

JB Hi-Fi Limited

2024

Modern Slavery Statement



ABOUT THIS STATEMENT

JB Hi-Fi Group's 2024 Modern Slavery Statement outlines the actions we have taken to assess and address the risks of modern slavery within our operations and supply chain covering the reporting period 1 July 2023 – 30 June 2024.

This statement has been prepared in accordance with the Modern Slavery Act 2018 (Cth) and the Australian Government Guidance for Reporting Entities, and is issued by JB Hi-Fi Limited as a joint statement on behalf of all the Group's reporting entities and owned and controlled subsidiaries, during the reporting period¹.

In developing this statement, JB Hi-Fi Limited consulted with each of its reporting entities and owned and controlled subsidiaries through the Ethical Sourcing Working Group, which involves members of senior management covering each reporting entity and owned and controlled subsidiary. The consultation process involved a review of the potential risks of modern slavery within each of the reporting entities' and owned and controlled subsidiaries' operations and supply chains, and the ongoing implementation of a Group-wide approach to address and report on these risks. Working Group members also reviewed a draft of the statement.

This statement has been reviewed and approved by the JB Hi-Fi Limited Board of Directors including the Group CEO, on 27 November 2024.

We recommend that this report be read in conjunction with the JB Hi-Fi Limited [2024 Sustainability Report](#).

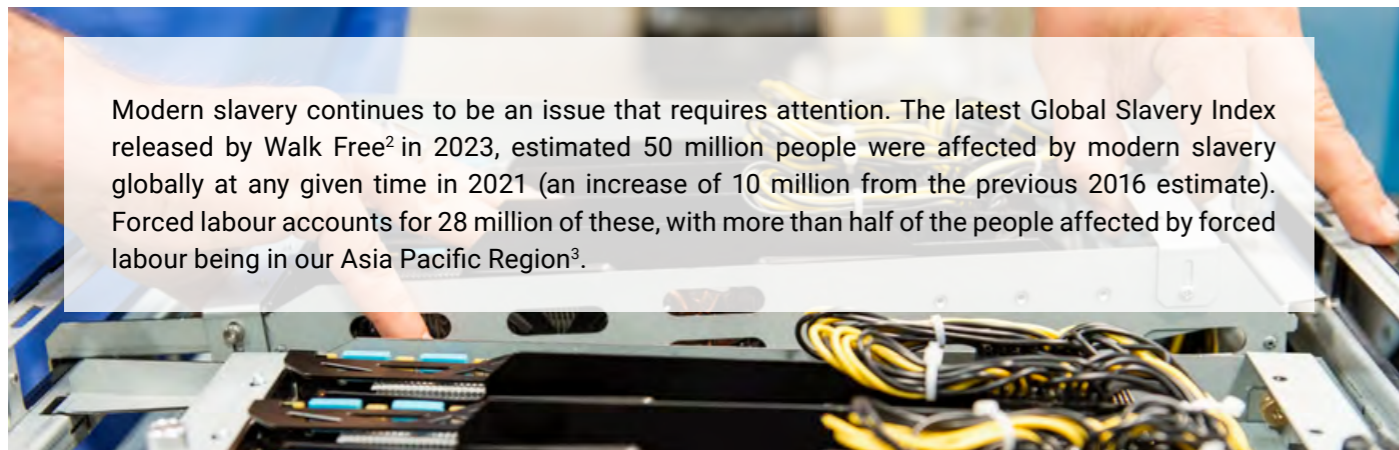
We welcome feedback on our statement. Please contact us at: ethicalsourcing@jbhifi.com.au

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¹For a definitive list of all Reporting Entities in the Group (as defined under the Modern Slavery Act), please refer to Appendix 2.

A MESSAGE FROM OUR CHIEF EXECUTIVE OFFICER



Modern slavery continues to be an issue that requires attention. The latest Global Slavery Index released by Walk Free² in 2023, estimated 50 million people were affected by modern slavery globally at any given time in 2021 (an increase of 10 million from the previous 2016 estimate). Forced labour accounts for 28 million of these, with more than half of the people affected by forced labour being in our Asia Pacific Region³.

We are committed to taking action to manage our modern slavery risks and reporting transparently on our efforts under the Modern Slavery Act 2018 (Cth) (the Act). Action is particularly important within our industry, noting that consumer electronics is considered a high-risk product category for modern slavery by the Global Slavery Index.

We acknowledge the Australian Parliament passing the Modern Slavery Amendment (Australian Anti-Slavery Commissioner) Bill this year, to establish Australia's inaugural federal Anti-Slavery Commissioner, and await the Federal Government's response to the independent review recommendations made last year on the Modern Slavery Act.

In the meantime we continue to implement our modern slavery response. Actions we took in FY24 included:

- Conducting due diligence checks on 79 supplier facilities included on the Group's 'Supplier Watchlist', which we use to prioritise engagement with suppliers we assess as being at higher risk of modern slavery;
- Visiting 5 factories in China that produce our private label (XCD) bracket, cabling, and headphone products to build on our understanding of work practices in China, and assess alignment with the Group's Ethical Sourcing Policy;

- Implementing a new ethical sourcing supplier questionnaire to enable the identification of foreign migrant labour within our supply chain more quickly; and
- Engaging with an additional 68 trade suppliers on supply chain mapping, country of origin for their final assembly facilities, foreign migrant labour, and the types of social auditing conducted on their facilities. Over the last two years we have undertaken supply chain mapping with 175 suppliers. Of these, 147 suppliers have responded with 39 of these suppliers being prioritised for further modern slavery due diligence due to the presence of foreign migrant labour in their supply chain.

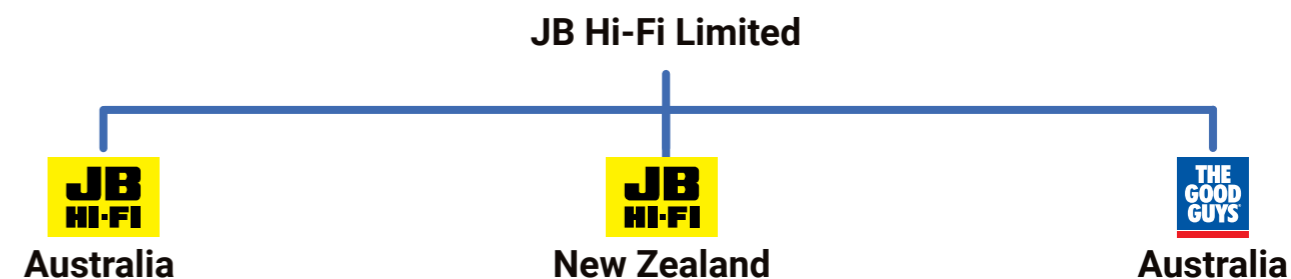
The Group recognises that it has a role to play in continuing to raise awareness around modern slavery and collaborating to develop an effective response across our industry sector. As we continue to refine our response, we remain open to engaging with all stakeholders, and committed to pursuing continuous improvement.

Terry Smart
Group Chief Executive Officer
JB Hi-Fi Limited
27 November 2024



OUR GROUP'S STRUCTURE AND OPERATIONS

The JB Hi-Fi Group structure and operations did not materially change over the reporting period, with the listed holding company (JB Hi-Fi Limited) having 100% ownership of entities in the Group that operate the JB Hi-Fi and The Good Guys businesses.⁴



JB Hi-Fi and The Good Guys are leading retailers of consumer electronics, technology, telecommunications and other services, home appliances and software. Both businesses have operations in Australia and JB Hi-Fi also has operations in New Zealand.

Both our JB Hi-Fi and The Good Guys retail brands have multi-channel operations, selling a wide variety of consumer electronics and home appliances through a network of branded stores, online websites and call centres. The key product categories of the Group are:

The key product categories of the Group are:

	<p>Consumer electronics and technology products including televisions, audio equipment, computers, fitness, health & wellbeing products, smart home products and cameras.</p>		<p>Home appliances including whitegoods, refrigeration, laundry, cooking products, heating and cooling products, small appliances and kitchen accessories.</p>
	<p>Telecommunications products and services.</p>		<p>Software (music, movies and games) and associated merchandise and collectibles.</p>

JB Hi-Fi and The Good Guys also have commercial businesses which service the commercial, insurance and education sectors in Australia and New Zealand.

The JB Hi-Fi and The Good Guys retail and commercial businesses are managed by brand-specific management teams in Australia and New Zealand, with additional support provided by a Group Executive team.

²Walk Free is an initiative of the Minderoo Foundation and is a global organisation with a mission to end modern slavery. Walk Free has published five editions of the Global Slavery Index

³Global Estimates of Modern Slavery, Forced Labour and Forced Marriage, September 2022, International Labour Organisation, International Organisation for Migration; and Walk

Free 2023, The Global Slavery Index 2023, Minderoo Foundation, <https://www.walkfree.org/global-slavery-index>.

⁴On 2 September 2024, JB Hi-Fi Limited acquired 75% of E. & S. Trading Co (Discounts) Pty Ltd (E&S). The Group will provide an update on how it has integrated E&S into its modern slavery approach in our 2025 Modern Slavery Statement.



The Group operates centralised Support Office functions based in Melbourne and Auckland, and Commercial offices in Sydney, Melbourne, Brisbane and Auckland. The Group also operates a network of home delivery centres and warehouses which manage inventory and fulfilment of big and bulky items.

The work undertaken by the Group in relation to modern slavery is encapsulated in the Group's Ethical Sourcing Framework, which covers all aspects of the Group's operations. The Group Chief Financial Officer has ownership of the framework at an executive level.

Day to day operational responsibility for ethical sourcing and modern slavery lies with the Group Sustainability and Ethical Sourcing team working in collaboration with business units across the Group.

Strategic direction and oversight over the implementation of the Group's approach to modern slavery is provided by a cross functional Ethical Sourcing Working Group, involving members of senior management and the Group Executive team.

The Working Group is chaired by the Group Chief Financial Officer and includes executive representation from the finance, legal, buying, commercial, sustainability, business improvement and risk management business units. Key areas relating to the Group's approach to ethical sourcing and modern slavery risk management are considered, with specific focus on:

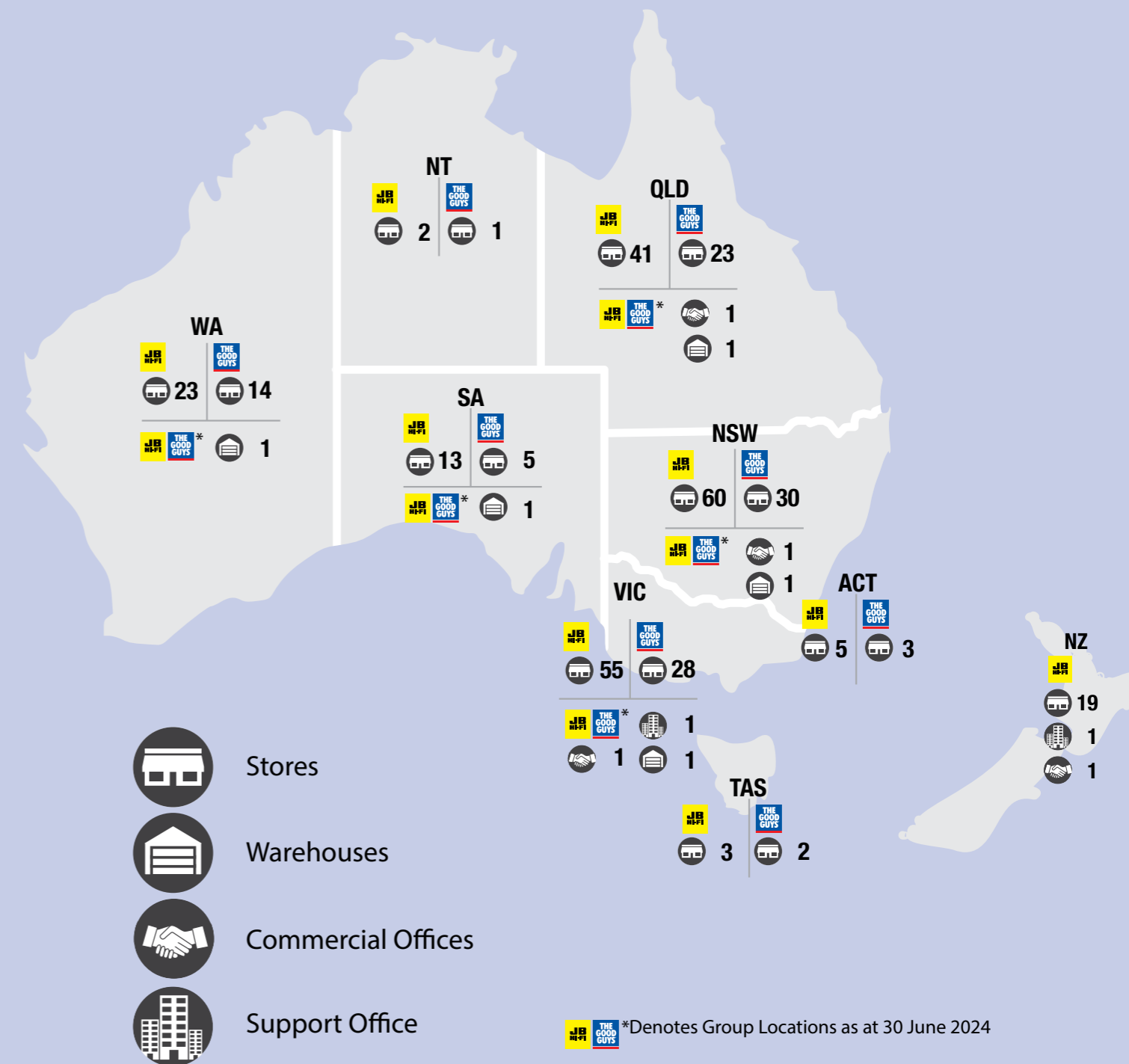
- ethical sourcing policy design and compliance;
- process improvement (such as new supplier onboarding);
- supply chain mapping;
- supplier engagement;
- supplier risk assessment;
- supplier due diligence; and
- internal and external training and awareness.

The Audit and Risk Management Committee (a sub-committee of the Board of Directors) is responsible for reviewing the Group's plans, actions and reporting in relation to modern slavery and for assessing and monitoring the effectiveness of the Group's programs and plans in this area. The Audit & Risk Committee reports to the Board on these issues.



