

Modern Star Pty Ltd Modern Slavery Statement

2025



modern 

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About this statement

This Modern Slavery Statement covers the reporting period 1 July 2024 to 30 June 2025 (FY25) and applies to all operations and supply chains under the control of **Modern Star Pty Ltd** and **Modern Teaching Aids Pty Ltd**, the two entities required to report under the Modern Slavery Act 2018 (Cth). It also voluntarily covers the remaining wholly owned subsidiaries within the Modern Star Group to reflect our shared governance, risk management and ethical sourcing systems.

This is a joint statement prepared on behalf of the two reporting entities named above and approved by their respective Boards. The Statement also includes voluntary coverage of other wholly owned subsidiaries within the Modern Star Group, such as **Zart Art**, **RE Batger**, **Educating Kids**, **EdVantage** and **Hart Sport**, which operate under the same governance and compliance framework.

The Statement sets out how Modern Star identifies, assesses, and addresses risks of modern slavery in its own operations and supply chains, and how we evaluate the effectiveness of our actions. It also outlines our governance structure, and continuous improvement priorities for managing human rights and modern slavery risks.

Once approved and published, this Statement will be publicly available on the Modern Slavery Register and on our corporate website at www.modernstar.com.



Questions or concerns

Modern Star prepares this Statement with the utmost care and transparency.

If you have any questions or concerns about this Statement, our approach to minimising modern slavery risks, or any other human rights matters in our operations or supply chains, please contact our ESG & Compliance Team at sydney-compliance@modernstar.com.

Alternatively, anyone can make an anonymous report through our independent whistleblower program, Stopleveline, via modernstar.stoplinereport.com or by calling **1300 30 45 50**.

We welcome engagement from stakeholders, customers and suppliers as we continue to improve the transparency and effectiveness of our modern slavery risk management framework.

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Acknowledgement of country

Modern Star respectfully acknowledges the Traditional Owners of the lands on which we live, learn, and work across Australia. We pay our respects to Elders past and present, and recognise their enduring connection to Country, waters, and communities. We honour the deep cultural heritage, knowledge, and traditions of Aboriginal and Torres Strait Islander peoples, and acknowledge their vital role as custodians of these lands.

We are committed to advancing reconciliation through education, understanding, and meaningful collaboration. We recognise the importance of preserving and celebrating the histories, cultures, and traditions of First Nations peoples while acknowledging the injustices of the past and their continuing impacts today.

In honouring the Traditional Owners, we embrace the values of respect, inclusion, and shared learning. We are dedicated to fostering a future guided by equity and unity, where these principles are reflected in our relationships, business practices, and ongoing commitment to ethical and responsible conduct.



Message from our Group CEO

At Modern Star, our purpose has always been to make a positive difference in the lives of the people we work with, including our employees, customers, suppliers and the many individuals throughout our supply chain. As I step into this role, I am proud to be part of a company that not only inspires learning and creativity but also leads with care, responsibility, and integrity.

Modern Star's commitment to ethical sourcing and human rights is deeply connected to our culture of trust, transparency, and equality. These values guide every decision we make, from how we support our people to how we work with our suppliers around the world. While the challenges of modern slavery remain complex, we believe that lasting change starts with empathy, collaboration, and leading by example.

This year, we have continued to strengthen our systems and relationships to protect the rights and wellbeing of those who help bring our products to life. From improving visibility across our supply chain to deepening engagement with our suppliers, we are taking important steps to ensure our operations uphold the highest standards of respect and fairness.

Looking ahead, my focus is on empowering our people, giving them the confidence, knowledge, and support to drive progress in our supply chain and combatting modern slavery. Every individual at Modern Star has a role to play in building a future where learning, opportunity, and dignity are shared by all.

Together with our teams, customers and suppliers we will continue to grow with integrity, shaping a business that helps raise standards, every day.

Karen Bozic
Group Chief Executive Officer
Modern Star Pty Ltd

This statement is approved by Modern Star's Board at a Directors' meeting held on 15 December 2025.

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Criteria 1.

Identify the reporting entity

1.1 Reporting & included Entities

This Modern Slavery Statement FY25 is a joint statement prepared for the two reporting entities that meet the mandatory reporting threshold under the Modern Slavery Act 2018 (Cth):

- **Modern Star Pty Ltd** (ABN 31 101 306 950) – the parent company of the Modern Star Group; and
- **Modern Teaching Aids Pty Ltd (MTA)** (ABN 98 000 628 786).

Both entities are governed by the Modern Star Board of Directors and operate under a shared governance, risk-management, and ethical sourcing framework. The Statement has been jointly approved by the Boards of both reporting entities and signed by the Group Chief Executive Officer prior to submission to the Australian Government’s Online Register for Modern Slavery Statements.



1956



Modern Teaching Aids Pty Ltd (MTA)* ABN: 98 000 628 786
Supplier of educational resources and teaching aids. Reporting entity under the Act.

2003



Modern Star Pty Ltd* ABN: 31 101 306 950
Parent company and reporting entity. Oversees Group governance and compliance.



Modern Brands Pty Ltd ABN: 85 112 894 318
Distributor of educational and toy brands throughout Australia and New Zealand.

2016



CleverPatch Pty Ltd ABN: 48 130 866 885
Supplier of arts and craft products for teachers and students.

2017



EdVantage Pty Ltd ABN: 19 160 681 112
Manufacturer of paints and art materials for education markets.

Educational Colours Pty Ltd ABN: 61 005 708 967
Distributor and product designer of educational and art and craft resources.

2018



Zart Art Pty Ltd ABN: 24 621 120 321
Supplier of art and craft materials and professional learning programs for educators.

2019



Educating Kids Pty Ltd ABN: 31 091 745 818
Dedicated to education for early years. We believe in making beautiful resources available to all children.

2021



RE Batger Pty Ltd ABN: 50 000 293 550
Manufacturer of educational and commercial furniture in Australia.

2022



Elizabeth Richards Pty Ltd ABN: 85 661 117 719
Supplier of educational furniture and resources.

2023



HART Sport Pty Ltd ABN: 85 664 465 034
Manufacturer and supplier of sporting and fitness equipment.

* Reporting entity under the Modern Slavery Act 2018 (Cth)

Criteria 2.

The structure, operations and supply chains of Modern Star

2.1 About Modern Star

Modern Star Group and its subsidiaries have grown to become one of Australia and New Zealand’s leading providers of educational resources, furniture, and toys. Our brands support educators, parents and students across early-childhood centres, primary and secondary schools, after-school programs, major retailers and toy stores.

Our mission is to empower learning, leadership, and play by providing high-quality, responsibly sourced educational materials and equipment that inspire creativity and exploration.



Our customers are split into the following channels:

Educational resources

Products and learning materials developed for educational environments, including resources for literacy, science and mathematics, art and craft material, school furniture, sports equipment and audio-visual equipment.



Wholesale education

Educational toys and games for children, distributed through major retail and specialty outlets across Australia and New Zealand.



2.2 Group structure and governance

Modern Star Pty Ltd is the parent company of the Modern Star Group and wholly owns all operating entities within the Group. Together with Modern Teaching Aids Pty Ltd (MTA), these two entities meet the mandatory reporting threshold under the Modern Slavery Act 2018 (Cth) and are the reporting entities for this Statement.

All subsidiaries operate under a single governance, risk management, and ethical sourcing framework, led by Modern Star's central ESG & Compliance Team. While CleverPatch and RE Batger maintain decentralised procurement and operational structures, they are required to comply fully with the Group's ESG and modern slavery requirements, and report progress annually.

Supplier due diligence processes, policies, and tools are consistent across all entities, and supplier ethical sourcing data is consolidated in the Group Supplier Register within Salesforce to support transparency and oversight.

The ESG & Compliance Team coordinates the preparation of this Statement, working closely with management and functional leaders across each subsidiary to ensure consistent data collection, policy alignment, and continuous improvement of the Group's modern slavery risk-management program.

2.2.1 Group and organisational changes



As of FY25, the Modern Star Group has experienced no significant acquisitions or divestments other than the cessation of Ross Haywood Sports Pty Ltd trading activities, and Kangaroo Pty Ltd and Kesco Pty Ltd being absorbed into MTA. The overall ownership and governance structure of the Group remains unchanged.

