

**Modern Slavery  
Statement 2024**



# Contents

01.	Reporting and Consultation	2
02.	From Our Group Managing Director	3
03.	Mandatory Criteria and Reporting Requirements	4
04.	Highlights from FY24	5
05.	About Us	8
06.	SRG Product and Services Sourcing	11
07.	Risks of Modern Slavery Practices	13
08.	Actions Taken to Reduce Modern Slavery Risks	19
09.	Assessing the Effectiveness of Our Actions	23
10.	Our Modern Slavery Priorities for FY25	25

# Reporting and Consultation

## 01.

Spotlight Group Holdings Pty Ltd (SGH) has prepared this Modern Slavery Statement to fulfil its reporting obligations under the Australian Modern Slavery Act 2018 (Cth). This statement outlines the actions taken by SGH during the financial year ending 30 June 2024 (FY24) to identify, assess, and address modern slavery risks across its operations and supply chains.

The statement is a joint submission on behalf of all reporting entities within SGH, which includes:

- Spotlight Pty Ltd (ABN 39 564 861 886)
- Spotlight Limited (NZ Company no. 553661)
- Spotlight Pte Ltd (Singapore Registration no. 199504453C)
- Spotlight Stores Sdn Bhd (Malaysia COID 1063748-V)
- Anaconda Group Pty Ltd (ABN 53 955 173 782)
- Mountain Designs Holdings Pty Ltd (ABN 45 944 511 754)
- Harris Scarfe Pty Ltd (ABN 83 095 018 803)

along with any other entities owned or controlled by SGH.

Although some of these entities may not be required to report under the Act, SGH has adopted a ‘group-wide approach’ to ensure a consistent and comprehensive response. This statement applies to all SGH operations, with policies, systems, and procedures implemented across all brands and business units.

### Consultation Process

SGH conducted consultation with all relevant reporting entities across our operations and supply chains. This included collaboration with our owned and controlled entities. A Modern Slavery Working Group, including senior members from these entities, was formed to contribute to the development of this statement.

The Board of Spotlight Group Holdings approved this statement on 20 December, 2024.

## From our Group Managing Director

02.

During FY24, SGH adopted a coordinated approach to meeting its compliance and reporting obligations under the Modern Slavery Act 2018 (Cth) **(the Act)**.

Key actions included the formation of a dedicated Modern Slavery Working Group, the rollout of targeted online training for relevant staff, a comprehensive review of our trade partners (covering both product and service suppliers), and the development of practical guidance for buyers. Our efforts were supported by our supply partners and external compliance consultants, to ensure our actions aligned with our regulatory obligations.

This, our fifth modern slavery statement, details the steps SGH has taken during FY24 to comply with mandatory reporting requirements. In line with the Act, the statement outlines our structure, operations and supply chains, identifies potential modern slavery risks, explains the actions we have implemented to address those risks, and describes how we measure the effectiveness of our actions. It also includes details of our consultation with relevant stakeholders.

Our Trade Partner Review has helped us to identify and manage modern slavery risks, assisting us in fulfilling our responsible sourcing obligations. This process has also helped us prioritise our efforts and to appropriately allocate resources into the future. As we move into FY25, SGH will continue its focused approach to ensuring compliance with its legal requirements and will aim to maintain open communication with suppliers, update buyer guidance and continue the delivery of relevant and practical training for our buying teams.

**Avi Gilboa**

**Group Managing Director**

This modern slavery statement was approved by the Board of Spotlight Group Holdings on 20 December, 2024.



## Mandatory Criteria and Reporting Requirements

03.