The Group employs over 15,300 permanent, part-time and casual team members to conduct its operations in Australia and New Zealand. The Group's workforce is supplemented by sub-contractors to fulfil certain tasks, such as store maintenance and development

THE GROUP'S OPERATIONS ACROSS AUSTRALIA AND NEW ZEALAND:



and product installation services. During busier trading periods such as Black Friday and Christmas, additional retail staff are employed on a casual basis to meet increased consumer demand.



OUR SUPPLY CHAIN

The JB Hi-Fi Group works with a vast network of domestic and international suppliers. Maintaining productive relationships with all our suppliers is critical to the success of our retail and commercial businesses. In FY24, the Group procured goods and services from over 3,435 (FY23: 3,200) suppliers with spending of circa \$8.9 billion (FY23: \$8.9 billion).

THE GROUP'S SUPPLY CHAIN CAN BE SEGMENTED INTO FIVE CATEGORIES:

1 Trade Suppliers - branded products and services

Trade suppliers of branded products and services consist of manufacturers and service providers that the Group contracts with directly for the supply of goods (e.g. televisions, computers and whitegoods) and services (e.g. telecommunication contracts, extended warranties and product care) for resale within our retail and commercial businesses. The trademarks and brands associated with these suppliers are not owned by JB Hi-Fi Group.

The Group also engages with a number of Australian distributors which assist in the supply of certain third party branded products to the Group.

Our suppliers range from large multinational 'big brand' companies to smaller product and service providers, each with varying maturity of processes and controls to assess and address modern slavery risk in their operations and supply chain.

Our suppliers of products utilise a combination of wholly owned and outsourced manufacturing facilities, with a large proportion of the facilities relating to our supply chain being located in the Asia Pacific Region. These manufacturing facilities employ a combination of foreign migrant labour as well as workers who are permanent residents of the country where the facility is located. (Please refer to [page 25](#) for more detail regarding the mapping of country of final assembly of our trade supply chain).

In FY24 the Group placed orders with over **720 different trade suppliers** (FY23: over 700), **spending circa \$8 billion** (FY23: circa \$8 billion).

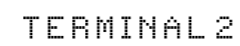
2 Trade Suppliers - JB Hi-Fi-owned private label products



'XCD', an accessories range which comprises cables, headphones, and other consumer electronics products.



'Flea Market', which comprises a range of gifting products (such as vinyl accessories, laptop sleeves, turntables and Christmas gifts).



'Terminal 2', which offers a range of adaptors, chargers and accessories catering to both international and domestic travel.

The Group contracts with a limited number of Australian-based suppliers for the sourcing and manufacture of products for JB Hi-Fi's private label brands (XCD, Flea Market and Terminal 2). These suppliers engage manufacturers in China and Vietnam for the production of our private label products and we work closely with our local suppliers on product design and quality, as well as compliance with our Ethical Sourcing Policy across the factories that are utilised for production. All workers employed by product manufacturers engaged by our Australia-based suppliers are permanent residents of either China or Vietnam. (Please refer to [page 31](#) for more detail regarding our private label supply chain).

In FY24 the Group spent circa **\$21.3 million** (FY23: \$19.7 million) on its private label product range, **across 4 different Australian-based suppliers** (FY23: 4 different suppliers).

3 Indirect Trade Suppliers

The end-to-end supply chain associated with the manufacture of consumer electronics and home appliances is vast, complex and can span across multiple countries. As such, there are a large number of indirect suppliers within the supply chain that contribute to the construction of a consumer electronics product or home appliance: from the technical design, to the minerals extracted from the ground, the fabrication of the materials, the construction and testing of the electronic components, and the final assembly, packaging and shipping.

These indirect suppliers are engaged by the trade suppliers and form part of the extended supply chain which contributes to the manufacture of the products we sell. The Group does not hold direct trading relationships with these indirect suppliers.

Case Study: Supply chain mapping undertaken by third party branded suppliers

Some of our larger international trade suppliers have mapped the various tiers of their supply chain, identifying suppliers of materials, manufacturing and final assembly, and the countries in which these suppliers operate (i.e. suppliers we classify as indirect suppliers of the Group).

For example, one of the Group's larger consumer electronics suppliers has published a list of their suppliers of raw materials (such as cobalt, gold, lithium, tantalum, tin, and tungsten), component manufacturing, and facilities that undertake assembly and packaging. The supply chain consists of 428 suppliers of materials, manufacturing, and assembly across 30 countries, with an additional 247 suppliers of raw materials smelting and refining across 41 countries⁵.

This example illustrates the depth and complexity of the global supply chain for consumer electronics. We aim to work with our suppliers to continue to build our understanding of these supply chains and key modern slavery risk areas, including as outlined later in this statement.

⁵This information is provided for illustrative purposes and was obtained through the 2023 public disclosures of one of the Group's largest international suppliers and has not been separately verified by the Group.



Non-Trade Suppliers (goods and services not for resale)

The procurement of goods and services not for resale is integral to the successful running of our operations, and includes the following types of suppliers:

- Landlords, property management and utility providers;
- Banks and finance companies;
- Energy companies;
- Professional service firms and security services;
- Advertising and media agencies;
- IT services, telecommunications and technology providers;
- Property and store development, cleaning and maintenance providers;
- Waste management and recycling providers;
- Delivery, logistics and warehousing providers; and
- Suppliers of office equipment and consumables.

In FY24 the Group engaged over **2,200** (FY23: over 2,100) **non-trade suppliers**, spending in excess of **\$850 million** (FY23: over \$850 million).



Service providers and outsourced sub-contractors

The Group's retail and commercial businesses offer installation and set-up services for some of the products we sell.

In our retail business this may include, for example, the mounting and set-up of a new television and sound system, or the installation and removal of home appliances such as air conditioners, refrigerators, washers, or dryers. These types of services are carried out by different types of sub-contracted service technicians and trade professionals such as electricians and plumbers.

Similarly, our commercial business offers installation services relating to networking and infrastructure solutions, as well as set up of audio and visual facilities for small to medium-size enterprises.

Both JB Hi-Fi and The Good Guys operate on-boarding and monitoring controls aimed at ensuring that all sub-contractors are appropriately skilled and qualified to carry out their duties, whilst adhering to the minimum standards included within our Ethical Sourcing Policy.

In FY24 the Group contracted with **514** (FY23: 425) **service providers and specialist sub-contractors for home installation services**, spending in excess of **\$39 million** (FY23: \$34 million).



MODERN SLAVERY RISK IN OUR OPERATIONS AND SUPPLY CHAINS

The Group recognises that modern slavery has serious impacts on people, and that no retailer is immune to the risks of modern slavery in its operations and supply chain. The Group's human rights-based approach to modern slavery considers risks to people in conjunction with risks to the business.

The Group utilises the framework provided by the [United Nations Guiding Principles on Business and Human Rights \(UNGPs\)](#), as well as the [Government Guidance to Reporting Entities on the Modern Slavery Act](#), to help assess the risk of modern slavery in our operations and supply chain. Using this guidance, the Group categorises modern slavery risks using the potential for the Group to either cause, contribute to, or be directly linked to, modern slavery through our operations or supply chain.

These three terms are drawn from the UNGPs and explained below:

Cause	The risk that our actions or omissions may directly result in modern slavery occurring (e.g. if forced labour or the worst forms of child labour were to be used directly in the Group's direct workforce).
Contribute	The risk that our actions or omissions may contribute to modern slavery occurring (e.g. if negotiations with suppliers on fulfilment or cost price resulted in suppliers utilising forced labour or the worst forms of child labour within their operations or supply chain in order to meet these requirements). We seek to discuss these factors with suppliers when we conduct our ethical sourcing due diligence.
Directly Linked	The risk that the products and services that we sell (and/or use), may be directly linked to modern slavery through the activities of another entity in the supply chain (e.g. if a component part of a consumer electronics product that we sell is manufactured by a supplier in the extended supply chain that has been found to have used forced labour, debt bondage or the worst forms of child labour).

Our modern slavery risks are not static and can change as our operations and supply chain change. For example, the introduction of new strategic objectives, suppliers, or product categories into the Group's operations may result in our business being exposed to new geographic locations or industries that have different modern slavery risks.

In addition, changing external factors (such as COVID, political conflicts, climate risk, and global migration patterns) may present increased risks for vulnerable workers. Management have sought to understand these risks with reference to the framework provided by the UNGPs.



1 Potential Modern Slavery Risks in Our Operations

The Group employs over 15,300 full time, part time and casual staff across our operations in Australia and New Zealand.

Most of the Group's team members are employed directly and on permanent contracts, which provides us with direct oversight and control of their working conditions. During the busier peak trading periods such as Black Friday and Christmas, additional retail staff are employed on a casual basis to meet increased consumer demand.

Our 14,700+ Australian team members are employed on individual employment agreements and provided with written contracts. Team members may be covered by one of the Modern Awards set out below, or otherwise are Award-free (such as senior management):

- General Retail Industry Award 2020
- Clerks Private Sector Award 2020
- Commercial Sales Award 2020
- Storage Services and Wholesale Award 2020
- Graphic Arts, Publishing and Printing Award 2020
- Professional Employees Award 2020

Our 600+ New Zealand team members are employed on individual employment agreements underpinned by national legislation and provided with written contracts. The Group is aware of, and continues to monitor proposed modern slavery legislation in New Zealand.

This, combined with the established supporting structures, policies and processes we have in place, in our view significantly reduces the risk of modern slavery being "caused" by the Group within our directly employed workforce.

2 Potential Modern Slavery Risks in Our Supply Chains

In 2023, Walk Free⁶ published the 2023 Global Slavery Index, a report published every five years which evaluates the prevalence of modern slavery and forced labour, as well as the progress being made to eradicate it.

This Index estimated 50 million people were affected by modern slavery globally at any given time in 2021 (an increase of 10 million from the previous 2016 estimate). Forced labour accounts for 28 million of these, with more than half of the people affected by forced labour being in our Asia Pacific Region⁷.

Given our reliance on electronics supply chains within the Asia Pacific Region, we recognise the risk of modern slavery occurring within our overseas supply chains. We also understand that modern slavery can occur here in Australia and that lower skilled workers in some sectors that we source services from may be more vulnerable to exploitation.

The 2023 Global Slavery Index estimated the value of at-risk consumer electronics globally to be \$243.6 billion (up from \$200 billion, published within the 2018 Global Slavery Index), with an estimated \$8.9 billion imported into the Australian marketplace (up from \$7b compared to 2018 estimates). Electronics (such as laptops, computers, and mobile phones) were considered the top 'at-risk' product category (by value) imported into the G20⁸ for the risk of slavery occurring in the supply chain.

Our modern slavery risks may also be influenced by a range of risk factors. These may include the use of migrant workers by suppliers for lower skilled roles such as manufacturing, reliance on complex global supply chains which can make it difficult to verify supplier practices, use of high-risk raw materials such as minerals, and sourcing from higher risk jurisdictions.

⁶Walk Free is an initiative of the Minderoo Foundation and is a global organisation with a mission to end modern slavery. Walk Free has published five editions of the Global Slavery Index.
⁷Global Estimates of Modern Slavery, Forced Labour and Forced Marriage, September 2022, International Labour Organisation, International Organisation for Migration; and Walk Free 2023, The Global Slavery Index 2023, Minderoo Foundation, <https://www.walkfree.org/global-slavery-index>.
⁸The G20 is the international forum for the world's major economies. Its members account for more than 80% of world GDP, 75% of global trade and 60% of the population of the planet.

Modern slavery risks in our trade suppliers

A large proportion of the trade suppliers we engage with are based in the Asia Pacific region, which is known to be a high-risk region for modern slavery and forced labour given the high levels of worker migration and use of third-party labour brokers facilitating worker migration across the region.

As such, the Group recognises that there is a risk it could be "directly linked" to modern slavery within all tiers of our trade supply chain.

The forms of modern slavery that could occur across this area of our supply chain may differ depending on the tier of the supply chain. For example, there may be higher risk of the worst forms of child labour within the extraction of raw materials, and a higher risk of debt bondage within the manufacture and assembly of products or their component parts.

The risk of modern slavery also increases in countries and industries where the upholding of human rights, and governance surrounding labour laws and practices, are not strong. Furthermore, suppliers which utilise a larger proportion of migrant labour, low-skilled workers, young workers and/or third-party recruitment companies, may be at greater risk of modern slavery occurring in their supply chains.

The Group recognises that the way it engages and negotiates with our suppliers on matters such as cost price or fulfilment time frames has the potential to contribute to the risk of modern slavery in downstream supply chains. These factors are discussed with suppliers when we conduct our ethical sourcing due diligence.

Some specific examples of modern slavery risk that may occur within our trade supply chain include:

- Deceptive recruitment practices and trafficking of migrant workers (for example, migrant workers are deceived about their working conditions when recruited, not provided within documented employment contracts, and are subsequently exploited upon commencing work at an overseas factory);
- The use of debt-bondage and/or the withholding of identification and travel documents (such as passports) to restrict the ability for workers to move freely in and out of employment (for example, migrant workers are charged recruitment fees and required to hand over their passports to an overseas factory); and
- The use of forced labour or the worst forms of child labour by direct or indirect suppliers in the assembly of products, component parts or the sourcing and refinement of raw materials (for example, children are used to mine minerals overseas used in electronics components).





Modern slavery risks in our non-trade suppliers - goods and services not for resale

A large proportion of the service industries we engage for our operations are based in Australia. Whilst the risk of slavery occurring in Australia is relatively low compared to some other parts of the world, we recognise that modern slavery can, and does, exist domestically and that workers in certain sectors may be disproportionately vulnerable.

Within our domestic supply chains, there is a potential for the group to be "directly linked" to modern slavery practices in industries and sectors which utilise low-skilled workers, young workers, migrant workers, or outsource work to sub-contractors. Such industries and sectors include (but are not limited to):

- Property and store development, cleaning and maintenance providers;
- Waste management and recycling providers;
- Delivery, warehousing, logistics and reverse logistics providers;
- Security service providers;
- Suppliers of solar panelling; and
- Suppliers of office equipment and consumables.

We also recognise we could potentially contribute to modern slavery in this area if our controls fail or are not fit for purpose.

Specific examples of modern slavery risk that may occur within our non-trade supply chain include:

- The use of forced labour or the worst forms of child labour by direct or indirect suppliers in the provision of services, or manufacturing of products to be used in our operations (for example, fixtures and fittings used in our stores

could be made in an overseas factory where workers are restricted from leaving the factory outside working hours and forced to work excessive overtime); and

- The exploitation of vulnerable workers such as ethnic minorities, low-skilled workers, and migrant workers (for example, lower skilled workers undertaking cleaning, or the processing of waste and recycling are not provided with written contracts and appropriate pay, with their employer threatening them with violence if they try to leave).

