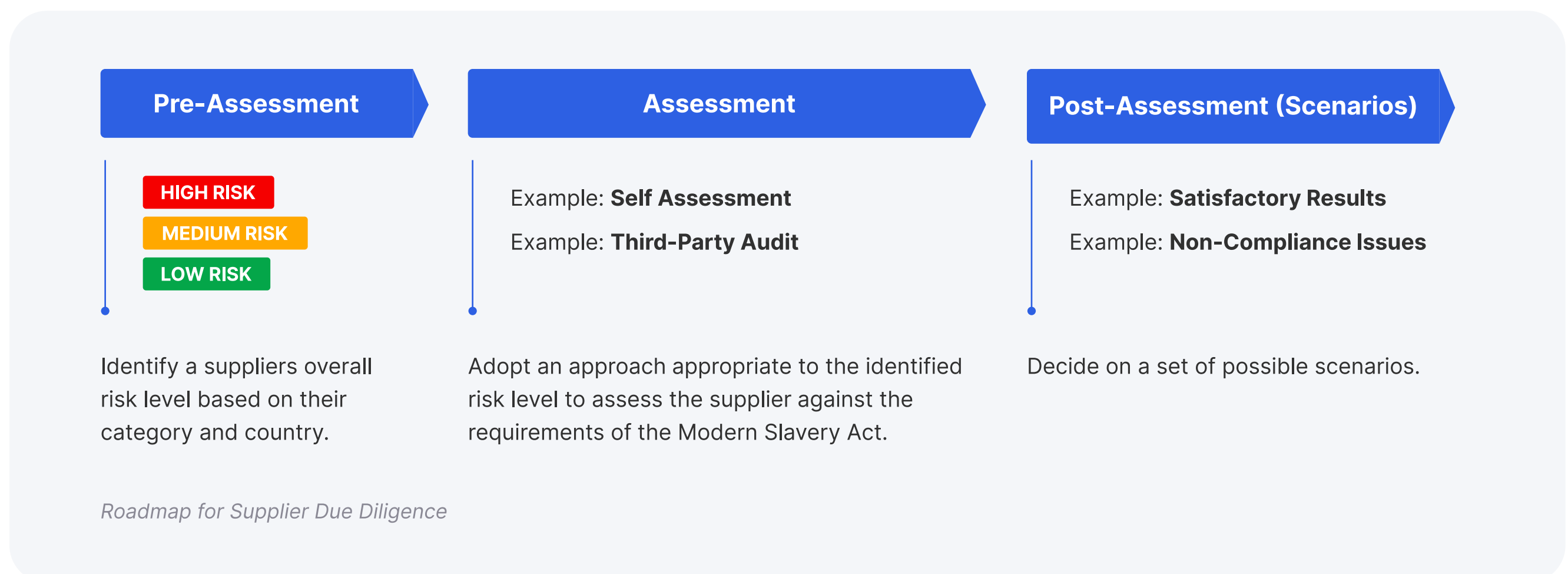
Building awareness and increasing capacity amongst our stakeholders continued to be a key focus of our reporting period. We identified various internal and external stakeholders who would benefit from further education and training on modern slavery, leading to the creation and delivery of customised sessions.

We believe that empowering our team members, suppliers and customers with knowledge is key to further embedding our responsible sourcing actions, mitigating risk and driving impact.