We have addressed these in our statement as follows:

- 01. Identification of the reporting entity**  
This is addressed on page 2.
- 02. Description of our structure, operations, and supply chain**  
This is addressed on pages 8 – 12.
- 03. Description of the risks of modern slavery practices in our operations and supply chains and any entities we own or control**  
This is addressed on pages 13 – 18.
- 04. Description of the actions we have taken to assess and address these risks (including due diligence and remediation processes)**  
This is addressed on pages 19 – 22.
- 05. How we assess the effectiveness of our actions**  
This is addressed on page 23.
- 06. Description of the process of consultation with any entities the reporting entity owns or controls**  
This is addressed on page 2.
- 07. Any other relevant information**  
This is included on pages 25 - 26 where we discuss our modern slavery priorities for FY25.

# Highlights from FY24

04.



## Formation of a Modern Slavery Working Group

SGH has established a dedicated modern slavery working group, which meets regularly to ensure oversight and improvement of our processes related to modern slavery risk management.



## Tailored Modern Slavery Training

We have rolled out tailored modern slavery training to relevant staff, ensuring they are equipped with the knowledge and skills necessary to identify and mitigate modern slavery risks within their roles.



## Comprehensive Trade Partner Review

SGH is currently conducting a comprehensive trade partner review, covering suppliers of both resale and non-resale goods. The review focuses on modern slavery statements, labour policies, supply chain risks, responsible sourcing audits, subcontractors, human rights breaches, employment of vulnerable workers, and workplace safety.



## Development of Ethical Sourcing Principles

We have provided guidance for our buyers and trade partners to support them to source cotton from suppliers that meet stringent standards and have certifications from programs such as Fairtrade Textile and Better Cotton Initiative (BCI).



## Supplier Code of Conduct Update

SGH has developed an updated one-page supplier code of conduct, outlining our expectations aimed at minimising instances of modern slavery within our supply chains and operations.



## Review of Suppliers Certification Process

SGH has reviewed any supplier certifications as they were provided, utilising both internal resources and external compliance support to work to ensure that our suppliers meet the required standards in ethical sourcing and modern slavery prevention.





# 05.

## About us

SGH is most recognised for its retail division, Spotlight Retail Group (SRG), which oversees the management of well-known retail brands:



SGH is a family owned and operated business, headquartered in South Melbourne, Victoria, Australia and its interests also include:

- a group property portfolio – managed under the **Spotlight Property Group (SPG)**;
- investment interests; and
- other shareholdings, a family office and a charitable foundation – the **Spotlight Foundation**.

SGH operates over 300 retail premises, across four countries, and employs over 12,000 team members.



SRG Brands

**Spotlight** is one of the largest fabric, craft, party and home interiors retailers in Australasia.

The first Spotlight store opened in Malvern in September of 1973, and today, after 50 years, Spotlight has grown to have over 150 stores and employs more than 7000 team members.

**Anaconda** is one of Australia's largest outdoor adventure superstore retailers. Founded in 2004, Anaconda is your one-stop adventure retailer, being the destination for all your equipment needs. Anaconda has over 85 stores across Australia and employs more than 2500 team members.

As part of its continuing evolution, Anaconda acquired the well known **Mountain Designs** brand in early 2018 and continues to produce and sell it's apparel, hiking, camp and everyday outdoor gear.

**Harris Scarfe** is one of Australia's longest trading retailers, with over 175 years of experience. Harris Scarfe is a small format lifestyle store with a product range that includes sheets, quilts, pillows, pots, cutlery, glasses, kitchen accessories, women's and men's fashion, underwear, shoes and sports clothing. Harris Scarfe has over 60 stores in Australia and employs more than 1500 team members.

The SRG brands are supported by a shared services model, with its Melbourne-based headquarters providing key support to its retail brands across finance, IT, supply chain, marketing, digital and omnichannel, property and store development, as well as human resources and payroll. Additionally, smaller support offices are located in New Zealand and Singapore to assist the international Spotlight stores.

Other SGH Operations

SGH has also developed an extensive portfolio of retail and commercial properties across Australia and New Zealand.

SGH serves as a landlord to key tenants such as Bunnings, The Good Guys, McDonald's, Adairs, and Godfreys, while also housing many SRG stores.