Modern slavery risks in our service providers and outsourced sub-contractors

Service providers and sub-contractors providing product installation, store development and maintenance services range from small business owners to large companies.

Workers within these industries range from highly qualified tradespeople, to young apprentice workers that are less skilled and experienced. There is a risk that the Group could be "directly linked", to modern slavery through its network of service providers and sub-contractors. We also recognise we could potentially contribute to modern slavery in this area if our controls fail or are not fit for purpose.

A specific example of modern slavery risk that may occur within our service providers and/or outsourced sub-contractors is the exploitation of vulnerable workers such as low-skilled workers, young workers, and/or migrant workers (for example, lower skilled workers or young workers assisting with product installation, but not being provided with written contracts and appropriate pay, with their employer threatening them with violence if they try to leave).

ACTIONS WE HAVE TAKEN IN THE FINANCIAL YEAR ENDED 30 JUNE 2024

Beyond the moral imperative to combat slavery, we also believe ethical sourcing can lead to better business outcomes such as highly engaged supplier relationships, superior product and service quality, and stronger investor and consumer confidence.

Our Ethical Sourcing Framework is focused on respecting human rights and ensuring workers in our operations and supply chains are treated fairly and provided with safe working and living conditions.

The key actions we have taken throughout the year have been focused on:

- implementation of a new ethical sourcing questionnaire for new and existing suppliers to identify the use of foreign migrant labour more quickly in our supply chain and triage high risk suppliers for further due diligence;
- requiring suppliers to carry out social compliance auditing in accordance with our Ethical Sourcing Policy, and working with suppliers to remediate any issues identified;
- engaging more of our smaller suppliers to understand the country of final assembly, utilisation of foreign migrant labour, and the types of social compliance audits conducted on the final assembly facilities identified;
- continuing to build capability and awareness, internally within our business and externally with our private label suppliers, through modern slavery training; and
- continuing to collaborate and engage across industry with peers, suppliers and investors to review and improve our approach to modern slavery.



The remainder of this section explains the key components of our Ethical Sourcing Framework, and the actions we took during FY24 in more detail.

1 POLICY GOVERNANCE & COMPLIANCE

Maintaining our Group Values

Underpinning the way in which we work and treat each other are our Group Values. Our Values emphasise the importance of respect and empowerment, acting with integrity, and operating with a social conscience, all of which have relevance to, and support our approach to, addressing modern slavery risk. In operating our business, we strive to:

- act honestly and do the right thing;
- act lawfully, ethically and responsibly;
- call things out that aren't right;
- treat everyone fairly and without discrimination; and
- ensure our business is safe, inclusive, welcoming for everyone.



The Group also operates an internal controls framework to ensure compliance with all relevant labour laws and regulations, and the maintenance of a safe working and shopping environment that promotes diversity and inclusion and is free of discrimination and harassment.

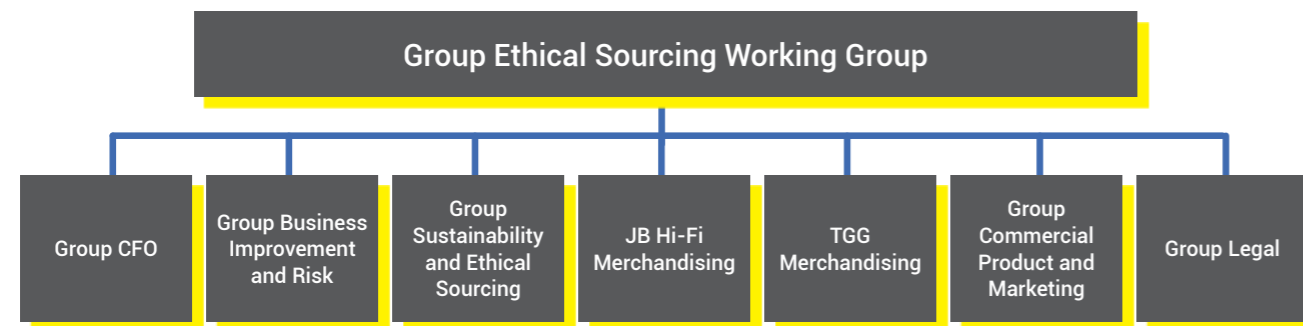
The following key policies assist the Group in maintaining a safe and fair working environment:

- Anti-Bribery and Corruption Policy;
- Diversity Policy;
- Domestic and Family Violence Policy;
- Drug and Alcohol Policy;
- Equal Opportunity Policy;
- Flexible Work Policy;
- Group Code of Conduct;
- Health and Safety Policy;
- Our Company Values;
- Parental Leave Policy;
- Reportable Misconduct and Whistleblower Policy;
- Risk Management Policy and Framework;
- Social Media Policy; and
- Workplace Behaviour Policy.

Our Ethical Sourcing Policy also outlines the standards we expect of our suppliers with respect to maintaining safe and fair working conditions for workers within our supply chain.

Maintaining governance over our Ethical Sourcing Framework

As described on [page 6](#) of this statement, strategic direction and implementation of the Group's Ethical Sourcing Framework is overseen by the Group's Ethical Sourcing Working Group. Further governance over the Group's response to modern slavery is provided by the JB Hi-Fi Limited Audit and Risk Management Committee (a sub-committee of the Board) and the Board itself.



Grievance Mechanisms and Remediation

In the event that we identify instances where the Group has "caused" or "contributed" to modern slavery in its operations or supply chain, these issues will be escalated to the Group Executive, the Audit and Risk Management Committee and/or the Board (as appropriate) with a recommended action plan to remediate the issue which prioritises the wellbeing and welfare of the victim/s identified. We did not identify any instances in FY24 where the Group caused or contributed to modern slavery in our operations or supply chain.

Where we identify the Group is "directly linked" to modern slavery in its operations or supply chain, these issues will be escalated to the Group Executive

and/or the Audit and Risk Management Committee, with further risk assessment and due diligence conducted on the entities concerned where required, and consideration of additional actions if deemed necessary.

The Group also maintains a [Reportable Misconduct and Whistleblower Policy](#) which encourages both our employees and suppliers to report concerns of reportable misconduct (such as forced labour), or instances of non-compliance with our Ethical Sourcing Policy, through either the third-party employee assistance lines operated by the Group, or directly to senior management or the Board.

Keeping our Group Ethical Sourcing Policy up to date

The Group has an Ethical Sourcing Policy which affirms our commitment to respecting human rights and outlines the minimum standards we expect of our suppliers' labour, health and safety, environmental, and ethical practices. It is informed by internationally recognised frameworks including the UNGPS, the Ethical Trading Initiative (ETI) Base Code, and the International Labour Organisation (ILO) fundamental conventions concerning rights at work.

The Policy is intended to uphold worker rights, protect health and safety, establish appropriate standards of ethical behaviour, and minimise unnecessary adverse impacts on the environment. Within our Ethical Sourcing Policy, the Group outlines its zero-tolerance position on all forms of forced labour, the worst forms of child labour, and restrictions on the right to freedom of movement. It also contains requirements around relevant issues such as working hours and prohibits the use of debt-bondage in the recruitment of workers, including by requiring recruitment and other related fees to be paid by the hiring company and not by workers. Where it is found that such fees have been paid by workers, our Policy requires workers to be reimbursed within a reasonable timeframe.

The Group is member of the Responsible Business Alliance a global non-profit industry coalition comprised of companies committed to supporting the rights and wellbeing of workers and communities. As a member of the RBA, we can access thought-leadership, industry collaboration, and the RBA's training and assessment tools on forced labour. The Group has regular engagement with the RBA, to ensure we keep up to date on the latest RBA and member initiatives to reduce the risk of forced labour in global supply chains and to stay abreast of emerging risks and regulation that may affect our supply chain.

Consequently, our Group Ethical Sourcing Policy is largely aligned with the Responsible Business Alliance's (RBA) Code of Conduct (COC). During the year, the Group reviewed and updated its Ethical Sourcing Policy to ensure it remains in line with the

Responsible Business Alliance Code of Conduct and other relevant international frameworks relating to rights at work. The key changes to our policy include (1) formalising the requirement for all new suppliers to complete our Group ethical sourcing questionnaire, (2) reducing the number of social compliance audit methodologies the Group accepts from 6 to 5, and (3) strengthening of the standards we require of suppliers in relation to anti-bribery, corruption and fraud. Our revised policy will be provided to suppliers in FY25.

Responsibility for maintaining and updating the Group Ethical Sourcing Policy lies with the Group Sustainability and Ethical Sourcing Team, with the buying, procurement, and legal teams responsible for ensuring the policy is implemented into supplier trading terms and communicated to suppliers. Oversight over policy design and implementation is provided by the Group Ethical Sourcing Working Group, and the Audit and Risk Management Committee.

The requirement to comply with the Group's Ethical Sourcing Policy has been integrated into the Group's standard supplier trading agreements and suppliers are asked to agree and sign the relevant trading agreement (which includes a requirement to comply with the Group's Ethical Sourcing Policy). We source from a wide range of companies, including both large multinational companies and smaller suppliers and, consequently, we have differing levels of influence with suppliers. In some instances, suppliers may not sign up to our standard trading agreements, or our Ethical Sourcing Policy, and in these situations we seek to agree key terms that promote consistency with our Ethical Sourcing Policy in practice.

The Group recognises that some suppliers may need to work towards complying with the standards set out in our Policy over time (rather than immediately) and, where this is the case, works with suppliers in achieving compliance within an agreed time frame.

Recognising that many of the Group's suppliers have final assembly locations in Asia, the Group's Ethical Sourcing Policy has also been translated into Mandarin for ease of use and interpretation throughout mainland China.

For a copy of our Ethical Sourcing Policy, please visit the [JB Hi-Fi Limited investor website](#).

Case study: Implementing grievance mechanisms

The Group recognises that there may be limitations in assessing the risk of modern slavery using social compliance audits. Such limitations can include lack of auditor independence, potential bribery and corruption in countries with lower levels of governance, audit quality, and/or the inability of a social compliance auditor to gain unfettered access to a facility, company records and/or to the workers themselves.

Establishing trusted and accessible grievance mechanisms in order to capture truthful and unbiased feedback from workers is an important risk identification tool, which can help to mitigate many of the limitations associated with social compliance auditing.

Our Ethical Sourcing Policy requires suppliers to provide workers with access to grievance mechanisms enabling workers to confidentially (and anonymously) communicate any concerns they may have without fear of detrimental treatment. The Group is provided information, through its supplier ethical sourcing self-assessment questionnaire (SAQ),

on whether supplier facilities have implemented a grievance policy and process. Further assurance over the operating effectiveness of this control can be sought through worker interviews and audits carried out at a supplier facility.

In FY24, through the SAQ's received from those factories, we confirmed grievance mechanisms were in place for 73 out of 79 factories (92%) listed on our Supplier Watchlist. Through the social compliance audits received during FY24, we also noted 9 factories where the auditor raised findings around management's review of the effectiveness of the grievance mechanism (a requirement under the social compliance auditing frameworks recognised by the Group).

The Group is in the process of working with its suppliers to ensure grievance mechanisms operate at all facilities listed on our Supplier Watchlist, and all issues raised through social compliance audits are remediated in an agreed timeframe.

Case Study: Responding to reports of forced labour within our trade supply chain

In FY24, we continued our engagement with a global third party branded trade supplier following media reports about potential forced labour in its supply chain in 2021.

The Group takes all allegations relating to our direct suppliers and potential modern slavery practices in their operations and supply chains seriously. We are committed to assessing any modern slavery allegations and, where feasible, we aim to work constructively and collaboratively with any supplier that may be implicated.

We aim to take a consistent approach when engaging our direct suppliers on allegations of modern slavery, irrespective of the country or industry which the supplier operates in. This involves applying our

supplier risk assessment and due diligence process (see [pages 23-30](#) for more information on this process) and, subject to the context of the allegation, engaging with the supplier to better understand the nature of the reports, actions undertaken to respond to potential risks, and the level of oversight and auditing undertaken on the supply chain.

1. Monitoring the risk of modern slavery through social compliance auditing

Our Ethical Sourcing Policy lists the social compliance auditing frameworks that the Group recognises as part of our due diligence framework. Through social compliance audits we can gain an understanding of the following type of issues:

1. the proportion of migrant workers, where they originate from, and how they are recruited;
2. the type of issues that may be present in the manufacturing facilities of the products we sell;
3. the nature and extent of oversight that a supplier has over its supply chain; and
4. what corrective actions may be required and how these are managed.

In the case at hand, our direct supplier has been unable to provide social compliance audits recognised by our Ethical Sourcing Policy. Instead, third-party Workplace Condition Assessment Reports (WCARs) are conducted regularly by an independent audit firm on all of our supplier's third-party final assembly locations. The Group has requested the WCAR's to be provided to us on an annual basis, or as soon as available.

Whilst WCARs are not recognised under our Ethical Sourcing Policy, the scope of the WCAR assesses 92% of the Group's minimum standards relating to labour contained in our Ethical Sourcing Policy (which includes our standards relating to forced labour and modern slavery). The WCAR's also allow us to build an understanding of worker demographics, the extent of our supplier's oversight, and other social compliance issues that have been identified (such as accommodation and health and safety).

The Group requested updated WCAR's from our supplier in FY23, and reviewed them in FY24. Through our review of these WCARs we noted 2 audit findings relating to the restriction of movement of workers within the factory facilities which we considered to be a potential modern slavery risk. The Group's Ethical Sourcing Policy requires freedom of movement by workers to be respected with no unreasonable restrictions imposed. In both instances, these issues were corrected by our supplier within a month of being raised by the auditor.

Other instances of non-compliance with our Ethical Sourcing Policy identified through the WCARs related to areas such as excessive working hours, health and safety, emergency preparedness, correct payment of wages and benefits, and standards relating to accommodation.

The Group continues to work closely with our supplier to ensure all instances of non-compliance are tracked and remediated within an agreed time frame.

2. On-going supplier engagement

In FY24 we continued to have detailed discussions with our supplier on how they are managing the risk of forced labour in their supply chain. During these discussions, our supplier confirmed that instances of debt bondage associated with recruitment fees were identified in previous financial years across final assembly facilities operated by its third-party contract manufacturers.

Our supplier confirmed that all affected workers have now been repaid fees associated with their recruitment that were previously deducted from their salaries. We also understand that all third-party manufacturers engaged by our supplier have now implemented zero recruitment fee policies and disseminated these policies to all third-party labour agencies responsible for the recruitment of migrant labour.