	EDUCATION TYPE	CONTENT AND LINK TO MODERN SLAVERY	OUTCOME
INTERNAL	Modern Slavery Learning Module and Quiz	In-house developed learning module built into our Learning Management System that defines modern slavery, explains indicators, provides examples and ways to address.	85.1% of team members completed the module.
	1:1 New Team Member Training	Overview of Winning Group's approach to sustainability and modern slavery due diligence as part of their onboarding process.	1 hour of 1:1 training sessions with 3 team members.
	Buying Team Member Training	Overview of trade supply chain risks and modern slavery due diligence onboarding process.	1 hour session with 6 team members.
	Commercial Team Member Training	Outlines how to identify, address and mitigate the risks of modern slavery; our approach to supplier engagement and due diligence; and how we can support our clients to achieve their responsible sourcing goals.	1 hour training session with 34 team members and tailored education material.
	Trade Team Member Training	Outlines our approach to supplier engagement and due diligence; highlights suppliers progressing in this area and how we can support our clients to achieve their responsible sourcing goals.	45-minute training session with 8 team members and tailored education material.
	Retail Store Manager Training	Outlines how to identify, address and mitigate the risks of modern slavery; our approach to supplier engagement and due diligence; and how we can educate customers on responsible sourcing.	45-minute training session with 16 team members and tailored education material.
	Sustainability Team Member Training	Review of latest reports, attendance of online seminars and key conferences where human rights and slavery risks were discussed including: CBA Momentum Conference, Sustainable Retail Go, NSW Anti-slavery Forum, Cambridge Sustainability Practitioner Leadership Programme.	80+ hours
EXTERNAL	Supplier Conference	Face-to-face engagement with trade and service suppliers on sustainability issues specific to our industry, including Modern Slavery and human rights.	86 suppliers from 56 different brands attended 3 days of engagement and keynote education sessions.
	Own Brand and SME Suppliers	Provide support across the key areas of social compliance, raw material and packaging selection, and responsible sourcing. We continue to work closely with these suppliers to ensure they are progressing in these areas.	1 hour 1:1 training and capacity session totalling 7 suppliers.
	Public Awareness and Education	Providing insights and transparency on our sustainability initiatives, including our responsible sourcing and Modern Slavery Action Plan externally at industry events.	50+ hours

Supplier Due Diligence

In our previous Modern Slavery Statements, we detailed our due diligence roadmap covering pre-assessment based on the country and industry risk profile, assessment approach appropriate to the identified risk level, and post-assessment scenarios based on risk assessment outcomes.



Those suppliers that have achieved satisfactory results have been assessed against the following criteria and are approved by our Sustainability Team:

- Return a completed MSSAQ and supporting documentation;
- Following assessment, achieve a score of 'Compliant with local laws' or above;
- Suppliers determined to be high-risk are required to provide a social compliance audit for review or have one conducted;
- Develop a corrective action plan to address any non-conformances; and
- Provide evidence of corrective action or be re-audited.

The Winning Group acknowledges that many suppliers are at different stages of their sustainability journey. Progress in this area, particularly concerning modern slavery, often corresponds to the size and capacity of business. Should a supplier not achieve satisfactory results, the Group takes an educational approach, providing practical advice and actions for suppliers to implement and understand the risks of modern slavery in their supply chain and improve transparency and due diligence measures.

Assessment

Our actions during FY24 focused on:

- Expanding the review of our suppliers' responsible sourcing process to capture additional areas beyond modern slavery, including carbon emissions, packaging, raw materials, circularity and consideration for First Nations engagement.
- Issuing the updated MSSAQ and Supplier Code of Conduct to key existing and new suppliers.
- Collecting the updated MSSAQ from key existing and new suppliers.
- Reviewing results from MSSAQs to determine if inherent risks are being sufficiently mitigated by our suppliers or if further due diligence is required.
- Requesting factory audit reports and summaries of audit findings from our own brand and wholesale suppliers.

CASE STUDY

New Supplier Onboarding



During the reporting period, one of our existing commercial clients requested assistance with importing new products into the country for distribution. This request triggered our new supplier onboarding process. Given the country of manufacture had a medium risk of modern slavery according to our MSSAQ (based on the Global Slavery Index) and a very high risk for the industry and manufacturing processes according to our Modern Slavery Risk Assessment Baseline, we were required to review an independent third-party social compliance audit report in addition to our MSSAQ.