Over the years SGH continues to diversify its interests, with ownership stakes in various other businesses, the development of a broad investment portfolio, an expanding property finance business, and ongoing contributions through the Spotlight Foundation, which provides grants and donations to support numerous worthy causes each year.



# SRG Product and Services Sourcing

06.

In FY24, SGH continued to improve transparency in its supply chains and operations by gathering data on its suppliers, including the total number of direct and indirect suppliers and supplier segmentation by country or region. Procurement is managed by teams at SGH’s South Melbourne headquarters, with a substantial amount of international sourcing handled through Glowstar Global Sourcing Organisation.

Reflecting our broad international supply chain, our brands source from a range of countries. These include China, Australia, India, Vietnam, Indonesia, Pakistan, Bangladesh, Japan and South Korea.

The categories of products we sell across our brands include:

- **Homewares**
- **Kitchenware**
- **Outdoor and Adventure Gear**
- **Apparel and Footwear**
- **Craft and Fabrics**
- **Party and Seasonal Supplies**
- **Camping and Hiking Equipment**

**The types of services we rely on to run our businesses include:**

- **Cleaning services:** Daily cleaning, maintenance, waste disposal, recycling, and sanitisation in high-traffic areas.
- **Freight and logistics:** Transportation of goods from suppliers, warehousing, stock management, and last-mile delivery for online orders.
- **IT and technical support:** Installation and maintenance of Point of Sale (POS) systems, network security, and hardware/software support.
- **Security services:** On-site security personnel, CCTV surveillance, alarm systems, and access control.
- **Marketing and advertising:** Digital marketing, in-store promotions, signage, and branding.
- **Human resources (HR):** Recruitment, onboarding, payroll, superannuation, and compliance with workplace safety and Fair Work legislation.
- **Customer service:** Call centres or support teams for inquiries, complaints, orders, returns, and refunds.

- **Legal and compliance services:** Legal advice on contracts, business operations, intellectual property, and compliance with consumer laws and privacy regulations.
- **Facilities management:** System maintenance, electrical, plumbing, general repairs, and car park maintenance.
- **Finance and accounting:** Bookkeeping, financial reporting, tax compliance, payroll processing, and budgeting.
- **Supply chain management:** Vendor relations, stock replenishment, distribution planning, and demand forecasting.
- **Training and development:** Ongoing staff training (sales, customer service, compliance), leadership, and performance management.
- **Health and safety services:** Workplace health and safety assessments, fire safety systems, first aid training, and emergency response.
- **Utilities management:** Electricity, water, gas supply management, energy efficiency, sustainability initiatives, waste management, and recycling programs.

**International Product Sourcing through Glowstar Global Sourcing (Glowstar)**

Glowstar engages with 287 third-party factories across China, India, Japan, South Korea, Pakistan, and Vietnam, supplying a wide range of merchandise. SGH has been advised by Glowstar that it has assessed the risk of modern slavery in its direct operations as low and that it maintains robust HR policies to ensure compliance with employment laws.

**Other Sourcing by SGH**

SGH primarily manages modern slavery risks in its supply chain by utilising internal policies and practices that guide its sourcing efforts. SGH carries out reviews of suppliers, focusing primarily on those identified as higher risk. SGH will perform supplier audits and follows up on any significant issues when necessary.

# Risks of Modern Slavery Practices

07.

SGH recognises that modern slavery risks may be heightened within certain areas of its supply chains and operations due to the geographic locations of some suppliers, the regions where SGH sources its products from, and the origin of materials used in the products it sources.

Additionally, SGH acknowledges that limited visibility into certain overseas markets presents further challenges, particularly in the deeper tiers of its supply chains. This lack of transparency increases the potential risks of modern slavery, especially in the sourcing of raw materials and components that contribute to SGH’s goods and services.