From our review of the WCAR's provided by our supplier, no additional instances of debt bondage have been identified through the audits conducted. However, given the high proportion of migrant labour associated with the supplier's final assembly supply chain and the previous issues identified, this supplier remains on the Group's watchlist.

We recognise that this is a sensitive topic for our supplier and appreciate their willingness to share information and openly discuss the actions taken. We continue to work closely with this supplier to understand the progress they are making to assess and mitigate the risk of forced labour in their supply chain. This includes our ethical sourcing team visiting our supplier's final assembly facilities in FY25, to further our understanding of potential modern slavery risks and mitigating controls.

Development and implementation of training and awareness

Operational responsibility for the implementation of the Group Ethical Sourcing Framework lies with the Group Sustainability and Ethical Sourcing team. The team undertakes a combination of structured learning, on-the-job training, and industry engagement to develop their understanding of emerging risks and industry best practice for assessing and addressing the risks of modern slavery.

The Group will continue to look for opportunities to build capability and awareness of the risks associated with modern slavery, both internally and with suppliers, as well as through our engagement with the RBA and participation within industry forums and working groups.

Training for our private label suppliers

The Group leverages the RBA's Learning Academy to deliver online training to our private label suppliers. The following are examples of training topics that are utilised to onboard new team members and suppliers, or provide refresher training when deemed necessary:

1. Forced labour: Case studies on forced labour risk indicators such as debt bondage, freedom of movement, threats and coercion, regulatory requirements, and mitigations.
 2. Working hours: Overview of working hour standards that should be met, and how to address the root causes of long hours.
 3. Chinese social insurance:
 - Overview of the legal requirements for workers and employers to contribute to public social insurances in China;
 - Explanations of the five different types of public social insurances (pension, unemployment, medical, maternity and work-related injury), as well as additional requirements to contribute to the worker Housing Fund; and
 - Risks, challenges and solutions to overcoming non-compliance.
1. A refresher on what modern slavery is, and how it can impact human rights in our supply chain;
 2. An overview of our Ethical Sourcing Policy and Framework;
 3. An overview of our supplier due diligence process; and
 4. Expectations around timely internal communication of any supplier non-compliance with our Ethical Sourcing Policy.

The training is provided to those personnel within our private label suppliers who are responsible for compliance, quality assurance and factory oversight, and is also extended to members of our suppliers' account management teams. Feedback on content and applicability has been positive, with some suppliers also suggesting that future opportunities could be explored to extend relevant training modules to their own supply chains. The Group will continue to work with our private label suppliers to identify training and capacity building opportunities.

Training and awareness raising for our team members

The Sustainability and Ethical Sourcing Team provides updates to relevant Group employees on the work being undertaken to assess and address the risk of modern slavery, through annual leadership conferences involving store and support office management teams, as well as training sessions with buying teams. Providing updates on modern slavery helps us re-emphasise the importance of ethical sourcing and modern slavery risk management as one of the Group's key sustainability commitments. Examples of some of the topics that are covered through these updates in FY24 include:

Responsible Business Alliance (RBA)

The RBA is a global non-profit industry coalition comprised of companies committed to supporting the rights and wellbeing of workers and communities. As members of the RBA, we can access thought-leadership, industry collaboration, and the RBA's training and assessment tools on forced labour.

The Group has regular engagement with the RBA, to ensure we keep up to date on the latest RBA and member initiatives to reduce the risk of forced labour in global supply chains and to stay abreast of emerging risks and regulation that may affect our supply chain.

As one of only two Australian-based companies that are members of the RBA, the Group is uniquely placed to help increase awareness around modern slavery practices (such as forced labour) within the Australian market and has shared some of the RBA's practice tools and guidelines with some of our Australian-based private label suppliers and industry partners that are not RBA members.

The Responsible Labor Initiative

We continue to monitor and review the output of the RBA's Responsible Labor Initiative (RLI). The RLI brings together members, suppliers, recruitment partners and stakeholders to use their collective influence and the application of due diligence to drive the transformation of recruitment markets, reduce the risk of forced labour, and provide remedies in global supply chains at all stages of recruitment and employment.

Through the RLI, we are able to access best practice tools and guidance on areas such as foreign worker migration and recruitment, due diligence relating to recruitment fees, and the steps the RLI are taking to understanding some of the key problems faced by migrant workers in Malaysia, including how they are working with recruitment agencies to build capability in addressing the risk of forced labour.

Modern slavery risk in the mining and refinement of 'conflict minerals'

Natural minerals from the earth are important components in many of the electronic products we sell. Tin, tantalum, tungsten, gold and cobalt are commonly used minerals within consumer electronics, and are often referred to as 'conflict minerals' given a large proportion of the global supply originates from countries where human rights and environmental violations have occurred.

The Group does not directly engage any suppliers of these minerals, as supply relationships occur many tiers further up the supply chain.

The Group recognises the risk of human rights violations such as modern slavery occurring in the mining and refinement of these minerals. Our Group Ethical Sourcing Policy contains minimum requirements for suppliers to implement policies and due diligence processes in line with the Organisation for Economic Cooperation and Development (OECD) guidance for responsible supply chains of minerals from conflict-affected and high-risk areas. The OECD guidance provides detailed recommendations to help companies respect human rights and avoid contributing to conflict through their mineral purchasing decisions and practices. This Guidance is for use by any company potentially sourcing minerals or metals from conflict-affected and high-risk areas.

The RBA's Responsible Minerals Initiative has been operating since 2008, evolving business practices to support responsible mineral production and sourcing globally, by providing companies with tools and resources to improve regulatory compliance, align with international standards, and support industry and stakeholder expectations. Many of the Group's international suppliers have joined as members of the Responsible Minerals Initiative as part of their organisations approach to assess and addressing the risk in the mining and refinement of conflict materials.



3 SUPPLIER ENGAGEMENT

Our suppliers range from large multinational 'big brand' companies to smaller product and service providers, each with varying maturity of processes and controls to manage modern slavery risk in their operations and supply chain. Our Ethical Sourcing Policy emphasises our desire to engage constructively with all suppliers on these issues, and to support continuous awareness and improvement in the pursuit of positive social and environmental outcomes.

In line with the Australian Government's official guidance about the Modern Slavery Act, we take a risk-based approach to supplier engagement. Whilst we expect all our suppliers to have adequate controls to assess and address the risk of modern slavery, suppliers operating in countries which are more susceptible to human rights violations and with lesser levels of worker protection and governance are considered higher risk.

Establishing constructive dialogue, cooperation, and an agreed level of transparency with regards to how modern slavery risk is assessed and addressed with our suppliers is an important component of the Group's Ethical Sourcing Framework.

This year we implemented a new ethical sourcing questionnaire for new and existing suppliers, designed to identify suppliers that employ foreign migrant labour in countries with lesser levels of work protection, allowing us to map our tier one supply chain upon the onboarding of new suppliers and more quickly triage these suppliers for further due diligence if required.

Whilst many of our suppliers engage openly and constructively, we have also experienced challenges, such as some larger suppliers being unwilling to incorporate compliance with our Ethical Sourcing Policy into trading terms, as well as push back from certain suppliers in complying with the Group's ethical sourcing supplier due diligence processes.

We continue to seek cooperation and engagement with all suppliers, and where appropriate, utilise the networks provided through relevant industry groups to open lines of communication.

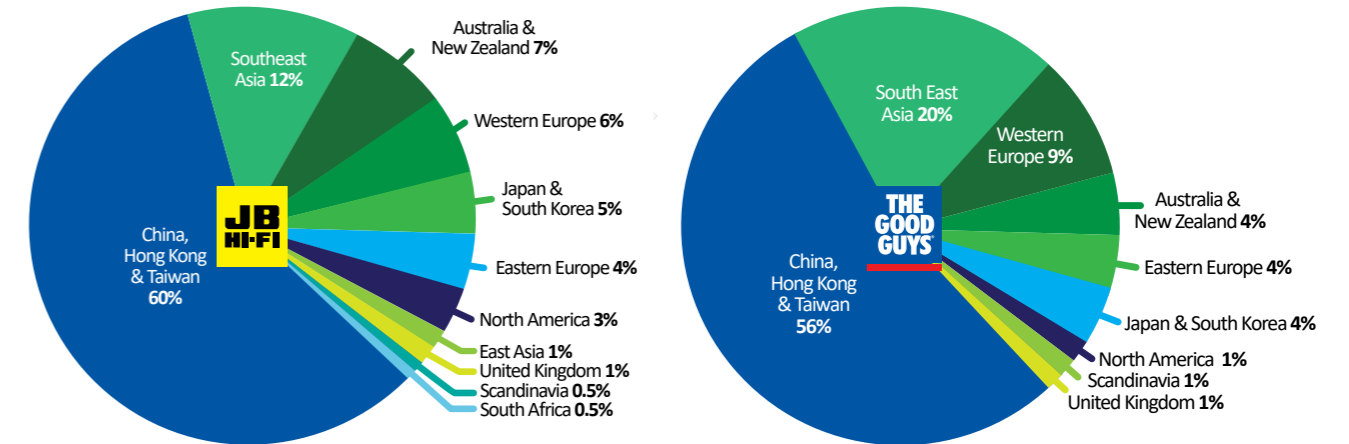
Undertaking supply chain mapping

In FY24 we continued to expand on the work that we have done since FY20 to map the supply chain of our largest trade suppliers, by furthering our understanding of country of final assembly across our trade supply chain. In FY24 we engaged an additional 68 suppliers (FY23: 107 suppliers), asking them to provide information relating to: (1) country of origin for their final assembly facilities; (2) whether any of these facilities utilised foreign migrant labour; and (3) the types of social auditing conducted on the final assembly facilities identified.

Of the 175 suppliers engaged over the last two years, 147 have responded with the requested information on modern slavery risk. In FY24 we used the information to prioritise due diligence with 39 of these suppliers whose responses either indicated use of foreign migrant labour, or that the supplier was unsure if foreign migrant labour was used in their final assembly facilities.

Trade supply - final assembly location by region

The geographic distribution of JB Hi-Fi's and The Good Guys' trade supply chain is summarised in the following charts.

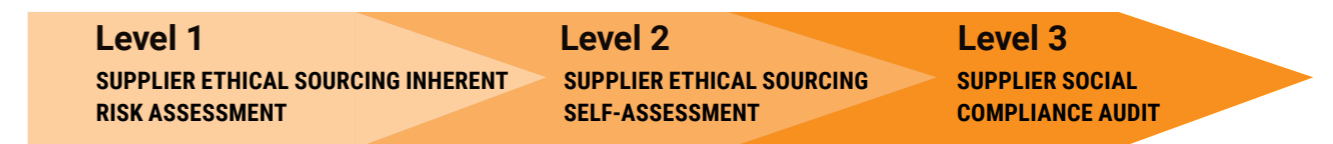


Aggregate trade spend was consistent with prior year at circa \$8 billion, and the Group has not seen a material change in the geographic distribution of its final assembly supply chain, with the majority of its goods for re-sale continuing to be manufactured and sourced from the Asia Pacific Region.

Understanding the country of final assembly is a key input into our supplier risk assessment process and has helped us prioritise our ethical sourcing work to locations where there is a higher risk of human rights abuse. Through the standards set out in our Ethical Sourcing Policy, we expect all suppliers (particularly those that operate in high-risk countries and industries) to understand the potential modern slavery risks in their operations and supply chain and have adequate controls and management systems to assess and address the risk of modern slavery.

4 SUPPLIER RISK ASSESSMENT AND DUE DILIGENCE

The Group has adopted a 3-tiered risk-based approach to supplier due diligence in order to assess the risk of modern slavery in its supply chain. The due diligence process is administered by the Group's Sustainability and Ethical Sourcing team.



Level 1 involves a risk assessment using the Group's ethical sourcing questionnaire in combination with the supply chain analytics capability of the RBA. The risk assessment takes into consideration characteristics associated with a supplier's operations, such as the country of final assembly, the use of foreign migrant labour, the sector within which they operate, and the products or services that are provided to the Group.

Level 2 involves completion of an ethical sourcing self-assessment questionnaire (SAQ) by our supplier.

The result of this self-assessment helps develop our understanding of the supplier's organisational policies, procedures, and risk profile across each pillar of our Ethical Sourcing Policy.

Level 3 involves review by the Group of social compliance audits for specific supplier locations to assess compliance against our Ethical Sourcing Policy. Our policy outlines the type and frequency of audits that we expect our suppliers to undertake.



A supplier's 'inherent risk' is based on specific characteristics associated with their operations, including:

- a supplier's geographic location;
- whether a supplier utilises foreign migrant labour in its factories;
- type of product or service;
- type of supply chain associated with the product or service;
- supplier leverage (i.e. how much is spent with the supplier); and
- materiality or degree of reliance placed on the supplier (e.g. is the supplier a sole source, multi-source, or commodity supplier).

Our Level 1 due diligence process involves using our Group ethical sourcing questionnaire to collect this information, in combination with a supply chain analytics tool provided by the RBA to calculate an initial 'risk-profile' for a supplier. The RBA analytics

tool is based on aggregated social compliance audit data and publicly available indices such as the United Nations Human Development Index, Global Slavery Index, World Bank and data from leading universities and government departments.

Suppliers that employ (or are unsure whether they employ) foreign migrant labour in their final assembly facilities are considered high-risk and prioritised for Level 2 due diligence.

