

A person wearing a grey button-down shirt and blue jeans is using a grey stick vacuum cleaner on a light-colored wooden floor. The background shows a modern kitchen with white cabinetry and a countertop. A black dog is sitting on the floor to the left.

GODFREYS GROUP PTY LTD
MODERN SLAVERY STATEMENT

FINANCIAL YEAR 2022

INTRODUCTION

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAINS

CRITERIA 3:
RISKS OF MODERN SLAVERY

CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD

Introduction

ABOUT US

Godfreys has been Australia and New Zealand's leading vacuum cleaning experts for over 90 years.

Godfreys is an iconic Australian retailer. Godfreys was founded by Godfrey Cohen in 1931 during the Great Depression. At the time, vacuum cleaners were sold door-to-door and could not be purchased in store in Australia, so Godfrey began selling reconditioned vacuum cleaners through his fathers' furniture store in Bourke Street, Melbourne.

From there, Godfreys has grown to over 170 stores across Australia and New Zealand, making it the largest vacuum retailer in the world.

As well as a wide range of vacuum cleaners from the world's leading brands, Godfreys offers a variety of other cleaning solutions including steam mops, carpet shampooers and hard floor cleaners. Godfreys continues to lead the market through continuous innovation and good old-fashioned hard work.

Godfreys takes its job as a cleaning expert seriously, providing our customers with the best products, advice and services to meet unique cleaning needs. From offering a diverse range of cleaning solutions to providing comprehensive after-purchase support, everything Godfreys does is aimed at making its customers' lives easier and cleaner.

Godfreys' multichannel offering is a mix of company owned and franchised stores located in standalone 'superstores', shopping centres and retail shopping strips. Godfreys' products are also distributed through wholesale channels via a range of retail outlets and an online platform.



INTRODUCTION

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAINS

CRITERIA 3:
RISKS OF MODERN SLAVERY

CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD

THIS STATEMENT

This is Godfreys' third modern slavery statement. During the reporting period, we entrenched the strong foundations that we implemented in our first two reporting periods, and enhanced our due diligence program to continue to assess the risks in our supply chains.

Godfreys is pleased to set out in a public manner the actions and initiatives we are taking to address and mitigate risks of modern slavery.

We are proud of the actions and steps we have taken in the reporting period, however we also acknowledge that our journey continues and we must continually evolve.

Godfreys is pleased to publish our third modern slavery statement. We welcome the opportunity to set out our continued action to address risks of modern slavery and the public reporting forum in which this allows us to do so.



David Lee, CEO

In a year with unprecedented challenges such as the continued impacts of COVID-19, supply chain disruption and inflation, we maintained our focus and commitment and we continued to take action, such as launching our supplier site auditing framework.

Working with our suppliers is a key component of our framework, including educating our suppliers regarding modern slavery. We are taking suppliers on a journey with us to understand risks of modern slavery and to mitigate such risks.

I am proud of the significant amount of work that has been done and I am looking forward to continuing the development of our modern slavery compliance framework.

INTRODUCTION

**CRITERIA 1:
REPORTING ENTITY**

CRITERIA 2:
OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAINS

CRITERIA 3:
RISKS OF MODERN SLAVERY

CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD

REPORTING ENTITY

Reporting Entity: Godfreys Group Pty Ltd

Head Office: Brandon Business Park, Building 3, Level 1, 530-540 Springvale Road, Glen Waverly, Victoria 3150

Australian Business Number: 35 602 722 985

Website: <https://www.godfreys.com.au/>



INTRODUCTION

CRITERIA 1:
REPORTING ENTITY

**CRITERIA 2:
OUR STRUCTURE,
OPERATIONS AND
SUPPLY CHAINS**

CRITERIA 3:
RISKS OF MODERN SLAVERY

CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD

Structure, Operations and Supply Chains

Godfreys Group Pty Ltd is a private company headquartered in Victoria, Australia. Godfreys Group Pty Ltd is the head entity of the Godfreys Group.

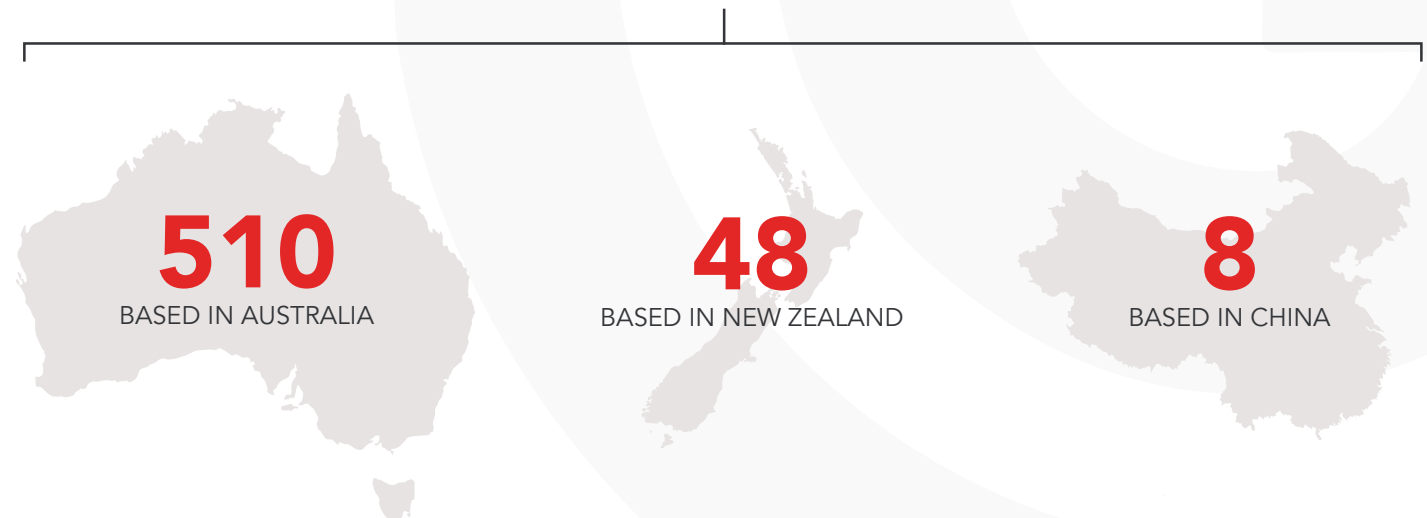
All entities in the Godfreys Group are wholly-owned and controlled by a common board and executive leadership. The same policies, procedures and governance structure applies to all entities in the Godfreys Group.