### Products

SGH is aware of the potential risks of forced labour and exploitation in global supply chains. While SGH has not identified any specific risks in its supply chain related to the products it sells, it acknowledges the broader risks flagged by organisations such as the US Department of Labor and the Walk Free Foundation. To address these concerns, SGH trains its buyers and procurement staff to identify and mitigate these risks, and also relies on its international sourcing partner, Glowstar, to ensure compliance with ethical standards throughout its supply chains. In terms of the broader risks that may exist, SGH is aware of product-related risks including:

The SGH Supplier Code of Conduct and SGH Global Sourcing Principles, require our suppliers (and their subcontractors) to commit to not using forced, bonded or prison labour and ensure that workers’ freedom of movement is not unreasonably restricted. The Code and Principles also include other modern slavery and social responsibility requirements that are relevant to the issues that have been identified in high-risk regions. SGH will continue to monitor the situation in these regions.

Our internal modern slavery training has information available on high-risk regions and provides our staff with access to resources prepared by the US Department of Labor and the Australian Strategic Policy Institute.

## 07. Risks of Modern Slavery

### Homewares

Products like bedding, curtains, rugs, and towels, particularly sourced from regions such as China, India, Uzbekistan, and Turkmenistan, which may involve forced labour in the cotton production and textile manufacturing sectors. Cotton farming in these areas, especially in Uzbekistan and Turkmenistan, has reportedly involved state-imposed forced labour, where workers, including children, are coerced into harvesting cotton. Textile factories in China and India have also been linked to exploitative working conditions. Also, timber used in furniture, particularly from Brazil and Peru, has been associated with illegal logging, which often involves forced labour in remote forested areas, where workers may be trapped in exploitative conditions with little recourse.

### Kitchenware

The production of stainless steel and ceramics in China and India has been associated with poor working conditions, including low wages, long hours, and unsafe environments in smelting and ceramic factories. Workers in these industries have been reported to suffer from exposure to harmful chemicals and poor safety protocols. Also, glassware and tableware manufacturing in these regions may involve hazardous working conditions, such as exposure to extreme heat and dangerous equipment, without adequate protections for workers.

### Outdoor and Adventure Gear:

Products such as tents, sleeping bags, and fishing equipment, manufactured in countries like China, Vietnam, Thailand, and Indonesia, have been flagged for forced labour risks, especially among migrant workers. Many of these products use synthetic materials derived from petroleum by-products, which are reportedly often processed under exploitative conditions in factories where labour rights are not adequately protected. Similarly, kayaks, paddleboards, and camping gear may be sourced from factories in these regions, where reports of long hours, underpayment, and unsafe working environments have been made.



### Camping and Hiking Equipment:

The production of camping gear, including tents and portable stoves, in China and Vietnam has been reported to involve labour rights violations. Workers in factories producing these goods often face long hours, inadequate pay, and unsafe working conditions, particularly in sectors relying on the use of synthetic materials and metal components.

### Apparel and Footwear:

The apparel industry in Bangladesh, India, Vietnam, and China is well-documented for its links to forced labour. Informal factories in these regions often employ vulnerable workers who face unsafe working conditions, wage theft, and excessive working hours. These issues are reportedly pronounced in garment production, where workers produce outdoor clothing and casual wear under exploitative conditions. It has also been reported that footwear manufacturing also involves similar risks, with many workers in China and Vietnam trapped in low-wage environments with poor labour protections.

### Craft and Fabrics:

Textile production, including cotton harvesting in Turkmenistan, Uzbekistan, and India, has long been associated with forced labour. In Turkmenistan and Uzbekistan, state-imposed forced labour in cotton fields is common, with workers, including children, forced to work in harsh conditions for little or no pay. It has also been reported that papercraft materials produced in China may involve exploitative practices, particularly in regions where low-wage workers are employed in factories with limited oversight or regulation of working conditions.

### Party and Seasonal Supplies: –

The production of costumes, decorations, and other seasonal supplies in China and India is often linked to forced labour in the textile and manufacturing sectors. Factories producing these items have been known to employ vulnerable workers, many of whom face poor conditions, low wages, and excessive working hours, particularly during peak production seasons such as holidays.