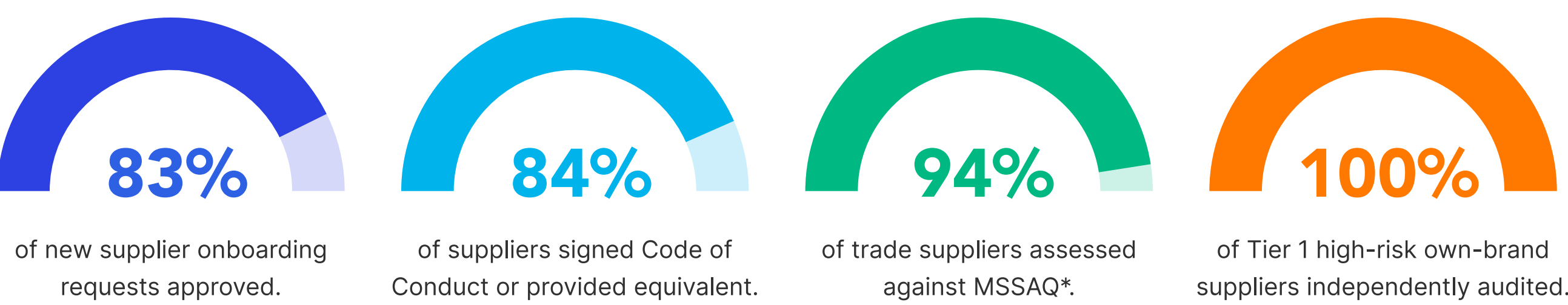
The factory obtained an SA8000 certification, however, when checked against the database, the certification did not exist, nor was the company that performed the certification an accredited body. The factory was unwilling to pay for another audit and therefore we were unable to approve the factory due to lack of transparency around working conditions.

We engaged a different factory that could share the required report and was either able to demonstrate remediation actions for any outstanding non-compliances, or had a corrective action plan in place for anything outstanding.

Whilst this process did take six months to complete, it ensured that our business had sufficiently mitigated any risks of modern slavery or unfair and unsafe working conditions within the factory of a direct supplier.

Key Results

Throughout the FY24 reporting period we completed the assessment of:

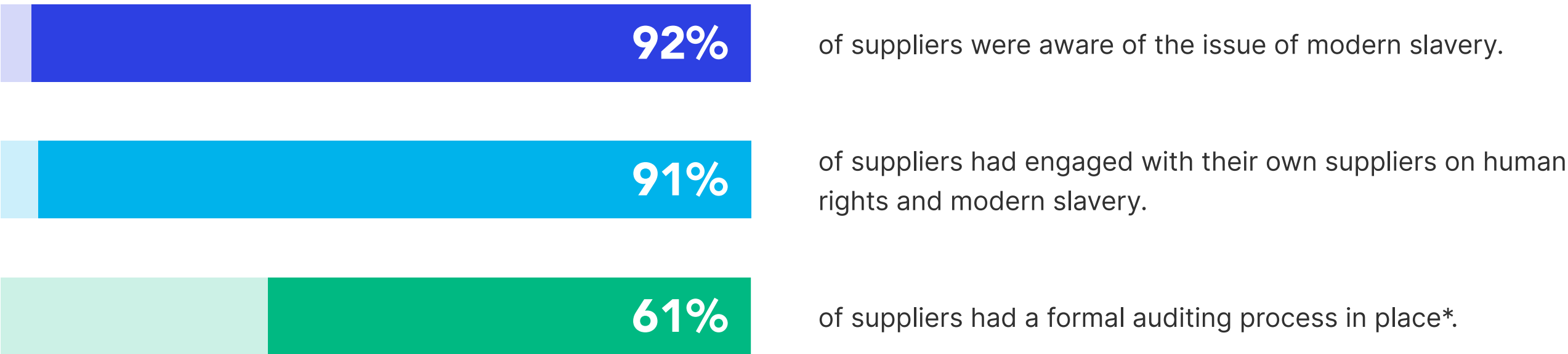


All statistics by spend.