Within the Godfreys Group, Electrical Home-Aids Pty Ltd ACN 007 539 577 is the main Australian trading entity and also franchisor. Other entities in the Godfreys Group do not trade for the purposes of this statement.

There are two entities within the Godfreys Group that are not based in Australia, these being:

- **New Zealand Vacuum Cleaner Co Ltd** (company number 1075877): operating entity in New Zealand; and
- **Electrical Home-Aids (Suzhou) Ltd** (registration number 320594400034162): operates the Godfreys China buying office.

GODFREYS COMPRISES OF APPROXIMATELY 566 EMPLOYEES (FULL TIME EQUIVALENT) WITH:



INTRODUCTION

CRITERIA 1:
REPORTING ENTITY

**CRITERIA 2:
OUR STRUCTURE,
OPERATIONS AND
SUPPLY CHAINS**

CRITERIA 3:
RISKS OF MODERN SLAVERY

CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD

OPERATIONS

Godfreys retails domestic and commercial floorcare and associated cleaning products in Australia and New Zealand. Godfreys has a mix of company owned and franchised stores across Australia and New Zealand. Outside of Australia and New Zealand, Godfreys has a buying office in China.

The locations of our operations, including the locations of our offices and retail stores (franchised and company sites) are as follows.



INTRODUCTION

CRITERIA 1:
REPORTING ENTITY

**CRITERIA 2:
OUR STRUCTURE,
OPERATIONS AND
SUPPLY CHAINS**

CRITERIA 3:
RISKS OF MODERN SLAVERY

CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

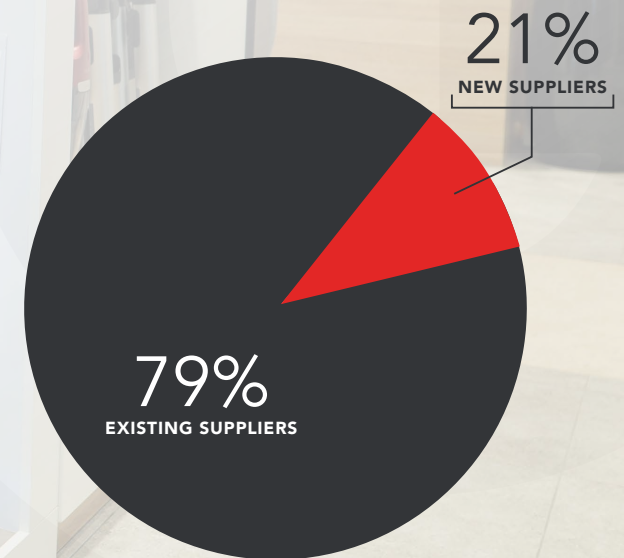
CRITERIA 7:
LOOKING FORWARD

SUPPLIERS AND SUPPLY CHAINS

SUPPLIER RELATIONSHIPS

Maintaining strong, long-term relationships is vital to our overall operations. Godfreys considers that its strong relationships help us maintain transparency with suppliers and assists us meeting the expectations of our customers.

In the reporting period, we continued to engage with long term, existing suppliers and 135 new suppliers. This was somewhat impacted by COVID-19 which continued to have disruptions across our organisation, both within our Australian retail outlets and internationally.



Celebrate the messiness



GODFREYS

Accidental droppiness



When life gives you lemons
Godfreys gives you lemonade



INTRODUCTION

CRITERIA 1:
REPORTING ENTITY

**CRITERIA 2:
OUR STRUCTURE,
OPERATIONS AND
SUPPLY CHAINS**

CRITERIA 3:
RISKS OF MODERN SLAVERY

CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD

SUPPLY CHAINS

Godfreys has a global supplier base and supply chains. The number of components used in the manufacturing of vacuum cleaners is complex, which results in complex supply chains. During the reporting period, Godfreys directly engaged with a total of 627 suppliers.

Godfreys' supply chains can be summarised as follows:



REPAIR

Our repair capabilities are predominantly based in Australia and occasionally based in China. For repair services we source repair tools, spare parts and also personal protective equipment for employees.



BUSINESS ADMINISTRATION AND FRANCHISEE MANAGEMENT

Legal advice, insurance, underwriting agencies, IT service providers, OH&S auditors and professional services.



