



MODERN SLAVERY STATEMENT 2021

SEPTEMBER 2020-SEPTEMBER 2021
2ND REPORTING STATEMENT



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This is Greenlit Brands Pty Limited's second modern slavery reporting statement under the Australian Modern Slavery Act 2018. This modern slavery statement covers each reporting entity that is a subsidiary of Greenlit Brands Pty Limited or FF HoldCo Pty Ltd and covers the same reporting entities as the modern slavery statement for the September 2019–September 2020 reporting period, other than Plush–Think Sofas Pty Ltd which was divested in late 2021.

Addressing modern slavery in our operations and supply chains is still new to many of the brands. While each brand is in different stages in their work to eradicate modern slavery, we are in a unique position where many of our brands work in collaboration as they source from each other or work with the same suppliers.

This financial year our brands continued to deal with COVID-19 impacts and disruptions across their operations and supply chain, which meant a heightened risk for modern slavery to occur. Greenlit Brands Pty Limited and its subsidiaries were restructured during the year, including a restructure resulting in the Fantastic Furniture and Fantastic Manufacturing businesses forming their own corporate group under common ownership with Greenlit Brands Pty Limited. These changes have implications for how the reporting entities covered by this statement will act and report on modern slavery.

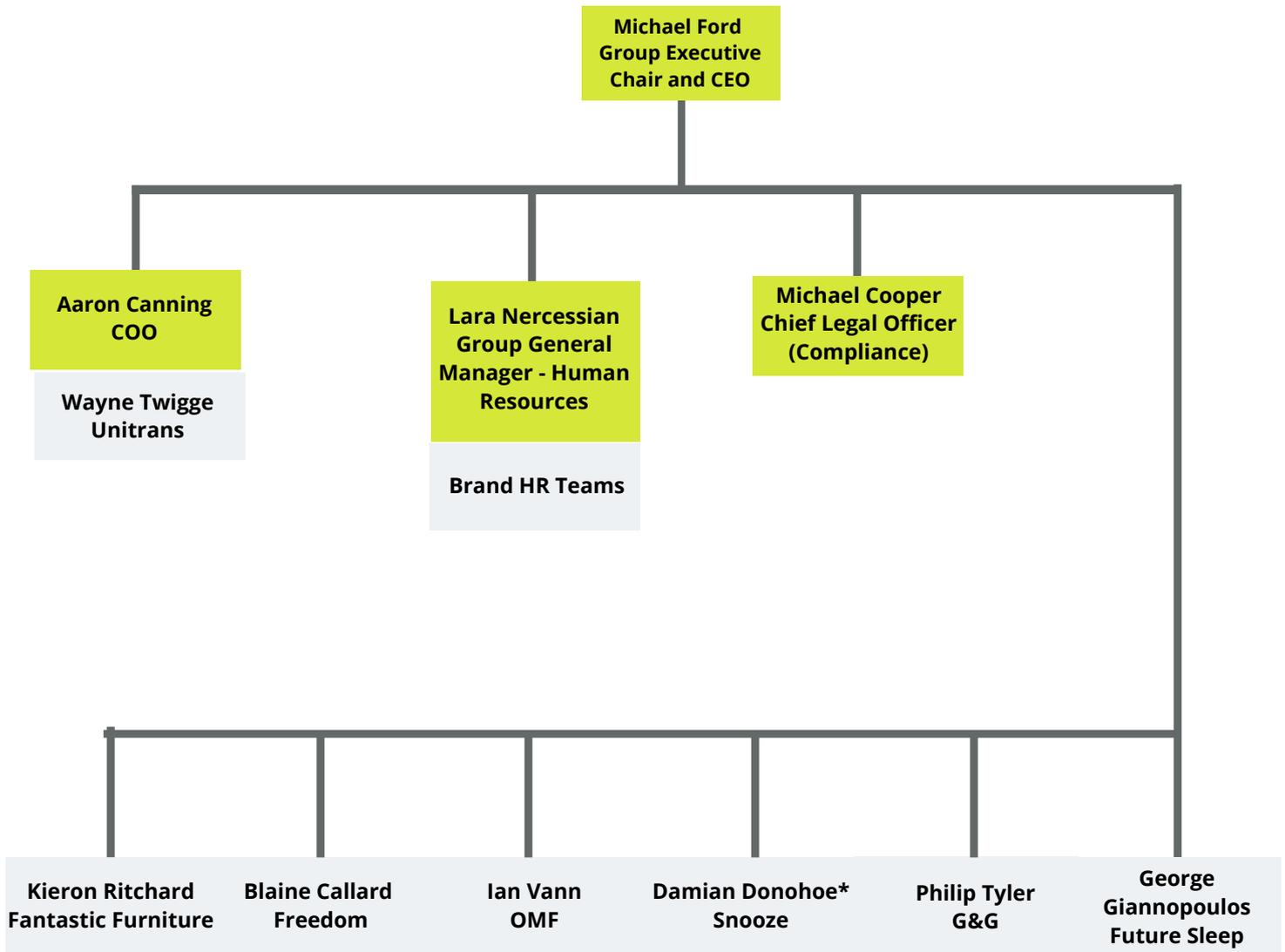
For now, we know we have a lot of work to do to protect the people in our operational teams and supply chains. Modern slavery is not always apparent, and our work in this space will always be ongoing. We are committed to tackling and eradicating all modern slavery in our business and supply chains.