Modern Star implemented several organisational enhancements to strengthen governance and operational efficiency:

- Appointment of a new Group CEO (effective November 2025) who has signed this Statement.
- Restructuring of the Inventory Team into distinct Demand Planning and Supply Planning functions to better anticipate seasonal demand and manage inbound supply flow.

2.3 Operations

Modern Star's operations are primarily based in Australia and New Zealand, supported by a small number of administrative staff in the Philippines engaged through a third-party recruitment agency. We do not own or operate any manufacturing facilities overseas.

Workforce

The Group operates primarily in Australia and New Zealand, with a small team of administrative support staff based in the Philippines (home-based only). Modern Star does not own or operate any manufacturing facilities outside Australia.

As of June 2025, Modern Star employed 694 employees across Australia, New Zealand and the Philippines, of which 97% is directly employed, and 93% is located in Australia. Contractors (5) and labour-hire workers (19) are also included in our total number of employees. We also contract a China-based certified auditor, who also conducts product quality checks and factory audits.

Each site has a Safety Manager responsible for hazard identification, incident reporting and corrective actions. Safety is a key performance indicator in all senior leadership bonus structures, reflecting our commitment to worker wellbeing.

Operational Sites

Modern Star operates offices, warehouses and manufacturing facilities across multiple states and territories, including:

(Head) Offices

Corporate, sales and support functions.

- Brookvale (NSW)
- Hallam (VIC)
- Aspley (QLD)
- Auckland (NZ)

Warehouses

Warehousing, distribution and logistics operations.

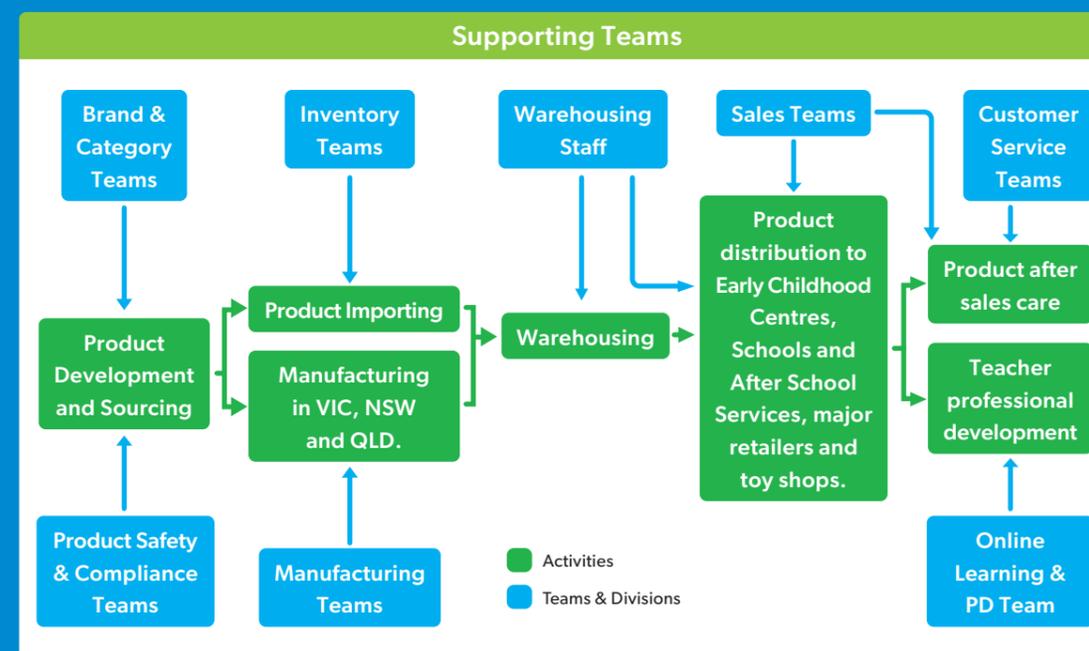
- Brendale (QLD)
- Beresfield (NSW)
- Hallam (VIC)
- Auckland (NZ)

Manufacturing Sites

Furniture (Batger), sports equipment (HART Sport), paints & dough (EdVantage).

- Girraween (NSW)
- Aspley (QLD)
- Bayswater (VIC)

In FY25, Modern Star closed the Zart Art Box Hill retail shop and consolidated several Hart Sport warehouses into the Brendale facility to improve efficiency.



All inbound and outbound freight is managed through a network of independent logistics providers under formal commercial agreements.

2.4 Supply chain & procurement

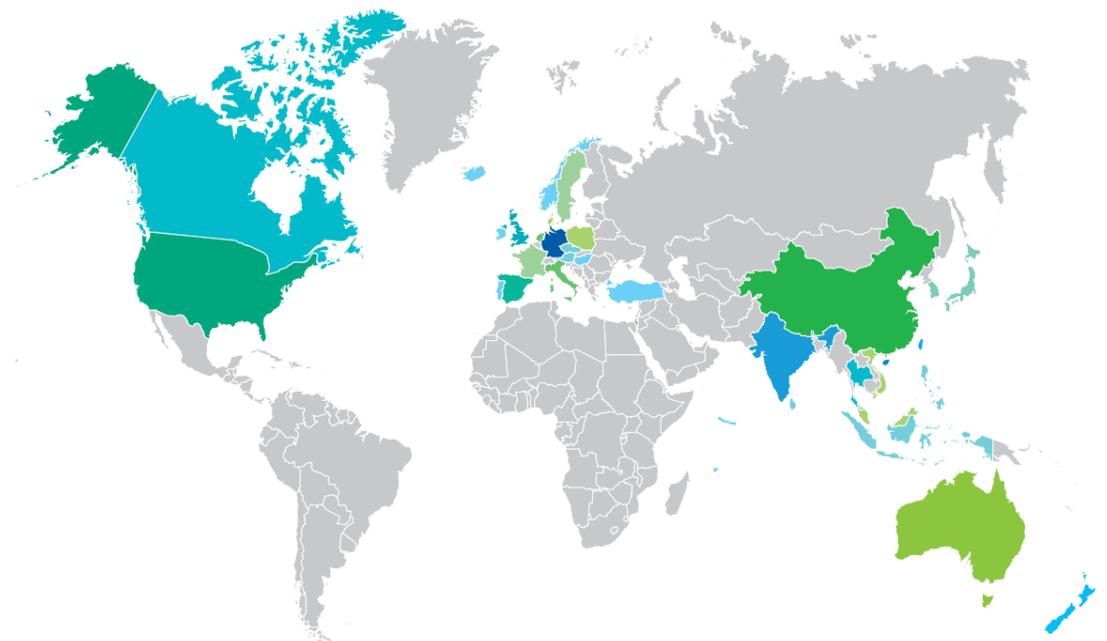
Modern Star maintains a complex and diverse supply chain that spans multiple sectors and product categories. In FY24 we engaged approximately **1,325 Tier 1 suppliers** across **33 countries**, and this figure has remained broadly stable in FY25.

