

MODERN SLAVERY STATEMENT FY25



Contents

03	Introduction	20	Contractual controls
04	CEO statement	20	Ethical Trading Initiative
05	Structure, operations and supply chain	20	Addressing risks in our operations
06	Our structure	21	Addressing risks in our merchandise supply chain
07	Our operations	22	Our Approved Factory Program
08	Our supply chain	22	Outcomes of social compliance auditing
09	Our merchandise supply chain	24	Tracing our supply chain to identify risks
10	Our non-trade goods and services supply chain	24	Training, capacity building and collaboration
11	Our merchandise supply chain footprint	26	Worker sentiment and voice
12	Assessing modern slavery risks	30	Monitoring and measuring our effectiveness
13	Identifying modern slavery risks	31	Process of consultation
14	How we identify risk	32	Looking forward
15	Our salient risks	33	Appendices
17	Modern slavery due diligence	33	Appendix 1
18	Addressing modern slavery	33	Appendix 2
18	Governance	34	Appendix 3
19	Policy controls		

Introduction

This statement is published by Country Road Group Pty Ltd (Country Road Group, CRG) as a joint statement on behalf of itself and six other related entities. All seven reporting entities covered by this statement have common directors, the same registered office address, use the same policies and processes, operate in the same sector, and share many of the same suppliers. Therefore, this joint statement provides a single consolidated description of their actions to assess and address modern slavery risks. Details of each reporting entity covered by this statement are listed in Appendix 1.

This is CRG's sixth modern slavery statement under Australia's Modern Slavery Act 2018 (Cth) (MSA) and sets out the actions we have taken to understand and mitigate our modern slavery risks during the 2025 financial year from 1 July 2024 to 30 June 2025 (FY25).

In preparing this statement, CRG has consulted with the relevant leadership and office holders of the reporting entities listed in Appendix 1, who have agreed on the actions taken against modern slavery as set out in this statement.

This statement was approved by the board of CRG on 10 December 2025.

CRG board member, Steven Cook, is also the sole director of the principal governing body of Country Road Clothing Pty Ltd, Witchery Australia Holdings Pty Ltd, Witchery Holdings Pty Ltd, and Witchery Fashions Pty Ltd. Therefore, the board of CRG approved this statement on behalf of CRG, as well as each of these subsidiaries.

The board of CRG also approved this statement on behalf of Country Road Group Holdings Pty Ltd and Woolworths International (Australia) Pty Ltd. The principal governing bodies of these entities did not approve this statement because they are holding companies which do not have outward facing operations or undertake external procurement.

Acknowledgement of Country

Country Road Group acknowledge the Traditional Owners and Custodians of the lands on which our Support Centre, distribution centres and stores are located, Australia's First Nations people. We acknowledge the rights of First Nations people to their traditional knowledge and cultural expressions and commit to working collaboratively and ethically to increase First Nations inclusion in our business and the Australian fashion and lifestyle industry.

CEO statement

Country Road Group is committed to building a better future by embedding responsible and ethical sourcing practices into every part of our business. Guided by our vision to be the most admired Australian lifestyle brand house, we continue to strengthen our responsible sourcing practices and collaborate with our teams, suppliers, and partners to protect human rights and reduce the risk of modern slavery across our value chain.

FY25 was a year defined by strengthening our due diligence and deepening visibility into our supply chain.

Internally, we embedded our commitment to responsible sourcing through the update of our Sourcing Code of Conduct, ensuring it reflects the standards we expect of ourselves and our suppliers in preventing modern slavery and supporting safe, fair workplaces. This work builds on prior years' training and awareness initiatives and strengthens the tools our teams use to engage with suppliers on these critical issues.

Externally, we took important steps to expand our visibility and understanding of our supply chain. We launched a supply chain mapping survey to validate our Tier 1 data and extend our knowledge of subcontractors and Tier 2 suppliers.

In partnership with LRQA, we also refreshed our modern slavery risk assessment, helping us better identify and prioritise areas of potential risk.

A significant milestone this calendar year was achieving full membership of the Ethical Trading Initiative, alongside our parent company, Woolworths Holdings Limited (WHL). This represents the culmination of several years of work and signals our commitment to aligning with global best-practice and collaborating with peers and experts to improve outcomes for workers across our value chain.

These steps reflect our ongoing commitment to transparency, accountability, and continuous improvement. We know that addressing modern slavery requires vigilance, collaboration, and long-term commitment, and we remain dedicated to building ethical and resilient supply chains in partnership with our team, our suppliers, and our stakeholders.



Steven Cook
Chief Executive Officer
Country Road Group



Progress and milestones achieved in FY25

- ✓ Continued to progress our engagement with the Ethical Trading Initiative, graduating to full membership in December 2024, as part of WHL's Group membership.
- ✓ Updated our Sourcing Code of Conduct to include CRG's commitments to its suppliers, and to strengthen ethical expectations in line with international standards.
- ✓ Launched a supply chain mapping survey covering all Tier 1 trade suppliers, providing greater visibility into supplier factory, subcontractor and Tier 2 supplier networks.
- ✓ Partnered with LRQA to refresh our supply chain risk assessment, revalidating our salient modern slavery risks as part of our ongoing due diligence program.

STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Country Road Group

Country Road Group consists of some of Australia's most iconic and most loved fashion retail brands – Country Road, MIMCO, POLITIX, Trenery and Witchery.

Our structure

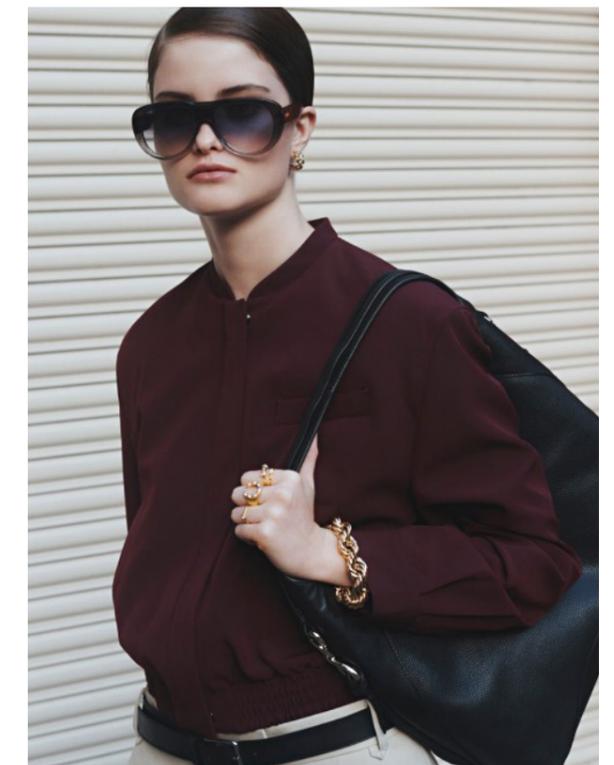
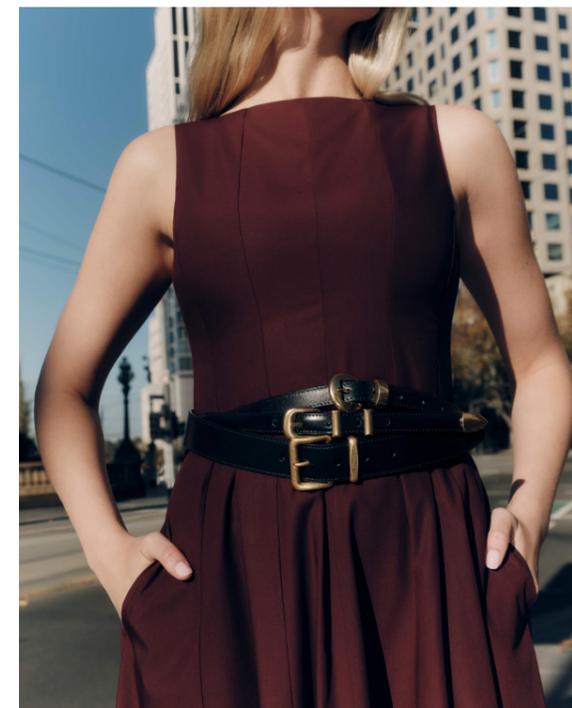
Country Road Group Pty Ltd is an Australian company (ACN 006 759 182) operating in the apparel, accessories and homewares retail sector and headquartered in Melbourne, Victoria.