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Section 1: Leadership structure



* Damian Donohue was promoted to Managing Director in March 2022. Simon Beaty was CEO for this statement's reporting period.

Section 2: Our structure, operations and supply chains

Greenlit Brands Pty Limited and FF HoldCo Pty Ltd and their subsidiaries are integrated retailers importers, wholesalers, and manufacturers of household goods across Australia and New Zealand. Our brands have been in operation for several decades. Across our brands, we continue to deliver a range of household consumer goods, including lounges, homewares, rugs, mattresses, bedding, upholstery cleaning products, tables, and chairs. Greenlit Brands Pty Limited or FF HoldCo Pty Ltd is the parent company of the following seven brands:

- Fantastic Furniture
- Freedom
- FutureSleep
- G&G Furniture
- Original Mattress Factory (OMF)
- Snooze
- Unitrans

Plush+Think Sofas Pty Limited (the operator of the Plush business) is no longer a subsidiary of Greenlit Brands Pty Limited and has not been included in this second modern slavery statement.

Both Greenlit Brands Pty Limited and FF HoldCo Pty Ltd are subsidiaries of members of the Steinhoff International Group, located in the United Kingdom, which is required to report under the United Kingdom's Modern Slavery Act 2015.

We operate in:

254

stores

17

factories

16

distribution centres

These premises are located throughout Australia and New Zealand. Our operations obtain a range of services from third parties, including cleaning services, waste services, property management, uniforms, transport and freight, security services, information technology services and products, communications and marketing, financial and superannuation services, and website and cloud storage.

The countries that we directly source and manufacture materials, products, and services from include Australia, China, Malaysia, Germany, India, Taiwan, Singapore, Denmark, Vietnam, United States, Algeria, Indonesia, and Turkey. Our tier two and three supplier countries include Australia, China, Saudi Arabia, Finland, Malaysia, Pakistan, Germany, Vietnam, Indonesia, Netherlands, Japan, Thailand, South Korea, Italy, United Kingdom, Argentina, Costa Rica, and Brazil. Historically, raw materials have also been sourced from Belarus and Russia prior to the imposition of sanctions.

Greenlit Brands Pty Limited itself comprises of a Group Services Team, including an Executive Team and several departments - Finance, Human Resources, Payroll, Safety, Internal Audit, Information Technology, Property, Legal, and Administration Support. The Group Services Team is primarily involved in strategic objectives for the corporate groups and acts as a support to the seven brands with operational requirements and initiatives.

46 full-time
0 part-time
0 casual
1 contractor
0 stores
0 factories
0 distribution centres

Unitrans' leadership team report to the Chief Operating Officer of Greenlit Brands Pty Limited. The team comprises of a Chief Financial Officer, General Manager, Head of People and Culture, DC Managers, National Transport Manager, Information Technology Manager, and an Executive Assistant. Unitrans looks after warehousing, deliveries, freight, and transport, and packaging across internal and external brands, and during the reporting period was the principal logistics company for all brands, other than Fantastic Furniture.

167 full-time
8 part-time
130 casual
0 stores
0 factory
5 distribution centre
340 suppliers

Snooze's Managing Director oversees a leadership team comprising of General Managers in Marketing and E-Commerce, Retail and Operations, Finance and Product, and Human Resources. There are 81 Snooze-branded stores nationally. Greenlit Brands Pty Limited owns and operates two principal suppliers to the Snooze business group (FutureSleep and G&G Furniture Imports).

90 full-time
9 part-time
49 casual
0 contractors
81 stores
0 factories
0 distribution centres
30 suppliers

G&G Furniture has a Managing Director who is responsible for the overall direction of the company with the support of the Financial Controller. There are two Sales Coordinators, a Customer Service Officer, and Logistics Manager. Logistics work, other than ocean freight, is generally performed by Unitrans. G&G Furniture does not operate any retail stores.

5 full-time
1 part-time
1 casual
0 contractors
0 stores
0 factories
0 distribution centres
19 suppliers

Freedom's leadership team comprises a Chief Executive Officer, a Chief Financial Officer, and General Managers in Marketing, People and Transformation, Retail Operations, Information Technology, Digital and Visual Merchandising, Merchandise Director, General Manager of Planning, Supply and Shipping, and General Manager of Marketing. Freedom also comprises of a Managing Director and Chief Financial Officer for its New Zealand operations. Freedom operates 47 stores across Australia and New Zealand.

274 full-time
359 part-time
55 casual
0 contractors
47 stores
0 factories
5 distribution centres
157 suppliers

OMF's structure includes a Chief Executive Officer, General Manager Operations, General Manager Finance & Inventory, Head of People and Culture, Head of Digital, Head of DC Operations, three state-based Retail Operations Managers, Central Operations Manager. OMF has 12 suppliers, two of which are internal - Unitrans and FutureSleep.