RETAIL

Lessors, fit-out providers, furnishing providers, cleaning services and sourcing uniforms.



DISTRIBUTION

Freight services (national and international), software, maintenance and design of our online store.

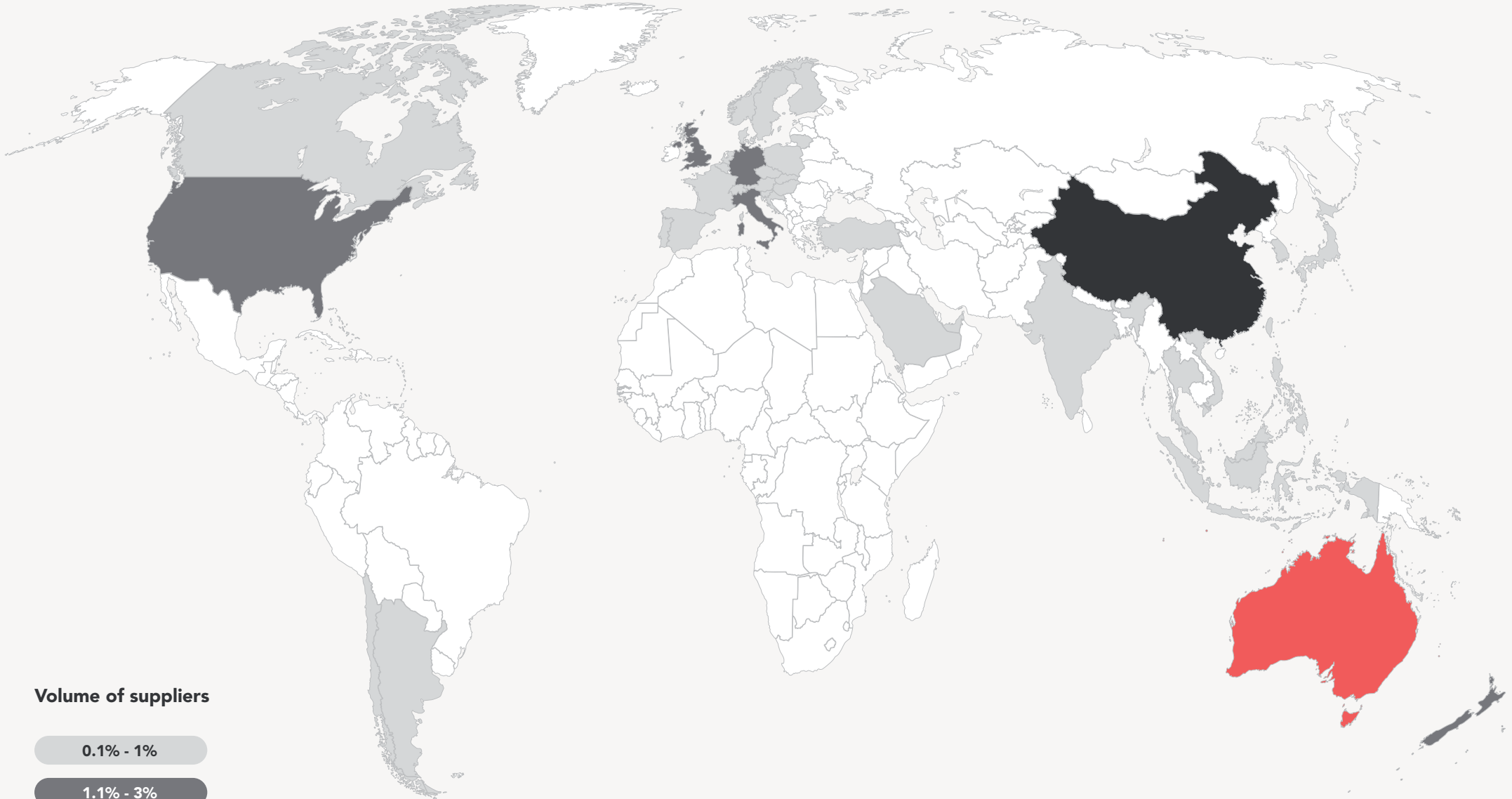


PRODUCTS

Inventory and stock including vacuum cleaner components, cleaning products, packaging, assembly, software, electrical components and personal protective equipment.

SUPPLY CHAIN BY VOLUME

Our tier 1, tier 2 and raw material suppliers are located across the globe.



Volume of suppliers

0.1% - 1%

1.1% - 3%

3.1% - 10%

>10%

Refer to the Annexure on page 29 for a full list of operating locations of Tier 1, Tier 2 and Raw Material suppliers.

INTRODUCTION

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAINS

**CRITERIA 3:
RISKS OF MODERN SLAVERY**

CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD

Risks of Modern Slavery

Godfreys is aware of the risks that a complicated supply chain can present.

The industry that Godfreys operates in, and the manufacturing of electronics in general, is exposed to higher risks of modern slavery. Legislation that recently passed in the US specifically identifies the manufacturing of electronics in China as being more likely to be connected to Uyghur forced labour.

Godfreys' products are manufactured in factories that can employ over 1000 workers. We acknowledge the inherent risks associated with factories of this nature, as oversight and audits become more challenging as the size of the factory increases. Godfreys acknowledge that its risks are not limited to the overseas manufacturing of its products.