CRG's corporate structure is unchanged from the previous reporting period, and our ultimate parent company remains Woolworths Holdings Limited, a South African business listed on the JSE (which is not a reporting entity for the purposes of this statement). The highest reporting entity in our Australian corporate structure remains Country Road Group Holdings Pty Ltd.

CRG comprises five customer-facing brands operated by the following wholly owned subsidiaries of CRG:

- Country Road Clothing Pty Ltd (ACN 005 419 447) trading as **COUNTRY ROAD** and **TRENERY**
- Witchery Fashions Pty Ltd (ACN 006 897 230) trading as **WITCHERY**
- Mimco Pty Ltd (ACN 067 573 291) trading as **MIMCO**
- Cicero Clothing Pty Ltd (ACN 614 757 327) trading as **POLITIX**

With the exception of both Mimco Pty Ltd and Cicero Clothing Pty Ltd, these entities are all reporting entities for the purposes of the MSA. In addition, CRG and the entities listed here own, control and operate various Australian, New Zealander and Singaporean subsidiary entities who are non-reporting entities under the MSA. These subsidiary entities are responsible for various operational functions such as warehousing, logistics, and property.



In FY25, we operated over 540 retail and concession stores across Australia and New Zealand consisting of 251 stores for individual brands and 291 concession arrangements.

Our operations

Headquartered in Melbourne, our operational activities range from creating initial fashion and marketing design concepts through to warehousing and fulfilling customer orders, either instore, from our Omni Fulfilment Centre (OFC)¹ which we own and operate, or from our third-party logistics provider. CRG does not directly manufacture goods, but rather engages with a range of suppliers for the manufacture of goods, sold under our five retail brands, including apparel, footwear, homewares and other accessories.

In FY25, we operated over 540 retail and concession stores across Australia and New Zealand consisting of 251 stores for individual brands and 291 concession arrangements (i.e. stores within David Jones or Myer stores).

Our team members' roles include retail services, design, production, sourcing, sustainability, IT, customer service, merchandising, retail operations, marketing, e-commerce, legal, risk, finance, and executive management. These team members are directly employed on either a full-time, part-time, or casual arrangement under Enterprise Bargaining Agreements, relevant Awards or Individual Employment Contracts depending on their position and work location.

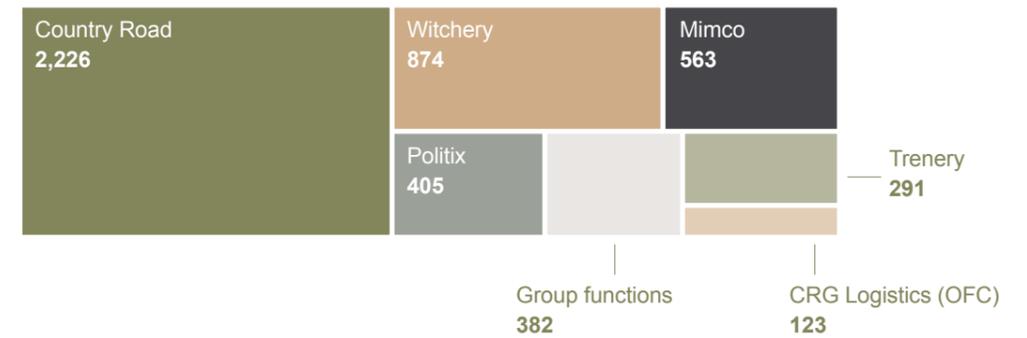
Our operations also include the use of indirect workers engaged via third-parties to provide services to support the ongoing activities of our operations. These indirect workers may include labour-hire in our OFC, or cleaning and security services across our store and support centre sites.

CRG Brands are our retail operating companies, engaging in the design, developing, and purchasing of products, goods and services, and are responsible for the retail operations.

¹ Omni Fulfilment Centre is a distribution center which receives and distributes merchandise.

Our CRG Team*

Australia



New Zealand



* As at 30 June 2025

Employees by Contract Type



Our supply chain

Our supply chains span the globe and can be widely varied and complex. CRG partners with suppliers with a range of different capabilities in our product supply chains for the manufacture and supply of merchandise for retail. This includes apparel, accessories, footwear and homewares. We also engage in the “non-trade” procurement of goods and services (such as cleaning services for offices and stores) to support the operation of our businesses. This section describes both of these elements of our supply chain.

Country Road Group Operations model



In FY25, our merchandise sourcing footprint covered 13 countries, where we partnered with 203 finished goods factories, contributing to the employment of over 80,000 workers at these sites.

Our merchandise supply chain

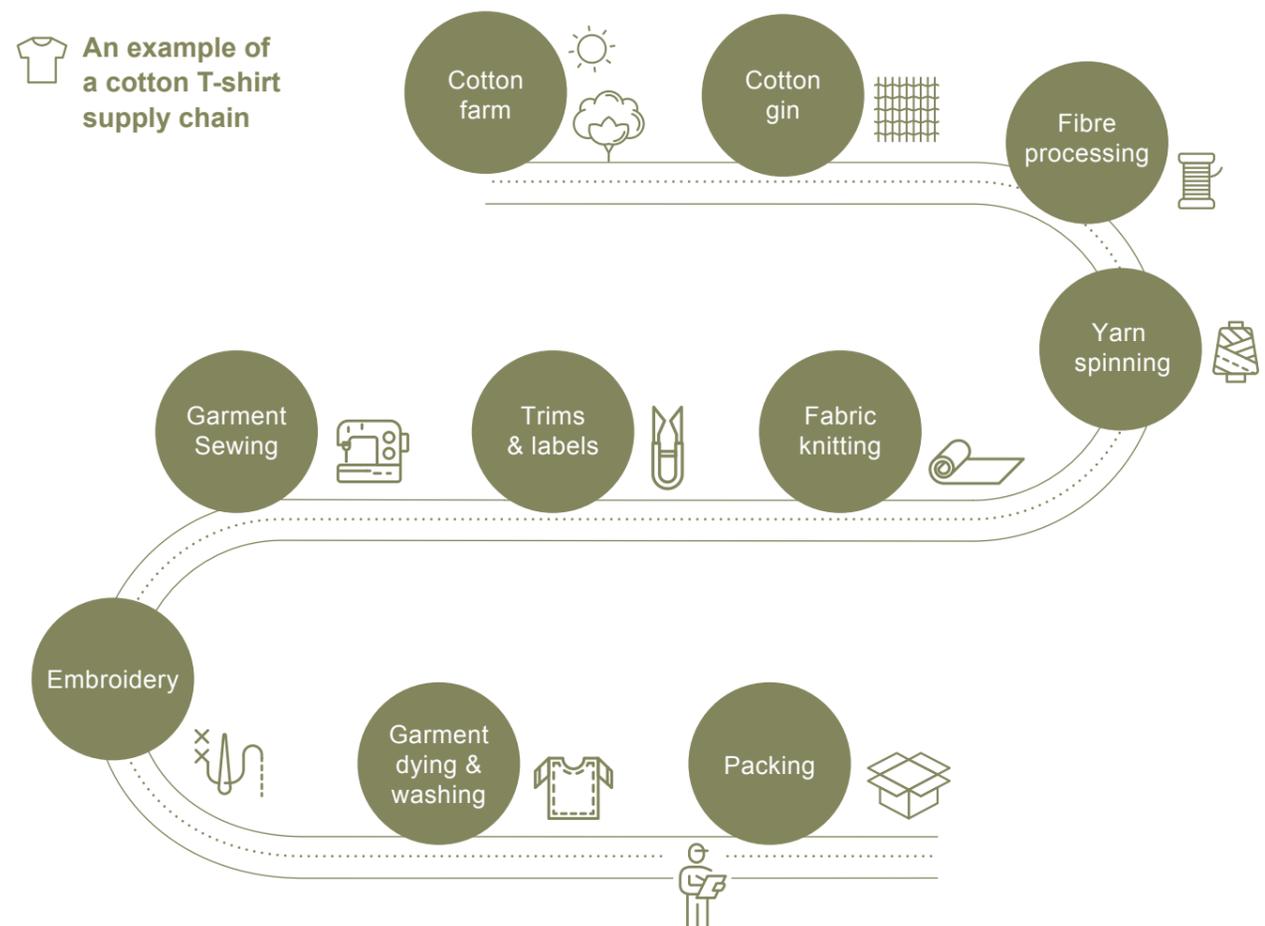
Merchandise (or trade) suppliers may own the finished goods factory that makes our products, or they may sub-contract to factories approved by CRG to complete the final production. The product range includes apparel, footwear, fashion accessories and homewares. Materials used in these products include natural textile fibres (e.g. cotton, wool, and linen), man-made cellulosic fibres (e.g. viscose, lyocell and acetate), synthetic textile fibres (e.g. polyester and nylon) and non-textile materials (e.g. leather, timber and glass).

