

# **MODERN SLAVERY STATEMENT**

For The Financial Year Ending 30 June 2020

**R. M. WILLIAMS**

EST. 1932. AUSTRALIA

# INTRODUCTION

This joint statement has been prepared in accordance with the Modern Slavery Act 2018 (Cth) (the Act) on behalf of RMW Holdco Pty Ltd, RMW Bidco Pty Ltd and R.M.Williams Proprietary Limited, each a reporting entity, together referred to in this statement as R.M.Williams for the financial year ending 30 June 2020.

R.M.Williams is committed to reducing the risks of modern slavery in its business operations and supply chains, and managing incidents where they might occur. This commitment is important to R.M.Williams, as well as its stakeholders, customers and employees both in Australia and internationally.

We recognise that apparel is a high-risk industry and that many workers in our supply chain are vulnerable to forced labour, debt bondage and other forms of modern slavery. We know that it is our responsibility to do all we can to assess and address these risks, and to continually improve our approach. We believe that transparency is critical to this process which is why we provide details of all our official suppliers on our website. We also conduct due diligence on our suppliers, through questionnaires, site visits and audits – to help us to identify any incidents of modern slavery or related exploitation.

This statement has been reviewed, approved and signed by the board of directors of RM Holdco on 14 July 2021 on behalf of RMW Holdco Pty Ltd, RMW Bidco Pty Ltd and R.M.Williams Proprietary Limited and signed by a director of RMW Holdco Pty Ltd pursuant to section 14(2)(e)(ii) of the Modern Slavery Act.

Signed by



**John Hartman**

Director

Date: 14 July 2021

# OUR STRUCTURE

R.M.Williams is a leading Australian manufacturer and retailer of footwear and fashion. The R.M.Williams Group (with RMW Holdco Pty Ltd as the Head Entity) was majority owned up until 16 October 2020 by L Catterton, a Singaporean Private Equity Fund and two other private investors. On 16 October 2020, Tattarang acquired 100% of the R.M.Williams Group from L Catterton. Tattarang is one of Australia's largest private investment groups owned by Andrew and Nicola Forrest.

The main operating entity, R.M.Williams Pty Ltd, wholly owns Australian subsidiaries:

- R.M.Williams Publishing Pty Ltd which produces the Outback Magazine sold across Australia; and
- The Original Bushmen's Outfitters Pty Ltd which owns the land at Frost Road Salisbury (our primary manufacturing facility).

Along with these Australian subsidiaries, R.M.Williams Proprietary Ltd also wholly owns subsidiaries in New Zealand, United Kingdom, United States, and the Netherlands. This statement has been prepared by R.M.Williams's centralised corporate function in consultation with senior leaders, staff and directors of R.M.Williams and the entities owned and controlled by R.M.Williams Proprietary Ltd.



# OUR COMMITMENT

Not only does R.M. Williams have a legal responsibility to reduce the risks of modern slavery in our business operations and supply chains, and to manage incidents where they might occur, we are committed to protecting the rights of our people, our suppliers and our customers. This statement sets out the process by which we identify, mitigate and remediate modern slavery risks.



# A LETTER FROM OUR ACTING CEO

Our people are fundamental to the success of R.M.Williams. As such, we strive to set a culture of integrity, humility and respect where our employees feel safe, empowered, and courageous, as well as passionate about the work they do. I recognise that we have the ability to impact the lives of all those associated with our business, both positively and negatively. Therefore, we are determined to uphold and protect the fundamental rights of our suppliers, our customers and our community, including, but not limited to, their right to a life free from slavery.

It is our opinion that there are two avenues through which we will achieve this goal: collaboration and consolidation. We recognise that we cannot face this issue alone and must collaborate with our customers, peers, civil society, governments and non-for-profits. We are committed to collaborating with industry bodies, as well as drawing upon our new relationship, if required, with the Minderoo Foundation, to gain insight and expertise to ultimately improve our approach modern slavery risk management.

Since being acquired by Tattarang in 2020, the brand has been bought back into Australian hands for the first time since 2014. We are proud of being an Australian heritage brand and it is our mission to continue to consolidate our business, by increasing our procurement of raw materials from Australia, consolidating our manufacturing to Australian locations and maintaining a strong relationship, based on mutual respect and communication, with a small supplier base.