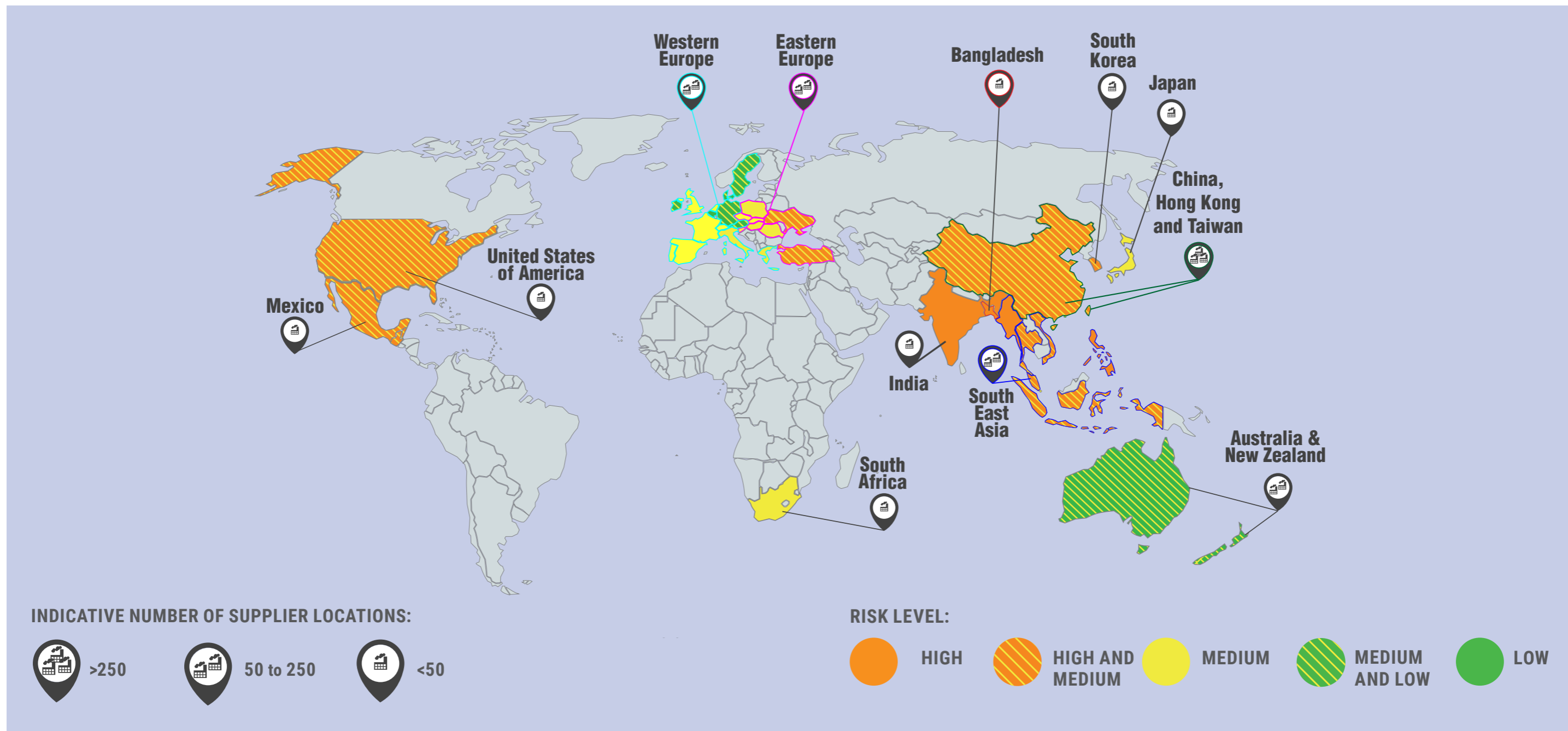
The Group's product and supplier mix is dynamic, and evolves with changes in consumer demand, supply, and the businesses' strategic direction. Whilst there has not been any material change in the geographic distribution of the Group's final assembly supply chain since our initial analysis in 2020, expansion into new products or services can change the risk profile of the Group's supply chain.

Such changes are considered by management, with the Sustainability and Ethical Sourcing team conducting an ethical sourcing risk assessment and due diligence for any new suppliers, products, or services that may present

significant risks from a modern slavery and ethical sourcing perspective.

The map below provides a high-level overview of the output of our Level 1 Supplier Ethical Sourcing Risk Assessment, along with indications of the number of supplier locations and level of risk associated with our suppliers in each country. The risk level associated with each country is representative of the individual risk scores assigned to each supplier location in that country, and helps inform how we prioritise suppliers for further due diligence.

Our inherent risk assessment may change from year to year as a result of updated data within the RBA analytics tool being applied to supplier risk scores, as well as new information received from the additional suppliers we engaged during the year.





Supplier Ethical Sourcing Self-Assessment Questionnaire (SAQ)

Our Level 2 due diligence process utilises the supplier Self-Assessment Questionnaire (SAQ) format and methodology developed and provided by the RBA. The answers to these SAQs help us build an understanding of the risk and control characteristics of our supply chain across the following areas:

- labour;
- worker safety and health;
- business ethics; and
- environmental management.

The SAQ used by the Group is widely recognised within the consumer electronics industry, having been developed by the RBA in consultation with its member companies. Many of our suppliers who are members of the RBA, complete RBA self-assessment questionnaires as part of their member compliance requirements or their own due diligence processes.

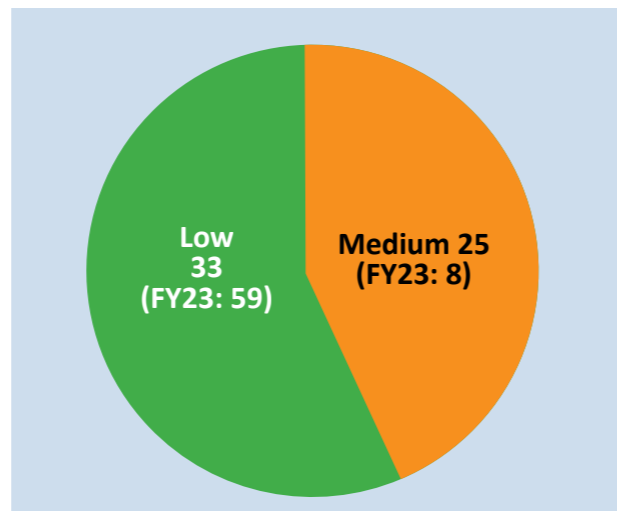
The SAQ helps us assess modern slavery risk by considering the following:

- use of migrant workers;
- use of worker accommodation;
- use of young workers;
- the proportion of male to female workers;
- use of sub-contractors;
- use of third-party recruitment agencies;
- the levying of recruitment and/or hiring fees;
- overtime hours worked and the payment of wages;
- how personal identification documents of workers are handled; and
- the quality of policies, management systems and organisational controls in place which may help mitigate the risk of modern slavery.

Suppliers receive a high, medium, or low risk rating using a pre-determined scoring methodology based on the answers provided through the questionnaire. All high risk SAQs are reviewed, and where areas of non-compliance or improvement opportunities are identified, these are discussed directly with the supplier, with the aim of putting corrective actions in place within an agreed time frame.

Chart 1 provides a summary of the SAQ results received from suppliers (by risk rating) during the 12 months ended 30 June 2024 in comparison to the prior year. We did not receive any "High Risk" self-assessment questionnaires from any suppliers in FY24.

CHART 1: Summary of FY24 SAQ results



In the event that any high-risk ethical sourcing self-assessments are received, these are immediately discussed with the relevant supplier, and we require them to provide us with a copy of their most recent social compliance audit (or conduct one if they have not done so recently), in order to determine if any of the risk factors arising in the questionnaire have resulted in non-compliance with our Ethical Sourcing Policy.

Social Compliance Audit Framework

Given the inherent limitations of a self-assessment, Level 3 of our approach supplements our Level 2 SAQ due diligence with a requirement for, and detailed analysis of, independent social compliance audit reports.

Social compliance focuses on systems and controls in place that seek to protect the health, safety and rights of workers, and the environment, as well as upholding the overall ethics of an organisation's operations and its supply chain. Social compliance

auditing is a means of checking that organisations are operating in a way that complies with acceptable standards in these areas.

Our Ethical Sourcing Policy outlines the Group's requirements for suppliers to conduct regular social compliance audits to assess and address the environmental, social and ethical risks within our supply chain, including the risk of modern slavery.

We may request that a supplier undertakes an additional and/or specific social compliance audit at any time, for the purposes of assessing compliance with our Ethical Sourcing Policy. In developing our policy on social compliance auditing, we have considered equivalency to internationally recognised social compliance auditing standards and include a list of recognised auditing standards within our policy that are acceptable to the Group. The Group reviews and updates this list on an annual basis.

Many of the Group's international suppliers conduct regular social compliance audits of their own operations and supply chains utilising a combination of internal and external audits.

Our requirements for social compliance auditing helps ensure factories in our supply chain are being audited periodically and to an acceptable standard, helping us to assess and address the risk of modern slavery, and compliance with our Ethical Sourcing Policy.

Suppliers must remediate any potential areas of non-compliance with the Group's Ethical Sourcing Policy within a timeframe that is commensurate to the severity and impact associated with the issue identified. The supplier must document a corrective action plan, outlining the responsibilities and timing for the action required. The Group may request details of any audits, corrective action plans, and follow up reviews undertaken.

The social compliance auditing requirements outlined in our Ethical Sourcing Policy differ depending on the type of supplier, as set out below.

Suppliers of the Group's Private Label Products

All suppliers of our Private Label product range are required to engage an independent auditor to conduct either a RBA Validated Assessment Program (VAP) Audit, SEDEX Members Ethical Trade Audit (SMETA),

Business Social Compliance Initiative (BSCI) Audit, Social Accountability International (SA8000) Audit, or an International Council of Toy Industries (ICTI) Audit prior to engaging a new factory of final assembly, and once every 12 months thereafter.

Suppliers that are either full or regular members of the RBA

Many of our large international suppliers are full members of the RBA, which requires them to comply with the RBA's Code of Conduct and member compliance requirements, which includes conducting annual self-assessments on their facilities, and undertaking RBA-approved audits regularly on any high-risk facilities identified. Suppliers that comply with these RBA's requirements automatically satisfy the Group's social compliance auditing requirements.

All other suppliers

All other suppliers are required to risk assess their business operations and supply chain, and conduct a social compliance audit on all wholly-owned facilities (and at least 50% of facilities that the supplier does not own or have operational control over) which are assessed to be at high-risk of non-compliance with the Group's Ethical Sourcing Policy (i.e. based on geography, industry, and/or known areas of risk or issues occurring).

Supplier Watchlist

The Group maintains a 'Supplier Watchlist' which we use to prioritise due diligence and monitoring of suppliers of: (i) our private label product (XCD, Flea Market and Terminal 2); (ii) brands that are exclusive to the Group (for example, the Group's 'Falcon' branded television range, or the Group's range of 'Solt' home appliances, which are retailed exclusively through JB Hi-Fi and The Good Guys respectively); and (iii) other products or services that we deem may be at higher risk of non-compliance with our Ethical Sourcing Policy due to either their product category, country of manufacture, known issues identified through auditing, or media allegations.

All suppliers on our watchlist go through our three-tiered due diligence processes.

FY24 Social Compliance Audit Observations

We use a risk-based approach to prioritise the review of supplier social compliance audit reports, and in FY24 we reviewed 80 social compliance audits across the manufacturing facilities on our watchlist (FY23: 72 audits). These facilities represent a range of final assembly manufacturing sites, some of which are owned by our direct suppliers and others which are owned and operated by third parties which have been engaged by our direct suppliers. Chart 2 provides the industry split of the suppliers that were on our watchlist during the year across consumer electronics, home appliances, garments, solar panels, and packaging manufacturing suppliers.

The majority of the facilities that were on our watchlist during the year are located in mainland China with the remainder in Vietnam, Malaysia, India, Myanmar and Taiwan. Chart 3 provides the percentage breakdown by location, of the facilities that we reviewed social compliance audits for.

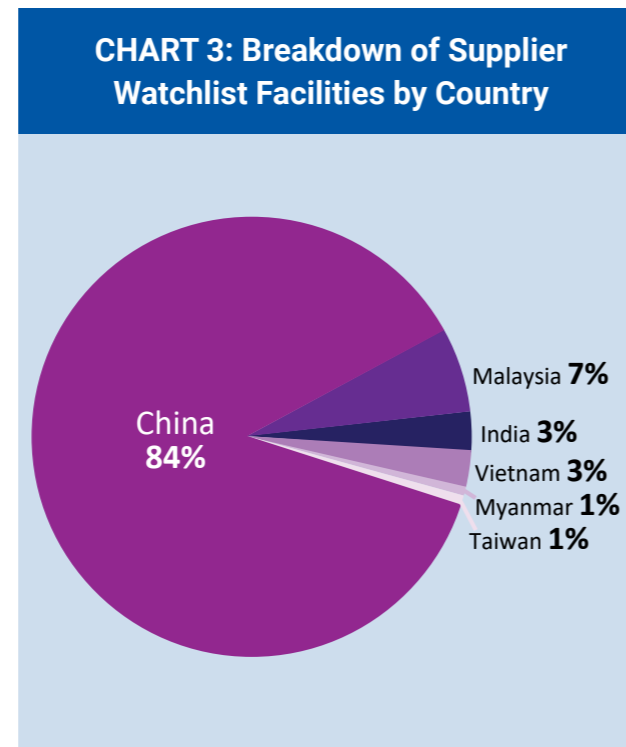
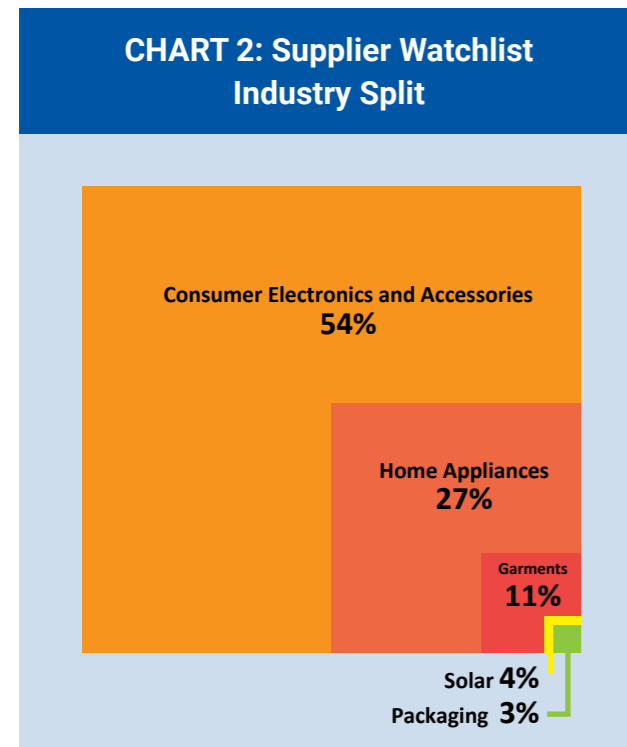


Chart 4 provides a breakdown of the types of audits received during the year from our watchlist suppliers, including the relative age of the audit reports.

Chart 4: Types of audits reviewed in FY24 from suppliers on our watchlist

Audit Type	2022	2023	2024	Total
Business Social Compliance Initiative (BSCI) Audit	6	31	10	47
RBA Validated Assessment Program (VAP) Audit		2		2
4-Pillar Sedex Members Ethical Trade Audit (SMETA)		14	7	21
2-Pillar Sedex Members Ethical Trade Audit (SMETA)		4		4
SA8000		1	1	2
WCAR		4		4
TOTAL	6	56	18	80

Implementing a process to review the social compliance audit reports of our suppliers' facilities has helped us develop a deeper understanding of the ethical sourcing risks within our supply chain and provides us clearer visibility as to how suppliers are responding to the issues identified.