Our contractual trading arrangements are primarily with our direct merchandise suppliers that own or engage factories to produce merchandise. We have contractual arrangements with some nominated fibre and fabric suppliers beyond these merchandise suppliers. However, we do not have direct relationships with every entity involved in the complex supply chains of our products.

Across the range of products that we design, each of the steps involved in manufacturing are often different and nuanced depending on the product type, design and style, or the materials used. The range of activities involved in our fashion supply chain may include:

- Cultivation of raw materials (e.g. cotton or linen)
- Processing of raw materials into fibres, yarn, or hides
- Weaving, knitting, or bonding of the fibres into fabrics
- Wet processing including dyeing, washing, and tanning
- Finished product assembly (including sewing, knitting, linking, and moulding)
- Other value-add processes (such as embroidery, trims, hardware, and printing)
- Packaging, labelling, packing and shipping

An example of a cotton T-shirt supply chain



Non-trade goods and services that we procure for the support of the operation of our business activities were obtained primarily from 90 different suppliers across eight major categories

The relationship between suppliers in each phase of the production supply chain are often complex. Each stage of production may occur in one or more countries and regions. Fibres may be grown in one country, shipped to another for converting into yarns before being woven into fabrics elsewhere. Some factories are vertically integrated and conduct multiple stages of production within the one facility. However, many supply chain participants specialise in certain aspects of production and act as component or service providers to other supply chain actors.

Our commitment to improving the transparency of our supply chains continues to be a major focus for our business.

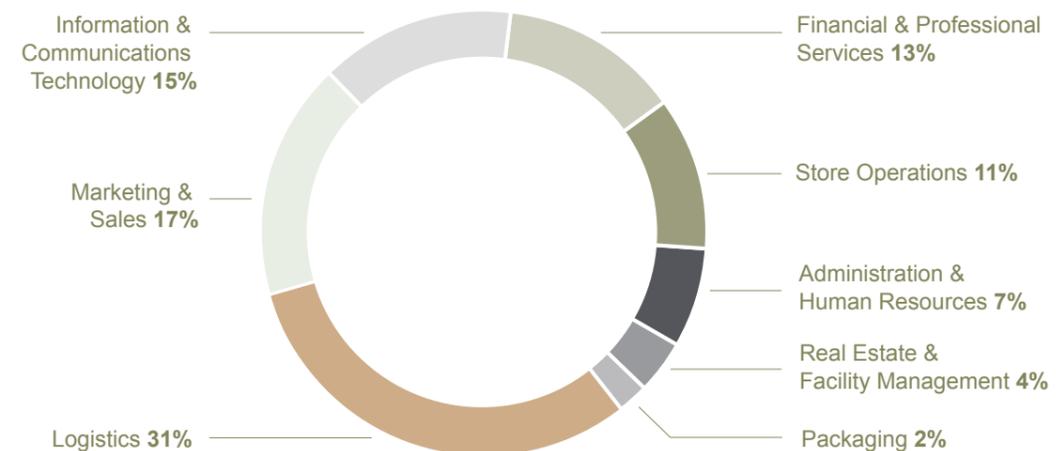
In addition to this list, some of our individual brands continue to build greater supply chain transparency on their brand websites, which can include additional information on the manufacturers, farmers, raw material sources and the processes involved in the production of goods².

Our non-trade procurement (NTP) goods and services supply chain

Non-trade goods and services that we procure for the support of the operation of our business activities were obtained primarily from 90 different suppliers across eight major categories throughout the reporting period. These 90 suppliers represented 80% of the total non-trade spend for the CRG in FY25.

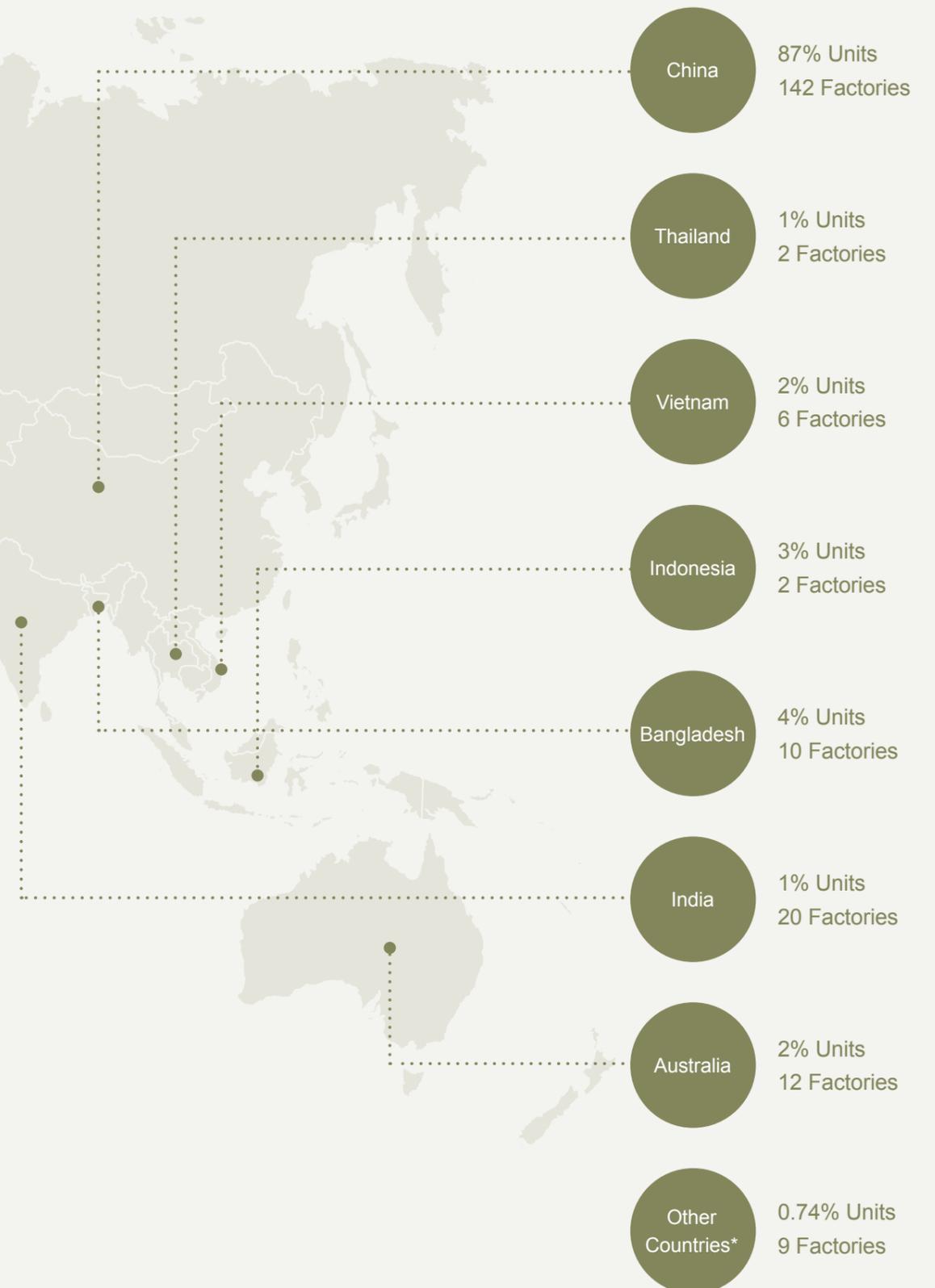
Most of these suppliers have their businesses incorporated and located in Australia, however the non-trade goods and services that we procure may involve both domestic and international activities.