As the world environment changes and we continued to navigate COVID-19 disruptions and supply chain issues during 2022, we consider that the risks of modern slavery practices in our supply chains are fluid and ever-changing. Modern slavery practices are more readily found in areas with vulnerable populations or in geographic regions with conflict, corruption or displacement. In addition, specific high risk industries and some types of business models are more likely to be involved with modern slavery practices.

Data from platforms including the Global Slavery Index highlight the risk of modern slavery in multi-layered supply chains. In Godfreys previous modern slavery statements, detail

was provided regarding information about the industries we consider presents the highest amount of risk

CAUSE, CONTRIBUTE AND DIRECTLY LINKED TO

Pursuant to the United Nations Guiding Principles on Business and Human Rights, Godfreys defines risks as to whether Godfreys:

!!! Causes modern slavery practices

Operations may directly result in modern slavery practices (for example, forced labour being used in its stores or head office).

!! Contributes to modern slavery practices

Operations and/or actions may contribute to modern slavery (for example, setting unrealistic cost and timeframe targets).

! Directly linked to modern slavery practices

Products and services may be connected to modern slavery through the activities of another entity to which there is a business relationship (for example, modern slavery practices within its a supply chain).

INTRODUCTION

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAINS

**CRITERIA 3:
RISKS OF MODERN SLAVERY**

CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD

OPERATIONS

Godfreys' operations are located predominantly in Australia and also has operations in New Zealand and China. Godfreys has a strong governance and values framework, that is supported by and codified within policies and procedures, including, for example:



Code of conduct

Whistleblower policy



Modern slavery policy

Access to resources such as
employee assistance programs



Godfreys is of the view that the risks of Modern Slavery in its operations are low, due to factors such as its governance framework, regulated nature to ensure payment of workers and systems and processes implemented.

SUPPLY CHAINS

Godfreys is of the view that risks of modern slavery are most likely to present in our supply chains. With a vast range of componentry and the volume of plastics and other high risk materials used in its products, risks of modern slavery may also present deeper in our supply chains.

Godfreys has worked to continue to gain transparency over its tier one and tier two suppliers. During the reporting period, further measures were implemented to ensure that the due diligence over its highest risk suppliers remained current and that Godfreys developed a greater understanding of how its suppliers operated.

The industries that Godfreys has focussed on due to the heightened risks of modern slavery practices include manufacturing, cleaning and cleaning products, apparel and waste management. Godfreys has also focussed on the procurement and production of raw materials.

INTRODUCTION

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAINS

**CRITERIA 3:
RISKS OF MODERN SLAVERY**

CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD

MODERN SLAVERY SUPPLY CHAIN RISKS

CATEGORY	TYPE OF RISK	PRESENTATION OF RISK
Electronic products	<i>Contribute to and directly linked to</i>	The electronics industry is high risk for modern slavery due to the frequent use of unskilled workers, often employed within a factory setting. Migrant workers are commonly used for electronics production and are vulnerable to forced labour and unsafe working environments due to the high demand for electronic products and short deadlines.
Cleaning products	<i>Contribute to and directly linked to</i>	The production of cleaning products is inherently dangerous. As such, it is vulnerable to modern slavery practices such as deceptive recruitment or forced labour.
Cleaning	<i>Directly linked to</i>	The cleaning industry is subject to high modern slavery risks due to the frequent use of vulnerable migrant workers, deceptive employment practices and unsafe working conditions. These risks are amplified by complex subcontracting arrangements.
Apparel	<i>Contribute to and directly linked to</i>	The entire supply chain of apparel is at risk of modern slavery, from the raw materials to manufacturing. Apparel is commonly sourced from factories in high risk countries where frequent instances of poor working conditions forced labour and excessive overtime hours are reported.
Waste management and recycling	<i>Directly linked to</i>	This industry is exposed to modern slavery risks due to the complex nature of subcontracting arrangements. Waste management often attracts migrant or unskilled workers who are at a higher risk of experiencing modern slavery.
Raw Materials	<i>Directly linked to</i>	The procurement and production of raw materials is inherently high risk for modern slavery as it often involves physical labour or unskilled workers. Raw materials are commonly sourced from countries with a high susceptibility to modern slavery.