2.4.1 Geographical location of stock suppliers

Tier 1 suppliers

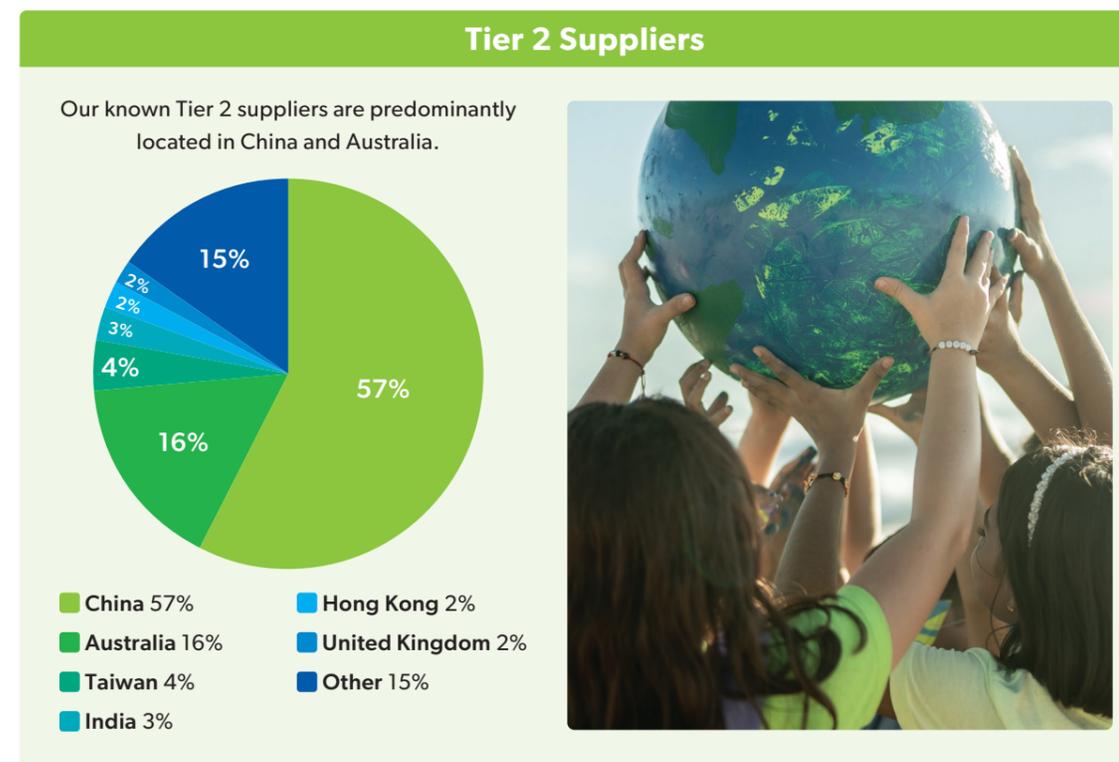
Our Tier 1 suppliers provide finished goods, components, raw materials and services that support manufacturing and distribution activities.

Tier 1 Suppliers					
Country	Suppliers	Country	Suppliers	Country	Suppliers
Australia	865	Israel	6	Austria	2
China	314	Italy	6	Czech Republic	2
USA	76	Netherlands	6	Indonesia	2
UK	51	Denmark	5	Philippines	2
Taiwan	42	Malaysia	5	Sri Lanka	2
Hong Kong	41	Poland	5	Hungary	1
Germany	18	Vietnam	5	Ireland	1
India	16	France	4	Nepal	1
New Zealand	13	Sweden	4	Norway	1
Canada	11	Japan	3	Portugal	1
Thailand	11	Singapore	3	South Africa	1
Spain	9	South Korea	3	Turkey	1



Tier 2 suppliers

We have enhanced visibility into our Tier 2 network in FY25, particularly for high-risk product categories such as textiles, toys and timber. Our mapping confirms that the majority of Tier 2 suppliers are located in China and Australia, with smaller concentrations across South-East Asia and Europe. We are progressively extending this mapping to reach our target of 50 % Tier 2 full visibility by FY26.



2.4.2 Product ranges and risk profile

Modern Star sources and manufactures products across more than 30 major categories, including art & craft supplies, furniture, toys, textiles, stationery, audio-visual equipment, sporting goods, and educational resources. Our main customers include schools and early childhood centres, toy shops and major retailers. Our procurement and manufacturing categories consist of (but are not limited to):



The Group's highest-risk categories (based on sector and geographic exposure) are:

- **Textiles and stitched sports items** (e.g balls, uniforms, soft furnishings).
- **Electronics and ICT equipment** (e.g robotics, interactive panels).
- **Timber and wood products** (e.g furniture, classroom materials).

The updated Product Category Risk Matrix developed in 2025 (see Appendix A – Product/Sector Risk Scoring) underpins these targets and directs our prioritisation of supplier engagement and auditing.

Criteria 3.

Identifying and Assessing Modern Slavery Risks

3.1 Risk assessment framework

At Modern Star, we recognise that the potential for modern slavery can exist in any business or supply chain, including our own. We're committed to understanding where those risks may arise, how they could impact people, and what actions we can take to prevent harm.

Our approach draws on the principles of the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Due Diligence Guidance for Responsible Business Conduct. It focuses on identifying and managing the risk of harm to people rather than risk to our business.

We currently apply a four-stage risk assessment model that aligns closely with the OECD's guidance.

Step 1: Identify high-risk areas

Each year, our ESG & Compliance team reviews suppliers and operational areas against three core risk factors:

Supplier risk

How we measure it: Percentage of total procurement spend; the higher the spend, the greater the influence and exposure. Where a supplier has previously been associated with any identified or suspected modern slavery concerns, they are automatically assigned a high supplier risk rating.

Purpose: Determines leverage and dependency.

Geographic risk

How we measure it: Country risk rating based on the Global Slavery Index (GSI) and other datasets.

Purpose: Highlights locations where legal protections and enforcement may be weaker, and therefore risks higher.

Product/service category risk

How we measure it: Risk inherent to the sector or commodity type (e.g textiles, electronics, timber). See Appendix A – Product/Sector Risk Scoring for full overview.

Purpose: Identifies categories most likely to involve vulnerable workers.

Step 2: Data collection and analyse

Modern Star requests various data points from our suppliers to understand the level of human rights practices the supplier has in place, and to further review if any human rights aspects are violated.

Supplier due diligence: Collect and review documentation from suppliers regarding our signed Ethical Sourcing Policies and any other documentation that may demonstrate the supplier's efforts to minimise modern slavery in their operations and supply chain.

Factory social audits: Conduct regular audits, including third party audits completed by our China-based Modern Star employed certified auditor, to verify supplier compliance.

Supplier visits: Where possible, our suppliers and their factories are visited by Modern Star employees to inspect the worker environments and ethical practices, while checking product quality.

Step 3: Evaluate risks

Each supplier receives a numerical score for these three risks factors, producing a combined risk rating from 1 (low) to 9 (high). High-risk suppliers are prioritised for engagement, audits and training.

Risk Score 1 to 3: Low-risk suppliers.

Risk Score 4 to 6: Medium-risk suppliers.

Risk Score 7 to 9: High-risk suppliers.

Step 4: Mitigate risks

For suppliers identified as high-risk suppliers in Step 3, we take the following actions:

Due diligence: Ensuring that the supplier has undertaken steps to minimise the risks associated with modern slavery in their supply chain, including conducting factory audits.

Contractual clauses: in supplier contracts that mandate compliance with anti-slavery practises.

Improvement plans: Where needed, we work with suppliers to address identified risks and implement corrective action plans.

Monitoring and review: Establish a schedule for regular follow-up assessments and ongoing monitoring.

Factory visits: The factories of our main suppliers are visited regularly.

Through these tools, we systematically review risk factors, evaluate human rights impacts, and develop strategies to mitigate risks. Our process includes identifying both actual and potential human rights impacts, acting on findings, and implementing corrective measures to mitigate identified risks.

To determine our involvement in potential adverse human rights impacts, we ask:

- 1. Is there an actual or potential adverse human rights impact?
- 2. Do our business activities increase the risk of this impact?
- 3. Do our business activities wholly contribute to this adverse impact?

If all three questions yield a “Yes,” we classify this as an impact caused by our business. If only the first two questions are affirmative, we assess our role as contributing to the impact and implement measures accordingly.

Building a smarter risk model

We’re developing an interactive Ethical Sourcing Dashboard in Salesforce to map and visualise our supply chain risk profile. The tool will consolidate data on audits, Sedex membership, ESP signoffs and geographic exposure, providing real-time insight into supplier performance and risk mitigation progress. This dashboard will include a residual risk scoring, showing the remaining modern slavery risks after controls have been applied.



3.2 Risks in our operations

We assess modern slavery risk across our own operations each year. Modern Star operates three primary types of facilities: offices, warehouses and manufacturing sites. Given that our workforce is predominantly employed in Australia and New Zealand, we have direct visibility over working conditions. Employment terms adhere to Australian and New Zealand labour standards, which minimises modern slavery risks in our direct operations. Additionally, our ISO 9001 and ISO 14001 certifications support risk mitigation through stringent international health, safety, and environmental standards. We consider our overall operational risk to be low.

Nevertheless, we recognise that no organisation is immune from risk, particularly where labour-hire or contract services are involved.



Potential risk areas

- Young workers in manufacturing locations:** Manufacturing environments can present a risk of exposure to hazardous work conditions, such as machinery and chemicals. Working in these hazardous environments is prohibited under child labour standards and international labour conventions.
- Labour-hire and recruitment practices:** The use of labour-hire providers and recruitment agencies—both in Australia and the Philippines—can reduce direct oversight of employment conditions, creating risks such as underpayment, excessive overtime, or the charging of recruitment fees to workers. These arrangements may also limit transparency over worker contracts, documentation, and freedom of movement, increasing the potential for exploitation if not carefully monitored.