NTP spend breakdown (%)



² <https://www.countryroad.com.au/stories/supporting-australian-farmers-to-improve-biodiversity.html>
<https://www.countryroad.com.au/stories/reshaping-wool-in-the-australian-fashion-industry.html>
<https://www.countryroad.com.au/stories/the-biodiversity-project-meet-the-schwager-family.html>
<https://www.countryroad.com.au/stories/homie-reborn.html>
<https://www.trener.com.au/italian-wool-blend-car-coat-60293109-2507>
<https://www.trener.com.au/duca-visconti-italian-cord-blazer-60303297-9411>

Our merchandise supply chain footprint



*Other countries includes Pakistan, Portugal, Sri Lanka, Spain, Slovakia, and Italy.



ASSESSING MODERN SLAVERY RISKS

Identifying modern slavery risks

The Country Road Group takes an holistic, Group-wide approach to identifying and assessing modern slavery risks in our operations and supply chains.

Modern slavery describes 'situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom'.³ The MSA defines modern slavery as including eight forms of serious exploitation, which are explained in Appendix 2. Consistent with the United Nations' 'Guiding Principles on Business and Human Rights' (UNGPs) and the Australian Government's official guidance about the MSA, we understand modern slavery risks to mean the risk that we may 'cause', 'contribute to' or be 'directly linked to' modern slavery. (see table opposite).

We recognise that modern slavery does not occur in isolation and can often be connected to other breaches of human rights, including failure to provide decent work or situations of substandard working conditions. We are committed to understanding and addressing our modern slavery risks as part of our broader efforts to respect human rights, including by integrating our assessments, actions and responses to modern slavery within our ethical sourcing and human rights approach.

Key term	Explanation	Hypothetical example relevant to the fashion sector
Cause	A business may cause an adverse human rights impact, such as modern slavery, where it causes the impact through its own activities or omissions.	For example, a logistics company could cause modern slavery by exploiting its workers used to crew shipping vessels.
Contribute to	A business may contribute to an adverse human rights impact, such as modern slavery, where its actions or omissions facilitate or incentivise the impact to the extent that it would have been unlikely to occur without them.	For example, a fabric wholesaler could contribute to modern slavery where it requires its suppliers to reduce costs to a level that could only be achieved by using exploited workers.
Directly linked to	A business may be directly linked to an adverse human rights impact where its operations, products or services are connected to the impact through the actions of another entity with which it has a business relationship (such as a supplier) but the business has not caused or contributed to the harm.	For example, a fashion company could be directly linked to modern slavery where its supplier manufactures garments made using raw materials produced by a third supplier who exploits its workers.

³ https://modernslaveryregister.gov.au/resources/Commonwealth_Modern_Slavery_Act_Guidance_for_Reporting_Entities.pdf

During the FY25 reporting period, we undertook a refreshed risk assessment to identify inherent modern slavery risks within our trade and non-trade supply chains.

How we identify risk

During the FY25 reporting period, we undertook a refreshed risk assessment in partnership with supply chain risk consultants, LRQA, to identify inherent modern slavery risks within our trade and non-trade supply chains.

Using their EiQ platform and risk data, Sentinel media scan, and third-party audit findings, this assessment looked at country and product or service sector risk exposure across CRG's supply chain.

Incorporating risk deep dives into six key sourcing countries where CRG maintains significant supply chain presence, the analysis identified elevated modern slavery risks in Tier 1–2 suppliers in high-risk countries, particularly China, Vietnam, and Bangladesh.

Key risks include domestic and foreign migrant worker exploitation, freedom of association and working hours. Cotton and home textiles supply chains present significant risks due to limited traceability and documented forced labour concerns in raw material production.

The report identified that human rights related risks increased in most countries, with forced labour risks deteriorating in most of the six key sourcing countries covered by the analysis. Vietnam experienced a substantial 22% increase in forced labour risk. China and Bangladesh recorded declines across several modern slavery indicators, while India showed mixed outcomes - with progress in areas such as child labour, forced labour and humane treatment, though some challenges remaining in others.

How are we making progress?



CASE STUDY

Country Road Group's supply chain risk assessment with LRQA

CRG partnered with LRQA's advisory team to undertake a comprehensive supply chain risk assessment and segmentation project. This initiative formed part of our commitment to strengthening our ethical sourcing program and meeting modern slavery reporting requirements.

Working closely with our Ethical Sourcing team, LRQA reviewed our existing supply chain segmentation and sustainability risk indicators, assessing environmental, social, and governance (ESG) risks across our value chain. The analysis examined supplier performance, risk exposure, and monitoring practices, benchmarking our approach against industry standards.

The findings identified the most salient sustainability risks and informed updates to our segmentation model, ensuring our monitoring framework focuses on priority areas. LRQA also provided a roadmap of recommendations to improve supplier monitoring processes, strengthen risk responsiveness, and enhance overall program effectiveness.

Beyond merchandise supply chains, we identified modern slavery risks in non-trade procurement including logistics services (warehousing and freight), ICT procurement, and service providers including cleaning, security, and labour hire across our Australian and international operations.

We use a number of methods, levers, tools and resources to assess our modern slavery risk profile.

These include:

- Engaging with risk screening and monitoring technology partners (such as LRQA's EiQ and Sentinel supply chain screening tools, and Supplier Ethical Data Exchange's (SEDEX) Radar risk tool);
- Identifying modern slavery indicators in factory social audits;
- Monitoring global news regarding human rights, forced labour and modern slavery issues; and
- Connecting with industry peers, NGOs, and multi-stakeholder initiatives to stay abreast of the ever-changing risk landscape and best practice mitigation strategies.

Our salient risks

Applying information gathered from our risk assessment approach, we consider the following modern slavery risks to be the most at risk of likely to have having been caused, contributed to, or directly linked to CRG in the FY25 period:

- Forced labour
- Child labour⁴
- Bonded labour (recruitment fees)
- Deceptive recruiting

Underlying factors and indicators that drive these risks may include:

- **Use of migrant labour (both domestic and foreign) in supply chains** where workers are more vulnerable to exploitation, recruitment debt bondage, and restricted freedom of movement.
- **Unauthorised subcontracting practices** which create supply chain opacity and unknown actors potentially engaged in modern slavery.
- **Extreme working conditions** including excessive overtime, inadequate rest periods, and unsafe working environments.

- **Inadequate worker protections and contract violations** including missing or inadequate employment contracts (particularly affecting migrant workers), lack of social insurance coverage, and absence of proper wage documentation.
- **Restrictions on freedom of association and collective bargaining** which limit workers' ability to report violations and advocate for their rights.
- **Supply chain transparency deficits and code awareness gaps** limiting visibility into labour practices and hindering effective monitoring.
- **Potential involvement of children in extended supply chains** including hazardous work in raw material production, with escalating child labour concerns identified in some high-risk countries.
- **Industries and geographies heavily dependent on manual labour** particularly in textile manufacturing, cotton production, and footwear sectors.

- **Inadequate grievance mechanisms and worker voice channels** preventing safe reporting of violations and limiting workers' ability to seek remediation without fear of retaliation.

We recognise that modern slavery risks can occur in entities' operations, as well as their supply chains. However, we have assessed the risks of modern slavery occurring in our direct operations (including our retail stores, head office support centre and the direct employment of our staff) as low. This reflects the strong controls we have in place, which are detailed on pages 20 and 21.

As set out in the accompanying table, we recognise that elements of our operations and supply chains, including engagement of service providers to support our activities, may pose potential modern slavery risks.

Additional human rights and environmental risks also sit outside of the above noted modern slavery risks. We continue to monitor broader risks in our businesses and value chain; for more information, please refer to the latest Woolworths Holdings Ltd (WHL) latest Good Business Journey Report.⁵

⁴ The MSA specifies that modern slavery includes only "the worst forms of child labour", however this reference to "child labour" in this statement refers to more general child labour risks.