Chart 5 provides a summary of the proportion of audit findings raised under each of the key pillars of our Ethical Sourcing Policy. Chart 6 provides a more detailed breakdown of the individual findings that are considered to be major vs minor, against each requirement of our Ethical Sourcing Policy.

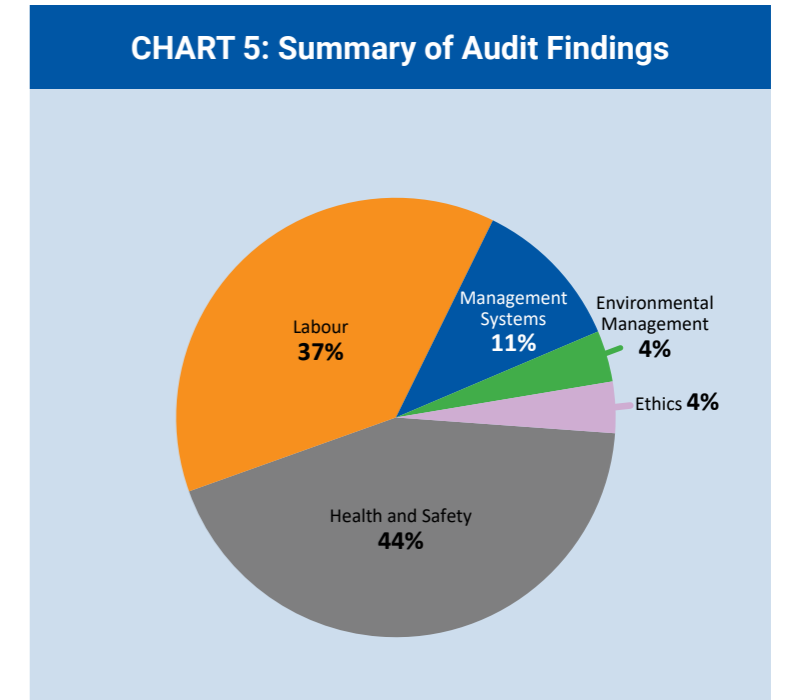
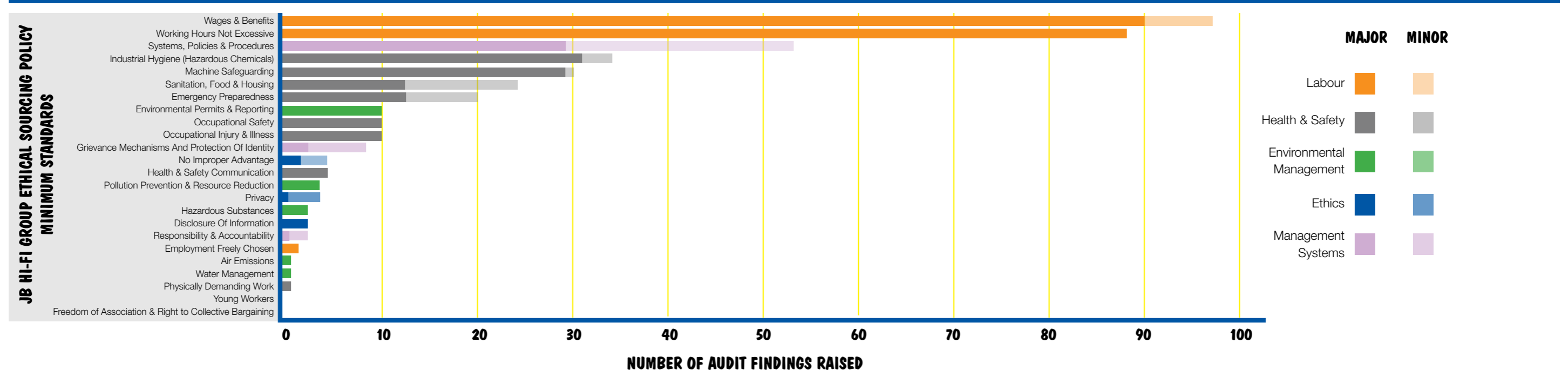




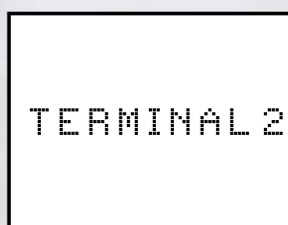
CHART 6: Summary of Audit Findings





Case Study: Private Label Factory Analysis

The Group currently works with 4 different Australian-based suppliers (local suppliers) who source and engage manufacturers in China for the production of our private label product range.

 <p>'XCD', an accessories range which comprises cables, headphones, and other consumer electronics products.</p>	 <p>'Flea Market' comprises a range of gifting products (such as vinyl accessories, laptop sleeves, turntables and Christmas gifts).</p>	 <p>'Terminal 2', offers a range of adaptors, chargers and accessories catering to both international and domestic travel.</p>
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The type and number of factories used to manufacture our products is managed by our local suppliers, and may change from time to time depending on our merchandising requirements, such as seasonal trading volumes, pricing, product design and quality, as well as the factories' ability to demonstrate compliance with our Ethical Sourcing Policy.

The Group's Sustainability and Ethical Sourcing team works with each of our local suppliers to monitor the factories utilised, and ensure our ethical sourcing due diligence requirements are met. This includes ensuring any new factories engaged by our local suppliers to manufacture our private label products complete our ethical sourcing SAQ, and provide a social compliance audit report that is no more than 12 months old, prior to any orders being placed.

Developing an understanding of our supply chain through these due diligence processes allows the Group to further refine its engagement with suppliers on the potential risks of modern slavery in the supply chain for our private label products⁹.

Private Label Factory Geography and Demographics

The information provided by our suppliers through the due diligence process helps the Group understand the geography, worker demographics and risk profile associated with the factories within our private label supply chain (summarised below). This helps us engage in discussions with our suppliers around potential worker vulnerabilities to modern slavery.

The number of final assembly locations utilised for our private label decreased from 46 in FY23 to 38 in FY24. The type and number of factories utilised to manufacture the Group's private label is managed directly by the Group's 4 Australian-based suppliers, and can be dynamic based on the nature, timing and volume of orders at any given time. During the year we noted the addition of a factory in Vietnam being utilised to produce our XCD powerboards.

The Group assigns either a major or minor rating to each of the social compliance audit observations that resulted in non-compliance with any one of the minimum standards contained within the Group's Ethical Sourcing Policy. The categorisation of a major vs minor finding is based on the RBA's Verified Audit Program audit ratings methodology. Using the RBA ratings methodology, we also utilise the concept of a 'priority' finding in our review process, which is defined as:

- an egregious ethical breach (for example, a finding such as forced labour, debt bondage, child labour, or human trafficking, which is prohibited by our Ethical Sourcing Policy) or multiple major findings that in aggregate are determined to be egregious; or
- an activity that occurred which resulted in significant impact on life, limb, facility, environment, or community.

The use of these ratings enables us to more effectively prioritise supplier engagement on major issues, and those that are recurring where corrective action plans are not working effectively.

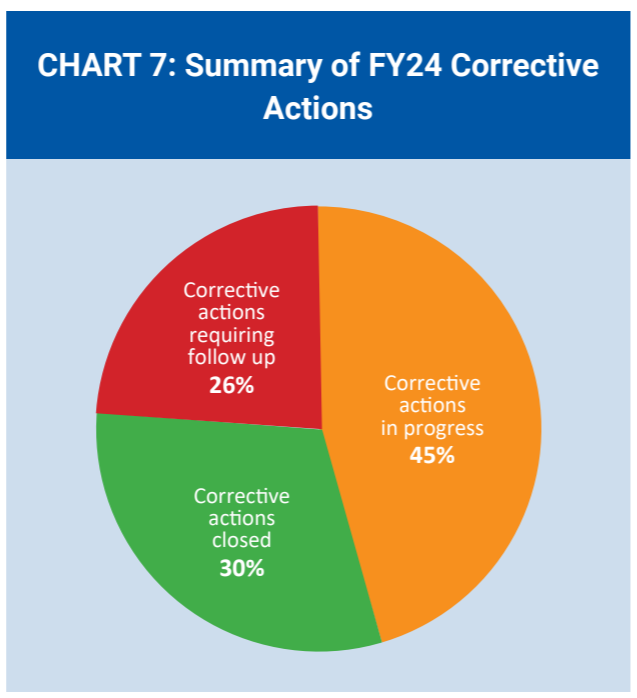
The majority of non-compliance with our Ethical Sourcing Policy in FY24 continues to be associated with labour, and health and safety practices. In particular, we continue to see recurring issues relating to working hours, payment of wages and benefits (such as social insurances not being compliant with local laws for several suppliers in China). We understand these issues to be systemic across industries and suppliers that have manufacturing facilities in this region, and we are continuing to work with our suppliers to raise awareness and drive continuous improvement in these areas. There were no priority findings identified during FY24.

As detailed on [pages 18 & 19](#), in FY24 we continued engaging with one of our branded trade suppliers following reports in 2021 about potential forced labour in their supply chain. During the year we noted 2 audit findings relating to the restriction of movement of workers within the third party final assembly facilities utilised by this supplier, which we considered to be potential modern slavery risks. The Group's Ethical Sourcing Policy requires freedom of movement by workers to be respected

with no unreasonable restrictions imposed. In both instances, these issues were corrected by our supplier within a month of being raised by the auditor. Further information is provided on [pages 18 & 19](#), detailing how we are working with our supplier to understand the actions they are taking to assess and address the risk of modern slavery in their supply chain.

Following the review of a social compliance audit, we run feedback sessions with the relevant direct supplier to discuss areas of non-compliance with our Policy. As part of this process, we request that suppliers implement corrective actions that are commensurate with the severity of the issues identified. All priority and major findings result in immediate engagement with suppliers to discuss the nature and timing of corrective actions.

Chart 7 provides an overview of the status of the corrective actions arising from the audits reviewed during the period. Corrective actions requiring following up relate to actions that were unable to be completed prior to the agreed due date, and which require further action from the factory. Corrective actions in progress relate to actions which are in the process of being undertaken, and which are not yet due.



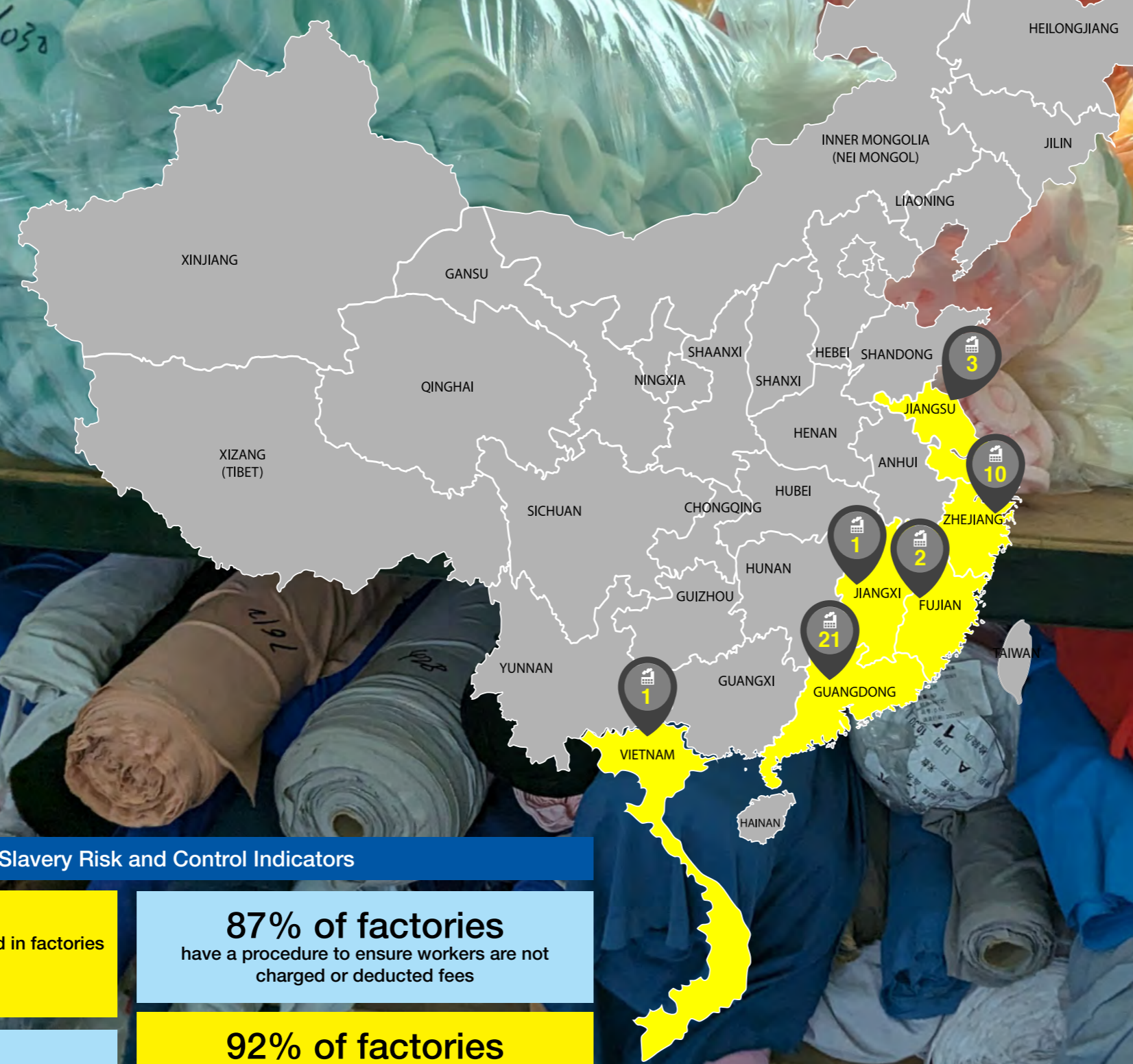
⁹Further detail on our how our supplier due diligence process helps us assess and address the risk of modern slavery is contained on [pages 23-27](#) of this report.