60 full-time
69 part-time
76 casual
0 contractors
44 stores
12 factories
0 distribution centres
12 suppliers

FutureSleep's structure comprises of three main groups working with the Chief Executive Officer. The Innovation and Design Team consists of Brand Account Management, Research Design and Innovation, Construction Methods and Pricing, Sourcing and Purchasing, and Supplier Relationships. The Operations Team includes Facilities Management, Customer Service and Logistics. The Professional Services Team includes Finance and Administration, Component Sourcing and Purchasing, and Human Resources and Safety.

187 full-time
3 part-time
66 casual
48 contractors
0 stores
4 factories
Distribution centres are part of manufacturing sites
30 suppliers

Fantastic Furniture is led by a Chief Executive Officer with the following departments reporting directly: People and Safety, Supply Chain and Manufacturing, Legal, Property and Risk, Marketing and Digital, Information Technology, Finance, Retail Operations, Products and Planning, and Customer Excellence.

830 full-time
417 part-time
86 casual
139 contractors
82 stores
1 factory
6 distribution centres
105 suppliers



Section 3: Risks of modern slavery in our operations and supply chains

We understand modern slavery as situations where offenders use coercion, threats, or deception to exploit victims and undermine their freedom. Modern slavery practices include human trafficking, forced labour, debt bondage, deceptive recruiting, forced marriage, child labour, and slavery-like practices such as servitude. We also recognise that we need to look further than this, as there are many indicators of modern slavery risk.

As reported in our first modern slavery statement, several assessments took place across our brands to identify how our brands may cause, contribute to, or be directly linked to modern slavery in our operations and supply chains. The risks identified in those assessments continue to be risks across our brands this financial year.

Modern slavery risks in our supply chains and operations include:

- forced labour and child labour in textiles, foam, metals, timber, plastics, and adhesives materials sectors and supplier countries
- in our internal management systems should there be gaps in policies and processes designed to protect human and labour rights
- our lack of visibility further down our operational supply chains beyond tier one. We have identified further risk this year in our varying degrees of control and oversight, which pose a risk of modern slavery, including unknown contractors and sub-contractors
- exposure to worker vulnerability which can lead to modern slavery risk. Vulnerable workers may be those exposed to deceptive recruiting and debt bondage, among other modern slavery risks
- the impacts of COVID-19 which continue to develop, remain unpredictable, and disruptive to our operations and supply chains. The impacts are not specific to one material, product, sector, or country. We have identified the impact of COVID-19 as a risk to modern slavery exposure and addressing COVID-19 impacts has been a priority across each of our brands this financial year. As a result, our modern slavery statement includes sections specific to COVID-19 impact.



Our continued risks of modern slavery

Supply Chains

COVID-19 has been the biggest impact on our supply chains this reporting year, with brands identifying it as a high risk of increasing worker vulnerability, which could ultimately lead to modern slavery. Please refer to page 20 for more information about these impacts.

Last financial year, each of our brands mapped out information on their products and services including worldwide manufacturing locations, materials used in products or services, the source country of materials (if known), and the use of third-party certifications. This information was entered into a social hotspot database to understand potential risks in our brands' supply chains relating to modern slavery, human and labour rights, and other interlinked social risks.

Our risks identified from this assessment have not changed. The two main modern slavery risks remain as forced labour and child labour in textiles, foam, metals, timber, plastics and adhesives sectors, or associated sectors where the material is used in product manufacturing. There is also the risk of corruption across material-sector-countries that we source from.

We understand that modern slavery is not limited to these sectors, materials or countries, and can occur at any time and place.

Textiles industry

The textiles industry is considered a very high risk for child labour, forced or compulsory labour, and corruption such as human trafficking. Our brands use a range of textiles including cotton, polyester, wool, leather, and other fabrics to make furniture products, mattresses, bedding, lounges, rugs, and homewares. People are at risk, particularly in the early stages of the textiles lifecycle, such as in the extraction of materials and manufacturing.

Timber industry

Our hotspot assessment showed forced or compulsory labour is a sector-country risk in the forestry industry. Particular areas of concern include the illegal harvesting of timber and associated child labour and corruption. Our brands source various types of wood to use in products they manufacture including pine, teak, oak, hardwood, softwood, walnut, beech, and particleboard. Our brands' tier-one suppliers also source these materials from a number of countries to manufacture wood-based products like sofas, lounges, bed bases, bed frames and ensembles, bedroom storage furniture, chairs and ottomans, tables, and storage accessories.

Other imported goods such as metals, adhesives, plastics and foam

Material-country risks include various metals, adhesives, plastics, and foam. Our brands use these materials in a number of their final products.



The table below illustrates the materials (outlined on page 9) and the countries from which our brands source or use these materials, either as raw material, manufacture products in our factories using the material, or distribute the product or material via our centres. This data is from our social hotspot assessments conducted in 2020.