Strengthening ethical recruitment

We audit recruitment agencies engaged for our Australian manufacturing and warehousing sites to ensure they comply with our Ethical Sourcing Policy and fair hiring standards, including age verifications. This also includes our recruitment agency in the Philippines.

3.3 Risk in our supply chain

We recognise that certain categories of goods, particularly raw materials and labour-intensive products, pose higher risks of modern slavery. Given the complexity of our supply chain, the diversity of the regions we purchase goods from and the types of products we source and manufacture, we recognise that there is a risk of the prevalence of modern slavery in our supply chain. Modern Star has identified several potential risk factors in our supply chain based on public data (GSI, ETI Base Code, UNGPs), which include:

 Forced, Bonded and Indentured Labour	 Deceptive Recruitment	 Child Labour	 Reliance on Lower-Skilled Labour
 Dangerous Working Conditions	 Absence of Grievance Mechanisms	 Exploitation of Migrant Workers	 Retention of Personal Identity Documents
 Excessive Working Hours	 Complex Supply Chains	 Underpayment of Wages	 High Levels of Sub-Contracting

Our risk assessment is based on three key risk drivers as described in our risk assessment framework:

Geographical risks: High exposure in Asia (China, Vietnam, India, Thailand, Sri Lanka).	Supplier risk: Our total spend with suppliers influences our dependency on the supplier and range, our influence with the supplier. Supplier risk is also influenced by previous audit findings.
Sector/product risks: Textiles, electronics, timber and sporting goods remain highest risk.	

3.3.1 Modern slavery risks related to geographical areas

Our supply chain spans **33 countries and includes approximately 1,300 Tier 1 suppliers**. Most of our procurement is concentrated in Australia, China and South-East Asia. Countries with weaker labour protections, high rates of migrant labour, or limited enforcement capacity, such as China, Vietnam, India, Thailand and Sri Lanka, pose a greater risk of modern slavery practices.

To manage this, we use the Global Slavery Index (GSI) and other country risk indicators to prioritise suppliers for due diligence, audit and engagement.

Each country linked to our operations or suppliers is assigned a Country Risk Score (1–9) derived primarily from the Global Slavery Index 2023 (GSI). The GSI measures three pillars:

Pillar	Description	Internal scoring from 1 (low risk) to 9 (high risk)
Prevalence	Estimated number of people in modern slavery per 1,000 population	Directly scaled from GSI prevalence band
Vulnerability	Structural and socio-economic factors that increase susceptibility	Directly scaled from GSI vulnerability band
Government response	Strength of laws, enforcement, victim support and coordination	Inverted (weaker response = higher risk)

The overall Country Risk Score is based on these three pillars and ranges from 1 (low risk) to 9 (high risk). This score represents the baseline context in which suppliers operate and influences the weighting of product and supplier assessments.

Risk Factors	<p>Lower regulatory oversight on labour rights: Less government protection and regulation to prevent modern slavery.</p> <p>High reliance on low-skilled labour and migrant workers: These workers are often vulnerable to exploitation due to limited job options, language barriers, and a lack of familiarity with local labour protections, making them more susceptible to exploitative practices.</p> <p>Fewer channels for reporting exploitation: The absence of a grievance mechanism or whistleblower hotline make it harder for employees to report modern slavery.</p>
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3.3.2 Modern slavery risks related to sector and product

Across Modern Star, we source a wide mix of products and services, including toys, textiles, furniture, sporting goods, electronics, chemicals and logistics. Certain sectors carry higher inherent exposure to modern slavery because of complex, multi-tiered supply chains, frequent subcontracting, hazardous processes, low-skilled or migrant workforces and limited regulatory oversight in key sourcing regions. Our higher risk categories include textiles and handicrafts, electronics and ICT equipment, timber and furniture, sporting goods, toys, and packaging and raw commodities, as well as sea freight and logistics. The table below summarises the common risk factors and where they most often arise. A full breakdown is included in Appendix A: Product and Services Category Risk Matrix.



Child labour		
Specific Risk	Description	Categories
Child labour in home-based or informal production	Children engaged in manual assembly or packaging in unregulated, home-based settings.	Toys, Textiles and Handicrafts
Child labour in fine-detail work	Children performing embroidery, weaving or intricate work due to small dexterity demands.	Textiles and Handicrafts
Child labour in hand-stitched goods	Children hand-stitching balls and equipment under piece-rate arrangements.	Sporting Goods
Child labour in early-stage timber processing	Children assisting in sawmills or basic material handling in high-risk regions.	Timber and Furniture

Forced or bonded labour		
Specific Risk	Description	Categories
Bonded labour in mineral extraction	Workers trapped in debt bondage or coercion during cobalt, lithium or metal extraction.	ICT Equipment and Electronics
Bonded labour in raw-material extraction	Coerced or debt-bonded workers in forestry, plastics recycling and material recovery.	Packaging and Raw Commodities, Timber and Furniture
Forced overtime during peak seasons	Pressure to meet quotas through compulsory overtime under threat of penalty.	Toys, ICT Equipment and Electronics
Excessive overtime due to production targets	Long shifts and harsh output requirements leading to exploitative working hours.	Textiles and Handicrafts, ICT Equipment and Electronics

Migrant worker exploitation		
Specific Risk	Description	Categories
Recruitment-fee debt	Workers incurring high fees to secure employment, creating vulnerability to coercion.	Sporting Goods, ICT Equipment and Electronics, Sea Freight and Logistics
Wage withholding	Employers withholding or delaying wages to maintain control.	Textiles and Handicrafts, Sporting Goods

Restriction of movement and freedom		
Specific Risk	Description	Categories
Document retention	Employers holding passports or identification, limiting workers' movement.	Sea Freight and Logistics, ICT Equipment and Electronics
Isolation and confinement	Workers spending extended periods at sea or in remote transit routes.	Sea Freight and Logistics



Unsafe and hazardous working conditions

Specific Risk	Description	Categories
Chemical exposure	Exposure to paints, varnishes, dyes, solvents, adhesives or industrial chemicals without adequate controls.	Toys, Timber and Furniture, Textiles and Handicrafts, Sporting Goods, ICT Equipment and Electronics, Packaging and Raw Commodities
Hazardous machinery	Operation of cutting, sanding, pressing or stitching machinery without proper safety measures.	Timber and Furniture, Sporting Goods, Toys
Hazardous electronics assembly	Soldering, handling solvents and related substances in poorly controlled environments.	ICT Equipment and Electronics

Lack of visibility in supply chains

Specific Risk	Description	Categories
Subcontracted or home-based production	Work outsourced to small, informal workshops with limited oversight.	Toys, Sporting Goods, Textiles and Handicrafts, Packaging and Raw Commodities
Multi-tier raw-material sourcing	Materials passing through multiple intermediaries, reducing traceability.	Timber and Furniture, ICT Equipment and Electronics, Packaging and Raw Commodities

Environmental and community vulnerability

Specific Risk	Description	Categories
Illegal or unsustainable extraction	Raw-material sourcing that displaces communities and increases economic vulnerability.	Timber and Furniture, Packaging and Raw Commodities
Environmental degradation	Loss of land or income creating heightened risk of forced or child labour.	Timber and Furniture, Packaging and Raw Commodities

Worker voice and grievance barriers

Specific Risk	Description	Categories
Limited access to grievance mechanisms	Workers unable to report misconduct due to legal, geographic or employer barriers.	Sea Freight and Logistics, ICT Equipment and Electronics