I am proud of what we have achieved to date under the guidance of CEO, Raju Vuppalapati. I acknowledge that there is still work to be done. This statement sets out the actions we are currently taking to address modern slavery within our organisation and across our supply chain, as well as our future commitments that will enable us to achieve our ambition of being slavery free.



**Michelle Hepworth**  
Acting CEO, R.M.Williams

# IMPACTS OF COVID-19

Like many other organisations, COVID-19 had significant impacts on our business. In order to protect the health and safety of our workers, we shut down all retail stores, distribution centres and manufacturing facilities globally. As we began to re-open our stores, we introduced additional COVID-19 health and safety procedures to protect our workforce and eliminate the risk of injury and disease to our workers and other persons, including visiting public and contractors. Our COVID-19 Safe Work Policy outlines our approach to the management of work health and safety, specifically:

- the health and safety measures implemented within the workplace, such as temperature checking, social distancing, personal hygiene, routine cleaning and face masks;
- travel restrictions; and
- the COVID-19 response procedure.

To lessen the financial burden on our workforce, we paid all staff during the lockdown period. We received Jobkeeper payments from March to September 2020 but continued to pay all our staff (excluding casuals) at least 80 per cent of salary for the remainder of the period.

During COVID-19 we worked closely with our supplier base to minimise the financial stress that it created. RMW implemented a tiering system to ensure that supplier payments were directed to those in need, while payment terms to other suppliers in a stronger financial position were extended.

The majority of our suppliers also faced a disruption to their supply. We reduced stock purchasing commitments to ensure that the supply chain continued to operate efficiently, while also honoring all purchase orders placed with suppliers during the period.



# OUR BUSINESS

Born in the Australian outback, R.M.Williams has become one of the best-known – and best-loved – heritage footwear brands in the world. Originally built for the men and women of the rugged, unforgiving Australian outback, our iconic one-piece-leather boots have gone on to grace the feet of millions of people worldwide. In addition to boots, we also make clothing, leather accessories (bags, belts and wallets) and casual footwear.

## OUR OPERATIONS

The R.M.Williams business comprises of product research and development, manufacturing both within Australia and overseas, distribution, and marketing. Our subsidiary, R.M.Williams Publishing is responsible for the creation and distribution of the R.M.Williams bi-monthly magazine, *R.M.Williams Outback*. Our head office is based in Sydney, New South Wales, and our primary manufacturing facility is based in Salisbury, South Australia. Today we operate more than 70 stores in Australia and New

Zealand, one store in the US located in New York, two stores in London and a Franchise shop in Copenhagen. In addition, R.M.Williams is available at more than 900 stockists around the globe and exports to 15 countries, comprising Germany, Italy, Switzerland, Sweden, France, Denmark, United Kingdom, United States, Canada, New Zealand, South Africa, Saudi Arabia, New Guinea, South Korea, and New Caledonia.

Our people are the foundation of our business. They are the face of R.M.Williams and fundamental to the success of our business. As such, we aim to create an environment where our people are supported and fulfilled within their role at R.M.Williams, whether that be in our workshop (manufacturing facility), retail, warehouse, corporate, publishing or distribution teams. Globally, we currently employ 828 people within our workshop, head office, distribution centres and retail stores. Our employee numbers are outlined in the table below.

		EMPLOYEE NUMBERS				
		 AU	 NZ	 UK	 US	 Total
DIVISION	Corporate	126				126
	Manufacturing	354				354
	Distribution centres	20				20
	Retail	273	12	15	18	318
	Publishing	10				10
	<b>Total</b>	<b>783</b>	<b>12</b>	<b>15</b>	<b>18</b>	<b>828</b>



## OUR SUPPLY CHAINS

Our supply chain is comprised of 95 Tier 1 suppliers. Tier 1 of our supply chain has been our priority to date, however we are working to increase the transparency of our supply chains through mapping to our Tier 2 and beyond. Our main categories of spend include footwear leather, craft leather, footwear components, garment fabric, headwear, socks, external garments, packaging including boxes and swing tags, threads, adhesives, chemicals, craft items, garment zips, burrs and rivets, and fittings.