Private Label Factory Geographic Footprint

Below is a map of China and Vietnam plotting the location of the factories utilised to manufacture our private label product

503a



Private Label Factory Statistics

46% male
54% female
 workers across the factory supply chain utilised for our private label product lines

97% of factories
 employ a proportion of workers from outside the Chinese province in which the factory is located

61% of workers
 across private label supplier factories are from outside the Chinese province in which the factories are located

No factories are using foreign migrant workers

38% of factories
 provide dormitories for workers

No factories utilise 3rd party recruitment agencies to source labour for their facilities

Modern Slavery Risk and Control Indicators

No foreign migrant workers employed in factories supplying private label

87% of factories
 have a procedure to ensure workers are not charged or deducted fees

No young workers (under 15) in factories supplying private label

92% of factories
 have a policy outlining non-withholding of worker property

100% of workers
 have a written signed employment contract in their native language

84% of factories
 reported the operation of a grievance mechanism

Self-Assessment Questionnaire - Thematic Analysis

In addition to providing information on factory demographics, the SAQ results for our private label supply chain also provide us with information relating to:

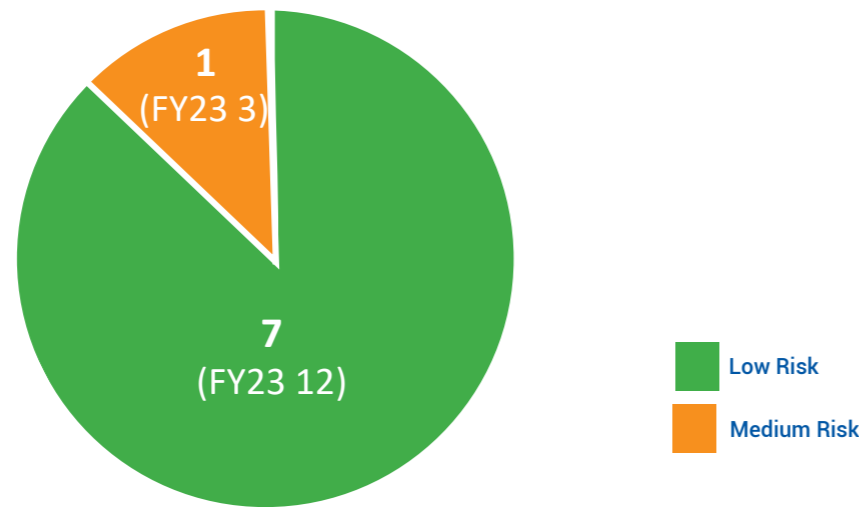
1. management accountability, policies, procedures and systems in place at the overseas factories' head office(s) to manage the risk of modern slavery across their entire business; and
2. factory-level information around management of workers, including potential labour rights risks and the quality of management systems on the factory floor, which can help mitigate any potential risk areas.

A scoring system is applied to the SAQ responses by the Group which results in each SAQ receiving either a low, medium or high-risk score. For more information on the SAQ process please refer to [page 26](#).

Upon receipt of any 'high-risk' self-assessment result, we work with our local suppliers to ensure areas of non-compliance are addressed with the relevant factory owner, including implementing corrective actions within a reasonable time frame.

The chart below provides a summary of the relative risk ratings associated with the self-assessment questionnaires¹⁰ received in relation to private-label products in FY24. No high risk SAQ's were received during the year, with the key issues arising from the self-assessment questionnaire responses related to a mixture of labour and environmental management systems, risk elements and control activities. None of the issues raised concerns related to modern slavery.

CHART 8: Private Label Head Office and Factory Level SAQ's received in FY23



Modern slavery risk and control indicators assessed through supplier self-assessments

Information provided by a supplier as part of the SAQ process provides the Group with additional context around worker demographics (such as proportion of females and young workers), and facility policies concerning the provision of employment contracts, payment of recruitment fees, freedom of association, freedom of movement and implementation of grievance mechanisms, all of which are factors that may impact the risk of modern slavery.

The information provided by suppliers to date suggests a relatively low risk of modern slavery occurring within the Group's private label facilities due to the absence of

foreign migrant labour, and implementation of policies which minimise the risk of debt bondage and restrictions on the freedom of movement.

The Group recognises that these insights do not provide absolute assurance against modern slavery occurring and continues to conduct annual social compliance monitoring to identify any changes in the risk profile of the facilities and determine if any non-compliances with the Group's Ethical Sourcing Policy have occurred. (See [page 36](#) for social compliance audit findings relating to the group's private label supply chain).

Assessing compliance with the Group's Ethical Sourcing Policy

Recognising the inherent limitations associated with a self-assessment, the Group requires a social compliance audit to be completed every 12 months by each of the factories engaged to manufacture our private label products. 41 audit reports were received and reviewed during the year (FY23: 47).

Below is a summary of the type and the relative ageing of the audits received by the Group in FY24.

Chart 9: Types of audits reviewed in FY24 from private label suppliers

Audit Type	2022	2023	2024	Total
<i>Business Social Compliance Initiative (BSCI) Audit</i>	4	24	9	37
<i>4-Pillar Sedex Members Ethical Trade Audit (SMETA)</i>		3	1	4
TOTAL				41

Both the audit results and any relevant corrective actions arising from those audits give the Group insight into the potential areas of non-compliance with our Ethical Sourcing Policy, including potential risks of modern slavery. Through the review of these audit results we have also been able to build our understanding of the quality, frequency and level of independence associated with the audits.

Chart 10 provides a summary of the proportion of audit findings raised under each of the key pillars of our Ethical Sourcing Policy.

CHART 10: Audit Findings relating to private label suppliers

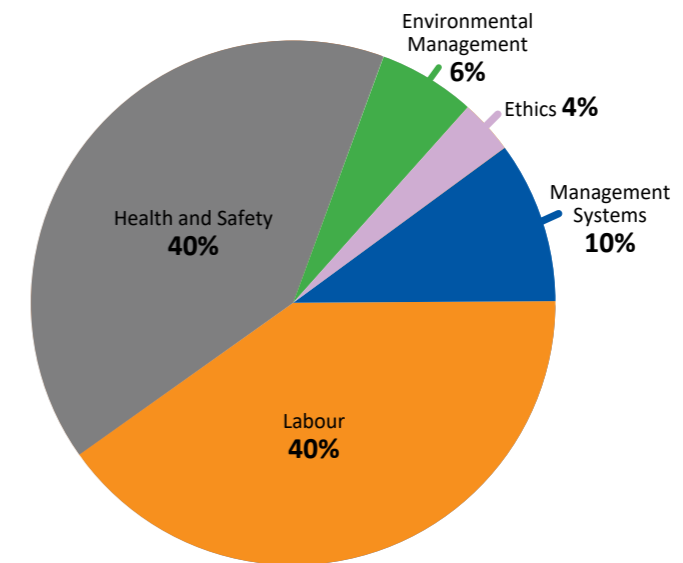
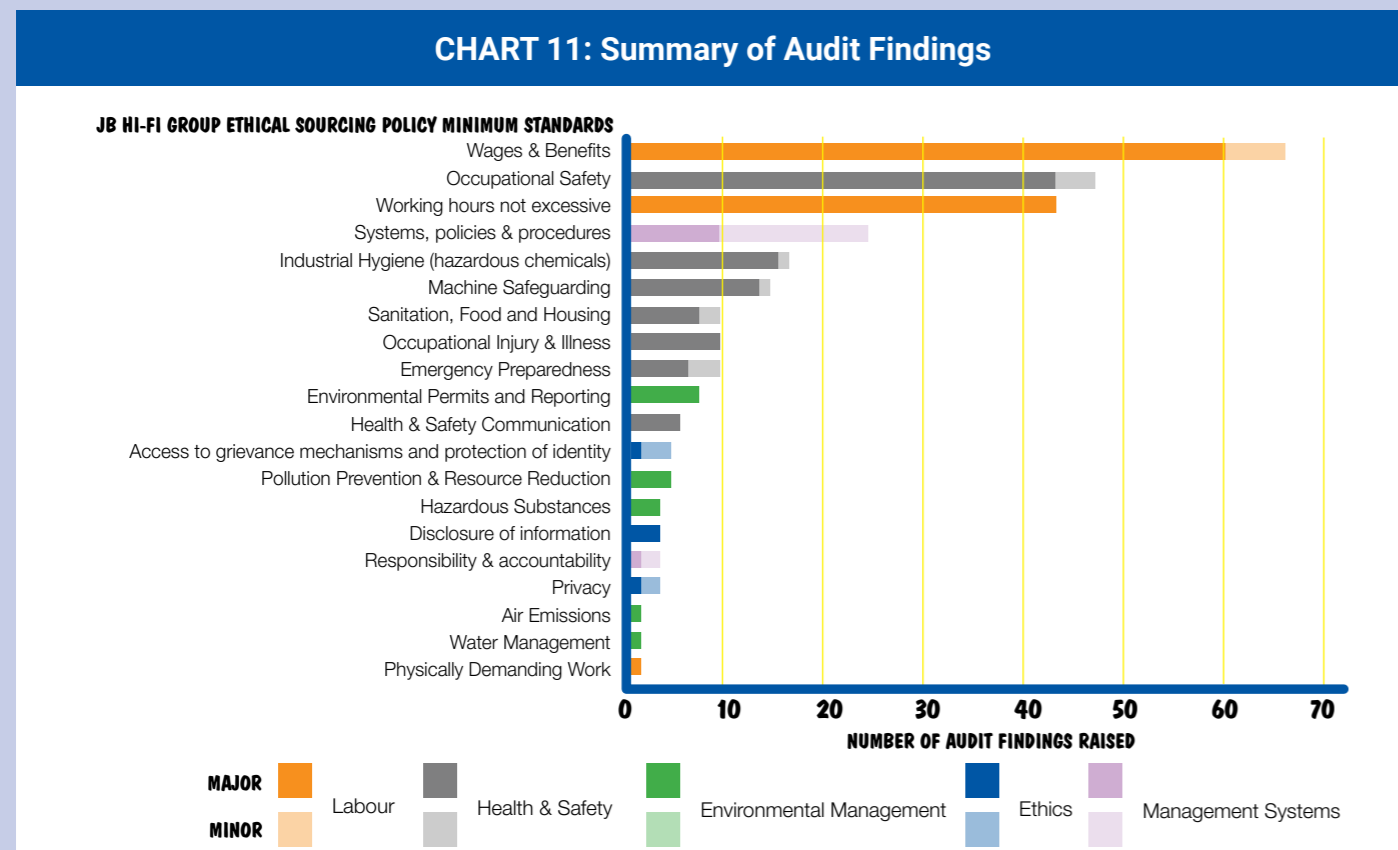




Chart 11 provides a more detailed breakdown of the individual findings against each requirement of our Ethical Sourcing Policy.



None of the audits reviewed in FY24 raised any priority findings in relation to forced labour, debt bondage, child labour or human trafficking.

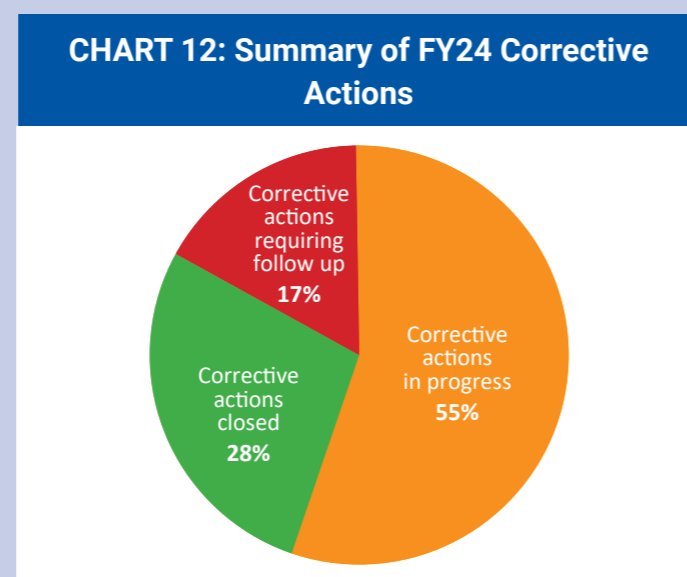
The majority of non-compliance with our Ethical Sourcing Policy has been relating to other labour and health and safety practices. In particular, we continue to see recurring issues relating to long working hours and incorrect payment of social insurances across many of the factories utilised to manufacture our private label. We understand these issues are systemic across industries and suppliers that have manufacturing facilities in China, and we are continuing to work with our suppliers to drive progress and continuous improvement in these areas.

All our private label suppliers have been provided specific training on forced labour, working hours and social insurance requirements in China through the RBA learning academy, in order to lift their awareness and capability in these areas. Training is also provided when new team members who are responsible for ethical sourcing join our suppliers. We continue to work with our suppliers to look for opportunities where additional training may be beneficial.

Following the review of our suppliers' social compliance audits, we run detailed feedback sessions with them to discuss areas of non-compliance with our policy. As

part of this process, we direct suppliers to implement corrective actions that are commensurate with the severity of the issues identified. All priority and major findings result in immediate engagement with suppliers to discuss the nature and timing of corrective actions.

Chart 12 provides an overview of the status of the corrective actions arising from the audits reviewed during the period. Corrective actions requiring following up relate to actions that were unable to be completed prior to the agreed due date, and which require further action from the factory. Corrective actions in progress relate to actions which are in the process of being undertaken, and which are not yet due.



Case Study: China factory visits



In April 2024, our Group Sustainability and Ethical Sourcing Team and Chief Financial Officer conducted on-site factory visits of 5 factories in China that produce our private label (XCD) bracket, cabling, and headphone products.

The trip was conducted in collaboration with two of our private label suppliers to build on our understanding of work practices on the ground in China, and assess alignment with the Group's Ethical Sourcing Policy.

The site visits involved conducting interviews with factory management, observing a third-party BSCI audit and worker interviews, reviewing the implementation of grievance mechanisms on the factory floor, observing factory production lines, and inspecting on-site dormitories and communal living areas.

Observations and learnings from the site visit increase our team's ability to assess and provide feedback on the findings within the social compliance audits provided by suppliers, as well as allowing us first-hand opportunity to review factory protocols and ask questions relating to compliance with our Ethical Sourcing Policy.

Case Study: Living Wage

The importance of a living wage has been highlighted by international organisations such as the International Labour Organisation. Workers that earn less than a living wage may be more susceptible to exploitation, including modern slavery.

Some of the key challenges around implementing a living wage across global supply chains may include lack of knowledge, difficulties in defining and estimating living wage, inflation, and increased global competition which exerts price and margin pressure on suppliers.

The Group has integrated the notion of a living wage into our Ethical Sourcing Policy, requiring suppliers to pay wages and other benefits in compliance with applicable laws and, at a minimum, provide for the basic living needs of workers providing residual income for discretionary spend. The group collects information¹¹ on minimum and living wage in order to better understand the extent of this issue within our supply chain. This has identified a need for further engagement with our suppliers to build their capacity in this area.

