



FY2021

Modern slavery statement

DAVID JONES



Introduction & Executive Summary

Since 1838, David Jones has stood the test of time. Today, it is the world's oldest department store retailer still trading under its original name. Tradition and heritage are the foundations on which we have built this great retail business.

We have continuously reinvented ourselves to remain relevant, aligned and supportive of the communities and livelihoods of all those who rely on and trust the David Jones brand. The flexibility and adaptability of our store teams, support teams and our suppliers has never been more evident than over the past 18 months as we tackled the many challenges of COVID-19. We are so proud of the professionalism, integrity and the empathy shown by our teams throughout this time.

As we now head into our second reporting period under the Modern Slavery Act, we reflect on a number of challenges, COVID-related and otherwise, which demonstrate our commitment to the principles of the Modern Slavery Act: to identify and address modern slavery risks in our own operations and within the supply chain.

“Modern slavery” is a confronting term. First impressions might suggest this is only a problem that exists in underdeveloped and under-regulated countries and communities. However, as we delve deeper to investigate possible areas of risk, we understand that without diligence on our part, evidence of modern slavery may appear even within developed countries such as Australia.

Modern slavery includes many types of exploitation – such as human trafficking, slavery and debt-bondage – which are often concealed and therefore not easy to identify. The tactics needed to uncover modern slavery therefore need to be agile, analytical and uncompromising. A challenge we accept.

Last year's report, being our first, captured baseline settings for our proposed approaches and methodologies for identifying and addressing potential modern slavery risks. It presented us with an opportunity to set the scene for the year ahead. We are proud that we have made inroads during this past year, many of which are outlined through this FY21 Modern Slavery Statement, and some which I now reflect upon.

We aim to eliminate modern slavery risks for our store, support centre and distribution centre team members through having robust and equitable employee contracts, the application of Enterprise Bargaining Agreements and a suite of policies that address specific risk vulnerabilities, for example our Discrimination, Harassment & Bullying Policy. Other codes relate more particularly to suppliers and factories, such as our Supplier Code of Conduct

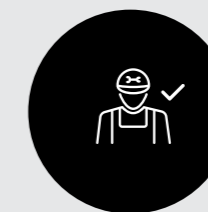
which was recently revised to incorporate references to modern slavery. These policies are outlined in more detail within this report.

In addition to the team members David Jones employs directly, many local suppliers provide additional labour services to David Jones. Some of these services, such as cleaning services in all store locations, may present higher modern slavery exposures. Risks often arise through the use of casual and transient migrant labour.

In acknowledgement, our non-trade procurement team and our two major cleaning service providers collaborated to identify potential risks and to implement appropriate preventative measures.

We are particularly pleased that we have been able to maintain a focus on the factories we partner with to produce David Jones branded merchandise. Though factory audits were often not possible in this reporting period due to travel restrictions within the countries and regions in which our products are produced, our sourcing teams have stayed connected to these factories throughout the pandemic.

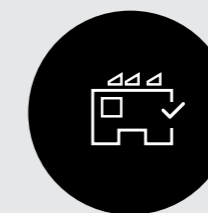
Significant milestones achieved in FY21



Stores' cleaning services – Contract renewal with a focus on labour risks



Modern Slavery provisions added to the David Jones Supplier Code of Conduct



Maintained our Approved Factory Program despite Covid challenges



“We are proud that we have made inroads during this past year, many of which are outlined through this FY21 Modern Slavery Statement”

Support was offered to our factories and suppliers to help navigate the sudden and brutal impacts of COVID-19, which included spontaneous factory lockdowns, restrictions on workforce availability and significant disruption to the merchandise supply chain.

We are also proud of our efforts to provide vulnerable factory workers with a voice. Worker-voice surveys were trialled, along with a pilot grievance mechanism to allow workers to express their concerns about inappropriate management behaviour and mistreatments without fear of reprisal from employers. We anticipate these approaches becoming more prevalent and embedded in the years ahead.

David Jones actions are not conducted solely to meet obligations under the Modern Slavery Act. “Doing the right thing and doing it the right way” forms the essence of our broader sustainability and ethics commitments; what we call our “Good Business Journey” (GBJ). The GBJ sustainability and ethical trade commitments are incorporated not only through David Jones,

but throughout the WHL network of retailers¹. David Jones partners with brands and concession businesses that are aligned to the David Jones values and share our commitment to being socially and ethically compliant.

I now invite you to read our Modern Slavery Statement. We understand there is so much more for us to uncover about potential modern slavery risks in our operations and supply chains, and recognise that this journey of discovery sees us still in the starting blocks of this race. We are, however, proud of the early inroads we have made as we set ourselves for the challenges that lay ahead.

This joint statement is published by David Jones Pty Ltd Pty Ltd on behalf of all wholly owned and controlled entities and on behalf of the reporting entities listed in Appendix 1.

On behalf of the Board of David Jones Pty Ltd, Vela Investments Pty Ltd and Osiris Holdings Pty Ltd, this statement and its contents are formally acknowledged and approved on 15 December 2021 by:



Scott Fyfe
Director of David Jones Pty Ltd,
Osiris Holdings Pty Ltd and Vela Investments Pty Ltd

Structure & Reporting Entity statement

David Jones Pty Ltd (David Jones) is an Australian company (ACN 000 074 573) registered in Melbourne, Victoria. This statement has been published in accordance with the Modern Slavery Act 2018 (Cth) (MSA) and describes the actions taken from July 1st, 2020, to June 30th, 2021, by David Jones, its Australian parent entities, and all their owned and controlled entities, to assess and address modern slavery risks.

This joint statement is made on behalf of all reporting entities which include David Jones Pty Ltd, Vela Investments Pty Ltd and Osiris Holdings Pty Ltd.

For clarity, Country Road Group Pty Ltd (Country Road Group) and its associated entities, who are also, like David Jones, ultimately owned by Woolworths Holdings Limited, will report separately via its own modern slavery statement. There is a degree of similarity between the modern slavery statements of Country Road Group and David Jones due to the centralised actions and processes undertaken by both businesses, largely via a shared head office support centre in Melbourne, Victoria.

¹ “WHL network of retailers” includes Woolworths Holdings Limited in South Africa, David Jones and the Country Road Group brands



Structure, operations and supply chains



David Jones

OUR STRUCTURE

David Jones Pty Ltd is an Australian company (ACN 000 074 573) headquartered in Melbourne, Victoria, and is the oldest continuously operating department store in the world to still be trading under its original name.

David Jones' ultimate parent company is a South African business, Woolworths Holdings Limited (WHL), listed on the JSE.

David Jones Pty Ltd and David Jones (NZ) Pty Ltd are the only customer facing entities, however the David Jones corporate structure is made up of 23 companies² which includes numerous non-customer facing entities which are involved in activities such as property arrangement, or are parent/holding entities.



OUR OPERATIONS

David Jones does not manufacture goods directly, but rather engages with a range of suppliers for the manufacture of goods sold under David Jones proprietary brands.

David Jones' main operations in FY21 involved the management of 46 physical stores³ covering 442,000m² of retail trading space across Australia and New Zealand. David Jones employed over 6,330 team members across our retail department stores, our head office support centre and stand-alone food stores that we operated throughout the year. These employees undertook a range of activities including retail sales, product design, merchandise planning and fulfillment of on-line orders.

² A list of the 23 companies in the David Jones corporate structure is listed in Appendix 1 of our FY20 modern slavery statement <https://modernslaveryregister.gov.au/statements/file/80208af7-f686-4151-9d47-62ba2dc9a2ae/>

³ Store count as at June 30, 2021: Excludes 2 stand alone food businesses that closed during FY21



“David Jones’ main operations in FY21 involved the management of 46 physical stores³ covering 442,000m² of retail trading space across Australia and New Zealand.”

David Jones sells apparel, footwear, accessories, homewares, beauty, gifts, electrical products, technology, and food under various trading arrangements described in this statement. These goods may be sold under David Jones’ proprietary brands or third-party brands or services from international and domestic suppliers with whom we partner through our stores or via our e-commerce channel.

During this reporting period we reduced the footprint of our store portfolio in line with our WHL corporate strategy and closed 2 stand-alone food stores, as well as ending our partnership with BP for the supply David Jones branded food products to locations throughout the BP store network .

We also partner with American Express who provide financial services to our customers where David Jones’ responsibilities includes marketing and distribution of the American Express services.

Our head office support centre is located in Melbourne, Victoria where we employ over 1,400 team members⁴ on full-time, part-time and casual agreements across our buying, planning, marketing, store design, customer service and shared services teams which include supply chain, finance and our people team.