Our primary manufacturing facility is located in Salisbury, South Australia, and more than 65 per cent of all revenue is generated from this location. While R.M.Williams has established relationships with several overseas manufacturing partners, including those in China, Vietnam, Madagascar, Portugal, Bangladesh and Pakistan, we are committed to supporting and growing Australian manufacturing capabilities as a business we are actively moving toward 100 per cent of all R.M.Williams boots and leather goods – including all bags and wallets – to be exclusively made in Australia.

Where possible, we prioritise sourcing materials from local suppliers, however, due to the nature of the materials in our expanded range we increasingly source from 26 overseas

countries, including Australia, Argentina, Bangladesh, Brazil, China, France, Germany, Hong Kong, India, Italy, Madagascar, Malaysia, Mauritius, Mexico, Morocco, New Zealand, Pakistan, Portugal, South Africa, Spain, Sri Lanka, Taiwan, Turkey, United Kingdom, United States and Vietnam. These materials include leather, woven and knitted fabrics, footwear components, clothing sundries along with packaging materials. Several of these source countries are generally considered to have a higher inherent risk for modern slavery. We are conducting further due diligence on the suppliers that we work with. In particular, we are assessing the risks and actions required in relation to forced labour risks wherever they may arise in the world, including the Xinjiang Uygur Autonomous Region.

Transparency is important to us and we list the names and addresses of suppliers that help make our products on our website.

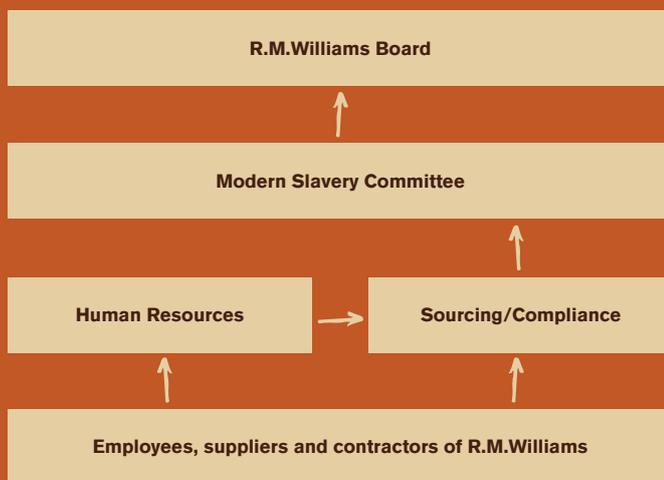
Our Manufacturing Sourcing Team is responsible for procuring finished items across the following categories:

- Clothing i.e., shirts, bottoms, knits, outerwear and headwear;
- Footwear i.e., boots and casual footwear; and
- Craft Items i.e., belts, bags and wallets.

# OUR GOVERNANCE MODEL

## GOVERNANCE

R.M.Williams has a formal governance structure to address modern slavery risks, which is illustrated in the diagram below.



It is the responsibility of all employees, contractors and suppliers working for, or on behalf of, R.M.Williams to identify, prevent and remediate modern slavery risks. Internally, the Human Resources Team and the Procurement and Compliance Team are responsible for implementing modern slavery risk management into existing business processes and systems and ensuring that all relevant policies and procedures are adhered to.

Currently, our Modern Slavery Committee are responsible for discussing modern slavery risks, incidents and responses, and ultimately will be responsible for establishing and implementing our Modern Slavery Framework and monitoring our progress. The Committee provides updates to the R.M.Williams Board on an as needed basis. The board of directors is responsible for putting into place actions to address risks of modern slavery in its operations and supply chains.

Our legal team has responsibility for ensuring this Policy complies with our legal obligations.

## POLICIES

We have zero tolerance of slavery and we expect the same commitment from all organisations that we do business with.

To ensure that we, as well as all those in our supply chain, uphold this commitment, we have in place several policies and procedures, which include:

### Anti-Slavery Policy.<sup>1</sup>

Our commitment to reducing the risks of modern slavery in our business operations and supply chains, and to managing incidents where they might occur, is outlined within our Anti-Slavery Policy.

### Modern slavery fact sheet.

We created a one-page modern slavery fact sheet, which included information on, as well as the requirements of the Australian Modern Slavery Act, which was sent to all our Tier 1 suppliers.