INTRODUCTION

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAINS

**CRITERIA 3:
RISKS OF MODERN SLAVERY**

CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD



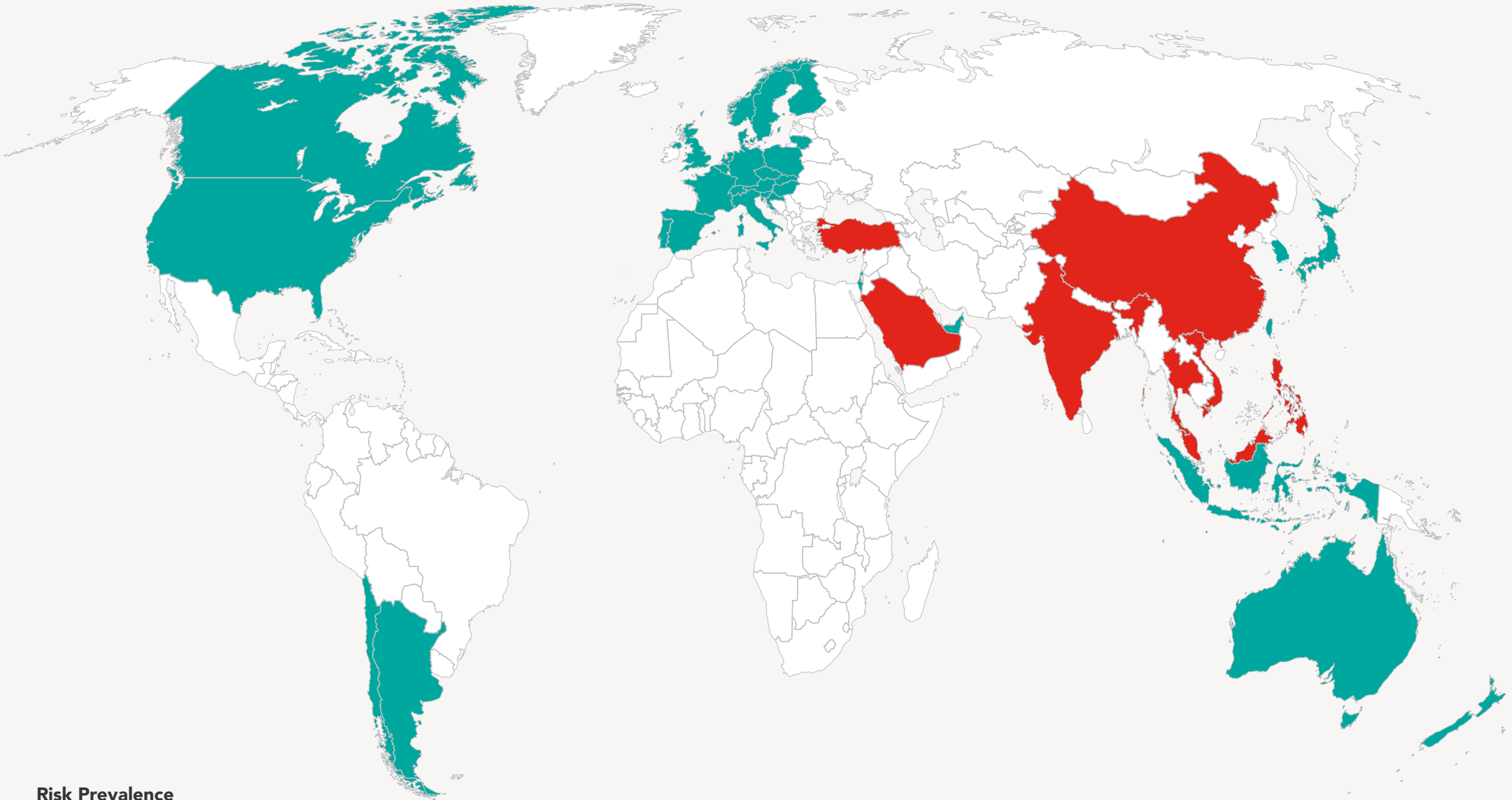
Case Study:

ELECTRONICS MANUFACTURING

There have been several reports that highlight the complexity and significant componentry that goes into manufacturing electronic products such as vacuum cleaners. Godfreys is aware of the heightened risks associated with the production of these goods and the difficulty in identifying the source location of the range of components that its products are made up of.

To this end, Godfreys continues to take steps to trace down supply chains to understand the risks that may lie in the tiers with limited visibility.

SUPPLY CHAIN BY RISK



Risk Prevalence

LOW RISK

HIGH RISK

Refer to the Annexure on page 29 for a full list of operating locations of Tier 1, Tier 2 and Raw Material suppliers.

INTRODUCTION

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAINS

**CRITERIA 3:
RISKS OF MODERN SLAVERY**

CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD

COVID-19

COVID-19 was another variable that contributed to the risk of modern slavery practices in Godfreys' supply chains during the reporting period. COVID-19 caused widescale supply chain issues, including forced closures of factories which in some places, particularly China, which could last significant periods of time. Godfreys managed such delays by working collaboratively, continuing to work with our suppliers and support them through such disruptions

COVID-19 also presented risks to workers, with unemployment rising in many areas and adding stress to the lives of people across the world. This means that people in certain industries may have been more susceptible to deceptive practices such as debt bondage or unpaid excessive overtime requirements.





DEEBOT



INTRODUCTION

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAINS

CRITERIA 3:
RISKS OF MODERN SLAVERY

**CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN**

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD

Actions Godfreys has taken

The third year of Godfreys' due diligence system saw further developments to our ability to assess modern slavery risks throughout both our operations and supply chains. As our compliance framework is embedded, Godfreys was able to expand its actions whilst being confident that the underlying processes would continue to identify and address the risks that were uncovered in our operations and supply chains.

Godfreys due diligence process has several steps. Godfreys considers that multiple approaches are necessary to gain visibility and transparency, which in turn allows us to better identify and address our modern slavery risks.

A summary of the key actions that we addressed in previous reporting periods are as follows:

- third party guidance
- governance and leadership
- scoping
- risk assessment
- remediation
- contracting
- tracking and monitoring
- training

In addition to building on each of these actions, Godfreys also covered new ground in the reporting period, by way of:

- auditing suppliers from an ethical perspective
- auditing other risk indicators within manufacturing

- analysis of hours worked in manufacturing roles
- benchmarking against others in the industry

GUIDANCE

Godfreys continued to engage third party specialists to provide guidance and strategic advice to continue improving our processes whilst enhancing the level of information we obtain from our suppliers. This also assists with the ongoing management of our Supplier Platform (Platform), which has now been firmly established in our organisation. Each year, we continue to increase engagement on the Platform, which is now being expanded to engage in bespoke communications with each supplier depending on their risk profile. This is a significant development from the more general communications which were sent out during our initial implementation of the Platform.