⁵ <https://www.woolworthsholdings.co.za/wp-content/uploads/2025/09/2025-Good-Business-Journey-Report.pdf>

Key inherent risk summary by supply chain tier

Supply Chain Tier	Activities / Entities	Countries	Key Inherent Modern Slavery Risks
Tier 1	Garment manufacturing	China, Vietnam, Bangladesh	Excessive overtime, migrant worker debt bondage, lack of insurance
Tier 2	Fabric dyeing and finishing	India, China	Informal labour, hazardous working conditions
Tier 3	Yarn and fibre processing	India, China	Migrant labour, poor wage practices
Tier 4	Cotton farming, raw wool	India, China	Forced labour, child labour, limited traceability
Other	Warehousing, cleaning, logistics	Australia	Underpayment, visa exploitation in outsourced services

Risk areas in our operations

	Context	Potential hypothetical examples
<p>Industry risk factors</p>	<p>We engage service providers to support our operations from industries recognised as having higher modern slavery risks, including logistics, cleaning, security and labour hire for our support centre, stores and OFC.</p>	<ul style="list-style-type: none"> Logistics service providers or their subcontractors could exploit workers providing services on CRG sites. Labour hire workers engaged through third parties to work in our business could be exploited by the labour hire provider.

Risk areas in our supply chain

	Context	Potential hypothetical examples
<p>Geographic risk factors</p>	<p>We source and procure merchandise and goods that are not-for-retail from a range of countries, including countries classified as high risk for modern slavery due to factors such as reliance on manual and migrant labour with poor rule of law.</p> <p>We recognise that excessive working hours remains a persistent challenge across our supply chain. Contributing factors include structural labour market pressures, production demands, and inadequate labour protections in key sourcing regions. These conditions create environments where workers may be vulnerable to exploitation and where modern slavery risks can emerge, particularly affecting migrant workers who may have limited recourse to address violations.</p>	<ul style="list-style-type: none"> Workers producing raw materials such as cotton and ceramics in our extended merchandise supply chain could be subject to exploitation. Workers involved in manufacturing activities in our extended merchandise supply chain (such as factory workers) could be exploited by factory managers. Logistics workers involved in the warehousing and distribution of products (including seafarers) could be subject to exploitation. Workers involved in the manufacturing of not-for-retail products such as IT equipment could be subject to exploitation (including workers involved in the sourcing of raw materials).
<p>Industry risk factors</p>	<p>The textiles and fashion industry is recognised as a high-risk sector for modern slavery globally, including due to the widespread use of migrant labour and high levels of subcontracting. Our assessment identified apparel, footwear, and home textiles as high-risk product categories for modern slavery exposure.</p> <p>There are also risks associated with the transport and logistics sector, including in relation to the warehousing and shipping of merchandise and other products.</p>	
<p>Commodity risk factors</p>	<p>Key agricultural commodities have been widely documented to be of higher risk of potential modern slavery. This includes the harvesting and cultivation of cotton, and the collection of PET bottles used to make recycled polyester.</p> <p>For example: The CRG is aware of the global focus on high-risk regions for sourcing cotton being produced in countries with alleged state sponsored forced labour.</p>	

MODERN SLAVERY DUE DILIGENCE

Addressing modern slavery

We recognise that modern slavery can be challenging to identify and address and we are committed to implementing practical approaches to uncover and address modern slavery risks in our supply chains and operations.

This section of the statement explains how we have integrated modern slavery into our governance structure, outlines our policy framework and explains our due diligence and remediation processes.

Governance

Human rights responsibilities (including in relation to modern slavery) are managed at the highest level across our companies and are integrated into our governance framework.

The Board of CRG is responsible for overseeing our approach to assessing and addressing modern slavery risks, including our reporting obligations under the MSA. Our parent company, WHL, also has direct oversight on modern slavery through the WHL Social and Ethics Committee, which meets three times per annum.

The CRG Executive Team retained “Modern Slavery” (as a subset of our “Good Business Journey”) within the Strategic Risk Profile. This places our Good Business Journey on the

highest-level agenda for our companies and continues to elevate the voice of human rights (including in relation to modern slavery) within our business. Through being on the Strategic Risk Profile, we will continually review the existing risks and mitigation strategies at a more granular level to assess the effectiveness of current controls and identify opportunities for improvement.

Management of human rights risks is held by the Chief Sourcing and Supply Chain Officer (merchandise supply chain), Chief People Officer (our team members), and Chief Financial Officer (non-trade supply chain).

On a day-to-day basis, modern slavery risk monitoring is performed by our Ethical Sourcing function. Reporting to the Chief Sourcing and Supply Chain Officer, this team is also responsible for the implementation of our Approved Factory Program (AFP).



We will continually review the existing risks and mitigation strategies at a more granular level to assess the effectiveness of current controls and identify opportunities for improvement.

Policy controls

CRG has a clear set of codes, policies, and protocols with which our team members and suppliers are required to adhere. These codes and policies operate equivalently and consistently across the full group, including owned and controlled entities.

This suite of documents helps to effectively manage modern slavery and broader human and labour rights risks by articulating our expectations and ways of working to our team members and suppliers.

The following documents are most relevant to our modern slavery approach:

Policy, Protocol or Mechanism	Description
Employment contracts	Formal legal agreements between CRG and employees which clearly specify each party's responsibilities regarding adherence to our governing laws, codes, and policies.
Award/Enterprise agreements	Formal agreements setting out our terms and conditions of employment, wage rates, overtime rules and leave arrangements.
Employee Code of Conduct	Details the standards of behaviour and ethical conduct expected of employees.
Workplace Behaviour	The Workplace Behaviour Policy aims to raise awareness of and prevent unlawful discrimination, harassment and bullying in the workplace, and provides avenues on how to raise a concern/complaint.
Ethics Hotline Procedure	Details the procedure by which complaints or tip-offs made to the Ethics Hotline via phone, email or submitted to the website will be received, escalated and managed.
Whistleblower Policy	Provides guidance on how improper or criminal conduct (such as instances of modern slavery) can be confidentially disclosed and will be investigated.
Grievance and Dispute Resolution Policy	Provides a fair and just process for the resolution of genuine personal grievances relating to the workplace.
Supplier agreements	Formal legal agreements between CRG and its suppliers that clearly state each party's responsibilities including adherence to our governing laws, codes, and policies.
Sourcing Code of Conduct	Included in all supplier agreements, this Code sets out the expectations of our suppliers in relation to health and safety, human rights and labour rights.

Modern slavery is a systemic global challenge that requires broad engagement and collaboration to shift the needle.

Contractual controls

Our contractual controls help CRG mitigate adverse human rights impacts by setting clear minimum requirements and creating responsible boundaries within which our suppliers agree to operate.

Key contractual obligations include:

- Prohibition on unauthorised subcontracting (to facilitate visibility of supply chain risks and ensure sub-contractors respect international human rights);
- Requirement that all factory sites undertake our social auditing procedures (to monitor working conditions and practices on the ground);
- Obligation on all suppliers and sub-suppliers to comply with local law or ETI base code as per procedures carried out in the auditing process (to ensure workers' rights are respected in practice); and

- Zero tolerance clauses included to deter use of forced labour and modern slavery like practices (to highlight CRG's focus on ensuring these practices do not occur in its supply chains).

There may be times where our expectations are not being met and we are committed to working with our supply chain partners to achieve change over time. If a supplier is unwilling to address breaches of our standards or has registered a critical or zero-tolerance issue, CRG has the right to terminate the trading arrangement if required.

Partnerships and memberships

Modern slavery is a systemic global challenge that requires broad engagement and collaboration to shift the needle.

We actively engage or partner with a number of key groups to keep our approach up to date and to leverage industry-scaled advocacy:

- Ethical Trading Initiative
- SEDEX
- LRQA
- International Accord
- UNGCNA (MSCoP)

Through the collaboration and action in our valued multi-stakeholder partnerships, we aim to drive and influence improved social outcomes throughout our value chain.

Ethical Trading Initiative

As a member of the Ethical Trading Initiative (ETI), alongside our parent company WHL, through FY25 we have continued to progress our ethical sourcing program in-line with their membership progression framework. This involves engaging with ETI teams to identify areas for improvement and applying their feedback and learnings from training sessions to our existing policies and practices.

Our ETI membership provides a global best practice framework and ability to network with other members, to support us in continuing to refine and strengthen our ethical sourcing and human rights programs.