** Includes supplier assessed against the 2021 and 2024 MSSAQ*

Areas of Good Performance

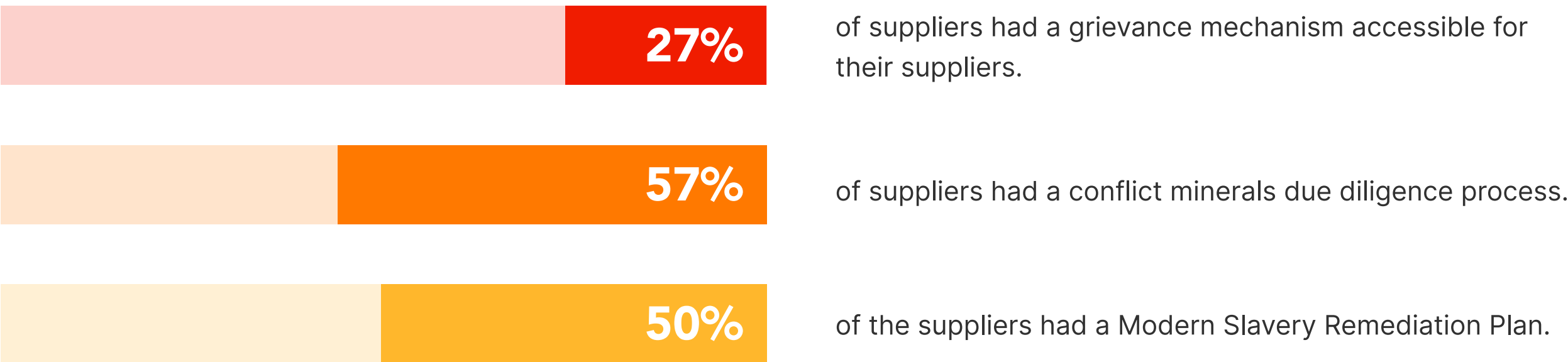
These results are based on suppliers assessed against our FY24 MSSAQ:



** Whilst this is only a marginal improvement to last year, we expect this to improve further following the introduction of CS3D reporting requirements for many of our EU headquartered suppliers.*

Areas of Improvement

These results are based on suppliers assessed against our FY24 MSSAQ:



CASE STUDY

Wholesale Trade Supplier Improvements



Reissuing an updated version of our MSSAQ provided an opportunity to compare the performance and progress of many of our suppliers from FY21 to FY24.

One of our suppliers has since implemented an independent third-party due diligence program which they manage through SEDEX, requiring all Tier 1 suppliers to undergo an annual SMETA Audit, equating to over 80% of their suppliers. They have established a remediation process for any corrective actions to be closed out within an agreed timeframe, with support and follow-up provided by our supplier if required.

Additionally, they have also implemented a grievance mechanism that is accessible to not only their own staff but also suppliers.

Ethical Sourcing training is now also conducted annually for their Tier 1 suppliers and with key internal stakeholders.

Through our FY24 review of this particular supplier, we are able to see an improvement in the controls they have implemented to mitigate and manage the risks of modern slavery and substandard working conditions in their supply chains and how they have embedded these into their business processes. This ensures ongoing compliance with the requirements set out in our Supplier Code of Conduct and aligns with the continuous improvement approach we expect of our suppliers.

Grievance Mechanisms and Remediation

The Winning Group understands that effective grievance mechanisms and remediation are key to identifying and responding to modern slavery issues. Over the past three years, we have strengthened and matured our capacity through our Speak Up Policy, responding to audit reports, and developing a Remediation Plan.

Whistleblower Policy

We actively encourage the reporting of any actual or suspected wrongdoing or any other issues that may affect a team member's well-being at work or that may affect the Group, its customers or suppliers, through our Speak Up/Whistleblower Policy. We recognise the importance of ensuring a safe, supportive, and confidential environment where people feel confident to 'Speak Up' about wrongdoing and feel supported throughout the process. We have had no reported complaints in FY24.

Increasing Accessibility and Visibility of our Grievance Mechanism

In order to create greater awareness of our Speak Up Policy and Hotline amongst our most at-risk service providers, namely cleaners and logistics contractors, we worked with our grievance mechanism partner, Core Integrity, to develop updated posters increasing visibility and accessibility. The posters are located at all our offices, stores and distribution centres in discreet locations such as bathroom stalls or tea rooms to ensure privacy and confidentiality when accessing the service or making a report. The process has been further simplified through the addition of a QR code that refers individuals to more information and a confidential online reporting platform.

Modern Slavery Remediation Plan

The Winning Group Modern Slavery Remediation Plan has been developed to ensure each instance of suspected or actual case of modern slavery is investigated and appropriately addressed by the Group. The plan has been communicated to all team members and is accessible through the intranet.

'Remediation' in the context of our plan is the process of taking active steps to assist in the correction of harm experienced by victims of modern slavery. The concept of 'remedy' aims to restore individuals or groups that have been harmed (in this case by a business's activities) to the situation they would have been in had the impact not occurred or as close to that point as possible. As the United Nations Guiding Principles set out, 'remedy' in the judicial context is understood to include: "apologies, restitution, rehabilitation, financial or non-financial compensation, and punitive sanctions (whether criminal or administrative, such as fines), as well the prevention of harm through, for example, injunctions or guarantees of non-repetition."