GOVERNANCE

Much like other areas of our business, Godfreys' Modern Slavery Committee has evolved throughout the reporting period. Having members from international procurement, finance, and executive level members means that our Committee has a wide ranging skill set which assists with the implementation of different initiatives. The Committee reports directly to the CEO and the Board.

SCOPING AND RISK ASSESSMENT

We continued to take a targeted, risk based approach with our due diligence. This year, we further actioned measures based on risks presented by suppliers and began to push factory audits and remediation plans for the key factories that presented the highest risk profile. The following workflow sets out our approach to due diligence and the due diligence undertaken in the reporting period.

INTRODUCTION

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAINS

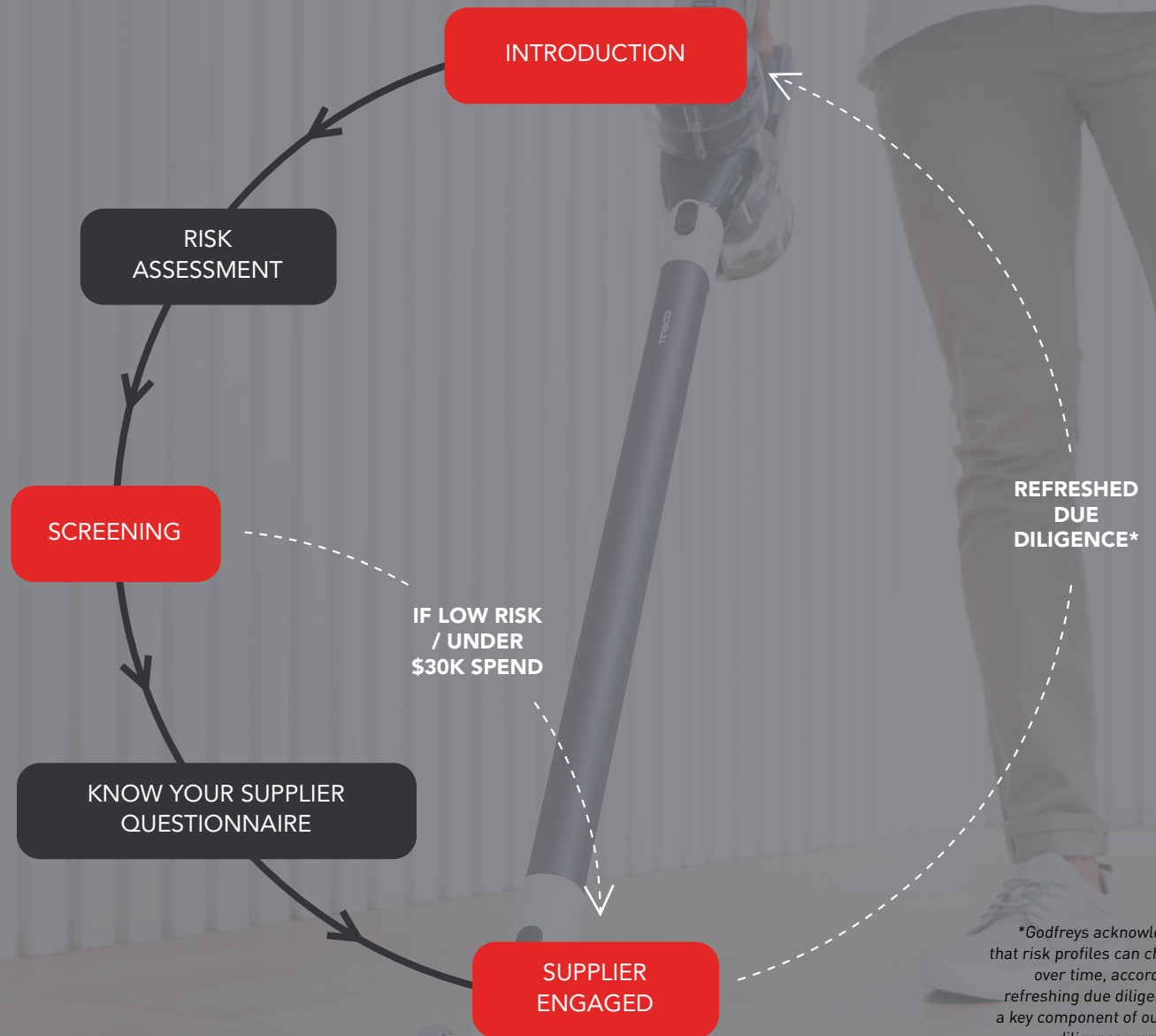
CRITERIA 3:
RISKS OF MODERN SLAVERY

**CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN**

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD



**Godfreys acknowledges that risk profiles can change over time, accordingly, refreshing due diligence is a key component of our due diligence workflow.*

INTRODUCTION

CRITERIA 1: REPORTING ENTITY

CRITERIA 2: OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

CRITERIA 3: RISKS OF MODERN SLAVERY

CRITERIA 4: ACTIONS GODFREYS HAS TAKEN

CRITERIA 5: MEASURING EFFECTIVENESS

CRITERIA 6: CONSULTATION

CRITERIA 7: LOOKING FORWARD

CONTRACTING

Whilst Godfreys takes active steps to assess and address modern slavery risks in its supply chains, we also acknowledge that requiring suppliers to report suspected instances of modern slavery is an effective tool to identify potential risks. All Godfreys supply contracts include a modern slavery clause, which requires suppliers to report on any practices that may indicate modern slavery. Godfreys ensures that all engaged manufacture suppliers have avenues available to report actual or suspected modern slavery issues.