	Textiles	Timber	Metals	Foam	Adhesives	Plastics
Argentina	x	x				
Australia	x	x	x	x	x	x
Brazil	x	x	x			x
China	x	x	x	x	x	x
Costa Rica		x				
Finland		x				
Europe	x	x		x		x
Germany	x		x	x		x
Indonesia		x				
India	x					
Italy	x					
Japan				x		x
Malaysia	x	x	x	x	x	x
Netherlands					x	
Pakistan	x					
Saudi Arabia				x		
Singapore				x		x
South America	x	x	x	x	x	
South Korea				x		x
Taiwan	x	x	x		x	
Thailand	x			x		x
USA	x			x		x
UK		x	x	x	x	x
Vietnam	x	x	x		x	x

Operations

COVID-19 has had a significant impact on our brands' operations over the reporting period. Please refer to the following page for more information about these impacts.

Further investigation into some of our brands' operations this year has increasingly shown a lack of visibility in their operational supply chains beyond tier one, including unknown contractors and sub-contractors. For example, Freedom uses a third-party sourcing agent, FutureSleep sources textile and mattress components using a third-party agent and G&G Furniture Imports G&G uses a third-party sourcing agent in China, Indonesia, and Vietnam. This means these brands do not have direct control over certain areas of their supply chain. The risk is mitigated but not eliminated through a detailed agreement and ongoing communications.

Our brands predominately employ full-time, part-time, and casual workers meaning they largely have oversight over our direct operational workforce.

Other indicators of exploitation

As outlined in our first modern slavery statement, an indicator of modern slavery includes workers who are more vulnerable which can lead to exploitation. Vulnerability can include, but is not limited to, workers who experience discrimination or marginalisation, those who work in substandard conditions, workers who live in countries that do not adopt international conventions, or who have not set up laws, unions, and policies to protect human and labour rights. Vulnerability of workers can mean they are exposed to deceptive recruiting and debt bondage, among other modern slavery risks.

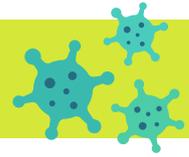
Other indicators identified by our brands include:

- migrant workers and Indigenous peoples' rights and protections continue to be at risk
- a higher risk of occupational injuries, hazards, and deaths exist in the use of chemicals, timber, textiles, metal, plastic, latex, foam, adhesives, and cleaning materials, products, and industries. While occupational injuries and deaths are not considered modern slavery, if it is a common occurrence in a workplace it can show substandard work conditions.
- risk in the timber, metals, foam, and textiles industries across all brands regarding workers' right to freedom of association with others, including the right to form and join trade unions for the protection of interests.

In addition to these hotspots, COVID-19 impacts are increasing the likelihood of worker vulnerability.



COVID-19 impacts on our supply chains and operations



This year COVID-19 has had a significant impact on each of our brands' operations and supply chains and is globally an ongoing area of risk to human rights. We have identified this as a heightened risk to modern slavery as it can increase worker vulnerability and exposure to modern slavery. In this section, we describe the impacts of COVID-19 on each of our brands. On page 20, we describe what actions we are taking to address these impacts.

Fantastic Furniture experienced delays in manufacturing and shipping of raw materials. Lockdowns and restrictions both locally and internationally impacted retail, logistics and manufacturing networks.

Freedom endured major delays with production and reduced availability in shipping. Some factories and suppliers closed or had limited staff due to the pandemic. Freedom also experienced the inability to travel to visit factories and source products. The lockdown imposed in Australia and New Zealand meant retail team members were impacted resulting in reduced working hours.

FutureSleep reported their raw material supply chain was impacted due to shipping delays. Workers were stood down as a result of COVID-19 restrictions in New South Wales and Victoria in order to comply with health orders from State Governments. FutureSleep also experienced a shortage of labour in manufacturing and logistics.

G&G Furniture Imports have seen delays in production, and delays in the shipping of containers from all ports due to a lack of space on vessels. G&G Furniture Imports have also been impacted by restrictions with lockdowns.

OMF has experienced supply delays, supplier shortages, and lockdowns. Some suppliers have had to let team members go, or reduce production due to COVID-19 impacts. OMF had staff needing to take time off work due to COVID-19 related illness in both its operations and retail network.

Snooze reported an impact on the supply of raw materials. Two-thirds of Snooze's retail stores were in lockdown for between two and four months which restricted the ability to generate income, and led to the temporary closure of some stores.

Unitrans' supply chains have been affected through delayed shipments and containers. For example, containers unable to be unloaded at their destination as well as being delayed leaving the destination country. Unitrans' biggest impact has been on its operations. A percentage of the workforce had to work from home and as Unitrans is considered an essential service, they were allowed to continue to operate. Restrictions around vaccination mandates and local government area lockdowns meant Unitrans had to change the way they conduct home deliveries and their outbound/inbound functions.

Section 4: Actions to assess and address modern slavery risks, including due diligence and remediation

This section of our statement (pages 13 to 21) outlines each of our brands' actions and priorities to remedy situations where they may cause, or contribute to, modern slavery or modern slavery risks. This includes due diligence and remediation. We've outlined where our brands have improved or built on actions from our last reporting statement, the differing priorities for each of our brands, areas not yet progressed, new actions, and goals for the years ahead. Please note, each entity has reported on its own actions which may differ from each other. Individual entity actions are detailed in each of the sections below, and not every brand relates to each section.