It is important to acknowledge that there is no 'one-size-fits-all' approach to remediation and that each of the steps set out in the Winning Group's remediation plan will need to be considered in the context of the situation and adjusted accordingly. The Winning Group's ability to implement remediation processes is largely dependent on the nature of the relationship between the victim and the Group. Regardless, a victim-centred approach to remediation that focuses on the wellbeing, safety and protection of the victim is paramount.

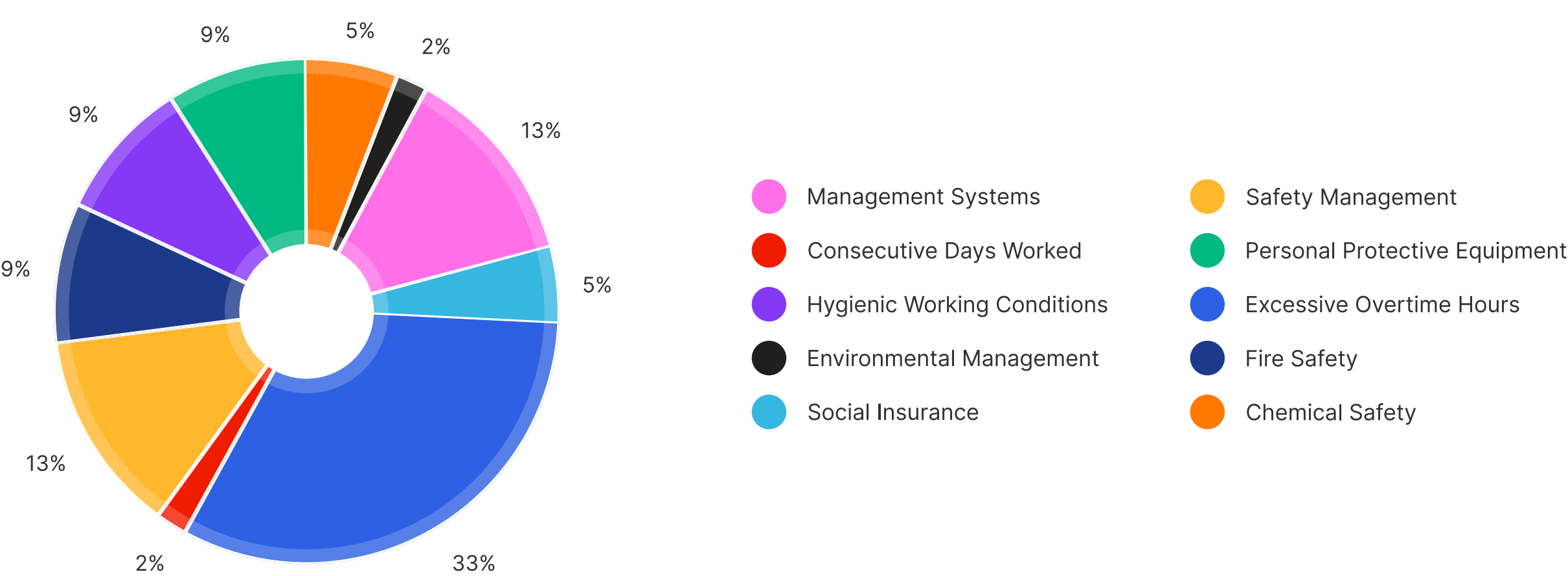
Modern Slavery Remediation Process



Off-shore Tier 1 and 2 Supplier Non-conformance

We did not identify any instances of Modern Slavery through our FY24 due diligence actions; however, there were a variety of non-conformances against local laws that contributed to dangerous or substandard working conditions.

The review of audit reports and certifications such as SMETA 4 Pillar, SMETA 2 Pillar, Amifori BSCI, SA8000 and Responsible Business Alliance Validated Assessment Program identified the following non-conformances during the period:



Those suppliers who have progressed with implementing ethical sourcing programs may not have provided copies of their audit reports to Winning Group but have made disclosures in their own Sustainability Statements detailing the number of audits conducted over a specified period, the types of non-compliances identified and their remediation status. These have not been included in the above figures, however, we would like to take this opportunity to acknowledge the increased level of transparency that has been provided within their own reports, demonstrating an increasing maturity of responsible sourcing actions amongst our suppliers.