We recognise that payment of living wage is a complex issue and we plan to continue progressing this work over coming years. We are also exploring opportunities to learn from and collaborate with peers in this area, including through the RBA.

¹¹Information on minimum and living wage at facility level has been sourced from social compliance audits received from suppliers.

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

We understand the importance of continually improving our modern slavery risk management, including by taking steps to assess the effectiveness of our actions.

In principle, the Group regards an effective approach to managing modern slavery risks as one which demonstrates:

- A human rights-based approach which prioritises respect for workers' rights, including their health, safety and wellbeing;
- An understanding of modern slavery risks, factory characteristics and worker demographics and how these may evolve over time;
- An ability to meaningfully engage with suppliers to assess and address potential modern slavery risks, including positively influencing continuous improvement; and
- The capacity to identify, and enable remediation of, modern slavery issues in line with the expectations set out in the UN Guiding Principles on Business and Human Rights.

Our work to assess the effectiveness of our actions also includes considering our approach to engaging our suppliers through our ethical sourcing due diligence process, including the lessons learned and feedback we have received.

The Group evaluates the effectiveness of our actions in relation to suppliers on our watchlist using a combination of qualitative and quantitative factors:

Effectiveness Measure	Private Label Suppliers		Other Watchlist Suppliers	
	FY23	FY24	FY23	FY24
% of factories that completed an SAQ	100%	92%	61%	51%
% of factories that completed a social compliance audit in line with our Ethical Sourcing Policy	93%	89%	73%	80%
% of overall compliance with our Ethical Sourcing Policy	76%	77%	78%	75%
Total number of audit findings	338	272	109	231
Total number of completed audits	47	41	25	39
Average number of audit findings per factory	7.1	6.6	4.3	5.9
Total number of findings related to modern slavery risk	0	0	0	2 ¹²

Working with our private label and other watchlist suppliers to improve supply chain transparency and audit quality is an important part of our approach for combatting modern slavery and helps us understand the challenges 'on the ground' in achieving higher levels of compliance with our Ethical Sourcing Policy.

¹²For further detail on the actions taken in relation to the 2 findings relating to modern slavery risk, please refer to the case study outlined on pages 18-19.

Some of the key learnings and outcomes relating to the effectiveness of our response that we have derived over the last 12 months are as follows:

Trade Suppliers – JB Hi-Fi private label products and other suppliers on our watchlist

In FY24, we continued to:

- optimise our ethical sourcing due diligence through the continuous improvement of our ethical sourcing policies, systems and processes;
- engage consistently with all of our private label suppliers and other watchlist suppliers on our due diligence process; and
- build closer working relationships with our suppliers to ensure there is a common understanding of the work necessary to assess and address modern slavery risk in our supply chain

In FY24, we obtained social compliance audits for 89% of private label factories and 78% of other watchlist supplier factories. This high level of engagement with our due diligence process demonstrates that our private label and watchlist suppliers have a good understanding of our ethical sourcing requirements, including providing us with updated audit reports when required, and only working with third party facilities which are willing to work toward complying with the Group's ethical sourcing requirements.

Trade Suppliers – Branded Products and Services

While larger suppliers are not immune from modern slavery risks, we recognise that they can often have greater influence, capability and resourcing to identify and manage potential risk areas and effect change where necessary. In some cases, the Group itself has limited leverage in being able to influence the policies and processes of these larger branded suppliers.

Consequently, the Group believes it can evolve the effectiveness of its approach by focusing engagement on smaller suppliers operating in high-risk product and industry sectors which we can more positively influence. In most cases, these suppliers do not have access to the RBA (or an equivalent industry body) and may have less mature policies, procedures and controls than larger suppliers.

In FY24 the Group prioritised supply chain mapping and risk assessment for an additional 68 of its smaller suppliers. Of the 175 suppliers engaged since FY23, 147 have responded with the requested information on modern slavery risk. In FY24 we used the information to prioritise due diligence with 39 of these suppliers whose responses either indicated use of foreign migrant labour, or that the supplier was unsure if foreign migrant labour was used in their final assembly facilities.

Non-Trade Suppliers

Whilst we believe the risk of slavery occurring in our non-trade suppliers is lower, given a large proportion of the service industries we engage for our operations are based in Australia, we do recognise the risk of modern slavery occurring domestically, particularly in industries (such as cleaning) that employ a large proportion of migrant workers.

In FY24 we continued reviewing our cleaning supply chain for potential labour risks.

The Group does not employ any cleaners directly and engages third-party cleaning contractors either directly, or indirectly through landlords, to conduct cleaning of stores, warehouses, and office locations. We expect all cleaning contractors to comply with the Group's Ethical Sourcing Policy. Our approach to assessing cleaning contractors' compliance with the Group's Ethical Sourcing Policy has been focused on assessing supplier compliance with the Contract Cleaning Award Wage¹³.

Our review this year involved a sample of 9 cleaning contractors. Using a combination of supplier information and team member feedback, we sought to confirm that the payments made by the Group to these suppliers were sufficient to cover the award wages required to be paid to employees of the contractors. In doing this we considered the nature and scope of cleaning services, the number of workers used to carry out these services, and the hours worked. We are currently reviewing and validating our analysis of these 9 suppliers and upon completion of our review will contact any suppliers we believe may not be meeting the cleaning award wage requirements. Going forward, we will take a risk-based approach to expanding the number of cleaning suppliers subject to our review.

¹³The Cleaning Award is a legal document administered by The Fair Work Ombudsman outlining the minimum pay rates and conditions relating to workers in the contract cleaning services industry



OUR FY25 COMMITMENTS

We understand that modern slavery cannot be solved by any one company. We will seek further opportunities for collaboration with our suppliers, and continuous improvement of our systems and processes to assess and address the risk of modern slavery in our operations and supply chain.

The Group's FY25 roadmap includes the following initiatives:

1. Distribute our revised Ethical Sourcing Policy to our suppliers;
2. Continue to execute and seek continuous improvement in the Group's Ethical Sourcing Framework, which includes the review of social compliance audits, supplier self-assessments and engaging with all watchlist suppliers on remedial actions where necessary;
3. Continue to collaborate and build engagement with suppliers;
4. Conduct a factory visit of a third party branded supplier that has undertaken remediation of forced labour in their supply chain;
5. Continue to learn and build capacity and awareness internally, with key suppliers, and across industry;
6. Continue to utilise RBA training content on modern slavery, seeking opportunities to share best practice tools and guidelines with our smaller suppliers;
7. Continue to review and refine our approach to better assess and address the key risks within our cleaning supply chain;
8. Commence the integration of E&S Trading into our modern slavery approach; and
9. Continue to take a risk-based approach to expanding our due diligence process to cover more of our smaller suppliers.

ACTIONS TAKEN TO ADDRESS OUR FY24 MODERN SLAVERY COMMITMENTS

FY24 Commitment	Actions taken during FY24
<i>Continue to execute and seek continuous improvement in the Group's Ethical Sourcing Framework which includes the review of social compliance audits, supplier self-assessments and engaging with all watchlist suppliers on remedial actions where necessary</i>	<ul style="list-style-type: none"> Reviewed and updated the Group Ethical Sourcing Policy to ensure it remains in line with the Responsible Business Alliance Code of Conduct and other relevant international frameworks relating to rights at work. Implemented a new ethical sourcing questionnaire for new and existing suppliers to identify the use of foreign migrant labour more quickly in our supply chain and triage high-risk suppliers for further due diligence where necessary.
<i>Continue to collaborate and build engagement with suppliers</i>	<ul style="list-style-type: none"> Continued to deepen engagement with all private label and watchlist suppliers on our ethical sourcing due diligence, conducting feedback sessions on all priority and major audit findings. Conducted on-site factory visits of 5 factories in China that produce our private label (XCD) bracket, cabling, and headphone products in collaboration with two of our private label suppliers, to build on our understanding of work practices on the ground in China.
<i>Continue to learn and build capacity and awareness internally, with key suppliers, and across industry</i>	<ul style="list-style-type: none"> Provided reporting to our JB Hi-Fi and The Good Guys management teams on the Group's modern slavery approach, providing an update on the audits we have been conducting on watchlist suppliers, and reiterating the importance of ethical sourcing within the Group's broader sustainability strategy. Conducted detailed feedback sessions with watchlist suppliers to discuss areas of non-compliance with our policy and improvement opportunities.
<i>Continue to utilise RBA training content on modern slavery, seeking opportunities to share best practice tools and guidelines with our smaller suppliers</i>	<ul style="list-style-type: none"> Continued to leverage the RBA's Learning Academy which we utilise to provide bespoke training on key topics (such as recognising forced labour, effective management of working hours, and correctly administering employee social insurance payments).
<i>Continue to review and refine our approach to better assess and address the key risks within our cleaning supply chain</i>	<ul style="list-style-type: none"> Continued reviewing our cleaning supply chain for potential labour risks. Our review this year involved a sample of 9 cleaning contractors. Using a combination of supplier information and team member feedback, we sought to confirm that the payments made by the Group to these suppliers were sufficient to cover the award wages required to be paid to employees of the contractors. Going forward, we will take a risk-based approach to expanding the number of cleaning suppliers subject to our review.
<i>Continue to take a risk-based approach to expanding our due diligence process to cover some of our smaller suppliers</i>	<ul style="list-style-type: none"> Engaged an additional 68 suppliers requesting them to provide information relating to: (1) country of origin for their final assembly facilities, (2) whether any of these facilities utilised foreign migrant labour, and (3) the types of social auditing conducted on the final assembly facilities identified. Of the 175 suppliers engaged so far, 147 have responded with the requested information on modern slavery risk. In FY24 we used the information to prioritise due diligence with 39 of these suppliers whose responses either indicated use of foreign migrant labour, or that the supplier was unsure if foreign migrant labour was used in their final assembly facilities.



APPENDIX 1: MODERN SLAVERY ACT MANDATORY CRITERIA MAPPING

Modern Slavery Act Mandatory Criteria	Section reference	Sub-section reference	Page #
Identify each reporting entity covered by the joint statement	About this Statement	N/a	2
	Appendix 2 Listing of Reporting Entities During the Reporting Period	N/a	44
Describe the structure, operations and supply chains of each reporting entity covered by the joint statement	Our Group's Structure and Operations	N/a	5-7
	Our Supply Chain	<ul style="list-style-type: none"> Trade suppliers - branded products and services Trade suppliers - JB Hi-Fi owned private label products Indirect trade suppliers Case study: Supply chain mapping undertaken by third party branded suppliers Non-trade suppliers (goods and services not for resale) Service providers and out-sourced sub-contractors 	8-10
Describe the risks of modern slavery practices in the operations and supply chains of each reporting entity covered by the joint statement and any entities that each of those reporting entities owns or control	Modern Slavery Risk in Our Operations and Supply Chains	Potential modern slavery risks in our operations	12
		Potential modern slavery risks in our supply chains <ul style="list-style-type: none"> Modern slavery risks in our trade suppliers Modern slavery risks in our non-trade suppliers - goods and services not for resale Modern slavery risks in our service providers and outsourced sub-contractors 	12-14
Describe the actions taken by each reporting entity covered by the joint statement and any entities that each of those reporting entities owns or controls to assess and address these risks, including due diligence and remediation processes	Actions we have taken in the Financial Year Ended 30 June 2024	Policy Governance and Compliance <ul style="list-style-type: none"> Maintaining our Group values Maintaining governance over our Ethical Sourcing Framework Grievance mechanisms and remediation Keeping our Group Ethical Sourcing Policy up to date Case study: Implementing grievance mechanisms Case study: Responding to reports of forced labour within our trade supply chain 	15-19
		Build Capability and Awareness <ul style="list-style-type: none"> Development and implementation of training and awareness Responsible Business Alliance The Responsible Labor Initiative Modern slavery risk in the mining and refinement of 'conflict minerals' 	20-21
		Supplier Engagement <ul style="list-style-type: none"> Undertaking supply chain mapping Trade supply - final assembly location by region 	22-23
		Supplier Risk Assessment and Due Diligence <ul style="list-style-type: none"> Level 1: Supplier ethical sourcing inherent risk assessment Level 2: Supplier ethical sourcing self-assessment questionnaire (SAQ) Level 3: Social compliance audit framework Suppliers of the Group's private label products Suppliers that are either full or regular members of the RBA All other suppliers Supplier watchlist FY24 social compliance audit observations Case study: Private label factory analysis Case study: Living wage 	23-37
Describe how each reporting entity covered by the joint statement assesses the effectiveness of actions being taken to assess and address modern slavery risks	Assessing the Effectiveness of our actions	<ul style="list-style-type: none"> Trade Suppliers – JB Hi-Fi private label products and other suppliers on our watchlist Trade Suppliers – Branded products and services Non-trade suppliers 	38-39
Describe the process of consultation with each reporting entity covered by the joint statement and with any entities that each of those reporting entities owns or controls	About this Statement	N/a	2
Any other relevant information	A message from our Chief Executive Officer	N/a	4
	Our FY25 Commitments	N/a	40
	Actions taken to address our FY24 Modern Slavery Commitments	N/a	41



APPENDIX 2: LISTING OF REPORTING ENTITIES¹⁴ DURING THE REPORTING PERIOD¹⁵

JB Hi-Fi Limited	ACN 093 220 136
JB Hi-Fi Group Pty Ltd	ACN 093 114 286
JB H-Fi (A) Pty Ltd	ACN 094 252 534
JB Hi-Fi (B) Pty Ltd	ACN 614 635 835
Muir Investment Unit Trust	ACN 033 911 881
The Good Guys Discount Warehouses (Australia) Pty Ltd	ACN 004 880 657
The Good Guys Discount Warehouses (Australia) Trust	ACN 821 962 838



¹⁴A reporting entity under the Modern Slavery Act is defined as an entity with annual consolidated revenue of at least \$100m and is either an Australian Entity or a Foreign Entity carrying on business in Australia. JB Hi-Fi NZ Limited (NZBN 9429038383892) and its controlled subsidiary JB Hi-Fi Group (NZ) Limited (NZBN 9429033649177) are not considered reporting entities under the Modern Slavery Act but are controlled subsidiaries of the Group and included within the Group's centralised response to Modern Slavery. As such, the content of this report can be taken to also cover JB Hi-Fi NZ Limited and JB Hi-Fi Group (NZ) Limited.

¹⁵On 2 September 2024, JB Hi-Fi Limited acquired 75% of E. & S. Trading Co (Discounts) Pty Ltd (E&S). E&S will be added to the Group's list of reporting entities in FY25.

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