We utilise one leased and operated warehouse and distribution facility, and contract one third-party logistics warehouse to support the operations of our store network. Both are located in New South Wales.

Along with our direct employees, these facilities use labour hire arrangements to engage over 190 additional labour-hire workers to receive and process over 332 TEU’s⁵, to fulfil stock for our store network and pick-and-pack millions of e-commerce parcels for our online customers.

David Jones employees and operations



⁴ 1400 employees in total of which approximately 550 are dedicated to David Jones, 550 to Country Road Group and the balance across shared and group services

⁵ TEU – In freight terms, indication of a container unit of measure: “Twenty-foot Equivalent Unit”



“suppliers who provide goods we sell are managed through Buying Teams in collaboration with oversight from our Legal and Ethical Sourcing Teams.”

OUR SUPPLIERS AND SUPPLY CHAIN

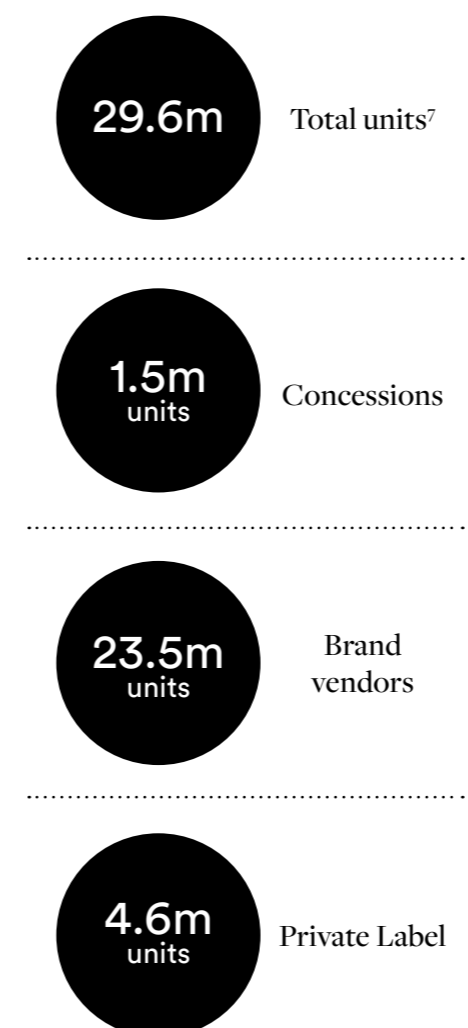
As a department store, we have various trading arrangements with our suppliers across our premium store and online offerings which are primarily defined in four distinct ways:

1. Concessions – where third party brands operate their own ‘shop-in-a-shop’ area within David Jones stores, including fashion and accessories, beauty treatments, and food services.
2. Brand vendors – an arrangement through which we buy a selection of domestic and international brand merchandise from wholesalers/suppliers and then sell/retail products to consumers.
3. Private label – products that are designed & developed under our proprietary brand names, but which are manufactured and sourced on our behalf by a diverse range of third parties in numerous locations. Products include apparel, fashion accessories and homewares.

4. Non-trade procurement (NTP) – where goods and services that we do not sell are supplied to David Jones to support the operation of our businesses, including Information Communication Technologies (ICT), logistics, packaging, marketing, cleaning, and security services.

The above definitions of our trading arrangements with suppliers, brands and concessions are managed through our business, each with their own set of agreements and procedures. For example, suppliers who provide goods we sell are managed through Buying Teams in collaboration with oversight from our Legal and Ethical Sourcing Teams. Suppliers engaged in non-trade procurement (NTP) activities are managed by our head office NTP Team.

Products sold⁶ (FY21 units transacted)



⁶ Merchandise units (including Food) - FY21 sales data provided from Merchandise Information Specialist

⁷ “Unit” means an item of merchandise sourced for retail sale



“we see transparency as a critical part of meeting our responsibility to respect human rights”

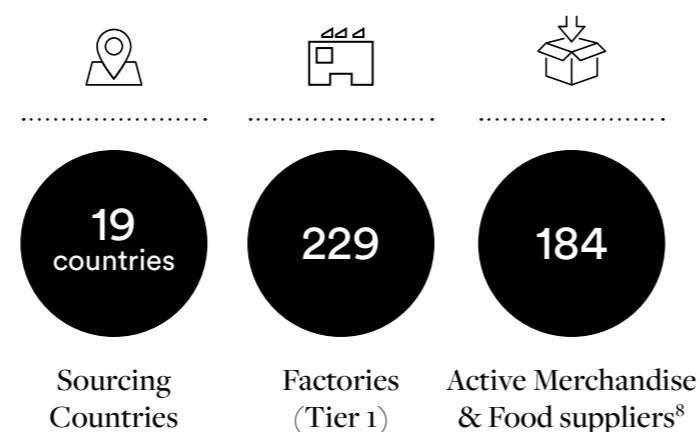
OUR FOOTPRINT – PRIVATE LABEL SUPPLY CHAIN

We sell a range of products under our private label propriety brand labels, listed in Appendix 3. We engage with suppliers and factories from a number of countries worldwide who support us to develop and manufacture these products on our behalf.

In this reporting period, our private label goods were manufactured, assembled, packed or finished in 125 Tier 1 “fashion and general merchandise” factories and 129 food business sites, sourced from 19 countries as set out below.

Private Label – Goods for sale Country of Origin	Private Label (Tier 1) factory sites
Australia	100
China	67
Italy	22
India	16
South Africa	6
Others	18

⁸ Extracted data is taken from compliance master folders as at 30 June 2021



These factories and sites are routinely updated on our interactive factory map located on [our corporate website](#).

For private label products, we see transparency as a critical part of meeting our responsibility to respect human rights, in line with the UN Guiding Principles on Business Human Rights. We are developing strategies for building deeper mapping of our supply chain and in FY21 we have increased the percentage of our factories mapped, along with adding information which may be relevant to modern slavery risks including:

- Number of workers at the factory site
- Percentage of women workers
- Percentage of international migrant labour used at a site

We aim to continue to trace our supply chain further and to deepen our knowledge of our Tier 1 factories and beyond.



“the non-trade goods and services that we procure may involve domestic and international production activities”

OUR NON-TRADE PROCUREMENT (NTP) GOODS AND SERVICES

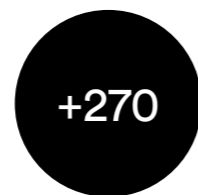
The non-trade goods and services that we procure for the support of the operations of our business activities are purchased from 270 major suppliers⁹ across eight major categories of non-trade procurement.

The goods and services we procure within our Non-Trade categories include:

- Logistics services, including freight and distribution
- Information Communication Technologies (ICT) equipment including computers, digital applications, and telecommunications
- Marketing materials and services, instore bags and collateral, and instore fixtures and fittings
- Real Estate and Facilities Management Services including cleaning and security personnel

The majority of NTP suppliers have their businesses incorporated and located in Australia. However, the non-trade goods and services that we procure may involve domestic and international production activities. For example, our in-store bags may be produced overseas.

Modern slavery within the service sectors, such as those used in providing cleaning for David Jones facilities, is recognised as a high-risk environment.



Major NTP Suppliers represent more than 85% of NTP spend



of total NTP spend represented by Real Estate, Facilities Management, Marketing and Logistics