SGH aims to engage in ethical sourcing practices by staying informed of these reported risks and taking the necessary steps to ensure its compliance with international standards.

## Services

SGH understands that there are reported risks of forced labour and exploitation in global service supply chains. However, SGH is not aware of any specific risks directly associated with its supply chain in relation to the services it engages. Nonetheless, we recognise that these risks have been highlighted in industry reports and are therefore aware of the potential for such issues within the broader service supply chains we interact with.

SGH is aware that several industries face potential risks related to worker exploitation and poor labour practices such as:



- **Cleaning services**, including daily maintenance and waste disposal, are vulnerable to issues like underpayment and poor working conditions, particularly affecting migrant workers. The use of contractors in this industry can also create gaps in oversight and compliance.



- The **freight and logistics sector**, which is critical for the transportation of goods and last-mile delivery, has been reported to face challenges with worker safety and underpayment. In particular, truck drivers and warehouse workers are reportedly sometimes subjected to unsafe working conditions, excessive hours, and inadequate pay, especially in subcontracted roles.



- In the **security services industry**, there have been reports of exploitation, particularly of temporary or migrant workers, who may face issues such as underpayment and insufficient workplace protections. This can include on-site security personnel hired through agencies or contractors, where oversight may be weaker.



- While the **customer service industry** in Australia is generally well-regulated, there can be risks within outsourced call centres, including excessive working hours and pressure on workers. These risks are typically higher in lower-wage roles where job security and workplace protections may not be as robust.



- In the **facilities management industry**, which includes contractors used for store fit out, maintenance, plumbing, and general repairs, subcontracting can lead to reduced oversight of working conditions, with migrant workers sometimes facing exploitation. This issue is more prevalent in sectors with a reliance on temporary or casual labour.



- The **supply chain management and warehousing sectors** also carry risks of underpayment and poor conditions, especially in outsourced or contracted operations. Workers involved in warehousing and stock replenishment may face long hours with limited rights, particularly where casual or part-time contracts are used.

In these industries, SGH understands that ongoing vigilance and robust compliance with Australian labour laws are essential to mitigate risks, ensuring that all workers, regardless of their role or status, are protected under fair workplace practices.



## Actions Taken to Reduce Modern Slavery Risks

08.

In FY24, SGH has taken several important steps to address modern slavery risks within its supply chains. A key development has been the formation of a **modern slavery working group**, which now meets regularly to identify, assess, and mitigate risks across the business. This group plays a central role in guiding SGH's efforts to ensure that its operations and supply chains remain free from exploitation.

A key element of SGH's modern slavery risk management strategy is its strong partnership with **Glowstar**, which as outlined above manages modern slavery risks across its supply chain, enforcing minimum standards that prohibit child labour, forced labour, and other exploitative practices. To address risks in its supply chain, Glowstar has implemented an Ethical Sourcing (ES) Program. This program includes a Code of Conduct that prohibits forced labour, child labour, and wage non-compliance. It also features an audit system that requires all factories to pass ethical sourcing audits before onboarding, with mandatory renewals every two years, and 97% of factories completed these audits in FY24. The program further included corrective action processes to address non-compliances and a critical non-compliance protocol, which allows for disengagement from non-compliant factories when necessary.

As part of its efforts, Glowstar also reported it conducted site visits and training at 89 factories to reinforce its ethical standards. It also advised that it tracked key metrics, including audits, renewals, and responses to critical non-compliances, through reports prepared by its Compliance Manager, enabling the identification of improvement opportunities. Glowstar has advised SGH that it undertook a comprehensive review of its modern slavery risk management approach in FY24, reflecting its commitment to continuous improvement.