### Supplier Agreements.

Our Supplier Agreement stipulates the terms and conditions required to be a supplier and was updated during the reporting period to include contractual provisions relating to modern slavery.

### Supplier Code of Conduct.

Our Code sets out our performance and behavioural expectations for our suppliers and, similarly, was updated during the reporting period to include modern slavery considerations.

### Whistleblower Policy.

Our Whistleblower policy encourages employees, contractors, suppliers and customers to raise concerns of suspected unethical, illegal or fraudulent conduct. The policy provides protection for whistle-blowers so they feel safe to disclose any malpractice, misconduct.

**Anti-harassment and Bullying Policy.**

The Anti-harassment and Bullying Policy ensures all staff are treated and treat other with dignity and respect, free from harassment and bullying. It helps foster an environment in which our staff are comfortable to say something, if they see something.

**Code of Conduct.**

Our Code of Conduct provides advice and guidance on how our employees, contractors, consultants, and board members should conduct business, ethically, and in accordance with all applicable laws, regulations and policies.

All updated policies have been made available to employees via the internal R.M.Williams' portal.



# OUR MODERN SLAVERY RISKS

We recognise that as a company operating within the garment and footwear industry, we are inherently at a higher risk of causing, contributing or being linked to modern slavery, either through our business operations or supplier relationships. Typically, the garment and footwear supply chain is characterised by low skilled, low paid labour, short lead times and intensive, dispersed production, therefore exposing the industry to labour and human rights risks. However, the likelihood and severity of these risks and potential adverse impacts varies considerably based on the country of production, the regulatory environment and socio-economic factors.<sup>2</sup>

To identify and assess the potential risks of modern slavery in our operations and supply chain, our Sourcing and Compliance Team have conducted a risk assessment that focuses primarily on country risk, using the Global Slavery Index (GSI). The GSI, an index developed in 2018 by Minderoo Foundation's Walk Free initiative, provides a country by country ranking of the number of people living in conditions of modern slavery.<sup>3</sup> The findings of the assessment were used to highlight the highest risk countries within our supply chain. Recognising that our ability to influence is dependent on the amount of business we do with them, we have prioritised our activities on 'major suppliers' where we have an annual spend of \$100,000 and above. Based on spend and country risk, we identified five higher risk suppliers located in 5 countries, China, India, Madagascar, North Vietnam, and South Vietnam.

## OUR RESPONSE

To further understand these five priority suppliers' approach to managing modern slavery risks, we issued a self-assessment questionnaire (SAQ). The SAQ responses and most recent supplier audit reports did not identify any factors or processes that indicate modern slavery impacts.

We recognise that modern slavery, in all its forms, exists within most supply chains. We appreciate that, at this point in time, the scope of our risk assessment only covers Tier 1 of our supply chain and therefore does not consider the risks across the full length of our supply chain. As such, we are committed to increasing transparency across our supply chain and by mapping our supply chain to tier 2 and beyond. This will ultimately allow us to take a more risk-based approach to due diligence and prioritise those sourcing areas and production processes where adverse impacts are most severe.

# OUR MANAGEMENT APPROACH

We recognise that risks of modern slavery can never be eliminated. However, in our dealings with suppliers we are committed to taking all reasonable steps to reduce the risk of instances of modern slavery occurring. To do this, we have in place systems to:

- Identify and assess potential risk areas;
- Monitor potential risk areas;
- Provide a mechanism to report potential or actual incidents of modern slavery; and
- Provide appropriate remediation where incidents of modern slavery have occurred.



## RISK IDENTIFICATION AND ASSESSMENT

### OPERATIONS

While the garment and footwear industries are typically higher risk for modern slavery, particularly in the manufacturing workforce, our business operations are located in countries with strong regulatory environments and rule of law, such as Australia, the United Kingdom and the United States. In addition to this, our operational policies and processes protect the labour rights of our employees that work for R.M.Williams.

All recruitment is done internally through our recruitment manager and we do not engage third-party labour providers or recruitment agencies to perform recruitment on our behalf. This internal function reduces the risk of debt bondage by ensuring that our recruitment practices meet the requirements of the Fair Work Act and allows us to have sufficient oversight of our workforce.