MINI SNAPSHOT

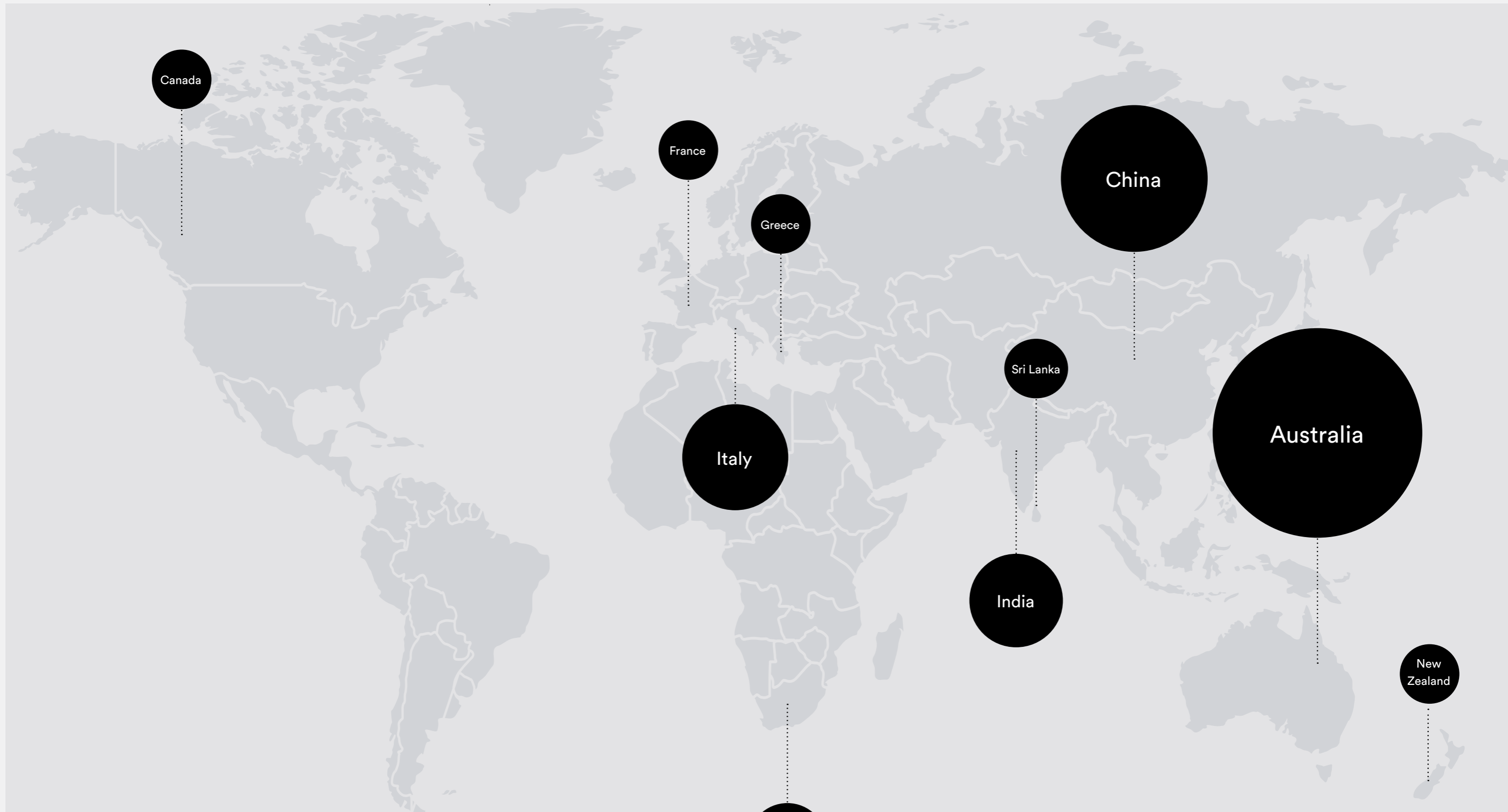
Cleaning services

The risk of transient and exploited labour in the cleaning services sector was recognised prior to searching for a new service provider. Two significant steps were taken to mitigate labour exploitation risks during the process of tendering for a new cleaning service provider:

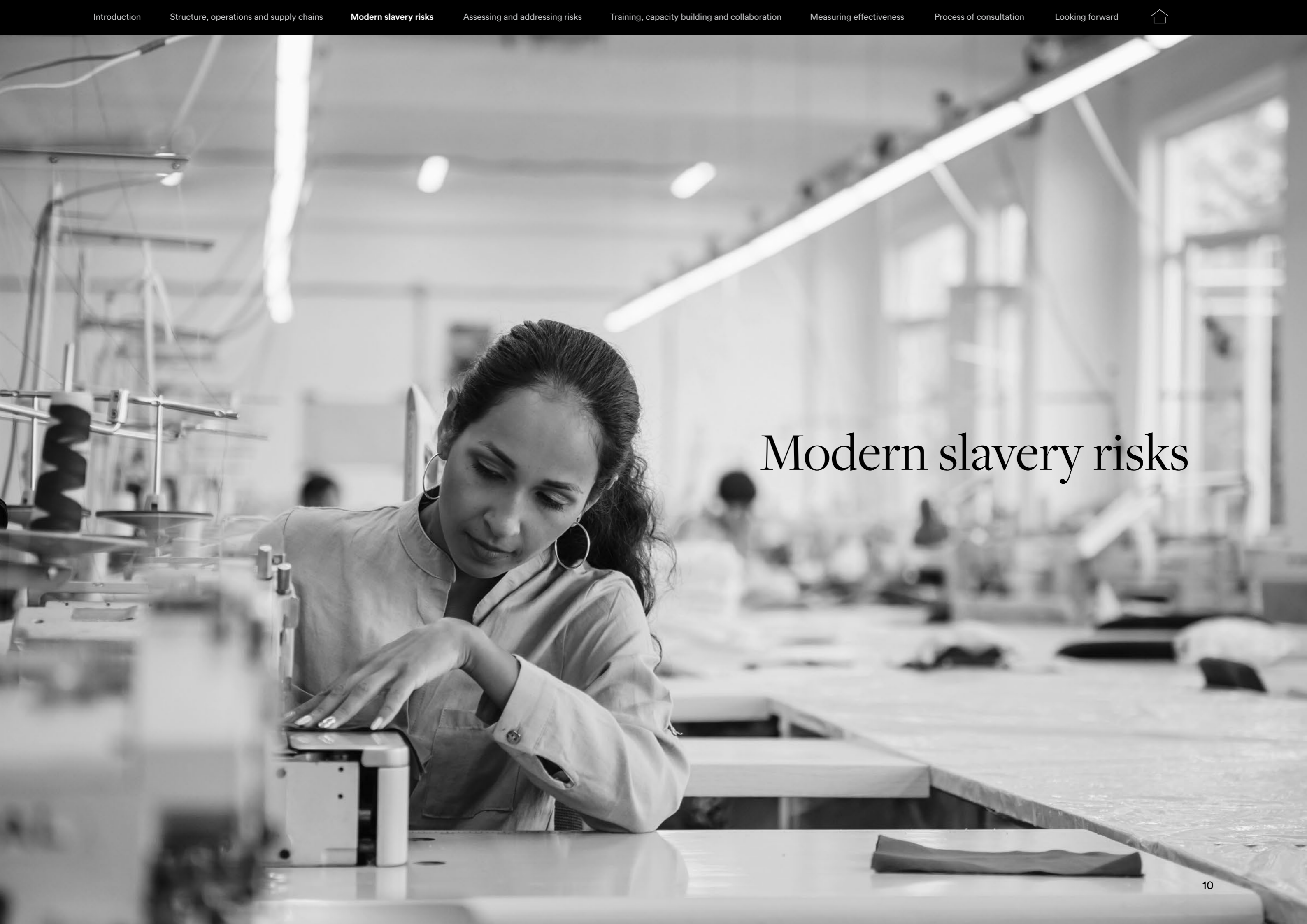
- 1) Specifying the adoption of a supplier with a high percentage of permanent employees with a correspondingly low exposure to casual labour, and
- 2) The inclusion of a detailed schedule within the contract that focuses entirely on “Compliance with workplace legislation”. This includes a requirement for independent audit twice annually. Audit results must be provided simultaneously to both the supplier and David Jones, with corrective actions to be completed within 30 days.

David Jones has one predominant supplier of cleaning services operating across the warehouses and stores network. The current cleaning provider was recently audited as part of a retendering process. The audit results confirmed that 85% of employees are permanent employees and that no breaches or anomalies in labour practices were identified.

⁹ 270 major suppliers. In excess of 400 small-scale NTP suppliers.



David Jones private label
top 10 sourcing locations



Modern slavery risks



Modern slavery risks in our supply chains and operations

David Jones recognises that the risks of modern slavery exist in the operations and supply chains of all businesses, including our own. We take an active role in identifying, assessing and addressing the risks of modern slavery across 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’.¹⁰ The MSA defines modern slavery as including eight forms of serious exploitation, which are explained in Appendix 2.

Consistent with the [UN 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. These terms are explained in the following table.

In FY20, we undertook a risk assessment with an expert third-party organisation to identify potential areas of modern slavery risk across our operations supply chain. Further information about this assessment is included in our FY20 statement. Importantly, this risk assessment indicated that while we are unlikely to cause or contribute to modern slavery risks in our operations or supply chains, we may be linked to areas of modern slavery risk in our extended supply chains.

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 it is connected to the impact through the actions of another entity with which it has a business relationship (such as a supplier).	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 with modern slavery.

¹⁰ [Australian Government Guidance for Reporting Entities](#)



MODERN SLAVERY RISKS

Applying the information gathered from our modern slavery and human rights risk assessment (as noted in our FY20 statement) and reviewing the ongoing activities in our operations and supply chains, we consider that the most relevant types of modern slavery practices for David Jones are;

- Forced labour
- Bonded labour
- Deceptive recruiting
- Child labour¹¹

We monitor both macro risks and any specific risks that may be associated with the businesses engaged in our operations and supply chains. We source information on these risks from various resources including desktop research, media monitoring, industry expert advice, multi-stakeholder initiatives, non-government organisations, industry partners, peers and our suppliers. We are conscious of COVID-19 and the associated modern slavery risks heightened by the pandemic both internationally and domestically.