When sourcing directly (not through an agent), SGH typically connects with new factories via international fairs or introductory emails. To assess factory standards, SGH requests details of current customers in Australia or the United States and copies of relevant certifications, such as BSCI, WRAP, SEDEX, SMETA, ISO, ICS, RWS, or PG. While SGH does not visit every factory or inspect all goods before shipping, team members visit suppliers factories where possible.

SGH also provides suppliers with its Trading Terms and Vendor Compliance requirements to ensure responsible sourcing practices are upheld.

SGH has implemented comprehensive and essential **modern slavery training for all relevant staff**, designed to equip both new starters and current employees with the critical skills and knowledge needed to identify and respond to potential modern slavery risks. This training is vital for ensuring that all team members understand SGH's ethical standards and responsibilities within its procurement processes. The training covers key topics such as understanding modern slavery, why SGH must address these risks, and how various roles within the company might contribute to or mitigate these risks. Employees are taught to recognise factors that could expose SGH to modern slavery, and they are empowered to take action to prevent, detect, and report any potential issues. Additionally, all employees, suppliers, and business partners are reminded of their responsibility in addressing modern slavery risks within the business and supply chain.

The **Trade Partner Review** being conducted by SGH is a critical step in deepening the company's understanding of modern slavery risks within its supply chain. By including both products and non-resale goods trade partners, SGH has broadened the scope of the review to cover a wider range of its operations, improving its efforts to ensure that modern slavery risks are identified and mitigated across the entire supply chain.

The detailed questions posed to trade partners regarding their labour practices—such as policies addressing modern slavery, health and safety, wages, and discrimination—provide valuable insights into each partner's commitment to ethical standards. Additionally, assessing trade partners' visibility over their sub-contractors and raw material suppliers will assist us in detecting potential risks further down the supply chain, such as exploitation occurring at the raw material sourcing stage.

Furthermore, the use of a **new electronic form, translated from English into Chinese Mandarin and Vietnamese**, demonstrates SGH's commitment to ensuring that all of its overseas trade partners can fully comprehend and engage with the review process. This multilingual approach allows for more accurate responses and fosters better communication and understanding between SGH and its trade partners, ultimately leading to more reliable and actionable results.



08.  
**Actions taken to Address Risks**

Additionally, SGH developed **new ethical sourcing principles** which will be implemented in the future and updated its **Trade Partner Code of Conduct**, further strengthening its commitment to addressing modern slavery risks. These documents clearly outline SGH’s expectations regarding modern slavery and human rights, ensuring that its trade partners align with the company’s values of ethical and responsible business practices. The existing Code of Conduct established a baseline of accountability for all trade partners, providing SGH with the means to assess whether partners were upholding their commitments to human rights and labour standards.

SGH has had a Whistleblower Policy in place for several years, to allow the reporting of wrongdoing, including modern slavery concerns. In addition, SGH has a ‘Talk Back to the Boss’ program across its brands, which has been in existence for decades and is culturally embedded. The program enables employees at any level to raise concerns they have and those issues are responded to within 24 hours and shared with all leadership, ensuring timely and transparent resolution. These initiatives reflect SGH’s commitment to fostering open communication, accountability, and ethical practices across its operations and supply chains.

To mitigate the **risks involved with the services we obtain from third party suppliers**, SGH had taken proactive steps which include training its procurement teams to identify potential red flags and issues related to the procurement of those services. Teams are aware of the known broader risks identified in industries like cleaning, security, and logistics, which are known to be vulnerable to exploitation. In these sectors, teams are trained to look for red flags including contractors paying below minimum wage, lack of adequate health and safety measures, and restrictions on workers’ freedom to resign or leave employment freely. Additionally, the procurement team was trained to recognise risks associated with the use of subcontractors, especially if visibility into their working conditions and compliance with labour laws is limited.

As SGH continues its work to review supply chains and operations, we have encountered several **challenges**, including time and resource constraints and grappling with the complexities of overseas sourcing, particularly when engaging with SGH’s very large number of suppliers.