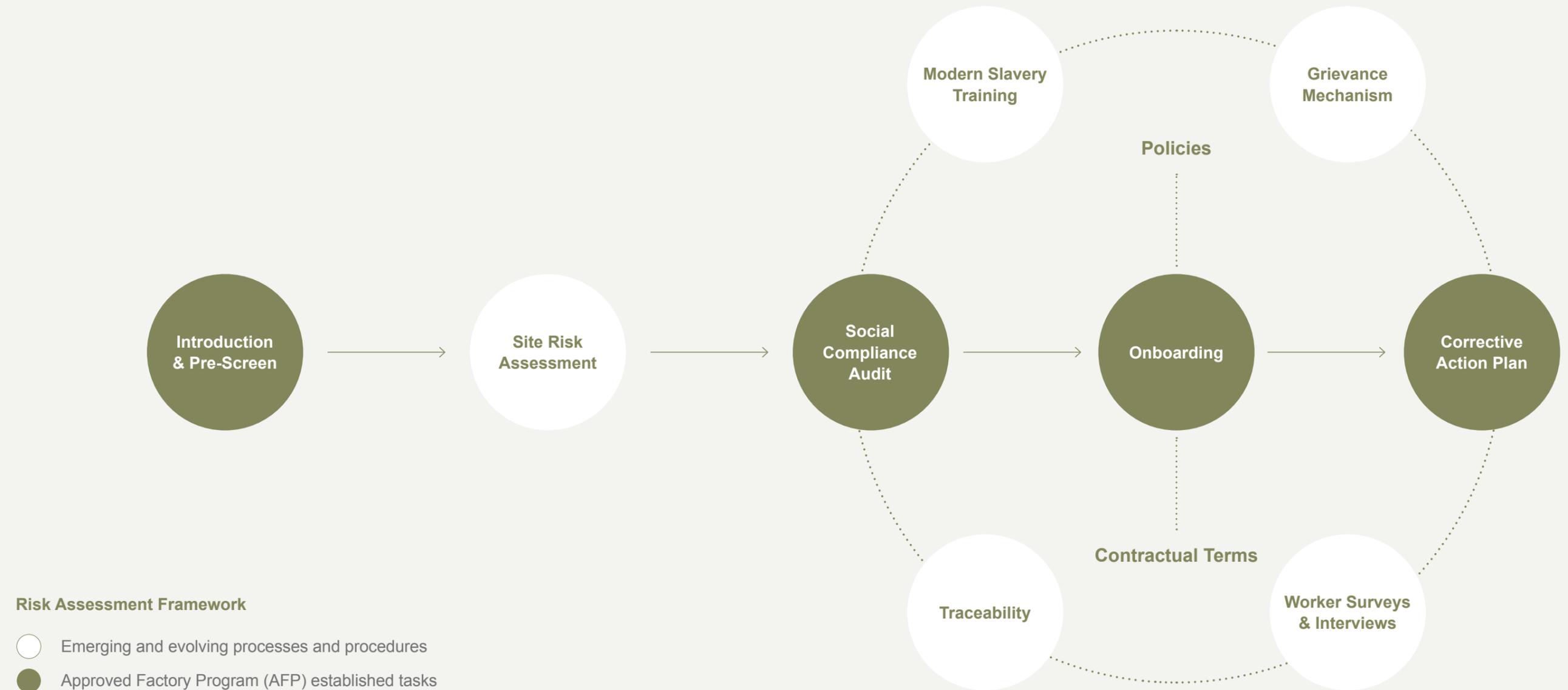
Addressing risks in our operations

We consider the risk of modern slavery in our operations through directly employed team members as low.

The majority of our team members are employed directly, with employment contracts aligned with either an Enterprise Bargaining Agreement, relevant Award, or Individual Employment Contract as regulated by Australian and New Zealand employment laws.

We also comply with relevant workplace laws, including the Australian Fair Work Act 2009 (Cth). Our People Team regularly review our employment agreements and our internal people policies to ensure that they meet and, where possible, exceed legal requirements.

Addressing risks in our merchandise supply chain



Our Approved Factory Program

We understand that our supply chain operates in an environment with a higher risk of potential labour-related issues due to geographical and industry risk factors. Our Approved Factory Program (AFP) continues to be our primary management tool for identifying, preventing, and mitigating any violations of human rights, including forms of modern slavery.

Our Sourcing Code of Conduct (Code) is aligned to the ETI Base Code and sets out clear expectations for suppliers' and factories' working conditions as they undergo the activities of sourcing and production for CRG goods.

Compliance with the Code is monitored through the AFP, which involves assessments to be carried out through a range of methods, including self- assessment questionnaires and independent third-party social compliance auditing of factories producing our products. Non-compliances identified in these audits result in a corrective plan (agreed with CRG) being implemented which are then monitored to ensure all issues are rectified.

These site-specific factory audits help us to identify workplace indicators that may lead to, or be a flag for, modern slavery. Social compliance audits provide our business and the suppliers' factories with clear corrective action plans to verify, remedy and close non-compliance issues.

We require our suppliers to be active members of the platform SEDEX as part of our AFP, providing increased visibility of risk profiles and enabling active management of non-compliance and audit renewal schedules. For FY25 80% of our factories had active SEDEX memberships.

Our Approved Factory Program captures all Tier 1 factories (i.e. those involved in the production of finished goods), as these are the supply chain actors where we have the greatest ability to influence change. Sites in-scope for social audits are required to undertake a third- party social audit at least every two years.

Factory assessments are monitored by our Ethical Sourcing team based in Melbourne, with findings documented and reported through both ad-hoc and regular reporting processes.

The most serious non-compliances⁶, where immediate interventions are required, are escalated to relevant stakeholders and our Executive Team for awareness, consultation and approval of actions to address issues. Resolution may include termination of supplier relationships where required, but our aim is always to work with suppliers to resolve issues where possible. We recognise that remediation is the best option to resolve these issues in the best interests of the workers affected.

Outcomes of social compliance auditing

Our Ethical Sourcing team assessed 144 social compliance audits (representing 71% of factories) conducted over FY25.

During the reporting period, four business critical non-compliances (NCs), and 29 critical NCs were identified across 20 sites. As at the end of FY25, 27 of these 33 non-compliances had been verified as closed. Five of the six remaining open issues had active remediation plans in place to close out in the next reporting period. The sixth remaining open issue is no longer being actively monitored, as we exited the factory for a sourcing related reason.

⁶ Defined as zero-tolerance or Business Critical in accordance with the Sedex SMETA guidance.

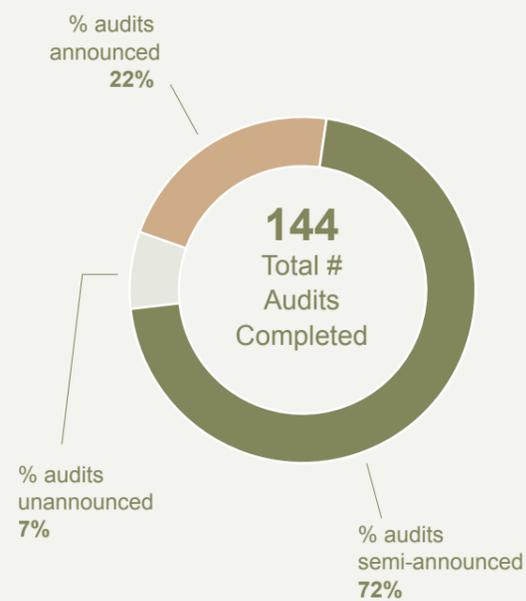
FY25 audits and factory non-compliances

Serious non-compliances found in FY25

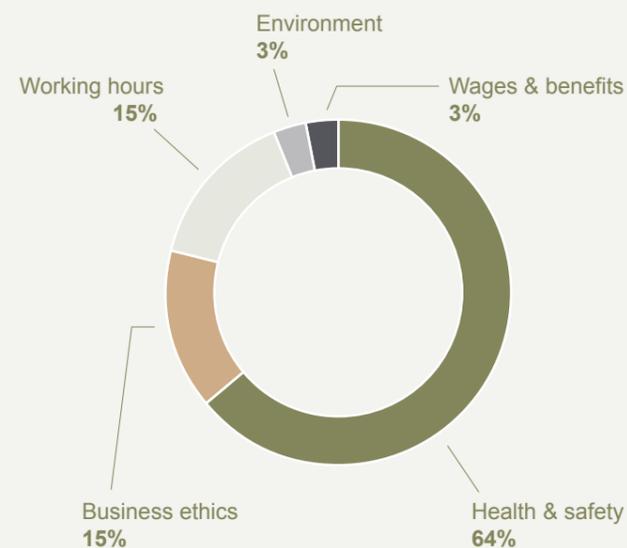
Criticality	# non compliances found in FY25	# of these closed in FY25	# remaining open at end of FY25
Business critical	4	4	0
Critical	29	23	6*

*Five of these six outstanding non-compliances are in an active remediation process

Audit window breakdown



Business critical & critical non-compliance issue categories



How are we making progress?