Although the geographical locations of our head office, stores and direct supply chains is concentrated in Australia, modern slavery risks remain real and can be pervasive, particularly when the activities and location of our supply chain partners and their sub-suppliers are taken into account. Key risk factors for modern slavery relevant to our operations and supply chains may include:



- Use of migrant labour or unskilled labour where workers are more vulnerable to exploitation, leading to situations of bonded labour or forced labour
- Unauthorised subcontracting which could lead to unknown actors involved in the provision of goods or services who may be engaged in modern slavery
- Potential involvement of children in extended supply chains, including in hazardous or harmful work, such as the production of raw materials
- Extreme working conditions such as excessive overtime hours or lack of rest days
- Underpayments of wages or social insurances, and
- Lack of transparency and willingness to collaborate




The global food, clothing and textile industry has been largely dependent on human labour. Globalisation of supply chains has increased the global exposure to modern slavery risks in emerging economies which have built their competitive advantage through the supply of low-cost labour and international trading arrangements.

The correlations between low skilled labour and labour-related issues occurring through the exploitation of an uneducated and vulnerable workforce has been widely documented. We seek to directly assess and address these particular risk indicators through our contractual agreements, codes and policies, our Approved Factory Program (AFP), broader ethical sourcing actions with our suppliers, and via our employment arrangements with our direct workforce.

¹¹ Modern Slavery Act 2018 (Cth) defines “the worst forms of child labour”, however the reference above to “child labour” refers to more prevalent general child labour risks



Potential modern slavery risk areas in our operations and supply chains

	 Industry risks	 Geographic risks	 Commodity risks
Context	<p>Industry specific risks</p> <p>Key sectors associated with the products we procure for retail and non-trade use such as food, electronics, garment and footwear sectors are recognised as high-risk sectors for modern slavery globally, including due to the widespread use of migrant labour and high levels of subcontracting. There are also risks associated with the transport and logistics sector, including in relation to the warehousing and shipping of merchandise and other products. These risks are likely to have been heightened by COVID-19, including due to factors such as restrictions on seafarers leaving vessels and increased use of temporary labour in distribution services. We also engage with service providers from high risk sectors to support our operations, including cleaning and security contractors.</p>	<p>Countries we source from</p> <p>We source and procure goods for retail and not for trade from a range of countries, including countries which may have a higher vulnerability to modern slavery due to factors such as poor rule of law. For example, we may be exposed to geographic risk factors through fashion supply chains for our private label or third-party brands or for the goods and equipment we use to operate our business such as ICT.</p>	<p>Cultivation of Raw Materials</p> <p>Key agricultural commodities have been widely documented to be of higher risk of potential modern slavery. These include mined minerals used in the third-party beauty products and electrical goods we sell, and the harvesting and cultivation of commodities such as cotton used in our fashion items. These commodity risks are often associated with the production of raw materials and so may occur deep in our extended supply chains.</p> <p>David Jones is aware of the global focus on high risk regions for sourcing cotton. By example: For the Xinjiang Uyghur Autonomous Region in China. Through our approved factory program (AFP) we can identify that no Private Label products are produced within this region.</p>
Potential hypothetical examples	<ul style="list-style-type: none"> Workers harvesting raw materials such as cotton and minerals for beauty products could be subject to exploitation in our extended retail supply chain Workers involved in manufacturing activities, such as factory workers producing apparel or assembling electronics, could be exploited by factory managers in our extended retail supply chain 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) 		

We continue to monitor the modern slavery risks in our specific businesses as well as at an overarching corporate group level. These additional risks are identified and noted within our Good Business Journey Sustainability Reports¹² published by our parent company Woolworths Holding Limited (WHL) headquartered in Cape Town, South Africa.

¹² <https://www.woolworthsholdings.co.za/sustainability/reports/>



Assessing and addressing risks



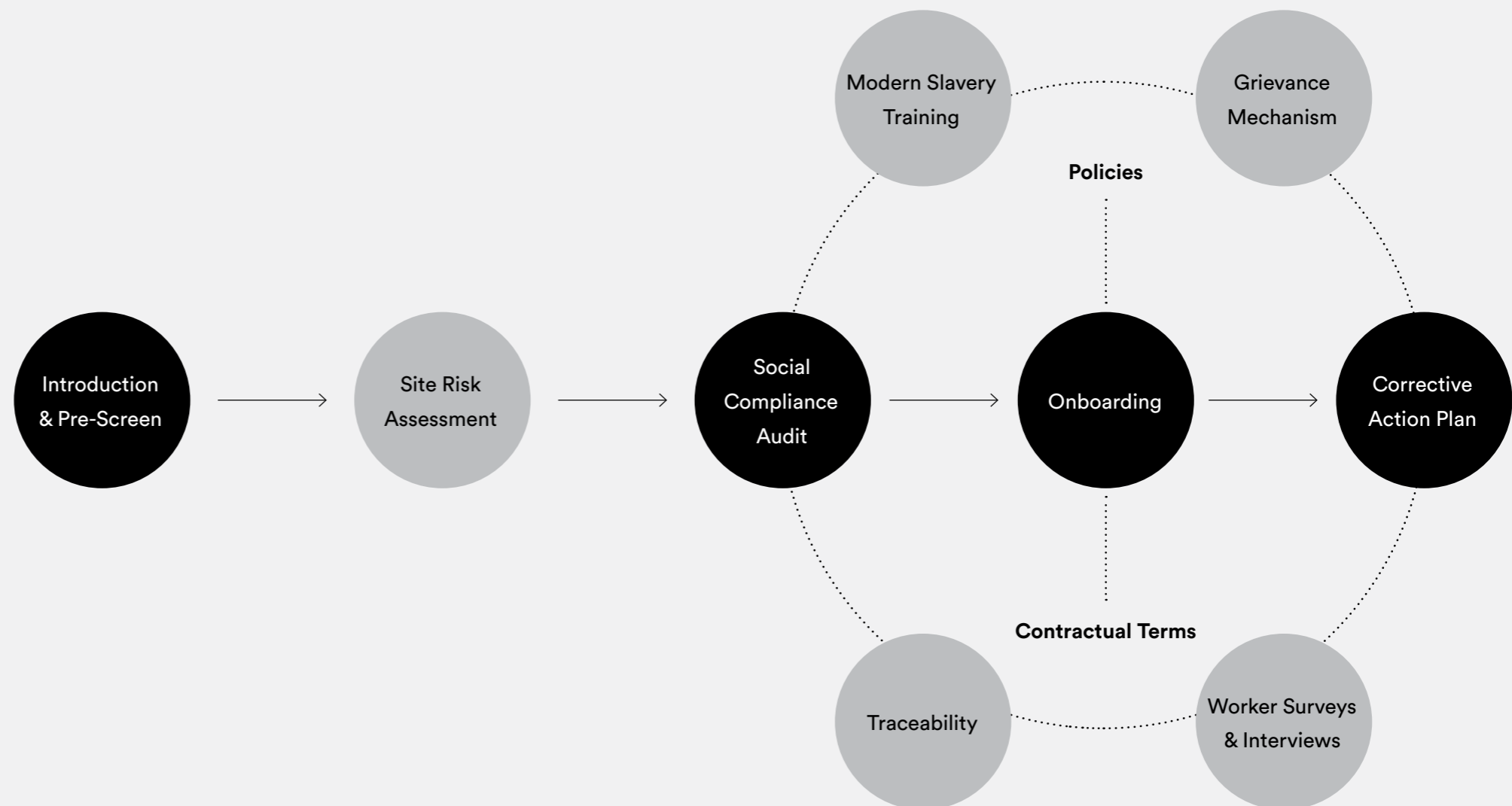
Assessing and addressing risks of modern slavery

We identify, assess, and manage modern slavery and broader human rights risks in an agile and adaptive manor through our Human Resources, Legal, Risk and Ethical Sourcing Teams where we use controls against these risks to help mitigate harm to others.

We utilise a suite of tools which include policies, contractual agreements, self-assessment questionnaires and audits deployed throughout our supply chain (as depicted above). In this reporting period, we worked with the Country Road Group on various joint initiatives to improve our procedures and to go “Beyond Compliance” to promote worker voice within the supply base.