TRACKING AND MONITORING

Our Platform continues to assist with updating risk assessment and monitoring changes of risk profiles on a global scale. Godfreys engages assistance to ensure that risk data remains current and that any changes to risk are accurately reflected on the Supplier Platform.

Godfreys continues to issue questionnaires to new suppliers in order to ensure that due diligence is conducted early in the relationship to identify potential issues that may need to be addressed.

TRAINING

Supplier and employee training continued to be rolled out in the reporting period. Based on due diligence, supplier training is issued to suppliers to educate them regarding modern slavery. Employees are trained as part of induction, with bespoke training issued as necessary depending on the role of the person.

SITE AUDITS

A significant action implemented in the reporting period was the launch of Godfreys' site audit program.

Conducting site audits in a COVID-19 environment had its challenges, but ultimately Godfreys audited suppliers comprising 68% of our manufacturing spend.

Godfreys engaged a third party auditor, QIMA, to conduct the site audits across key areas including:

- health, safety and hygiene;
- environmental management
- child labour and young workers
- working hours, wages and benefit
- labour practices.

SITE AUDIT FINDINGS

Overall, the results of the site audits were pleasing, with the overwhelming majority of factories scoring above industry average.

Godfreys had previously identified via its due diligence processes that a risk area is working of overtime hours in China.

Site audits conducted identified that in China workers often exceeded the monthly quota of overtime hours. In all instances, worker interviews indicated that the overtime was voluntary and that workers chose to work extra hours to increase their pay.

INTRODUCTION

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAINS

CRITERIA 3:
RISKS OF MODERN SLAVERY

**CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN**

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD

Site audits also assisted Godfreys to begin to gain more accurate data relating to female workers and migrant workers within the factories that are engaged. This data is recorded on the Platform and assists Godfreys to understand the operations of its suppliers and continue to increase the transparency and visibility over these more nuanced aspects of its supplier base.

Godfreys received an average supplier audit score of 7.4/10, with a number of factories scoring exceptionally well, with an audit score of over 9/10. The types of non-compliances identified in the site audits include:



**SIGNAGE
& WORKER
HEALTH
AND
SAFETY**



**INADEQUATE
EMPLOYEE
RECORDS**



**WORKER
OVERTIME**



**ENVIRONMENT
AND
WASTE**

Godfreys acknowledges that inadequate employee records and worker overtime are indicators of modern slavery, as such, remediation of such indicators is a key priority for Godfreys.

REMEDIATION

Non-compliances identified in the site audits are requested to be remediated. In the reporting period a majority of non-compliances were remediated, whilst we are continuing to monitor overtime hours. Part of the remediation process may include a re-audit of the supplier's site.

Case Study:

REMEDIATION

Godfreys arranged for a site audit for a supplier engaged in China. The site audit indicated that the records of overtime compared to the worker log records were inconsistent and the auditor could not verify that the workers were being correctly paid for the hours worked.

Godfreys liaised with the supplier about the requirement for remediation and the supplier was immediately responsive. Godfreys were able to communicate the need for remediation and are actively working with the supplier to ensure that the issue is resolved. Godfreys will consider re-auditing this supplier to ensure that action has been taken and that there is no inconsistency between records and that all workers are being paid for the correct overtime.

INTRODUCTION

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAINS

CRITERIA 3:
RISKS OF MODERN SLAVERY

CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN

**CRITERIA 5:
MEASURING
EFFECTIVENESS**

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD

Measuring effectiveness

Godfreys has continued to work and develop its systems and processes to ensure that they remain fit for purpose. Godfreys recognises that it is important to assess the effectiveness of its processes.

Now that the Godfreys due diligence process, along with other policies, has been in place for over 2 years, Godfreys is in a position to analyse the system as a whole in order to determine how changes may make the overall process more effective.

GAP ANALYSIS

In the reporting period Godfreys reviewed due diligence completed by suppliers and the timing of when due diligence occurred. In this review it became apparent that whilst Godfreys conducts due diligence on all suppliers during their engagement, it would be more effective to, where possible, have a supplier engage with completing a questionnaire at or before engagement. Such timing would better equip us to prevent engaging with riskier supply chains. Godfreys is looking to roll this out in the next reporting period.

BENCHMARKING

To gain a deeper understanding of the effectiveness of our actions to address modern slavery risks, in the reporting period Godfreys benchmarked itself against other electronic retailers. The purpose of this exercise was to also gain an understanding and identify any key areas for improvement. A third party was commissioned to externally review our performance.

As a result of such benchmarking, in the next reporting period Godfreys will focus on:

- expanding its training and engagement framework;
- reviewing existing policies and codes; and
- expanding due diligence and supplier assessment.

Godfreys was pleased that the benchmarking demonstrated that Godfreys was high performing in the category of electronics, which was also supported by the results of site audits.