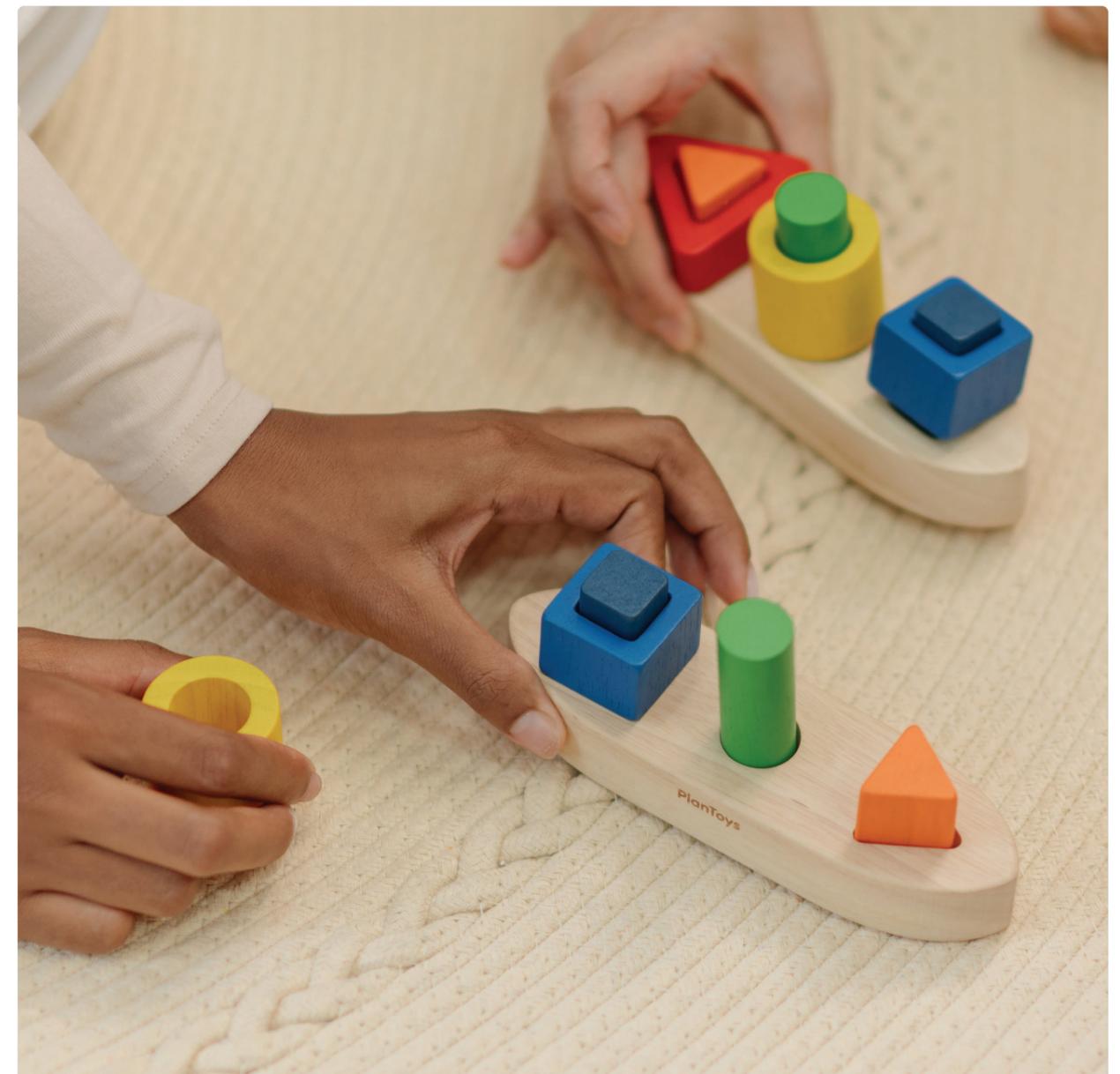
3.3.3 Supplier risks

Modern Star recognises that supplier risk is influenced not only by geography and product category but also by the level of dependency and influence we hold through our commercial relationships. Suppliers representing a higher proportion of our total spend, or who provide products critical to our core ranges, present elevated strategic importance and therefore require closer monitoring and engagement.

We assess supplier risk by considering both the extent of our reliance on the supplier and the degree of leverage we can apply to drive responsible practices. High-spend or range-dependent suppliers are prioritised for due diligence, ethical sourcing agreements, and regular audit review.

Audit results remain a key part of this assessment, providing practical insights into working conditions and management systems. The most frequent issues identified continue to relate to excessive overtime, limited grievance mechanisms, and incomplete employment documentation. While most non-conformances reflect gaps in management or record-keeping rather than intentional harm, they signal where additional oversight and collaboration are needed.

All supplier critical non-conformances and corrective actions are now recorded and tracked through our central SharePoint monitoring system, ensuring transparency, accountability, and timely closure of identified risks.



Criteria 4.

Actions to address modern slavery risks

Building on the risk insights outlined in Section 3, Modern Star focused in FY25 on practical actions that prevent, detect and address modern slavery risks. These actions include policy enhancements, supplier due diligence, system improvements and training initiatives designed to strengthen transparency and accountability across our operations and supply chain.

4.1 Policies supporting our modern slavery program

Modern Star has implemented a comprehensive set of policies and procedures – reviewed annually – which detail our values, ways of working and expectations for our own employees as well as all other involved parties, including our suppliers. This policy framework ensures that all stakeholders clearly understand our expectations and in return can expect a consistent approach in implementing these expectations.

The following policies are most relevant to our approach in minimising the risk of modern slavery in our supply chain and addressing and mitigating suspected or confirmed modern slavery anywhere in our operations and supply chain.



Ethical Sourcing Policy

Our Ethical Sourcing Policy (ESP) is the heart of our modern slavery program. It outlines our expectations of suppliers around social and environmental obligations and requirements and ensures that our supply chain complies with legal and contractual obligations.

Our ESP specifically refers to the prohibition of modern slavery and child labour, fair working conditions, freedom of association, non-discrimination and harsh or inhumane treatment, anti-bribery and corruption, ethical sourcing of raw materials, environmental protection and grievance mechanisms. It also requires our supply chain to complete their own human rights due diligence.

Human Rights Policy

Our Human Rights Policy is our commitment to respecting and promoting human rights across our own operations, supply chain and communities. By outlining our key principles in alignment with international human right standards and we strive to identify, mitigate and address human right risks of our employees and all workers in our supply chain.

Child Labour Policy

Our Child Labour Policy outlines our commitment to respecting and protecting the rights of children to a safe and healthy environment, protection from harm, and access to education. The policy outlines our expectations of suppliers, as well as a remediation process for suspected or identified child labour.

Modern Slavery Risk Assessment Policy

The Modern Slavery Risk Assessment Policy is our new policy to ensure a consistent and proactive approach in identifying and assessing the risk of modern slavery in our supply chain, and to mitigate these risks effectively. The process consists of four steps: identifying high-risk areas, data collection and analysis, evaluating and rating, and mitigation actions.

Modern Slavery Remediation Policy

The Modern Slavery Remediation Policy is another new policy, with the purpose to outline Modern Star's approach to remediating instances of modern slavery identified in the supply chain. The aim is to protect and support affected individuals, support suppliers to correct and remediate the root cause, and to restore ethical standards.

Code of Conduct

Our Code of Conduct ensures Modern star conducts business to the highest standards of ethics, integrity, and behaviour when dealing with its employees, suppliers, customers, or other business partners. It outlines a set of standards and expected ethical behaviour which are required to support the company's legal, moral and ethical standards.

Timber, Pulp & Paper Sourcing Policy

Our Timber, Pulp and Paper Sourcing Policy aims to ensure that the timber used in any of our products is legally harvested, with a transparent chain of custody. This policy focuses more on the protection on the environment and deforestation, but there is a documented correlation between illegal logging and modern slavery. Therefore, by protecting the forests, we are indirectly protecting the workers in this supply chain.

Whistleblower Policy

A modern slavery program can't exist without the availability of a reporting system where unethical wrongdoing can be reported without fear of intimidation, disadvantage or reprisal. Our whistleblower policy aims to protect employees and all other stakeholders, who want to confidentially report any reportable conduct in relation to modern slavery and human rights violations. This can be done directly to Modern Star, or via our independent third-party hotline Stopleveline.

4.2 Actions to address risks within our operations

Our direct operations remain low risk for modern slavery due to the strong legislative protections in Australia and New Zealand and our direct oversight of employees. We continue to take proactive steps to protect worker rights and wellbeing across all sites.