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



Risk assessment framework

- New and evolving processes and procedures
- Approved Factory Program (AFP) existing tasks

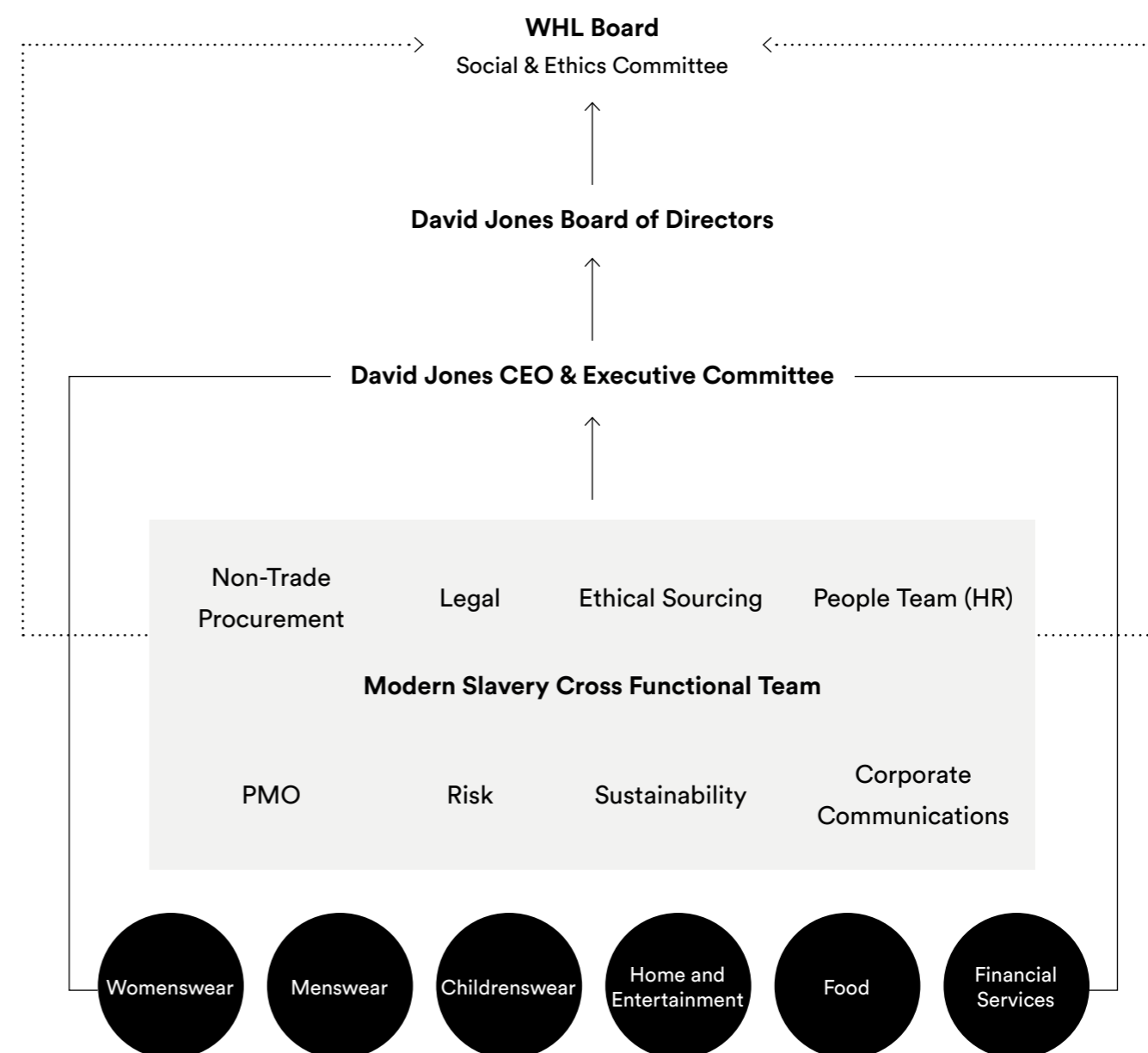


GOVERNANCE

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 David Jones is directly responsible for the activities taken by all owned and controlled Australian entities to assess and address modern slavery, including our reporting obligations under the MSA.

Our parent company, WHL, also has direct oversight on modern slavery actions and reporting through the WHL Social and Ethics Committee.

Our Modern Slavery Cross-Functional team (CFT), convened on a monthly basis in FY21 to share information on modern slavery actions across the business, identify and collaborate on embedding modern slavery and broader human rights knowledge further across our operations and supply chains, and provide key inputs and consultation in the development of this statement.





“The suite of codes and policies helps to effectively manage modern slavery and human rights risks in our supply chains and our operations.”

POLICY CONTROLS

David Jones has a clear set of codes, policies and protocols with which our people and suppliers are required to adhere. These codes and policies operate equivalently and consistently across the full group, including owned and controlled entities. The suite of codes and policies helps to effectively manage modern slavery and human rights risks in our supply chains and our operations. We understand that the implementation of these policies should focus not only on the risks to the business, but on preventing and addressing risks to people.

Some of the key control documents and policies include:

Policy, Protocol or Mechanism	Description
Employment Contracts	Formal legal agreements between David Jones and employees which clearly specifies each party’s responsibilities including in regard to adherence to laws, our codes and policies
<u>Employee Code of Conduct</u>	Details the standards of behaviour and ethical conduct expected of employees
<u>Workplace Behaviour and EEO Policy</u>	Set out obligations to behave appropriately in the workplace and provides guidelines on how to access support and how to resolve a complaint
<u>Discrimination, Harassment and Bullying Policy</u>	Provides guidelines and processes for resolution of concerns in relation to workplace behaviour
<u>Whistleblower policy</u>	Provides guidance on how improper or criminal conduct (such as instances of Modern Slavery) can be confidentially disclosed and will be investigated
<u>Grievance and Dispute Resolution Policy</u>	Designed to raise awareness about, and provide a fair and just working environment, by ensuring that team members have access to processes for the resolution of genuine personal grievances relating to the workplace
Supplier Agreements	Formal legal agreements between David Jones and suppliers which clearly specifies each party’s responsibilities including in regard to adherence to laws, our codes and policies
<u>Supplier Code of Conduct</u>	Sets out the expectations of our suppliers in relation to health and safety, labour rights.
Ethical Sourcing - Approved Factory Program	Framework for all suppliers and factories to adhere to when supplying goods for sale to our business

MINI SNAPSHOT

Supplier Code of Conduct

During the reporting period, in recognition of the importance of expressly recognising the risk of modern slavery, the David Jones Supplier Code of Conduct¹³ was updated with changes specifically added to address modern slavery.

¹³ https://www.davidjones.com/images/assetimages/good-business-journey/DJ_Supplier-Code-of-Conduct-2021.pdf



“Our people team regularly review our employment agreements and our internal people policies to ensure that they meet, and where possible exceed, legal requirements.”

The above formal arrangements bind and guide our business, employees and suppliers. They help to ensure that we mitigate the risks of modern slavery occurring in our operations and supply chains. They set clear obligations and expectations on parties and where stated, these requirements are expected to be promoted and applied in sub-supply chains. These policies are clearly communicated to employees and suppliers via our onboarding requirements, employment or supplier contracts, via the internal intranet, or publicly on our websites.

Employees are trained at regular intervals throughout the year through our corporate governance program, as well as additional engagement in FY21 at our Governance Week training on codes, policies and modern slavery seminars.

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 remedy breaches, or has a zero-tolerance issue, David Jones has the right to terminate the trading arrangement if required.

ASSESSING AND ADDRESSING OPERATIONAL RISKS

Our direct team members are employed on a full-time, part-time or casual basis and are covered by Enterprise Bargaining Agreements, relevant Award or Individual Employment Contracts, depending on their position and work location. Prior to beginning their employment, employees are provided copies of agreements that cover the relevant employment laws that protect them from situations of modern slavery.

These employment provisions, along with our policies detailed in this statement, provide a strong framework to help ensure modern slavery does not occur in our direct operations. Furthermore, as our operating businesses are bound by national laws including the Fair Work Act and National

Employment Standards, we have assessed the risks of modern slavery occurring in our operations as low.

Our people team regularly review our employment agreements and our internal people policies to ensure that they meet, and where possible exceed, legal requirements.

David Jones supports the right to organise, and within our operating warehouses, workers are active members of two unions.



“we have strengthened the contractual arrangements with our main cleaning company, adding clauses specifically aimed at addressing and reducing the risks of modern slavery”

LABOUR SERVICES SUPPORTING OUR OPERATIONS

The risk assessment detailed in our FY20 statement, being still applicable throughout FY21, identified higher risk areas within the third party labour services that support the ongoing operations of our stores and business. During this reporting period, we had increased requirements for cleaning specifically required in the context of the COVID-19, offset by the intermittent forced closures of stores across Australia and New Zealand as a result of the ongoing COVID-19 pandemic.