- Modern slavery working group and dedicated roles
- Modern slavery training
- Supplier relationships
- Supplier self-assessment questionnaires
- Internal management systems
- Supplier's management systems
- Labour transparency
- Freedom of association
- Third-party social certifications and initiatives
- Social auditing
- COVID-19 response
- Partnerships

Each of our brands' goals and targets will continue to evolve and become even more individually orientated as our brands continue to build their knowledge of modern slavery risks associated with their business and operations.

Modern Slavery Working Group and dedicated roles

Last year we committed to establishing a modern slavery working group across our brands. Due to the disruptions of COVID-19 and the associated impact on our retail businesses, the joint modern slavery working group was not established. However, some of our brands employed new staff members or allocated existing staff with the responsibility to lead and incorporate modern slavery work as a part of their job description.

- Fantastic Furniture will establish a Modern Slavery Working Group in 2022 which will comprise of representatives from Legal, Products, Supply Chain, Human Resources and Operations.
- Freedom will include a modern slavery review within their Product Safety and Quality meetings, chaired by the Head of Quality (including compliance), Head of Merchandise, Customer Service Manager, and Safety Officer. Meetings will be held every 6 weeks and third-party sourcing agents within Asia will be involved to ensure discussion and action across their supplier network.
- A working group will be established at FutureSleep in the second half of the 2022 financial year comprising members of the Operations, Product, Procurement, and Human Resources teams to continue identifying risks and mitigation strategies.

- G&G Furniture Imports' Managing Director is responsible for the sourcing of the products supplied to its retail customers, making sure the factories they buy from are acting ethically and fair towards their workers. The Managing Director is also active in conversations with its suppliers about how they are addressing the same issues with their second and third-tier material suppliers.
- OMF's CEO, along with their General Manager and Head of People and Culture oversee modern slavery work within their business.
- Snooze has appointed a staff member to oversee and work on an operational and process strategy for continual improvement regarding modern slavery. This plan will align with its recently established inter-departmental Safety and Sustainability Committee.

Modern Slavery training

Education about what modern slavery is, how to detect it, appropriately respond to it, and provide support mechanisms are important for our brands to get right. Modern slavery training has not yet commenced for our broader staff and suppliers. The following brands have committed to implementing training in the future.

- Fantastic Furniture expects to be in a position to distribute Modern Slavery training to its Support Office and Executive Team in 2022.
- Freedom aims to ensure that department heads undergo relevant training and are engaged with suppliers and sourcing agents to establish corrective action plans
- FutureSleep will ensure the executive team and all managers have completed training on Modern Slavery.
- All OMF suppliers have been briefed on OMF's position on modern slavery, product sourcing, and environmental commitments under their Project Zero23.
- Snooze plans to set targets and create action plans for training in the future.

Supplier Relationships

An essential aspect of our brands' management of modern slavery risks is ensuring there are clear and open lines of communication with their suppliers.

- Fantastic Furniture has strong supplier relationships and engagement and regularly audits suppliers of its products (page 19).
- Freedom plans to increase the frequency of supplier meetings and continue with the activities being conducted by sourcing agents including audits, and supplier declarations to ensure responsible supply chains are in place and that commitments on modern slavery are evident.
- FutureSleep plans to engage with suppliers further to better understand the potential modern slavery risks in their supply chain by obtaining their declarations and commitments on actions to mitigate modern slavery.
- G&G Furniture Imports see engagement and supplier relationships as key. The majority of the operational staff at G&G Furniture Imports have been with the company for 20 years or more, building strong and lasting relationships with suppliers on a personal level. Ongoing and regular communication is a key aspect for the company.
- OMF engages directly with supplier owners and has a firm stance on employee working conditions, including access to safe and positive work environments. OMF has in the past walked away from suppliers that did not meet their expectations of working conditions. This expectation and continuous improvement are expected from all suppliers.

- Snooze continues to have clear and open discussions with their supply base about the importance of working openly and transparently together and to provide evidence where possible to demonstrate that there is no modern slavery in their supply chains via code of conduct and questionnaire responses.

Case study

One of G&G Furniture Imports' supplier factories in Malaysia burnt down in October this year. The fire started as an extractor fan malfunctioned, causing a spark that dropped into the painting /chemical area, which subsequently set the factory alight. The fire spread quickly and attempts to extinguish it failed.

To ensure ongoing worker safety and understand the impacts on the business operations (including the risk of exposure to vulnerable situations and modern slavery), it was important for the Managing Director of G&G Furniture Imports to receive regular updates from the factory. There was already an established relationship between them, which meant the Managing Director received regular updates outlining the interim measures and safety protocols and was aware that the factory had a Whistle-blower Policy in place.

A new location for the factory was found promptly, and the communications continued with regular phone calls and newsletters informing G&G Furniture Imports and other buyers on the health and Safety measures for workers whilst setting up the new factory.