### SUPPLY CHAINS

Our focus is on building consistent and long-term relationships with our suppliers and our aim is to engage suppliers that uphold the same commitment and values of sustainability, quality, and ethics.

Our Sourcing and Compliance Team issue an SAQ to all potential suppliers prior to engagement to identify a supplier's exposure to risk, including modern slavery, and to assess their compliance with our performance expectations, as outlined in the Supplier Code of Conduct. The SAQ sets out a list of comprehensive questions relating to awareness, due diligence and remediation to identify the suppliers risk exposure and to understand the current approach to risk management.

Prior to becoming an approved supplier for R.M.Williams, suppliers are required to either:

- Undertake an audit from a third party appointed by R.M.Williams;
- Provide a recent audit report (for example, undertaken for another customer) that is equivalent in scope to our assessment.

The audit report, SAQ results, and the annual risk mapping exercise, inform our risk assessment and ultimately influence our decision to engage a vendor. The SAQ outcomes and audit report allow us to identify opportunities for improvement in current business practices and guide ongoing supplier risk management.

## RISK MANAGEMENT

### OPERATIONS

Our HR systems, policies and processes help us to manage risks of unfair treatment of employees across our operations, including risks of modern slavery.

Our behavioural standards are communicated to our employees via our Employee Handbook. The handbook specifically outlines the following:

- Employment, including pay, probation and termination;
- Benefits, including leave entitlements;
- Policies & procedures, including the Confidentiality Policy, Harassment Policy, Misconduct Policy, Drug and Alcohol Policy, Employee Bags and Belongings Search Policy, Email, Computer and Internet Usage Policy, Media and Social Media Policy and Whistleblower Policy; and
- Operations policies and procedures. These are the procedures and guidelines relevant to the division of the business in which the employee is hired, e.g. the workshop, retail store, etc.

All employees are required to sign the handbook to acknowledge receipt and agree to abide by all policies and procedures in the Handbook, as well as all other policies and procedures prior to starting work with R.M.Williams.

Our employment contracts stipulate the minimum terms and conditions of employment. It is mandatory for all employees must read and acknowledge the terms and conditions of their employment, as outlined in the contract, prior to engaging in work.

In order to ensure that our employees are recognised for their hard work, we undertake an annual salary and bonus review. Salary reviews occur once a year following annual performance reviews for all Head Office, Store Managers and Workshop Management.

## SUPPLY CHAINS

We use the results of our risk assessment activities, specifically the audit report, SAQ and risk mapping exercise, to guide ongoing supplier management.

Our behavioural and performance expectations are communicated to our suppliers via the Supplier Code of Conduct and the Supplier Agreement, which is mandatory to sign for all new suppliers. During the reporting period, both the Code and the Agreement to were updated to include a section on the Modern Slavery Act.

Our Supplier Agreement was updated to include the following contractual provisions:

- a) the Supplier must meet and comply with standards equivalent to R.M.Williams' commitment under this Policy (or, if applicable, take verifiable steps towards compliance) and generally act in a way that is consistent with its values;
- b) the Supplier must hold its own contractors, suppliers, representatives and business partners to the same standard;
- c) R.M.Williams may require the Supplier to remediate any breach of that standard; and
- d) R.M.Williams has the right to terminate if the Supplier is in breach of that standard, fails to work towards full compliance with that standard, or fails to take remediation action required by R.M.Williams.

The Supplier Agreements, alongside the Supplier Code of Conduct, were issued for re-signing following these amendments. Once the Code of Conduct and Supplier Agreement have both been signed, a supplier can be approved as an official supplier to R.M.Williams.

To assess ongoing compliance with both the Agreement and the Code, all suppliers that fall into the major supplier category are required to be audited on an annual, biennial or triennial basis. Where our audits identify critical non-conformances, we follow up with suppliers to obtain evidence of issues being closed out. The frequency of follow ups depends on the gravity of the non-conformance (see risk remediation for more detail). During FY20, 23 suppliers audits were completed, with four of these completed by Bureau Veritas on R.M.Williams behalf and the remaining were undertaken for another customer or arranged by the supplier. From all the audits performed during the reporting period, we did not identify any instances of forced labour or other forms of modern slavery. We did however identify non-conformities that needed to be addressed and worked with suppliers to rectify these. For example, one of our suppliers in Pakistan was required to unblock two fire extinguishers, and to ensure that all workers were complying with health and safety measures, such as wearing face masks. The Procurement and Compliance Team also conduct regular site inspections for major suppliers to monitor their compliance with the Code and Agreement. No site inspections were conducted during the reporting year due to COVID-19 travel restrictions, however four suppliers were visited during the FY19 period.