CASE STUDY

Addressing Critical Non-Compliance through Supplier Escalation

During a factory visit by a CRG team member, the use of an unapproved informal workshop manufacturing CRG products was discovered. These facilities presented serious safety risks, including hazardous casting and moulding operations, inadequate fire protection measures, and unsatisfactory factory layout with the childcare facilities too close to dangerous equipment.

This is a severe breach of CRG's Sourcing Code of Conduct and their contractual obligations. CRG immediately activated its critical breach process, undertaking internal engagement and coordinating next steps across relevant teams.

A formal notice was issued to the supplier, requiring immediate corrective actions and reaffirming that production must only take place in approved facilities.

CRG held multiple meetings with the supplier's management and required the completion of a corrective action plan, which included relocating CRG production to an alternative site that was assessed by our ethical sourcing team through third party audits before production commenced. Given the severe conditions of the informal unapproved facility it was determined that remediation of this facility to meet our Code of Conduct requirements was not feasible.

As part of our actions to address modern slavery, we look to build the capacity of our employees and suppliers via training, collaboration with industry groups and supporting long-term relationships with our suppliers.

Tracing our supply chain to identify risks

Knowing your supply chain is the first step in identifying the risks, assessing the risks, and putting actions in place to address and remedy the risks.

We regularly collect data from our Tier 1 factories through AFP audit procedures, but also through more targeted information gathering activities such as supplier onboarding and periodic supplier surveys. Critical information, including visibility into subcontracting, is collected to identify potentially vulnerable people in our supply chain.

Some of the site-specific data includes:

- Total worker numbers,
- Gender ratios, and
- Percentage of domestic and international migrant workers.

Through FY25, we updated both our Sourcing Code of Conduct and our Supplier Contracts to include requirements related to traceability and transparency of supply chain information from Tier 2 and beyond.

Training, capacity building and collaboration

We continue to identify new opportunities for training and awareness building within our operations and supply chains. As part of our actions to address modern slavery, we look to build the capacity of our employees and suppliers via training, collaboration with industry groups and supporting long-term relationships with our suppliers.

During the period, our Ethical Sourcing team participated in:

- Oxfam's Living Wage Working Group with other leading Australian brands to share knowledge, explore best practices, and address common challenges in advancing living wage commitments.
- A series of seminars organised by the ETI on human rights topics, e.g. Human rights in the era of climate crisis.

How are we making progress?



CASE STUDY

Supply Chain Mapping and Updated Sourcing Code of Conduct Rollout

In April 2025, CRG launched its updated Sourcing Code of Conduct (Code) with all Tier 1 suppliers. The Code was updated to include CRG's commitments to its suppliers, and to strengthen ethical expectations in line with international standards. At the same time, CRG launched a supply chain mapping survey targeting all Tier 1 trade suppliers.

This survey collected detailed information from suppliers, including business details, factory and subcontractor networks, and Tier 2 material input suppliers, with the aim of validating existing supply data and providing greater visibility on subcontracting and our Tier 2 supply chain. This enhanced transparency allows CRG to better identify potential risks related to modern slavery, supporting more targeted and effective risk mitigation efforts.

CRG will continue to use the insights gained from this mapping exercise to refine its supplier engagement and monitoring strategies. Ongoing efforts will focus on maintaining accurate supply chain data and expanding the supply chain mapping beyond Tier 2. These actions support CRG's broader commitment to gain greater visibility and traceability of our value chain.



How are we making progress?

CASE STUDY

Supplier Engagement: Sourcing Events Driving Connection and Compliance

In the reporting period, CRG's Sourcing & Supply Chain team hosted three Supplier Events in our support office, bringing together over 30 suppliers from across key product categories.

These events created valuable opportunities for suppliers to:

- Connect with CRG teams and peers across our supplier network,
- Showcase innovations in materials, design, and production, and
- Deepen their understanding of CRG's expectations ethical sourcing, working conditions, and compliance

Each session reinforced our commitment to responsible sourcing and continuous improvement across our supply chain. We reiterated our requirements under the Approved Factory Program, provided updates on reporting and due diligence processes, and highlighted shared accountability in preventing modern slavery risks. These events strengthened our supplier relationships, support transparency, and ensure alignment with our Good Business Journey principles and modern slavery risk management program.



WORKER SENTIMENT AND VOICE

Worker sentiment and voice

To continue assessing and addressing modern slavery risks, we must engage with and promote the voices of the most vulnerable workers who may be at risk of modern slavery.

Remediation processes

In line with the UNGPs, we are committed to participating in remediation where we identify we have caused or contributed to human rights harm, such as modern slavery. We also understand we may play a role in remediation where we identify that we are directly linked to human rights harm.

We maintain both internal and external grievance channels for any of our team members or workers in our supply chain to raise concerns, which could include modern slavery related issues.

Concerns relating to modern slavery or broader human rights risks such as the 'physical conditions of work' can be raised by CRG team members directly with our Human Resources Team as outlined in our "Grievance and Dispute Resolution Policy".

As outlined in the CRG Sourcing Code of Conduct, suppliers and their employees can anonymously raise concerns via email. Grievances that are raised through this mechanism are investigated confidentially.

These policies and processes are communicated to our team members during induction, through our intranet, social workplace platforms and through other communications, including during ad hoc governance training sessions, and seminars.



This demonstrates the importance of accessible grievance mechanisms for workers and the value of collaborative action in addressing workplace concerns.

Through FY25, we actively engaged with a range of stakeholders to deepen understanding of effective approaches to worker grievance and dispute resolution.

Our initiatives included:

- Collaborating with the International Accord MSI to broaden the scope of grievance mechanisms and advance worker rights.
- Participating in ETI Group Progression session on human rights topics, e.g. grievance mechanisms and remediation.

In FY25, through the Readymade Garment Sustainability Council's (RSC's) Complaint Unit of the International Accord, CRG received five complaints across three supplier factories in Bangladesh. Of these, one related to occupational safety and health (OSH) and was resolved and closed by RSC's Complaint Unit.

The remaining four were non-OSH complaints concerning employment contracts, termination, and wages and benefits. In line with the grievance process, the non-OSH complaints were referred onto the appropriate parties such as factory management, signatory brands, or labour representatives for appropriate action.

By engaging directly with our suppliers and supporting the resolution process, three of the five complaints have been resolved and closed, while only two remain in progress. This demonstrates the importance of accessible grievance mechanisms for workers and the value of collaborative action in addressing workplace concerns.

Worker grievances received through the RSC's Complaint Unit

Type	Category	Year	Total Complaints	Resolved	Forwarded to Parties
OSH	Sickness	2024	1	1	-
Non-OSH	HR – Employment Contracts and Termination	2024	1	-	1
	Wages, Benefits and Leave (Compensation)	2025	3	2	1

How are we making progress?



CASE STUDY

Updating Living Wage Benchmarks for Country Road Group



CRG is committed to supporting the right to a living wage and ensuring fair pay for workers in our supply chain. In FY25, we updated our living wage benchmarks to provide a more accurate assessment of wage gaps in Tier 1 finished goods factories, prioritising the Anker methodology where available.

This update allows us to integrate worker data, wage records, and third-party audit findings to compare actual wages against minimum wage requirements and internationally recognised living wage benchmarks. We also began developing a methodology to incorporate in-kind benefits into our assessments, enabling a more complete view of total worker compensation.

These enhancements improve the accuracy of our wage gap analysis and will inform targeted actions. We will continue to refine our approach by validating in-kind benefit data, reviewing benchmark sources, and using these insights to guide supplier engagement, support wage improvements, and work collaboratively with industry partners to address systemic wage challenges. We will build on this work over the coming year as we progress our Living Wage roadmap.