Supplier Self-Assessment Questionnaires

The supplier self-assessment questionnaire is a tool used by some of our brands to improve communications, actions, and due diligence with their suppliers about modern slavery. The questionnaire helps our brands to gain an understanding of their supplier's policies, processes, and procedures regarding modern slavery, labour rights, human rights, environmental compliance, anti-corruption, and quality management. The following brands utilise, or plan to utilise, the questionnaire:

- Fantastic Furniture issues supplier questionnaires to certain suppliers as part of its CSR audit process (page 19).
- Freedom will work with their sourcing agents to ensure that questionnaires are sent out to suppliers. Having local support in its supplier countries through the sourcing agents will assist in ensuring that collected data is credible and that relevant action plans can be proposed.
- G&G Furniture Imports issued 15 supplier questionnaires with 15 responses. Findings included that its suppliers have some policies and procedures in place for their workers. G&G Furniture Imports plans to re-issue questionnaires as an ongoing communication tool.
- OMF completed a full round of supplier self-assessments in FY20/21. OMF plans to introduce another round of self-assessments in addition to external random auditing in FY22.
- Snooze will distribute its questionnaires to its top 14 suppliers (which accounts for 90% of the business) next financial year. In instances where the questionnaires cannot be completed, Snooze plans to communicate with suppliers in alternative ways using translators as required to ensure clear communication.

Internal management systems

Each of our brands will continue to assess what requires revision, improvement, or development in their internal policies, processes, and procedures to evaluate and continue addressing the risks of modern slavery.

The following list of policies, guidelines, and roadmaps were reported in our first modern slavery statement. These are still current and active for our brands.

- Greenlit Brands Speak Up (Whistle-blower) Policy
- Greenlit Brands Grievance Policy
- Greenlit Brands Anti-Bribery, Corruption and Fraud Policy
- Greenlit Brands Appropriate Workplace Behaviour Policy

These policies apply to all subsidiaries of Greenlit Brands Pty Limited and FF HoldCo Pty Ltd. The policies are addressed during orientation and all employees are required to complete mandatory training (including refresher training) on their rights and obligations under the policies.

Where possible, third parties engaged by subsidiaries of Greenlit Brands Pty Limited and FF HoldCo Pty Ltd are required to demonstrate they have policies and procedures in place equivalent to those listed above.

This financial year (2021), some brands focused on improving their own specific policies and processes to assess and/or address modern slavery risks. Below is a snapshot of new developments.

Freedom 'Workplace' and request for Modern Slavery Statements

Freedom created a group on its online platform 'Workplace' where team members can post issues, complaints, and/or improvements on day-to-day operations. The stores are also encouraged to log any incidents. Freedom includes a request for a Modern Slavery Statement to be a consideration when partnering with new international suppliers.

Incorporating modern slavery work into broader sustainability strategies

The idea of sustainability is wide-reaching and requires a wholistic and flexible approach to environmental, health, and ethical matters - including improving human and labour rights practices. Numerous factors can affect the quality of life for people right across our operations and supply chains. Social sustainability is as necessary as environmental sustainability. Some of the brands have recognised this link in their own sustainability work and developments.

For example, this year, Snooze has created a Safety & Sustainability Committee. The goal of the group is to make Snooze a safer place of employment as well as make Snooze more sustainable. Freedom has recently joined APCO and has established a working team on sustainability. This team will engage with key suppliers with the network and ensure that social sustainability is incorporated into relevant initiatives. OMF's Project Zero23 looks at achieving a minimum environmental footprint and maximum support of their supply network. The project involves ensuring key supply partners provide superior products where there is no negative risk of employee disadvantage. Suppliers were briefed on Project Zero23 and OMF's objective for suppliers to participate in the project by the end of 2023.

Supplier's management systems

Understanding our brands' suppliers' management systems is just as important as understanding their own as a measure to mitigate and remediate modern slavery in our supply chains.

Both G&G Furniture Imports and Snooze have been active in speaking to their suppliers about what policies and procedures they have in place. Findings include certain suppliers that developed their own whistle-blower, grievance, and complaints policies. G&G Furniture Imports and Snooze are committed to tracking and recording this in future years. From recent communications between G&G Furniture Imports and their suppliers, the majority of factories they deal with have whistle-blower, grievance, and complaint policies. G&G Furniture Imports aim to have these details confirmed during their next social audits. Some of Snooze's suppliers have internal management systems which include policies such as anti-Slavery, code of conduct, their own supplier Questionnaires, and factory safety audit. A supplier of Snooze conducts unannounced audits twice a year on all factories by their Regional Best Practice Team.

Freedom is supported by sourcing agents throughout Asia on supplier audits, including supply chains and factories. These audits include policies and procedures, and Freedom will conduct the necessary reviews in the next few years to ensure that these audits and documents are up-to-date and relevant to assess and address modern slavery risk.

Fantastic Furniture has a good understanding of product supplier processes, procedures and internal management systems by way of its supplier CSR audits.



Labour transparency

A modern slavery risk across Greenlit Brands Pty Limited and FF HoldCo Pty Ltd and their subsidiaries is the lack of oversight and control of suppliers - both via operations and in supply chains. This includes using contractors and sub-contractors.

In line with its Ethical Sourcing Roadmap and Guidelines, Unitrans focused on two main actions this financial year:

- ensured clearer reporting from its labour hire company. For example, what they are paying their workers and benchmarking that to modern awards.
- decreased the use of labour hire where possible by employing more casual staff directly, which provides more transparency and control.