Key actions in FY25 include

Policies	Modern Star adheres to a range of policies related to human rights, including our Child Labour policy, Human Rights Policy, Code of Conduct, Equal Employment Opportunity, Anti-Discrimination and Harassment Policy, Whistleblower Policy and Grievance Policy. All policies are reviewed annually.
Internal audits	Annual internal fair work audits at all manufacturing sites and SMETA bi-annual audits for our Bayswater facility (next audit due December 2025).
ISO certifications	ISO 9001 and ISO 14001 recertification for our Batger manufacturing facility, Brookvale and Brendale sites, reaffirming our commitment to quality and environmental management.
Recruitment agency monitoring	Continuous monitoring of our recruitment agencies in Australia and the Philippines, all audited annually against our Ethical Sourcing Policy. This includes confirmation of age-verification mechanisms, both in-house and through agencies.
Whistleblower Stoptline	Our partnership with third-partner whistleblower Stoptline, to allow all employees and other stakeholders to anonymously report any wrongdoing in our own operations.
Focus on safety	Dedicated Safety Managers at every site to ensure hazards are identified and mitigated early, and a strong culture of proactive safety reporting.
Training	Delivered annual modern-slavery training to procurement, ESG and senior-management teams.

External safety audit program

In FY25, Modern Star commissioned an independent external audit of warehouse safety practices across all major sites. The review assessed manual-handling, traffic flow, shift scheduling and contractor engagement to understand our full risk exposure. Findings have informed targeted improvements, ensuring our warehouses operate to the highest safety and worker-protection standards.

4.3 Actions to address risks within our supply chain

Given our complex supply chain, Modern Star has prioritised modern slavery risk mitigation within our Tier 1 supplier relationships, focusing on high-risk suppliers, regions and product categories. In FY25, Modern Star has further strengthened supplier oversight, due diligence and remediation processes to address modern-slavery risks in higher-exposure sectors and regions.

4.3.1 Policies and contractual requirement

- 1 Ethical sourcing policy**

Our Ethical Sourcing Policy has been updated to further align with international standards. All newly signed ESPs include the right to audit and require suppliers to have a grievance mechanism.
- 2 Supplier contracts**

Our supplier contracts now include binding provisions requiring compliance with the ESP, Code of Conduct, and other ethical sourcing requirements. Suppliers agree to be held accountable to our standards, allowing Modern Star to take remedial action as necessary.
- 3 Whistleblower protection**

Our third-party whistleblower agency Stoptline allows confidential and anonymous reporting of any suspected breaches of human rights policies. This service is available to internal staff and external stakeholders, with a link to the service published on our website.
- 4 Risk assessment policy and remediation policy**

The development of our risk assessment policy and remediation policy provide a robust framework to consistently assess our supply chain, and to provide a clear step-by-step process in case of suspected or confirmed modern slavery in our supply chain.
- 5 Supplier self-assessment questionnaire**

Self-Assessment Questionnaires via Sedex provide valuable insights into the risk levels of suppliers.



4.3.2 Due diligence enhancements

- 1** **Risk assessments** Annual risk assessments are completed for all Tier 1 suppliers, considering spend, geography and sector exposure. New suppliers are reviewed for modern slavery risks (by applying the three risk pillars), and risk mitigations are applied (signing of ESP and factory audits are reviewed).
- 2** **Improved tier 2 visibility** We continuously work on an improved Tier 2 visibility, with relevant ethical sourcing data kept in our Salesforce database.
- 3** **Increased factory visits** Our main suppliers and factories have been visited by our product, QA, category and procurement teams, and senior management.
- 4** **Supplier non-conformance tracker** We have implemented a SharePoint Non-Conformance Tracker to log and monitor supplier audit findings and CAP progress, to ensure critical non-conformances are closed out in a timely manner.
- 5** **FSC Chain of Custody certification** Various Modern Star companies maintained FSC® Chain of Custody certification (FSC-C204128), to ensure that FSC certified timber and paper products are sourced from responsibly managed forests. This certification supports the use of legally harvested materials and promotes fair and safe working conditions throughout the forestry supply chain.
- 6** **Training and awareness** Our modern slavery training program is mandatory for all new relevant employees and is incorporated into our onboarding process. Annual training sessions cover modern slavery awareness, red flags, and reporting procedures, to ensure all staff can recognise risks associated with modern slavery and understands their responsibility in reporting this.

Supplier non-conformance case example

One supplier audit identified the absence of a sub-contractor policy. Through our remediation process, the supplier developed and implemented a formal sub-contractor policy, reducing the risk of unverified labour and improving transparency. Sub-contracting without oversight is a known modern slavery risk, as it can obscure labour practices further down the chain. By formalising policies, the supplier now ensures all sub-contractors are verified and compliant with ethical labour standards.



4.3.3 System and data management

- 1** **Ethical sourcing Supplier data** All ethical sourcing data is tracked and updated through a custom-built Ethical Sourcing Database on Salesforce, giving all relevant stakeholders visibility in the current risk levels and mitigation efforts for each supplier, including but not limited to the ESP, factory audits, FSC certificates, ISO certifications and Sedex memberships.
- 2** **Supplier Dashboard** Initiated development of a Supplier Compliance Dashboard to calculate supplier social-performance scores and monitor compliance in real time.
- 3** **Real Time Monitoring** Through our CRM system, we receive notifications of expiring memberships and audit reports, allowing us to engage suppliers proactively for updates and renewals of reports and memberships.

4.3.4 Product specific risk mitigations

Built on our product-specific risk assessment from Criteria 3, we have implemented the following actions tailored to each product category, aimed at addressing their unique vulnerabilities:

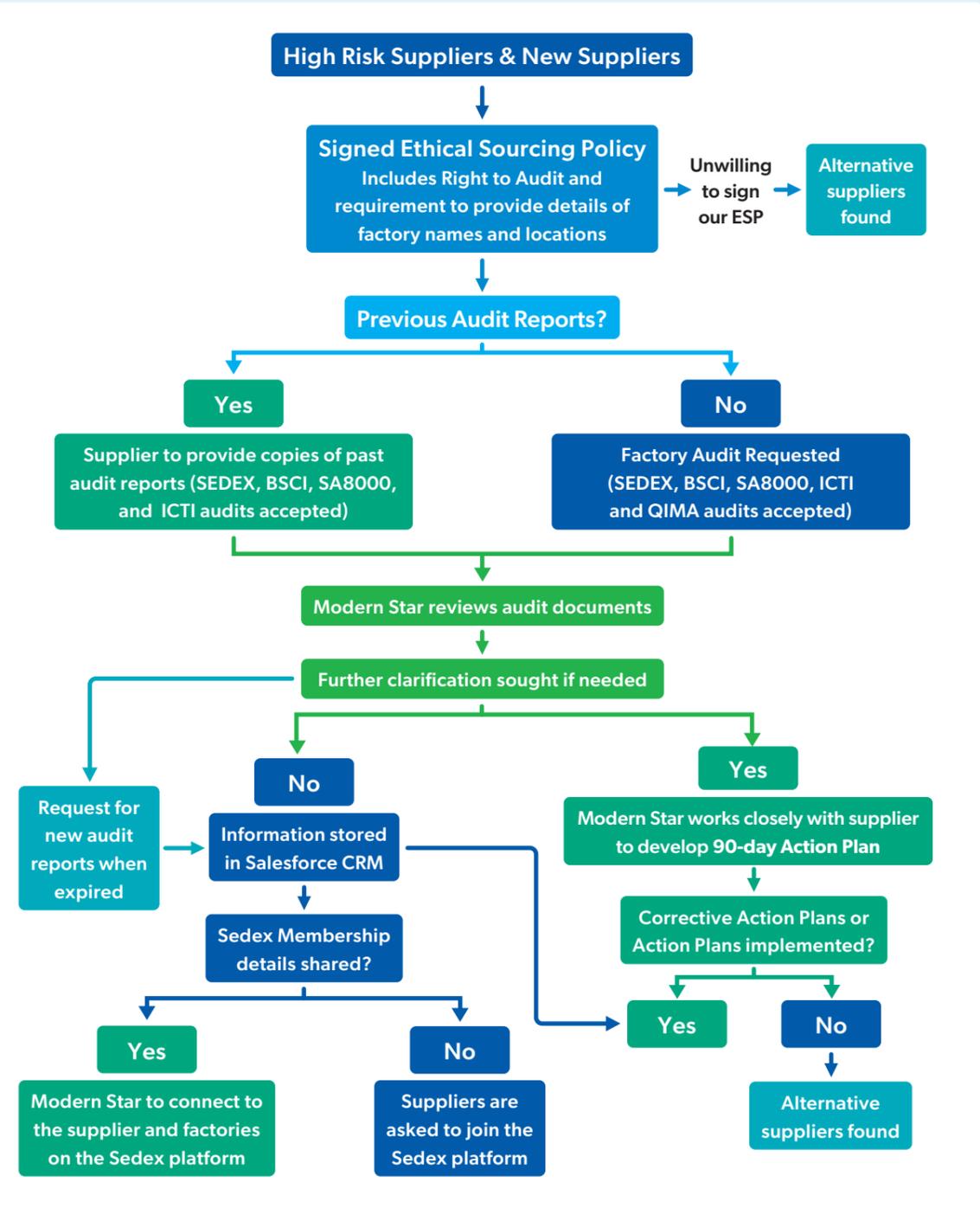
Product Category	Key Mitigation Actions
Toys	<ul style="list-style-type: none"> Regular third-party audits with age-verification requirements. Regular factory site visits to confirm safe working conditions for labourers.
Timber & Furniture	<ul style="list-style-type: none"> Achieved FSC® Chain of Custody certification and verified timber origins for high-volume suppliers.
Sporting Goods	<ul style="list-style-type: none"> Mapped our Tier 2 suppliers for our largest sporting goods supplier, including factory audits for the main sites.
Textiles and Handicrafts	<ul style="list-style-type: none"> Spot-checks to confirm compliance with child labour laws, chemical safety, and worker protection policies. Sample factory site visits to confirm safe working conditions for labourers. Request factory audits from independent third-party auditors.
ICT and Electronics	<ul style="list-style-type: none"> Third-party audits focused on bonded labour prevention in assembly sites.
Packaging and Raw Materials	<ul style="list-style-type: none"> Prioritise suppliers who provide FSC or PEFC certifications for timber sourcing of packaging and raw materials. Request chain of custody for timber products to ensure legally logged timber.
Sea Freight and Logistics	<ul style="list-style-type: none"> Collaboration with logistics providers who have implemented anti-human trafficking and modern slavery policies. Logistics providers who have implemented grievance mechanisms for logistics workers.