## RISK REMEDIATION

As we state within our Policy and Code of Conduct, all employees, suppliers, and contractors of R.M.Williams have a responsibility to prevent, detect and report potential, suspected or actual incidents of modern slavery in R.M.Williams' operations or supply chain. We make it clear to our employees, suppliers, and contractors, that we will not subject them to any repercussions for reporting such risks, as stated in our R.M.Williams Code of Conduct, Whistleblower Policy, and Anti-Slavery Policy and encourages the reporting of any instances of suspected unethical, illegal or fraudulent conduct involving the business of R.M.Williams.

## OPERATIONS

All employees who have reasonable grounds to suspect that a breach of a law or other standard of behaviour has occurred, are encouraged to report that suspicion to the Group Co-Ordinator. If this is considered inappropriate, he or she may raise the concern with a Protected Disclosure Officer, by phone or email, or in writing, via email or mail. Additionally, under the Corporations Act, an employee may also raise the matter with an "officer" or "senior manager" of the company. Based on the mechanisms provided, employees may choose to raise a grievance anonymously, however we encourage our employees to provide details for investigation purposes.



Once a disclosure has been received from a Whistleblower, R.M.Williams will consider the most appropriate action, which may include an investigation of the alleged conduct.

Any investigation in relation to a disclosure will be conducted promptly and fairly, with due regard for the nature of the allegation and the rights of the persons involved in the investigation. Any evidence gathered during an investigation, including any materials, documents or records, are securely held by the investigator. During the investigation, the investigator will have access to all of the relevant materials, documents, and records. The directors, officers, employees and agents of R.M.Williams must cooperate fully with the investigator. Once the investigation has been performed, a decision will be made and communicated to all parties and, if relevant, the complainant will be remedied.

## SUPPLY CHAINS

Suppliers and contractors may also use the procedures and mechanisms outlined above, however, based on the Anti-Slavery Policy, suppliers will now be encouraged to submit grievances to a private email box.

Where a potential incident is brought to the attention of our sourcing or compliance representatives, they will consider the modern slavery risk in the first instance and assess whether it should be escalated the modern

slavery committee. The delegated modern slavery committee is responsible for further investigation of potential, or actual, incidents of modern slavery within R.M.Williams' operations and supply chains, and whether referral is required to the CEO and board of directors.

If R.M.Williams determines that there has been a breach of this Policy by a Supplier, either flagged through our grievance mechanisms or via audits, we will endeavour to have that Supplier identify and correct that breach.

If it is apparent that an individual has suffered harm as a result of an identified issue, we will seek to ensure, first and foremost, that they are protected and that remedy is provided to them by using our leverage. In the event that we have caused or contributed to the risk, we will take action to prevent that risk and remedy any actual impact as appropriate. We also have processes in place to identify root causes of those issues to help prevent that issue recurring in the future with that supplier specifically and with our other suppliers generally.

If a supplier fails to make progress in respect of its required remediation, we will in the interest of the victims engage the help of government, local law enforcement agencies and non-for-profit organizations to ensure that the rights and entitlements of the victims are fully compensated.



# ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

In order to maintain a strong due diligence system and ensure that modern slavery risks are being identified, managed and remedied, we regularly assess the effectiveness of our systems and processes. The following processes are in place to monitor, review and assess the effectiveness of our actions:

- 
- Regularly reviewing our risk assessment processes, especially when commencing operations in a new country or region or when engaging a new supplier;
  - Facilitating regular engagement and feedback between key areas of the business via the Modern Slavery Committee;
  - Engaging an independent, International Auditing Company to conduct internal audits on our processes to address modern slavery risks;
  - Tracking the actions taken and measuring their impact, for instance the percentage of staff that have received modern slavery training; the percentage of suppliers that have been vetted;
  - Reviewing any modern slavery issues that have been reported to either the Sourcing or Compliance Teams and review how those issues were handled.