Freedom of association

As recognised in our first modern slavery statement, each of our brands recognise that all employees should have the right to freedom of association with others, including the right to form and join trade unions, and participate in lawful associated activities.

Social auditing

Some of our brands are conducting social audits on their factories. Social audits involve contracting with a third-party auditor to look at worker conditions, social impacts, and responsibility.

- During the 2019–2020 financial year, Fantastic Furniture commenced social auditing with 25% of its suppliers to begin determining its next steps for best practices in human and labour rights. Fantastic Furniture conducted CSR initial audits on approximately ten factories and a further nine CSR re-audits on factories during this reporting period.
- Freedom is supported by sourcing agents throughout Asia on their supplier audits and aims to review the frequency of social audits as well as ensure those already conducted are up-to-date.
- G&G Furniture Imports will arrange to have social audits done with all factories they source from in the next two financial years.
- OMF contracts an external party (same as Fantastic Furniture) to audit external suppliers on product and team at factories and supply partners.
- Snooze plans to commence its social auditing program during the 2021–2022 financial year and has set up a system where any new suppliers onboarded will need to go through the same process. Snooze works very closely with its small network of suppliers, therefore, believes that open and transparent communication reduces the need for continual audits.

Third-party social certifications and initiatives

G&G Furniture Imports requests information about the use of third-party certifications and initiatives when sourcing materials, products, or services. The following third-party certifications and initiatives have been identified in its supply chains that address various social compliance criteria relating to labour and human rights. From the factories they heard back from, five have SEDEX membership and two have undertaken Business Social Compliance Initiative (BSCI). Another factory had been audited and approved by QIMA (appointed and paid by a US buyer) for a Social Ethical Audit and CTPAT Audit.

As part of OMF's sourcing requirements, international and national partners must now meet the below requirements, some of which include social compliance criteria:

- International: FSC certification – timbers, SMETA (ethical trade reporting) – timbers and upholstery, CertiPUR-US – foams, SGS Testing & Inspection – foams, Control Unions Certification – fabrics, Okeo-Tex Standard 100 – fabrics, Seaqual Initiative – recycled fabrics
- Australian: Forest Stewardship Council (FSC) certification – timbers, OKEO-TEX Standard 100 – fabrics, foams locally produced – Good Environmental Choice Australia (GECA).

Some of Snooze's linen and timber sourced products have a Global Organic Textile Standard (GOTS) certification, OKEO-TEX Standard certification and FSC certification, where there are some inclusion of ecological and social compliance criteria in certifications.

COVID-19 response

Our brands have implemented several mitigation and remediation strategies in response to COVID-19 and the potential risk of it increasing worker vulnerability and modern slavery, where possible.

For example, G&G Furniture Imports have been in contact with suppliers enquiring about the support they are providing their supply chain workers. Findings saw that suppliers were active in supporting their workers from COVID-19 impacts. One factory in Malaysia was providing some meals to families in the local community. The executive team at G&G Furniture Imports distributed a COVID-19 questionnaire to its suppliers this financial year and is in constant contact with the factories as COVID-19 has such an impact on their supply chain. G&G Furniture Imports are supporting their suppliers who are requesting price increases, to ensure that they have the funds to remunerate their workers fairly.

Our brands will continue to monitor the impact COVID-19 has on our operations and supply chains.



Partnerships and initiatives

We understand that to combat and eradicate modern slavery and to ensure that effective support mechanisms for victims are in place, our brands need to make meaningful partnerships with external organisations, civil societies, and third-party initiatives.

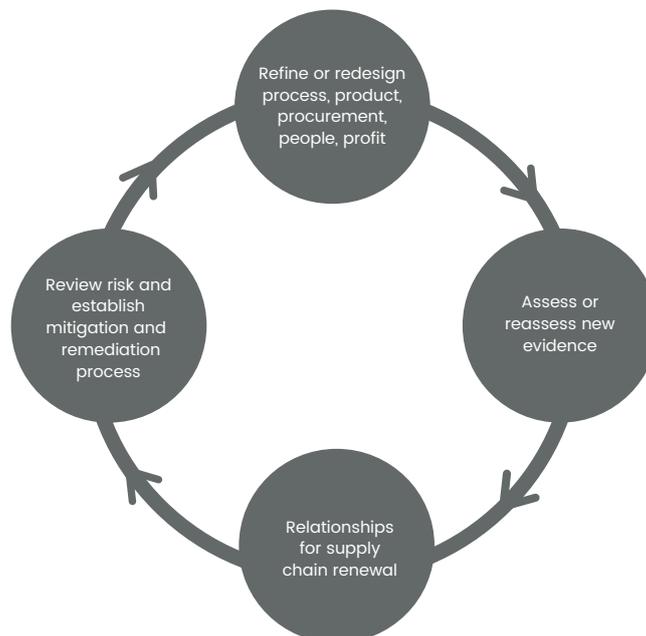
Snooze is taking an active approach to becoming a certified B Corporation by 2023. This certification means Snooze will be audited against its social and environmental performance, governance, and transparency. Snooze is considering joining the UN Global Compact and committing to responsible business practices in the areas of human rights, labour, the environment, and corruption.