Collaborative remediation

When modern slavery risks are identified, Modern Star prioritises remediation and supplier support rather than disengagement. This approach aligns with the UN Guiding Principles on Business and Human Rights and ensures that outcomes remain focused on protecting workers.

4.4 Processes for new and high-risk suppliers

Modern Star’s approach to new and high-risk suppliers is comprehensive, involving a three-part assessment of **Ethical Sourcing Policy**, **audit report availability**, and **Sedex membership**. All new suppliers, as well as existing high-risk suppliers, are required to complete these assessments as part of our due diligence program. This process is ongoing and continuously reassessed.



Criteria 5.

Assessing the effectiveness of our actions

Modern Star continuously reviews how effective our modern slavery program is, both in reducing risk and in driving meaningful, measurable improvement. By embedding modern-slavery oversight into our governance cycle and strengthening data visibility, we track progress transparently and identify where further work is needed.

How we measure effectiveness

Area of focus	How we measure progress
Governance and oversight	Monthly and quarterly reporting to the Senior Management Team and Board; annual ISO 9001 audit reviews supplier management processes.
Supplier engagement	Percentage of suppliers signing our Ethical Sourcing Policy (ESP); number and timeliness of supplier audits; number of factory visits; rate of Tier 2 visibility. .
Awareness and training	Percentage of employees in supplier-facing or leadership roles completing annual training.
Systems and data	Tracking and reporting improvements in Salesforce and SharePoint to capture supplier risk data, non-conformances and audit expiry dates.



5.1 Modern slavery program review framework

Our effectiveness framework operates across three levels to ensure continuous oversight and improvement:

Monthly reporting

Updates provided to the Senior Management Team and shared with the Board, covering compliance progress and potential risks.

Annual review

Modern Slavery Statement and overall performance reviewed by the Board. Supported by ISO 9001 external audits that assess supplier-risk management and continuous improvement.

5.2 Key effectiveness indicators (FY25)

Modern Star tracks a range of indicators to measure the reach and impact of our program. These measures help us evaluate whether our policies and actions are driving real progress in transparency and risk management.



Governance and oversight

Maintained consistent monthly and quarterly reporting to the Board and Senior Management.
Embedded supplier risk management within ISO 9001 external audits, linking quality and ethical sourcing performance.

Supply chain engagement and compliance

95% of high-risk suppliers signed our Ethical Sourcing Policy (ESP).
Enhanced internal tracking for expired audits, leading to a higher proportion of current, valid audit reports.
Tier 2 visibility expanded: 1128 Tier 2 suppliers mapped; 616 Tier 1 suppliers provided partial or full Tier 2 data (72% of high-risk suppliers now contributing information).
Sedex participation: 382 active suppliers (covering 44 % of high-risk suppliers) maintain Sedex memberships for ethical-trade transparency.

Training and awareness

Delivered modern-slavery training to 72 employees in direct supplier-contact and senior-management roles, achieving a 97 % completion rate.
Continued integration of training into onboarding for procurement and compliance roles.

Systems and data enhancements

Salesforce upgrades: Added fields for audit expiry dates, purchasing companies, and product categories; enhanced FSC tracking.
SharePoint upgrades: Launched non-conformance tracking to monitor corrective-action progress.

5.3 Program achievements and continuous improvement

In FY25, Modern Star focused on increasing supplier transparency and increased number of factory audit reports. Our continuous improvement efforts build on previous achievements and prepare the foundation for stronger performance in FY26.



FY25 achievements

- 1 Expanded supplier coverage with a continued increase in ESP sign offs across high-risk suppliers.
- 2 Improved audit renewal process, resulting in faster follow-up and higher rates of valid audit documentation.
- 3 Achieved FSC Chain of Custody certification across multiple brands to support responsibly sourced, legally harvested timber and fair working conditions.
- 4 Launched supplier non-conformance tracking through SharePoint, improving visibility and accountability for corrective-action progress.
- 5 Increased number of visits to our main suppliers and their factories.

FY26 focus areas

Modern Star remains committed to transparent and responsible operations, driving continuous improvement across its manufacturing and supply network to reduce the risk of modern slavery in every aspect of our business. To continue improving program effectiveness, Modern Star will prioritise the following actions in FY26:

Supplier dashboard rollout: Launch an integrated dashboard in Salesforce to monitor modern slavery risks (based on the three risk pillars), mitigation status (implemented controls to minimise this risk) and residual-risk scores.

Tier 2 mapping expansion: Increase supply-chain transparency by verifying Tier 2 data quality and coverage. This includes visibility of our Tier 2 suppliers, as well as improving data to include material types and product categories.

ESP expansion: Continuous increase of the number of suppliers who have signed our ESP, especially with the right to audit.

Enhanced audit schedule: Improve factory-audit planning for high-risk suppliers to strengthen verification and timely follow-up including increasing the number of audits.

Residual risk framework: Incorporate residual-risk scoring to measure how mitigations reduce overall exposure.

Continuous learning: Use insights from audit outcomes and supplier engagement to refine training and program reviews.

Increasing supplier collaboration: Improve working together with our suppliers on corrective action plans and worker voice mechanisms.

Criteria 6.

Consultation with entities owned by Modern Star

Modern Star is committed to ensuring that all entities within the Group align with our modern slavery program and ethical sourcing framework. We achieve this through regular consultation, shared governance, and consistent application of policies across our owned and controlled entities. Our collaborative approach helps maintain clear oversight, continuous compliance, and a unified standard of practice in identifying, assessing, and addressing modern slavery risks.

6.1 Consultation approach and frequency

Modern Star engages in structured, ongoing consultation with its controlled entities to ensure consistency in how modern slavery risks are managed and reported. These consultations are conducted through our established ESG and safety governance meetings and supported by documentation within our Integrated Management System (IMS).

Key activities include

- 1 Monthly ESG & safety risk assessment meetings:** Attended by members of the Senior Management Team, Safety Manager, and ISO Coordinator from various Modern Star entities. Meetings follow a structured agenda, which includes supplier-related issues, Work Improvement Notices, and progress updates on compliance with our Ethical Sourcing Policy.
- 2 Record keeping and action tracking:** Minutes and action items from all meetings are recorded in the Integrated Management System to ensure accountability and follow-through. This structure provides consistent oversight and enables management to identify and address emerging risks across the Group.
- 3 Monthly reporting:** A monthly progress report is submitted to the Board, which includes input from all controlled entities. This report covers the status of modern slavery actions, identified risks, and updates on supplier compliance. This allows Modern Star to monitor alignment with the Group's policies and identify areas where additional support or resources may be needed.