To further assess and address the risks of modern slavery within these cleaning services areas, we engaged specifically with our supplier who provides cleaning services across our stores and support-office sites in Australia. As noted above, we have strengthened the contractual arrangements with our main cleaning company, adding clauses specifically aimed at addressing

and reducing the risks of modern slavery being used in these services. This organisation is also obliged to prepare a modern slavery statement and has posted their FY20 Statement under the MSA requirements.

We will continue to engage with this cleaning services supplier to support them in their efforts to prevent modern slavery and other adverse human rights impacts. It is intended to further this work across other labour hire providers in our supply chain, such as our security service providers.

ASSESSING AND ADDRESSING SUPPLY CHAIN RISKS

During this reporting period, we actively reviewed our due diligence activities, strengthened our internal processes and initiated pilot projects that will continue to inform and progress our efforts in coming years.

OUR DUE DILIGENCE PROCESSES

Our human rights approach, which includes preventing and addressing modern slavery, is based on and aligned to the concept of human rights due diligence in the UNGPs, and includes:

- 1) Identifying and assessing actual and potential human rights risks (i.e. in our supply chain through third-party factory site audits)
- 2) Acting on these findings by collaborating to remedy issues (i.e. corrective action plans based on audit non-compliance findings)
- 3) Tracking and continuously monitoring results and progress (i.e. SEDEX5 (Supplier Ethical Data Exchange) online monitoring tool and risk reports)
- 4) Communicating our actions (i.e. WHL sustainability report, industry reports and via our websites, as well as moving forward through this statement)



“factories are assessed to identify modern slavery workplace indicators that may lead to modern slavery.”

All of our concession arrangements, third-party brands and private label suppliers are bound by various sets of contractual arrangements. These work to reduce the risks of modern slavery within the raw materials supply chain and during the manufacture of the goods that we sell.

For example, where a private label supplier is manufacturing goods which will be sold under the David Jones brand they must, under the David Jones Standard Supply Terms:

a) permit David Jones (or its agent) to inspect the supplier’s factories or facilities where the goods are being manufactured to ensure compliance with both laws and David Jones standards (further detail on assessment of supplier factory sites is set out below)

b) provide David Jones with full contact details for any sub-contractors engaged or assisting in the manufacture of the David Jones goods and/or any components of the David Jones goods so David Jones can conduct its own due diligence in relation to such sub-contractors, and

c) only source raw materials that comply with the specifications provided by David Jones

We recognise that our private label supply chain is the area in our supply chain where our own actions and decisions are more likely to influence the actions and decisions of our suppliers and where we have the most leverage to effect change.

Private label suppliers must adhere to our “Approved Factory Program” (AFP), which is our due diligence process for private label suppliers to provide ongoing assessment of the factory sites that produce our goods (as detailed within our FY20 statement¹⁴). Our AFP requires suppliers to register their Tier 1 factories on the Supplier Ethical Data Exchange (SEDEX) platform, complete self-assessment questionnaires, and where required provide a social compliance audit that covers the nine fundamental principles within our Supplier Code of Conduct which is aligned to the ETI Base Code¹⁵.

Through these audits, factories are assessed to identify modern slavery workplace indicators that may lead to modern slavery. This provides our business and the suppliers’ factories with clear corrective action plans to verify, remedy and close non-compliance issues. These assessments are administrated and monitored by our Head Office Ethical Sourcing Team, and findings from these assessments are recorded and reported on in both

¹⁴ <https://modernslaveryregister.gov.au/statements/file/80208af7-f686-4151-9d47-62ba2dc9a2ae/>

¹⁵ https://www.ethicaltrade.org/sites/default/files/shared_resources/ETI%20Base%20Code%20%28English%29.pdf



“No instances of modern slavery were identified through Approved Factory Program audits during the reporting period ending June 30, 2021”

ad-hoc and regular reporting processes. The most critical issues, where immediate interventions are required, are escalated to relevant stakeholders and our executive level 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.

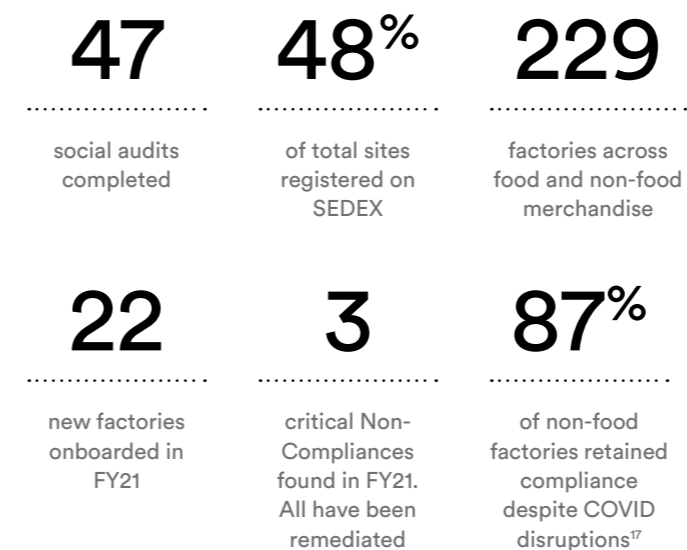
According to our AFP, factories are required to be re-audited on a 2-year cycle. In FY21, 47 social compliance audits were completed (18.5% of all factories, 37% of non-food merchandise factories). This is fewer than in previous years due partly to the ongoing impacts imposed by the COVID-19 pandemic that have restricted in-field auditing. Self Assessment Questionnaires (SAQs) have been used as an interim measure to gather information and to reinforce expectations until such time as these factories can again be assessed as part of the AFP.

In FY21 David Jones was undertaking a review of the future position of the David Jones food business, so audits were substantially suspended for factories manufacturing David Jones branded food until clarity was provided for the food business strategy.

During FY21 we continued to transition factories onto the SEDEX platform. 48% of factories (food and merchandise) are now onto the SEDEX platform: A system which provides increased visibility of factory risk profiles and enables active management of non-compliances and audit renewal schedules.

No instances of modern slavery were identified through AFP audits during the reporting period ending June 30, 2021 although we did identify broader issues relating to excessive working hours and health and safety. The following section explains how we are working to address these issues.

Summary of our Approved Factory Program for FY21 across private label¹⁶



¹⁶ Includes all categories of merchandise: Fashion, General Merchandise, Beauty and Food

¹⁷ According to AFP control documents: Just 14 of 106 non-food factories were unable to renew audits, mostly due to COVID disruptions



“We continue to explore processes and systems to strengthen our controls as part of our initial onboarding and continuous monitoring of our suppliers and their factories.”

EMBEDDING NEW CONTROLS IN OUR AFP

Using the outcomes from the risk assessment completed by ELEVATE in 2020, we identified areas requiring new controls to improve monitoring and management of risks. These actions included:

- Adding site-risk pre-screening into our AFP process, utilising the RADAR tool within the SEDEX platform to highlight inherent risks prior to onboarding
- Developing a Critical Issues Tracking tool where our Ethical Sourcing Team track critical issues within our AFP. The tool is then used within internal monthly non-compliance meetings to monitor and drive remedial action with suppliers. This is an additional measure to our previously documented process regarding non-compliances by adding a further layer of management to the remediation of issues in our supply chain

- Creating a De-registration list for factories who have been off-boarded due to unresolved critical issues or for being unresponsive to remedial actions. The list is used to cross-check applications for new factories and to prevent relisting those deemed unsuitable and inappropriate based on historical evidence

We continue to explore processes and systems to strengthen our controls as part of our initial onboarding and continuous monitoring of our suppliers and their factories.

We recognise modern slavery risks are more difficult to identify, assess and address within the supply chain of products supplied by third-party brands, as David Jones has no direct nor contractual relationship with those third-party supply chains. However, as many suppliers to David Jones are global and high-profile brands, David Jones is aware that a portion of such third-party suppliers are also subject to modern slavery reporting requirements. The wide assortment

of brands that use a complex array of factories, materials, distributors and extended services provides great challenges for analysing and influencing the product supply chains for multiple third-party brands.

ADDRESSING CRITICAL ISSUES IDENTIFIED THROUGH AUDITS

In FY21, the main critical issues found in AFP Tier 1 factory audits continued to be excessive working hours (including overtime and lack of rest days), and OH&S fire safety related issues. To prevent recurrence of non-conformities, David Jones and Country Road Group collectively engaged with industry experts to provide specific training and guidance to our Head Office Ethical Sourcing Team, suppliers and factories to remedy these issues, build capacity and empower factory management.