Monitoring and measuring our effectiveness

CRG continually monitors its actions to assess and address modern slavery risks using a combination of both quantitative and qualitative measures.

We also appreciate that these measures need to be reviewed and adapted as our actions mature and as our understanding of modern slavery continues to develop and evolve.

The following table sets out the measures and indicators we utilise to measure our effectiveness at assessing and addressing modern slavery risks across all our reporting entities and operating subsidiaries.

Area	Objectives	Effectiveness indicators
Policies and contractual control	<ul style="list-style-type: none"> • Ensure policies set clear expectations around preventing and addressing all forms of modern slavery across our operations and supply chains • Ensure policies are meaningfully implemented 	<p>Current</p> <ul style="list-style-type: none"> • Policies reviewed on regular basis (internal and external) • Percentage of suppliers and staff covered by agreements/ contracts and our codes and policies • Percentage of factories audited against compliance with relevant policies • Staff have ready access to policies related to modern slavery • Suppliers have ready access to policies related to modern slavery
Risk assessments	<ul style="list-style-type: none"> • Understanding and monitoring our exposure to modern slavery risks 	<p>Current</p> <ul style="list-style-type: none"> • Number of supply chain actors traced <p>Future</p> <ul style="list-style-type: none"> • Number of risk assessments conducted • Number of supplier sites in high and extreme risk ratings
Awareness raising and capacity building	<ul style="list-style-type: none"> • Modern slavery awareness training for internal staff and suppliers to ensure appropriate staff have knowledge of risks, prevention, and remediation • Improve external awareness and transparency relating to modern slavery risks 	<p>Current</p> <ul style="list-style-type: none"> • Number of staff trained on modern slavery and broader human rights risks • Number of suppliers trained on modern slavery and broader human rights risks <p>Ad-hoc</p> <ul style="list-style-type: none"> • External public assessments of our public reporting through NGO's or multi stakeholder initiatives (MSI's)
Audits and issue monitoring	<ul style="list-style-type: none"> • Supply chain monitoring and assurance (through Approved Factory Program) • Ensure quality and effectiveness of audit types • Audit corrective actions undertaken, improved, or closed (including remediation of any actual modern slavery findings) 	<p>Current</p> <ul style="list-style-type: none"> • Percentage of factories approved in our auditing program • Number of critical issues identified • Number of modern slavery issues identified • Number of audit issues remediated in line with Approved Factory Program criteria • Remediation of any actual modern slavery instances <p>Future</p> <ul style="list-style-type: none"> • Number of Non-Trade Procurement (NTP) suppliers who publish modern slavery statements
Worker voice and remediation processes	<ul style="list-style-type: none"> • Access to effective grievance mechanisms for workers in our operations and in our supply chains • Grievances effectively remediated • Required actions taken against actual modern slavery violations 	<p>Future</p> <ul style="list-style-type: none"> • Number of grievances raised by workers in our operations and our supply chains, by topic • Number of worker grievances resolved, and within what timeframe

Process of consultation

This statement has been prepared in consultation with each of the Reporting Entities listed in Appendix 1 and all owned and controlled entities of Country Road Group.

Each of the reporting entities covered by this statement, as well as all entities owned or controlled by those reporting entities:

- Have common directors
- Share the same registered office address
- Use the same policies and processes
- Operate in the same sector
- Use many of the same suppliers, and
- Report to the same executive team.

Senior management, executives and the directors of the Reporting Entities, and owned and controlled entities, have been consulted and informed of the actions taken throughout this reporting period, and development of this statement has occurred through:

- Face-to-face meetings with Directors
- Email correspondence
- Consultation on actions throughout the year, and
- Board meetings.



Looking forward

Country Road Group is committed to the people within our operations and supply chains and as a responsible business we aim for continuous improvement of our actions in our response to our modern slavery risks.

As we look to improve our approach to tackling modern slavery, we have broadly set out the below goals:

- Ongoing review and improvement of policies, including CRG's Sourcing Code of Conduct.
- Continue to provide training to our CRG teams on the topics of modern slavery, living wage and responsible purchasing practices.
- Extend our traceability program supply chain mapping and human rights due diligence further beyond our Tier 1 factories to gain better visibility on our Tier 2 + supply chain and modern slavery risks.
- Strengthen our human rights risk assessment processes for new supplier screening and extend due diligence to our non-trade suppliers.
- Further develop our systems for measuring the effectiveness of our efforts to assess and address modern slavery risks.
- Publish a refreshed Living Wage roadmap and continue to make progress against our commitments.
- Maintain ongoing engagement with industry partners, including progressing our ETI membership inline with their progression framework.
- Launch our CRG Country of Origin Whitelist to our suppliers, establishing clear material sourcing parameters that prioritise low-risk regions and enhance transparency in our supply chain.
- Undertake EiQ 'segmentation' project with all CRG factories to ensure our Ethical Sourcing requirements and due diligence efforts are focused on the highest risk and leverage sites.
- Review and update supplier remediation processes to manage highest risk incidents to align with best practice.



Appendices

Appendix 1

All entities that are Reporting Entities and included in this joint statement:

Country Road Group Holdings Pty Ltd	(Holding company)
Woolworths International (Australia) Pty Ltd	(Holding company)
Country Road Group Pty Ltd	(Parent company)
Country Road Clothing Pty Ltd	(Operates as COUNTRY ROAD and TRENERY)
Witchery Australia Holdings Pty Ltd	(Holding company)
Witchery Holdings Pty Ltd	(Holding company)
Witchery Fashions Pty Ltd	(Operates as WITCHERY)

Appendix 2

Definitions of modern slavery⁷

Type of modern slavery	Definition
Trafficking in persons	Describes the recruitment, harbouring and movement of a person for exploitation.
Slavery	Describes situations where the offender exercises powers of ownership over the victim, including the power to make a person an object of purchase and use their labour in an unrestricted way.
Servitude	Describes situations where the victim's personal freedom is significantly restricted, and they are not free to stop working or leave their place of work.
Forced marriage	Describes situations where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.
Forced labour	Describes situations where the victim is either not free to stop working or not free to leave their place of work.
Debt bondage	Describes situations where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.
Deceptive recruiting for labour or services	Describes situations where the victim is deceived about whether they will be exploited through a type of modern slavery.
The worst forms of child labour	Describes situations where children are: <ul style="list-style-type: none"> • exploited through slavery or similar practices, including for sexual exploitation or • engaged in hazardous work which may harm their health, safety, or morals or • used to produce or traffic drugs

⁷ Definitions taken from the Australian Commonwealth's Guidance for Reporting Entities: http://modernslaveryregister.gov.au/resources/Commonwealth_Modern_Slavery_Act_Guidance_for_Reporting_Entities.pdf

Appendix 3

Statement Criteria Index

MSA Mandatory Reporting Criteria	Location of response to mandatory criteria within this statement
16.1.a Identify each reporting entity covered by the joint statement	<ul style="list-style-type: none"> • Introduction • Appendix 1
16.1.b Describe the structure, operations and supply chains of each reporting entity covered by the joint statement	<ul style="list-style-type: none"> • Structure, Operations and Supply Chain
16.1.c 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 controls	<ul style="list-style-type: none"> • Assessing modern slavery risks
16.1.d 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 process	<ul style="list-style-type: none"> • CEO statement • Modern slavery due diligence • Worker sentiment and voice • Training, capacity building and collaboration
16.1.e Describe how each reporting entity covered by the joint statement assesses the effectiveness of actions being taken to assess and address modern slavery risks	<ul style="list-style-type: none"> • Monitoring and measuring our effectiveness
16.1.f 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	<ul style="list-style-type: none"> • Introduction • Governance • Process of consultation
16.1.g Any other relevant information	<ul style="list-style-type: none"> • Looking forward

Introduction

Structure, operations
and supply chain

Assessing modern
slavery risks

Modern slavery
due diligence

Worker sentiment
and voice

Monitoring and measuring
our effectiveness

Process of
consultation

Looking
forward



COUNTRY ROAD GROUP

COUNTRY ROAD MIMCO POLITIX TRENERY WITCHERY