6.2 Integration and alignment of policies

All Modern Star entities operate under the same set of core policies and procedures, ensuring a unified and consistent approach to human rights and ethical sourcing. These policies are embedded across operations and reviewed annually to ensure continued alignment with the Modern Slavery Act 2018 (Cth) and international standards.

Core policies include (but are not limited to):



Each entity is required to integrate these policies into procurement and supplier-management processes. All newly acquired businesses must adopt and implement these policies within the first 12 months of acquisition. Compliance with these policies is reinforced through our ISO 9001-certified quality management system, which includes external audits on how supplier relationships and risk identification are managed.



6.3 Roles and responsibilities

Modern Star's modern slavery program is governed by clear lines of accountability and collaboration between leadership, compliance, and product teams.

Group ESG & compliance team

Oversees the implementation of the Group's modern slavery program. Maintains supplier databases, follows up on expired audit reports, identifies target suppliers, and manages corrective actions and non-conformances.

Product (development) teams

Comprising category managers, brand managers, procurement manager, and product development managers, these teams manage day-to-day supplier relationships and ensure new suppliers complete all modern slavery requirements, including signing the ESP and providing valid audit documentation. Relevant information is then shared with the ESG & Compliance Team for central tracking and reporting.

Senior management and Board oversight

Senior Management provides active oversight of the program's implementation and progress through monthly meetings. The Board reviews and approves the Modern Slavery Statement, ensuring accountability across all entities and alignment with Modern Star's ethical commitments.

Criteria 7. Other relevant information

Modern Star's commitment to ethical sourcing and responsible business practices is strengthened through a range of external certifications, memberships, and compliance frameworks. These partnerships and standards help us embed transparency, quality, and sustainability across our operations and supply chain. We continuously review our systems and initiatives to ensure ongoing improvement in our environmental, social, and governance performance.

ISO 9001 and 14001 certifications

Modern Star's sites in Brookvale, Brendale, and Girraween (Batger) are certified to both ISO 9001 and ISO 14001 standards. These certifications reflect our commitment to quality management, environmental responsibility, and operational excellence. They also strengthen our supplier oversight processes by ensuring that manufacturing and procurement practices meet internationally recognised standards.

FSC Chain of Custody certification

Modern Star holds Forest Stewardship Council (FSC) Chain of Custody certification, ensuring that certified timber materials can be traced through every stage of our supply chain. The FSC framework promotes responsible forest management, protecting ecosystems, workers' rights, and community wellbeing. We are continually increasing the proportion of FSC-certified products within our range and remain committed to promoting legally and sustainably sourced timber across our operations.

Sedex membership

Modern Star is a Sedex member, supporting transparency and ethical sourcing through data sharing and audit visibility. Sedex membership helps us monitor and manage labour rights, health and safety, and environmental performance across our supply chain, reinforcing our modern slavery risk management approach.

ATA sustainability committee

As an active member of the Australian Toy Association (ATA) Sustainability Committee, Modern Star contributes to industry-wide discussions on sustainability and responsible business conduct. Through this forum, we regularly review upcoming ESG-related legislative changes and collaborate on practical responses to new requirements, helping our business stay ahead of emerging compliance and sustainability standards.

Illegal logging compliance

Modern Star complies with the Australian Illegal Logging Prohibition Act, ensuring that all timber sourced for our products originates from legal and responsible sources. This is supported by our FSC certification and strengthened by recent system improvements that enhance our ability to track progress, evidence compliance, and maintain accurate sourcing records.

APCO membership

Modern Star is a member of the Australian Packaging Covenant Organisation (APCO) and continues to report annually on our packaging output and commitments. We are continually working toward more sustainable packaging choices, reducing waste, and improving recyclability across our product portfolio.

Appendix A – Product/ sector risk scoring

	Category group	Category	Risk level	Risk scoring	Key risk indicators	Potential controls / mitigations
1	Finished Goods	Toys & Educational Resources	Very High	9	Migrant labour; excessive overtime	SMETA/BSCI audits; supplier training
2	Finished Goods	Sports Equipment – stitched items	Very High	9	Child / forced labour; piece-rate pay	SMETA audits; no-fees recruitment clauses
3	Finished Goods	Textiles & Soft Furnishings	Very High	9	Home-based labour; low wages	Trace yarn origin; social audits
4	Finished Goods	Electronics & ICT Hardware	Very High	9	Forced labour; conflict minerals	RBA or SMETA audits; minerals disclosure
5	Finished Goods	Robotics / Educational Electronics	High	8	Electronics-assembly exploitation	Conflict-minerals policy; supplier verification
6	Finished Goods	Art & Craft Materials	High	7	Child labour in mica/glitter	Supplier audits; safe-chemicals list
7	Finished Goods	Furniture – All Types	High	7	Illegal logging; bonded carpenters; low-wage metal fabrication	FSC/PEFC chain-of-custody; origin trace; factory audits; supplier ESP sign-off
8	Finished Goods	Furniture – Wood & MDF	High	7	Illegal logging; bonded carpenters	FSC/PEFC chain-of-custody; origin trace
9	Finished Goods	Furniture – Metal & Plastic	Medium-High	6	Low-wage metal fabrication	Factory WHS review; supplier ESP sign-off
10	Finished Goods	Stationery & Office Supplies	Medium	5	Chemical exposure; overtime	Supplier audits; Sedex membership
11	Finished Goods	Paper Products & Books	Medium	5	Child labour in pulp; deforestation	FSC/PEFC certification
12	Finished Goods	Science / Lab Equipment	Medium-High	6	Chemical production; migrant workers	ISO 9001 verification; supplier audit
13	Finished Goods	Cleaning Chemicals & Consumables	Medium-High	6	Chemical-plant labour	SDS verification; supplier WHS check

14	Finished Goods	Baby & Early-Learning Products	High	8	Home-based labour; safety risks	Audit suppliers; restricted-substance list
15	Finished Goods	Puzzles & Games	Medium	5	Long hours assembly	Worker interviews; corrective-action plans
16	Finished Goods	Sports Equipment – Metal / Plastic	Medium	5	Agency labour	Social-audit verification
17	Raw Materials & Parts	Timber & Wood Panels	High	7	Illegal logging; bonded sawmill labour	FSC/PEFC; supplier audits
18	Raw Materials & Parts	Metals / Steel / Aluminium	Medium	5	Fabrication labour risks	ISO 9001; ESP sign-off
19	Raw Materials & Parts	Screws / Bolts / Fittings	Medium-High	6	Small-workshop labour	Sedex/SA8000 evidence
20	Raw Materials & Parts	Chemicals & Coatings	Very High	9	Forced / unsafe chemical work	REACH / GHS compliance; WHS audit
21	Raw Materials & Parts	Packaging Materials	Medium	5	Pulp / plastics labour	FSC packaging; social audit
22	Raw Materials & Parts	Foam / Vinyl / Fabrics	High	7	Chemical handling; migrant labour	OEKO-TEX; supplier audits
23	Raw Materials & Parts	Adhesives & Sealants	Medium	5	Chemical exposure	SDS; supplier WHS evidence
24	Raw Materials & Parts	Hardware & Small Parts	Medium-High	6	Subcontracted assembly	ESP sign-off; audits
25	Services	Labour-Hire / Logistics	Very High	9	Visa exploitation; underpayment	Labour-hire audits; no-fees policy
26	Services	Warehouse Infrastructure	Medium	5	Subcontractor underpayment	WHS + ESP sign-off
27	Services	Warehouse Machinery & Forklifts	Medium	5	Assembly-labour risks	Supplier audits
28	Services	Warehouse Packaging Supplies	Medium	5	Pulp / plastic labour	FSC; recycled-content requirements
29	Services	Cleaning & Facility Maintenance	High	7	Labour-hire exploitation	Direct-employment verification; audit
30	Services	Catering / Canteen Services	High	7	Migrant worker underpayment	Fair Work audit; ESP sign-off
31	Services	Office Supplies & Printing	Medium	5	Electronics component labour	Certified brands; supplier review
32	Services	IT & Technology Services	Low-Medium	4	Hardware supply-chain risks	Procurement policy alignment
33	Services	Professional / Consultancy	Low	2	Minimal labour risk	Basic due diligence checklist

Modern Slavery Statement 2025



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