“preventative measures can play a broader role in helping to ensure that our partner-factories respect human rights by protecting the safety of their workers.”

Excessive Overtime Guidance – We engaged with international labour conditions specialists, Impactt Limited, to support our business in developing a set of “Guiding Principles when dealing with Excessive Overtime”. This document sets out internal processes for our Ethical Sourcing Team to lead discussions with factories and our internal teams to assess root-causes, brainstorm approaches to optimise operational performance and reduce the need for excessive overtime to occur.

This document was developed in conjunction with experts in the production of fashion goods in China, where most factories are located, and where the highest frequency of excessive overtime hours issues has been identified.

Key guidance areas included:

- Communication techniques with suppliers
- Identifying working hour planning gaps
- Implementation of remedial and corrective actions
- Improvement plans and progress tracking
- Training and communication of objectives

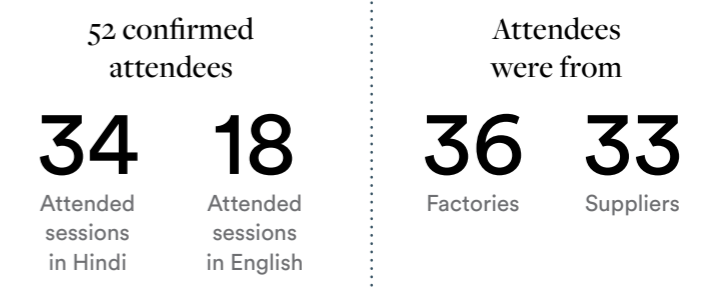
The Guiding Principles document was in late-draft stage deep into the FY21 period. We anticipate it being finalised, launched and used throughout FY22 and beyond to assist with excessive overtime investigation and remedy.

Fire Safety Training – During 2019 and 2020, there was increased media coverage of factory fires in the fashion supply chains in India, Pakistan, Bangladesh, and China. Two factories used to produce Country Road Group¹⁸ products were fire affected, causing damage to materials and adversely impacting production. No people were injured in these incidents.

To proactively respond to these incidents, we engaged with sustainability and supply chain services provider, ELEVATE, to develop specific fire safety training for suppliers and factories with facilities in India. To avoid potential COVID risks associated with on-site training, this training was delivered virtually by ELEVATE to suppliers and factories over two sessions: One being in English, and the other in Hindi to specifically target the increased awareness of issues and risks in India. The topics of this session included fire and safety laws, our businesses requirements, identifying issues and actions to ensure safety of workers.

Whilst this training sits outside of generally identified modern slavery risks, we recognise that such preventative measures can play a broader role in helping to ensure that our partner-factories respect human rights by protecting the safety of their workers.

Summary of Fire Safety Training attendance



¹⁸ Though the incidents specifically involved Country Road Group suppliers, the risks were deemed equally relevant to David Jones private label suppliers with the offer for training extended accordingly.



“Grievances are assessed and managed by our Legal and Ethical Sourcing teams to ensure outcomes and remedies are settled in accordance with internationally recognised human rights.”

LEVERAGE AND LONG-TERM RELATIONSHIPS

David Jones recognises that leverage plays an important role in making meaningful change. In line with the UNGPs we seek to increase our leverage where we can to influence more responsible behaviour including by our suppliers. We continue to partner with our long-term suppliers, positively using our buying power where possible, and collaborating with peers to prevent, mitigate and remediate human rights risks.

REMIEDIATION PROCESSES

David Jones has built further internal and external grievance channels to enable David Jones staff, in addition to workers in our supply chain, to raise concerns. Grievances relating to modern slavery or broader human rights risks such as the ‘physical conditions of work’ can be raised by David Jones staff directly with our Human Resources Team as outlined in our Grievance and Dispute Resolution Policy. Further, David Jones has an externally managed, independent, ethics hotline and ethics email address through which issues can be raised by either staff or by employees of suppliers where they will be investigated confidentially and anonymously.

Within our supply chain, grievances can be raised via our Ethical Sourcing email address listed in our Supplier Code of Conduct. Grievances are assessed and managed by our Legal and Ethical Sourcing teams to ensure outcomes and remedies are settled in accordance with internationally recognised human rights. An example of our email grievance channel was described in our FY20 modern slavery statement.



CASE STUDY

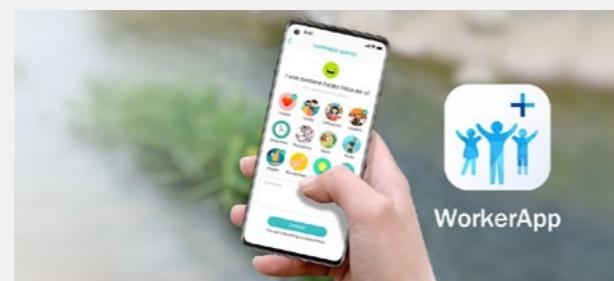
**Worker App & Factory level
Grievance Channel****DEVELOPMENT**

We continue to implement our responsibility as a business to respect human rights, in line with the expectations set out in the UNGPs.

We understand that providing access to effective grievance mechanisms is a key element of businesses' responsibility to respect human rights. In FY21, in partnership with Country Road, we deployed our first factory-level operational grievance mechanism into a key supplier factory in China. This supplier is our largest supplier and is also used to produce David Jones private label apparel. Importantly, our collective engagement with Country Road enabled us to increase our leverage with the supplier.

We consulted with industry peers both domestically and globally, and engaged with consultants, service providers, NGOs and human rights experts to ensure the mechanism met the effectiveness criteria set out in the UNGPs for grievance mechanisms and to collaborate on learnings from others in the development of this mechanism.

Importantly, our supplier-partner is very engaged, open to collaboration and shares our values to support workers. We recognise that this is not the case for all suppliers and factories. We collaborated with this supplier to understand what type of mechanism to deploy, taking into consideration:



- Demographics of workers – local, domestic migrant, international migrant, gender ratios
- Literacy levels of workers to understand if they could read posters, or understand training material
- How many workers had mobile devices to allow ready access to phone apps or digital technologies

From this assessment it was understood that all workers had access to smartphone technology, and as such, we selected a digital Worker App from sustainability and supply chain consultants, ELEVATE.

TRAINING

Ensuring that workers and factory management at the selected supplier were adequately trained in the grievance mechanism was considered the most important initial activity. Workers were trained in the function and operation of the Worker App and how a grievance should be lodged. This was fundamentally important to ensure that worker expectations could be met in respect to what issues represent a grievance and how remedy would take place.

Workers were trained in groups to not impact production and were trained via face-to-face education sessions. Sessions demonstrated downloading the app, training to identify types of grievance issues and how to raise an issue anonymously.

Two-way communication grievance channel

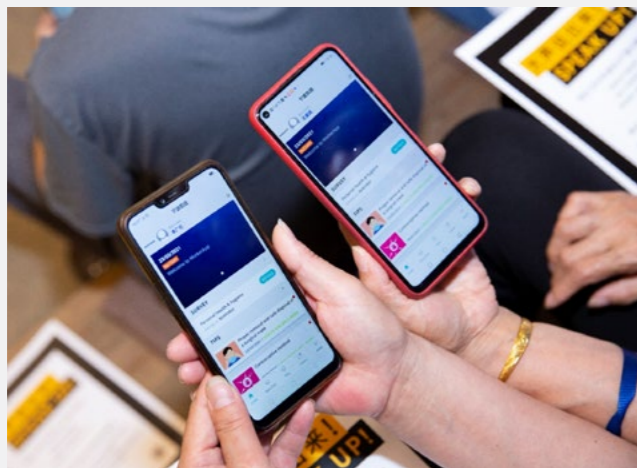


CASE STUDY (continued)

Factory management were also trained in a separate online session. Management Teams have a very different role from employees, involving receiving grievances, remediating grievances, ensuring closure of issues and providing clear timelines to the aggrieved.

Key features of the app include:

- e-learning modules for both workers and management to access on-demand, covering topics such as health and safety, and forced labour issues
- Workers being able to raise issues anonymously (should they choose)
- Issues that are raised can be tracked by the worker and management
- Workers complete a satisfaction survey when an issue is closed by management



In-language posters placed within factories

INITIAL FINDINGS

Feedback from the initial pilot is that the factory workers prefer to use voice messages over digital mediums such as WeChat, rather than text-based messages requiring (often) semi-literate users having to type their concerns.

In addition to the above training, we also developed posters in local language which were placed in both public factory locations for visibility and in toilets for privacy. Business cards were also passed to workers to take with them. These posters and cards included email and phone details of our direct businesses (Country Road and David Jones) to provide alternate methods for workers to raise issues.