INTRODUCTION

CRITERIA 1: REPORTING ENTITY

CRITERIA 2: OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

CRITERIA 3: RISKS OF MODERN SLAVERY

CRITERIA 4: ACTIONS GODFREYS HAS TAKEN

CRITERIA 5: MEASURING EFFECTIVENESS

CRITERIA 6: CONSULTATION

CRITERIA 7: LOOKING FORWARD

Consultation

The reporting entity governs and controls the entities in the Godfreys group. On this basis, this statement is a group wide response.

Key areas of the Godfreys group were engaged including managers, procurement, people and culture, and leadership. As these teams operate for the entire group, consultation across the entities in the group was extensive. Further, key personnel from each of these groups for the Godfreys Modern Slavery Committee, who meet monthly to discuss and progress matters for the Godfreys Group. All risk assessing and implementation of initiatives apply across the group. The executive leadership team and ultimately the Board has general oversight of the process.

To support internal consultation, Godfreys engaged external auditors and legal consultants to keep us abreast with our legislative requirements. The legal consultants attend the monthly Modern Slavery Committee meetings.



INTRODUCTION

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAINS

CRITERIA 3:
RISKS OF MODERN SLAVERY

CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

**CRITERIA 7:
LOOKING FORWARD**

Looking Forward

The Godfreys group has continued to make strides in developing its modern slavery compliance framework over the last 2 years with the goal of reducing the risks of modern slavery practices within its operations and supply chains.

The Godfreys group is proud of the significant amount of work that has been done in this reporting period and is looking forward to continuing the development maturity of its modern slavery compliance framework.

In the next reporting period, we will:



Implement prospective due diligence on all suppliers to ensure that new suppliers are assessed for risk prior to their formal engagement



Once again, commission external advisers to prepare an industry analysis report on how other large electronic retailers are tackling modern slavery issues



Continue to follow our remediation processes for suppliers that present any modern slavery risks; and continue to expand:

- supplier engagement on our Platform; and
- supply chain mapping to increase transparency regarding the procurement and production of raw materials.

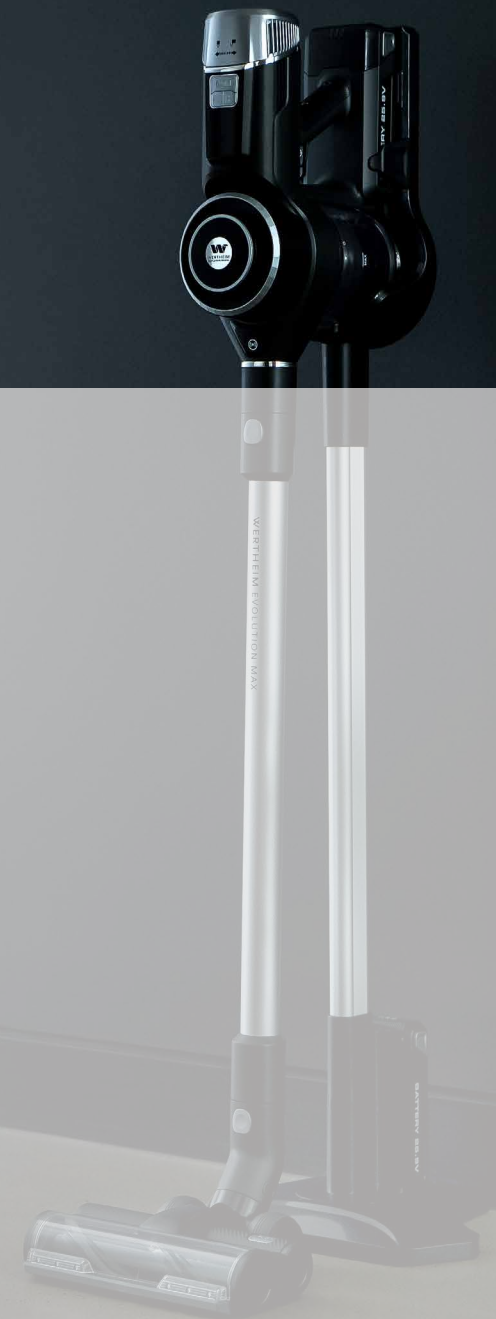
This modern slavery statement for the reporting period was approved by the Godfreys Board.

Signed by:

Grant Hancock
Director



Date: 16 December 2022



THANK YOU

Annexure

SUPPLIER BY VOLUME

>10%

AUSTRALIA

3.1% - 10%

CHINA

1.1% - 3%

**GERMANY
ITALY
NEW ZEALAND
UNITED KINGDOM
UNITED STATES**

0.1% - 1%

**ARGENTINA
AUSTRIA
BELGIUM
CANADA
CHILE
CROATIA
CZECH REPUBLIC
DENMARK
FINLAND
FRANCE
HONG KONG
HUNGARY
INDIA
ISRAEL
JAPAN
LITHUANIA
MALAYSIA
NETHERLANDS
NORTH KOREA
NORWAY
PHILIPPINES
POLAND
PORTUGAL
SAUDI ARABIA
SINGAPORE
SLOVAKIA
SLOVENIA
SOUTH KOREA
SPAIN
SWEDEN
SWITZERLAND
TAIWAN
THAILAND
TURKEY
UNITED ARAB EMIRATES
VIETNAM**

RISK ANALYSIS

LOW RISK

HIGH RISK