# OUR VISION

R.M.Williams and its supply chain understands that to eliminate modern slavery requires dedication and commitment to ensure a positive difference is made to people's lives. With this in mind, we will continue to evolve and continue to mitigate these risks by developing and improving the strategies mentioned throughout this statement.



AREA OF FOCUS	IMPROVEMENT INITIATIVE	ACTIONS	
		FY 21	FY22
<b>Governance</b>	Strengthen and implement modern slavery policies	<ul style="list-style-type: none"> <li>Finalise and implement the R.M.Williams Anti-Slavery Policy</li> <li>Draft an Ethical Sourcing Program</li> <li>Draft a Modern Slavery Action Plan, outlining key actions, responsibilities and targets, to meet the commitments made in this statement</li> </ul>	<ul style="list-style-type: none"> <li>Review and identify areas for further improvement in our policies and contracts</li> <li>Finalise the ethical sourcing program and roadmap</li> <li>Assign responsibilities to an individual / function to track and follow the progress against the Ethical Sourcing Program</li> <li>Finalise the Modern Slavery Action Plan and begin rolling it out across the business</li> <li>Draft an Ethical Sourcing Roadmap, outlining how ethical sourcing will be implemented throughout its business operations and supply chain</li> </ul>
<b>Risk assessment</b>	Conduct deeper due diligence on high-risk suppliers	<ul style="list-style-type: none"> <li>Conduct an annual risk assessment that considers industry risk, in addition to country risk</li> <li>As part of the ethical sourcing program: <ul style="list-style-type: none"> <li>Establish a risk screening mechanism to identify high risk vendors during onboarding</li> </ul> </li> <li>Review SAQs and verify responses for all high-risk / high-spend suppliers</li> </ul>	<ul style="list-style-type: none"> <li>Identify priority actions for high risk/ high spend suppliers to implement and continue to develop relationships</li> <li>Implement the risk based, due diligence process and screening mechanism within the procurement process</li> <li>Roll out audit program across 10% of our suppliers</li> <li>As part of the ethical sourcing program: <ul style="list-style-type: none"> <li>Draft a risk-based, due diligence process</li> <li>Develop a risk, based audit program</li> </ul> </li> <li>Engage with five high risk suppliers and conduct audits to verify SAQ results</li> </ul>
<b>Risk management</b>	Enhance supplier management processes	<ul style="list-style-type: none"> <li>Research new supplier management systems for adoption</li> <li>Increase our visibility of incidents by ensuring key high-risk suppliers have access to effective grievance mechanisms and encourage them to report all incidents to us</li> </ul>	<ul style="list-style-type: none"> <li>Roll out supplier management system</li> <li>Ensure suppliers require their suppliers to have an effective grievance mechanism</li> <li>Develop and rollout modern slavery and human rights training to major suppliers where and when required</li> </ul>
<b>Training and collaboration</b>	Improving our networking and industry collaboration	<ul style="list-style-type: none"> <li>Develop a tailored Modern Slavery Training Program for our people to increase their understanding and awareness of modern slavery risks</li> </ul>	<ul style="list-style-type: none"> <li>Join an industry body, or similar, to improve our modern slavery strategy</li> <li>Deliver a tailored Modern Slavery Training Program for those responsible for implementing modern slavery controls, i.e. our Procurement and Compliance Team and Our Human Resources Team</li> <li>Develop and implement quiz to test knowledge on module</li> <li>Identify opportunities for industry collaboration to improve our modern slavery program</li> </ul>

# ENDNOTES

- 1 Our Anti-Slavery Policy was drafted during the reporting period and was adopted subsequent to the period.
- 2 Organisation for Economic Co-operation and Development (OECD) (2016), *OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector*; <https://mneguidelines.oecd.org/Draft-for-Consultation-Due-Diligence-Guidance-Responsible-Supply-Chains-Garment-Footwear-Sector.pdf>
- 3 Walk Free (2018), *Global Slavery Index*, <https://www.globalslaveryindex.org/about/the-index/>





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