As part of the digital Worker App function our business receives a monthly dashboard report on grievance activity. The dashboard captures the number of issues raised, how they are categorised, and measurement of the time elapsed to take action. We use this dashboard to engage with the supplier to improve their actions to respond to issues and to gather feedback for future understanding and rollout.

As part of the deployment of this mechanism, David Jones and Country Road Group developed an internal Grievance Policy which defines issues that are deemed a grievance. A Remediation Procedure for dealing with grievances was also recently developed as a remediation process guide. It is expected to be finalised and put into practice during the FY22 period and beyond.



Monthly dashboard report on grievance activity



“it is a fundamental responsibility of our business to undertake or initiate remedial actions when we have identified that we have caused or contributed to the violation of human rights in our operations or supply chains.”

In FY21, we continued to review & improve our efforts for implementing an effectively remedy. We understand that it is a fundamental responsibility of our business to undertake or initiate remedial actions when we have identified that we have caused or contributed to the violation of human rights in our operations or supply chains. To date we have taken steps to remedy non-compliances found through our AFP, supplier agreements, codes and policies and instances of work-related violations, but none were identified as instances of modern slavery.

As mentioned above, during the reporting period we developed a Remediation Procedure across David Jones and Country Road Group. This is a process and procedure guide for effective management of severe issues we have identified in our supply chain including any suspected instances of modern slavery.

This procedure includes:

- How an issue or grievance is identified, captured, assessed, and escalated
- How any issues may be investigated, including relevant and internal members forming a Cross Functional Team
- How any remediation actions will be developed and agreed, which may include legal considerations

- How the procedure is designed to protect the complainant’s anonymity in order to prevent possible retaliation from employers or individual workers, and
- Any follow up training and monitoring required to ensure closure of the issue and to ensure no future harm to others

The knowledge acquired through developing this remediation process has been used to support remediation of all types of non-compliance across our AFP. It has provided our Ethical Sourcing Team and broader Modern Slavery Cross Functional Team with added skills and understanding of issues, and the challenging processes that may be involved in identifying and managing precarious situations, and how to provide adequate remedy to victims.



Training, capacity building and collaboration

David Jones continues to engage with our employees and suppliers through a number of avenues to promote the awareness of modern slavery risks.

We recognise that internal training is especially critical for the teams that are directly involved in making decisions that inform our modern slavery risk management. We also remain committed to promoting broader modern-slavery awareness across our supply chains and operations.

We understand that leverage and collaboration are two of the key actions to drive progressive change. We therefore engage with NGO's and participated in multi-stakeholder initiatives to not only support their efforts in raising awareness of modern slavery issues, but to also share our experiences and learnings wherever possible and to benefit from the learnings of others.

Actions in the reporting period included:

- Continuing our membership of the UN Global Compact Network Australia (GCNA), as well as participation as a sub-group member of the Modern Slavery Community of Practice (MSCoP)
- Supporting the development of the UN GCNA publication *Effective Modern Slavery Grievance Mechanisms*¹⁹ through participation in a case study on the development of our factory level grievance mechanism as documented within this statement
- Supporting the Australian Home Affairs 2020 Industry Summit with a panellist speaker on the Modern Slavery workshop
- Attendance by our entire Ethical Sourcing Team at an in-person workshop delivered by the GCNA: Educating and supporting businesses on Implementing Effective Grievance Mechanisms
- Speaking invitation at the SEDEX Asia Pacific Summit on the topic of "Effective Buyer-Supplier Collaboration"²⁰

- For the Modern Slavery Cross Functional Team, conducting an internal scenario workshop: "Building capacity with our team members to identify and assess instances of modern slavery and apply remediation actions in response"
- Dedicated virtual awareness training on modern slavery for Country Road Group and David Jones Head Office team members during our annual corporate 'Governance Week'
- Pillar Two, a business and human rights advisory firm, supported aspects of our modern slavery reporting

Some of the planned training activities were postponed due to COVID-19, however we will continue to develop appropriate awareness for those involved in our operations and supply chains on a continuous basis.

Our diverse range of stakeholders include NGO's, multi stakeholder initiatives (MSI's) and other organisations that play a role in partnering with us to improve our knowledge and actions in assessing and addressing modern slavery risks.

Stakeholders and partners

 ELEVATE

 PILLAR TWO

 impactt

 Sedex

¹⁹ <https://unglobalcompact.org.au/wp-content/uploads/2021/03/4261-UNGC-Grievance-Mechanisms-CASE-STUDY-10-FA.pdf>

²⁰ <https://www.sedex.com/sedex-virtual-asia-pacific-conference-2020/>



Measuring our effectiveness

We strive for continuous improvement in our approach to assessing and addressing modern slavery risks, which is informed by our work to assess the effectiveness of our actions across our entire corporate structure.

We continually monitor our key programs and activities using a combination of both quantitative and qualitative measures. We understand these indicators 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 details the measures we utilise to assess our effectiveness across all of our reporting entities and operating subsidiaries.

Area	Objectives	Effectiveness indicators
Policies & Contractual Controls	<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 • Policies to provide modern slavery prevention and protection for workers against 	<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 ✓ 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 	<ul style="list-style-type: none"> ✓ Number of supply chain actors traced ✓ 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 	<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 ✓ 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 (AFP) • Ensure quality and effectiveness of audit types • Audit corrective actions undertaken, improved, or closed 	<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 Non-Trade Procurement (NTP) suppliers who publish modern slavery statements
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 	<ul style="list-style-type: none"> ✓ Number of audit issues remediated in line with (Approved Factory Program (AFP) criteria ✓ Remediation of any actual modern slavery instances



Process of consultation

David Jones has consulted up and down its corporate structure ensuring that the directors of all owned and controlled entities were consulted and have reviewed and approved this statement.

Osiris Holdings Pty Ltd and its principal governing body are the highest Australian entity of David Jones and owns and controls all subsidiary entities.

Senior management, executives and the directors of the reporting entities covered by this statement (namely Osiris Holdings Pty Ltd, Vela Investments Pty Ltd and David Jones Pty Ltd), in addition to 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, via email correspondence, through consultation on actions throughout the year, and being tabled at relevant board meetings.





Looking forward

As we look to improve our actions in tackling modern slavery we have set out the below broad goals:

- Continue to enhance our supplier onboarding process through improved evaluation and risk assessment methods
- Ensure our supplier due diligence is appropriate in line with changes to our apparel and food private-label business
- Assess Non-Trade Procurement (NTP) supplier contracts to identify any gaps in our contractual arrangements
- Ongoing review and improvement of policies where required
- Continue to provide modern slavery and human rights training, workshops and guidance to our suppliers and brand partners
- Review the outcomes of the pilot digital factory-level grievance mechanism to steer future grievance mechanism standards
- Continue to extend our traceability of private label factory sites deeper into the supply chain across a wider set of materials
- Ongoing training of internal staff, including senior leadership teams, through modern slavery and responsible purchasing practices
- Further develop the methods and systems for measuring the effectiveness of programs

Statement Criteria Index

Australian Modern Slavery Act 2018 (Cth) 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 and Executive Summary • 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 chains
(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"> • Modern Slavery Risks in our supply chains and operations
(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 processes	<ul style="list-style-type: none"> • Introduction & Executive Summary • Assessing and Addressing the risks of modern slavery • 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"> • Measuring 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 and Executive Summary • Process of consultation • Appendix 1
(16.1.g) Any other relevant information	<ul style="list-style-type: none"> • Looking Forward • Appendices



Appendices

APPENDIX 1.

All entities who are reporting entities and included in this joint statement:

Osiris Holdings Pty Ltd	(Holding Company)
Vela Investments Pty Ltd	(Holding Company)
David Jones Pty Ltd	

APPENDIX 2.

Definitions of types of Modern Slavery²¹

Type of Exploitation	Definition
Trafficking in Persons	Describes the recruitment, harbouring and movement of a person for exploitation through modern slavery.
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 of 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

APPENDIX 3.

List of proprietary brands David Jones owns and considers "Private Label".

Brand name	Product category
Alta Linea	• Menswear
Agenda	• Women's Accessories
David Jones	• Home & Women's Accessories
David Jones Classic Collection	• Bedding, towels etc
David Jones Collection	• Women's Intimates & Apparel • Men's Apparel • Children's Apparel
David Jones Junior	• Children's Apparel
Milana	• Women's Footwear & Accessories • Menswear
Organic by David Jones	• Babywear
The Foundry	• Homeware

²¹ Definitions and descriptions based on the Australian Commonwealth's Guidance for Reporting entities https://modernslaveryregister.gov.au/resources/MSA_-_Official_Guidance_.pdf



DAVID JONES