Actions Taken in Response to Non-conformances Identified

Where non-conformances were categorised as minor, we found that suppliers either:

- had already remediated these prior to Winning Group requesting an audit report, or;
- committed to remediate the non-conformance within the period stipulated by the auditor in the audit report, with verification to take place at the periodic follow-up audit.

Where non-conformances were categorised as major or critical, particularly those relating to labour rights, Winning Group took a more active approach by:

- educating the supplier on the need to remediate the non-conformance;
- understanding the root-cause of the non-conformance; and
- ensuring any remediation action plan was adhered to.

Some of these non-conformances, particularly in relation to overtime hours, are still in the process of being remediated with verification required by a follow-up audit.

CASE STUDY

Non-conformance Remediation

In the past year, during a social audit of one of our own-brand suppliers in China, a critical non-conformance was identified related to excessive overtime hours. Consistent with our values and shared responsibility ethos in managing modern slavery risks, we engaged with the supplier to better understand the context of this issue.

Through this engagement, we were able to confirm that both workers were being compensated in accordance with local laws and that the workers themselves expressed a desire to work additional hours to maximise their income. However, the volume of overtime exceeded our expectations for worker wellbeing.

This experience has deepened our understanding of the complex needs of workers in our supply chains. While the consultation process is ongoing, we remain committed to working collaboratively with the supplier to address this issue, balancing worker needs with our standards. This learning is helping us continuously refine our approach to supplier engagement in modern slavery risk management.

How we Assess the Effectiveness of our Actions

We assess the effectiveness of our actions by reviewing expected outcomes and, where possible, key performance indicators of our Responsible Sourcing Roadmap covering policy and governance, engagement and training, due diligence measures, and grievance mechanisms. This is key in driving continuous improvement in our approach to identifying, managing, and mitigating modern slavery risks.

Our Modern Slavery and Responsible Sourcing Committee governs the progress against our Roadmap within our business quarterly and conducts annual evaluations of the outcomes achieved. We will incorporate learnings into actions for the following years, to ensure that we are continuously improving and that our actions have a measurable impact.

In addition, we continue to engage specialist external consultants to review our reporting mechanism, including metrics and data to ensure our approach is always improving in line with mandatory reporting criteria and industry best practice.



GREEN

Initiatives at this level have performed as expected or better than expected, or are completed, or have met their target.

YELLOW

Initiatives at this level have performed a bit below expectations, or are partially completed, or have performed slightly below target.

RED

Initiatives at this level have performed well below expectations, or are not completed, or have performed significantly below target.

Our FY25 Commitments

Winning Group acknowledges that eradicating modern slavery requires continuous improvement and dedication from our business, our suppliers and the broader ecosystem we engage with. As our Responsible Sourcing Roadmap matures, we are implementing continuous improvement initiatives and strengthening our commitment across our key focus areas.

We thank our suppliers and partners for their engagement and collaboration to assess and mitigate modern slavery risks in our operations and supply chains.

As we move forward into FY2025 and beyond, we remain committed to advancing our Responsible Sourcing Roadmap and striving to fulfil the objectives and commitments under the pillars of governance, systems and processes; risk management and due diligence; training, awareness and engagement; monitoring and reporting as detailed below:

	ROADMAP FOCUS AREAS	OBJECTIVE	FY25 KEY COMMITMENTS
GOVERNANCE, SYSTEMS, AND PROCESSES	Policy and Governance	Provide oversight of modern slavery risks and management frameworks to guide our decision-making and continuous improvement.	Hold quarterly cross-functional ESG Committee meetings including Modern Slavery. Review outcomes of reconducted hot spot risk assessment and where necessary propose governance and policy improvements. Track sustainability, responsible sourcing, and modern slavery management against relevant KPIs and metrics.
	Continuous Improvement and Innovation	Continuously identify ways to improve the response and management of sustainability and modern slavery risks and opportunities.	Increase accessibility of sustainable supplier and product information available to customers. Review the feasibility of minimum product requirements implementation.
RISK MANAGEMENT AND DUE DILIGENCE	Risk and Due Diligence Measures - Trade Supply Chain	Effectively identify and address modern slavery risks in the Winning Group's trade supply chain.	Re-conduct human rights and modern slavery hotspot risk assessment for trade supply chain. Implement corrective action and improvement plans for suppliers assessed with new MSSAQ. Engage with remaining top suppliers to encourage completion of new MSSAQ. Conduct independent third-party audits on medium-high risk Tier 1 and 2 own-brand suppliers. Gather top supplier non-conformance reporting. Ensure adherence to new supplier on-boarding process.
	Risk and Due Diligence Measures - Non-Trade Supply Chain	Effectively identify and address modern slavery risks in the Winning Groups's non-trade supply chain.	Re-conduct human rights and modern slavery hotspot risk assessment for non-trade supply chain. Ensure new cleaning and logistics service suppliers complete service provider MSSAQ prior to commencing business.