When we do find modern slavery

As mentioned in our first modern slavery statement, we understand that if, or when, we find modern slavery occurring in our brands' operations or supply chains we need to ensure it is handled delicately and in a manner that does not jeopardise anyone's safety. For severe cases, we understand our responsibility to contact local authorities.

Our process for continual improvement

Our process for continual improvement is illustrated in the diagram below. We will continue to assess and reassess, and take the necessary steps for improvement.



Section 5: Assessing the effectiveness of our actions

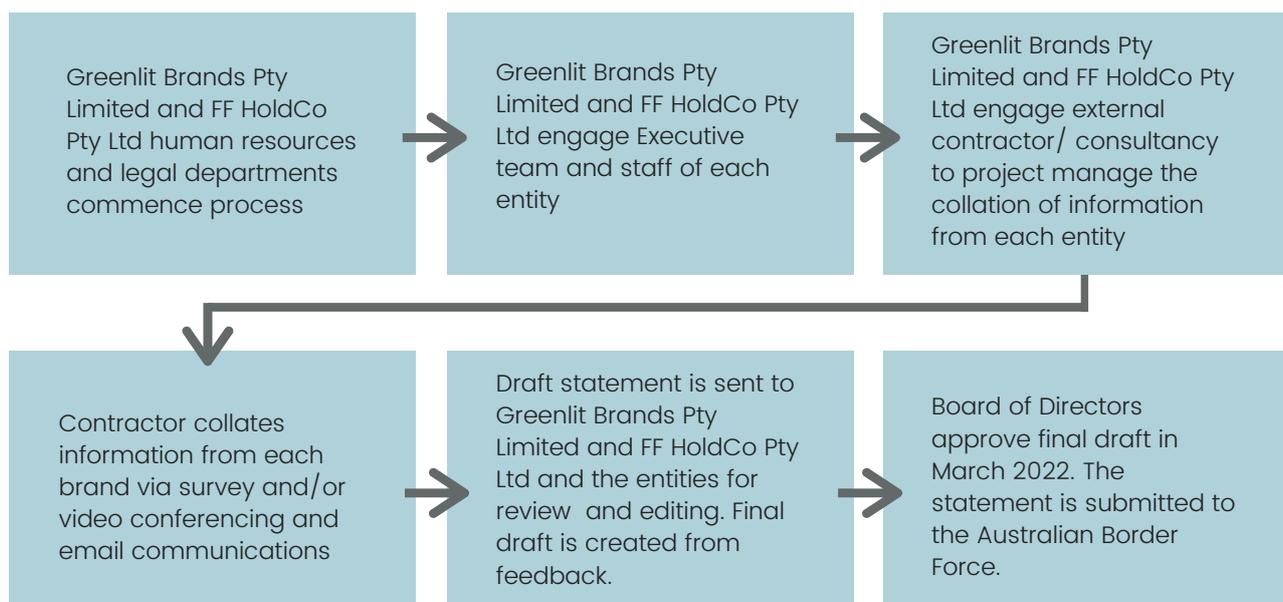
There has been no evidence of modern slavery across Greenlit Brands Pty Limited or FF HoldCo Pty Ltd or any of their subsidiaries' operations and tier-one suppliers presented or identified in this reporting period. Our position is limited as we have identified the need to improve how we address our risks and assess whether our actions are effective.

Currently, many of our brands have informal assessment processes in place on only some of the actions listed in this statement. For example, some of our brands analyse the results of questionnaires and social audits for risk.

Greenlit Brands Pty Limited and FF HoldCo Pty Ltd and their subsidiaries are developing a formal assessment program to assess the effectiveness of actions to address modern slavery risk. Constraints to progressing this work have included our focus on responding to COVID-19 impacts.

Section 6: Process of consultation

The process for consultation to develop our modern slavery statement for the 2020-2021 financial year is outlined in the diagram below:



This statement was approved in March 2022 by the board of directors of Greenlit Brands Pty Limited and FF HoldCo Pty Ltd, one of which is a higher entity (as referred to in section 14 of the Modern Slavery Act 2018) of each of the reporting entities detailed below. This statement is signed below by Michael Robert Stransham Ford as responsible member of both Greenlit Brands Pty Limited and FF HoldCo Pty Ltd.



Michael Robert Stransham Ford
Executive Chairperson and Group Chief Executive Officer
Greenlit Brands Pty Limited and FF HoldCo Pty Ltd

This statement is also signed by the Chief Executive Officer or Managing Director of each of our brands however, their signatures are not included as a responsible member for the governing body of the reporting entity.



Wayne Twigge
Chief Financial Officer
Unitrans Asia Pacific Pty Limited



Ian Vann
Chief Executive Officer
Original Mattress Factory Pty Limited



Philip Tyler
Managing Director
G&G Furniture Import Pty Limited



Damian Donohoe
Managing Director
Snooze Management Pty Ltd



George Giannopolous
Managing Director
FutureSleep Pty Ltd



Blaine Callard
Chief Executive Officer
Freedom Furniture Australia Pty Limited



Kieron Ritchard
Chief Executive Officer
Fantastic Furniture Pty Limited, Fantastic
Manufacturing Pty Ltd, FHL Distribution Centre
Pty Limited