Gathering credible information can be hindered by language barriers and suppliers’ lack of engagement. We recognise the need to develop innovative solutions, such as potentially offering online modern slavery awareness training for suppliers, to address these issues. Traceability, especially for materials like cotton, also remains a significant challenge, requiring us to explore new approaches. Despite these hurdles, SGH remains committed to overcoming these obstacles and continuing our efforts to achieve our transparency and ethical sourcing goals.

Through the initiatives outlined herein, SGH, in collaboration with Glowstar, aims to take a proactive approach to mitigating modern slavery risks both within Australia and across its international supply chains. By working together on supplier engagement, compliance checks, and awareness training, SGH aims to ensure that its operations and partnerships align with its commitment to ethical sourcing and responsible business practices.



## Assessing the Effectiveness of Our Actions

09.

Our Modern Slavery Working Group is actively monitoring the effectiveness of our processes and procedures to ensure we address any modern slavery risks that SGH's operations may cause, contribute to, or be linked to. This oversight is essential in fostering a culture of accountability and transparency throughout our business and supply chains.

As part of these efforts, SGH gathers feedback from its suppliers through our comprehensive Trade Partner Review. This review not only assesses suppliers' awareness and implementation of anti-slavery practices but also evaluates the strength and openness of our supplier relationships. By maintaining an ongoing dialogue, SGH is able to monitor our suppliers' willingness to comply with our modern slavery policies and initiatives.

Additionally, SGH tracks and reviews modern slavery-related incidents or grievances through our customer care centre, Talk Back to the Boss program and whistleblower process. These mechanisms provide valuable avenues for both employees and stakeholders to report concerns without fear of retaliation. Our Modern Slavery Working Group also monitors employee participation in training sessions.

By regularly reviewing these processes, SGH strives to continue to improve its approach to managing its modern slavery risks. These initiatives are critical in maintaining our commitment to ethical business practices, protecting human rights, and ensuring long-term sustainability in our operations and supply chains.





# Our Modern Slavery Priorities for FY25

10.

In FY25, SGH aims to embed existing practices by incorporating modern slavery prohibitions into **pro-forma landlord leases, SRG design briefs** for external developers constructing new sites, and **SPG construction contracts**.

Regular meetings of the modern slavery working group will continue to be essential to monitor progress, assess risks, and ensure that SGH meets all regulatory and reporting requirements. These meetings will play a crucial role in keeping the company aligned with modern slavery laws and promoting a culture of accountability.

In FY25, SGH will continue to work with its sourcing office Glowstar to further strengthen collaboration on modern slavery initiatives. These meetings will focus on refining the onboarding processes for new suppliers and ensuring compliance with modern slavery regulations.

SGH will also continue to provide modern slavery training to all relevant staff, including both new starters and existing employees. This training is critical in helping employees understand their responsibilities, equipping them with the knowledge to identify risks and take action. By training relevant staff to recognise red flags and potential vulnerabilities, SGH mitigates risks across its supply chains and is better positioned to address modern slavery concerns as they arise.

The Trade Partner review and review of supplier responses will continue, focusing on ensuring that SGH’s suppliers are aware of and comply with the company’s Code of Conduct and Ethical Sourcing Principles. Suppliers will be encouraged to complete a thorough review prior to onboarding.

This step is vital to ensure that all new suppliers align with SGH’s ethical standards, helping to prevent risks related to modern slavery before they can manifest in the supply chain.

In FY25, SGH plans to develop comprehensive guidelines for buyers, including pocket-sized cards for easy reference during factory visits, to promote responsible purchasing practices and compliance with legal requirements.

Finally, SGH will maintain its focus on monitoring changes in modern slavery legislation and reporting requirements. Staying current with evolving laws will ensure that SGH remains compliant and that its due diligence efforts continue to meet legal standards. This continuous monitoring is key to adapting to regulatory changes and maintaining transparency across its operations and supply chains, ultimately helping to mitigate modern slavery risks.





**[spotlightgroup.com](http://spotlightgroup.com)**