	ROADMAP FOCUS AREAS	OBJECTIVE	FY25 KEY COMMITMENTS
TRAINING, AWARENESS AND ENGAGEMENT	Grievance Mechanism and Remediation	Ensure adequate and effective grievance mechanisms include a remediation process to manage human rights impacts.	<p>Monitor the effectiveness of grievance mechanisms.</p> <p>Ensure adherence to the Modern Slavery Remediation Plan.</p>
	Internal Training, Awareness and Engagement	<p>Continue implementing modern slavery training to support identification and management of modern slavery risk.</p> <p>Develop specific modern slavery training for staff in key roles of responsibility as well as areas where modern slavery is more likely to occur e.g. Procurement, Legal, Sales and HR teams.</p>	<p>Review and improve training, awareness and engagement with buying team for sustainability and ethical sourcing topics.</p> <p>Continuously increase completion rate of MS Learning Module.</p> <p>Conduct commercial team sustainability training.</p> <p>Conduct store team members sustainable and ethical supplier and product training.</p> <p>Conduct key new-starter 1:1 tailored training.</p>
	External Training, Awareness and Engagement	Increase collaboration with suppliers and other stakeholders to improve their capacity to address modern slavery risks.	1:1 supplier engagement and capability building sessions as required.
MONITORING AND REPORTING	Reporting	Communicate our commitment to assist in the prevention, response and remediation of modern slavery and meet compliance obligations under the Modern Slavery Act.	Publish MSS as required.



Process of Consultation and Approval

The related reporting entities covered by this joint statement have been consulted and informed of the reporting requirements of the MSA. The respective General Managers of each of the Winning Group businesses meet regularly to discuss and consult on their individual obligations in relation to Modern Slavery, as well as the ways in which their units feed into the larger Group operation.

As responsible sourcing is at the heart of the Winning Group's Sustainability Strategy, senior management of our Marketing, Sales, Buying, Operations, Strategy, Legal, Finance, Sustainability, Technology, Customer Service and HR units have all collectively discussed and engaged with the MSA, and the ways in which the Winning Group as a whole can make a positive impact on reducing the risk of modern slavery within our supply chains.

The various training, information sessions, dissemination of MSSAQs, Supplier Code of Conduct, and collaborative supplier engagement conducted by the various entities demonstrate the consultation that has been undertaken between the relevant reporting entities.

This joint FY24 statement has been approved by the Board of Directors on behalf of itself and its reporting entities on 20 December 2024.



John R Winning
Director



John W Winning
Director



Amy E Cowper
Company Secretary

Appendix – Mandatory Reporting Criteria

The following table summarises how this statement meets the reporting obligations under the Commonwealth Modern Slavery Act 2018.

MODERN SLAVERY ACT REPORTING REQUIREMENT	ADDRESSED IN SECTION
1. Identify the reporting entity	Section 1: About this Statement Page 1
2. Describe the reporting entity’s structure, operations and supply chains	Section 2: Our Structure, Operations and Supply Chain Page 6
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Section 3: Our Modern Slavery Risks Page 10
4. Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Section 4: How we Assess and Address our Modern Slavery Risks Page 13
5. Describe how the reporting entity assesses the effectiveness of such actions	Section 5: How we Assess the Effectiveness of our Actions Page 23
6. Describe the process of consultation with (i) any entities the reporting entity owns or controls; and (ii) for a reporting entity covered by a joint statement, the entity giving the statement	Section 6: Process of Consultation and Approval Page 27

