

20 MODERN 24 SLAVERY STATEMENT

Inspiring you to live your passion



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ABOUT THIS STATEMENT

Super Retail Group Limited (ACN: 108 676 204) is an Australian public company listed on the Australian Securities Exchange (ASX:SUL). The registered office is at 6 Coulthards Avenue, Strathpine, Queensland, 4500, Australia.

This is Super Retail Group's (**the Group**) Modern Slavery Statement (Statement) pursuant to the *Modern Slavery Act (Commonwealth) 2018* (the Act) for the financial year ended 29 June 2024 (FY24). This is a joint statement covering Super Retail Group and the entities described under Appendix 3 *Reporting Entities*. This Statement describes how Super Retail Group seeks to identify, assess, and address risks and instances of modern slavery across its operations and supply chain. It also sets out how the Group assesses the effectiveness of its approach.

This is our fifth Statement, and it has been internally reviewed and subject to internal assurance.

The CEO and Board of Super Retail Group (as principal governing body of the entities described in Appendix 3 *Reporting Entities*) approved this Statement on 26 November 2024. This statement has been signed by Anthony Heraghty, Group Managing Director and Chief Executive Officer in his role as a responsible member of the Super Retail Group Board. Refer to Appendix 2 for approvals and confirmation of mandatory criteria according to sections 4 and 16 of the Act.

This report contains forward looking statements. Please read our disclaimer on page 4 of the [FY24 Sustainability Report](#) for more information.

Note: Key capitalised terms used in this Statement are defined in the Glossary in Appendix 1.

Acknowledgement of Country

Super Retail Group acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and communities. We pay our respect to Aboriginal and Torres Strait Islander cultures; and to Elders past and present.

We also operate in Aotearoa New Zealand, and we acknowledge ngā iwi Māori as Tangata Whenua (First People) of Aotearoa.

Super Retail Group is committed to upholding Te Tiriti o Waitangi - Treaty of Waitangi principles, developing relationships with, and supporting local iwi.

Manaaki whenua,
Manaaki tāngata,
Haere whakamua.

If we care for the land,
If we care for the people,
We can move forward into the future.

*Original artwork Seed Dreaming -
Watiya-warnu Jukurrpa, was produced by
Charmaine Napangardi Dickson, who is a third-
generation artist with Warlukurlangu Artists, for
our Reflect Reconciliation Action Plan.*



SECTION 1



Our CEO's statement

Our Modern Slavery Statement reflects our commitment to upholding human rights and fair working conditions throughout our supply chain and operations. It presents the progress that has been made during the year in enhancing our Responsible Sourcing program and strengthening the management of human rights and modern slavery risks in our supply chain.

Super Retail Group remains committed to:

- Conducting business with integrity, honesty and transparency, in compliance with our laws and Group policies;
- Respecting human rights, labour standards and fair working conditions to protect the people across our operations and supply chains; and
- Implementing environmental protection and management measures to reduce our impact on the people and planet.

We expect our Trade Partners and Service Providers to share our commitment to working together to enhance compliance, provide remedy as applicable and deliver improved outcomes.

In FY24, we continued our focus on verifying compliance for higher risk first tier Factories that supply our private brand, direct import and licensed products that the Group is responsible for manufacturing. Through this process we identified various human rights and potential modern slavery related issues.

For example, at a Factory in China, we identified a child worker (15 years old, under the legal age of 16). In addition, the Factory did not meet a number of other legal requirements, or the requirements of our Responsible Sourcing Code. In response to this, we worked with the Factory to address the issues and engaged external services from LRQA to support and monitor the situation. The child worker has returned to school and the Factory has addressed the majority of the non-conformances and is now Conditionally Approved.

Other findings identified at Factories included recruitment-related fees being charged to workers, issues relating to payroll,

attendance records and health and safety. We work with our suppliers to address critical non-conformances and if we are unable to reach an acceptable resolution, we seek alternative sourcing options.

In FY24, we also implemented several key updates to support our Responsible Sourcing program. In conjunction with an external human rights consultant, we reviewed and strengthened our Human Rights and Responsible Sourcing Policy ([policy](#)) and Responsible Sourcing Code ([code](#)) which were approved by the Board in February 2024.

Additional key program enhancements included:

- Introducing a Zero Tolerance non-conformance rating effective from FY25;
- Strengthening our approach to risk identification by using LRQA's supply chain intelligence platform, EiQ, and adverse media scanning tool, Sentinel;
- Enhancing our due diligence processes by introducing Second Party Audits; and
- Investing in additional access to LRQA online learning platform modules as part of our knowledge and capacity building initiative which will roll out to relevant team members and priority suppliers in FY25.

As a business with complex supply chains and a diverse product mix, identifying and addressing modern slavery risks will take time and require ongoing focus. Progress is gradual and deliberate, and we are guided and motivated by our organisational values as we work towards our goals.

Anthony Heraghty
Group Managing Director and Chief Executive Officer
26 November 2024

WE SUPPORT



Super Retail Group is a signatory to the United Nations Global Compact (UNGC), a participant of the Global Compact Network Australia (GCNA), and strongly supports the Ten Principles of the UNGC in the areas of Human Rights, Labour, Environment and Anti-Corruption. The Group aims to contribute to the UN Sustainable Development Goals (SDGs) through our Operations and Supply Chain.

Our structure, operations and supply chain

OUR STRUCTURE

Super Retail Group (ASX: SUL) is the proud owner of four iconic brands: Supercheap Auto, rebel, BCF and Macpac, and is one of Australia and New Zealand’s largest retailers.

Our powerful Brands have leading positions in growing high-involvement lifestyle categories of auto, sports, and outdoor leisure. For our customers and highly engaged 11.5 million active club members, we source, distribute and provide a mix of national and international consumer branded products, as well as Private Brand products, through online and in-store channels.

The Group provides centralised support services for the procurement and distribution of goods, including, e-commerce activities, customer service and logistics management.



Supercheap Auto is Australia and New Zealand’s favourite specialty automotive parts and accessories retail business. With 341 stores, we provide a wide range of service parts, tools, and accessories, as well as products for the garage, travel, touring and outdoors.

rebel is Australia’s leading sporting goods retailer with 159 stores across Australia. Through rich digital and in-store experiences, customers from all walks of life can harness the transformative power of sport. With a broad range of quality product and expert knowledge, we inspire all Australians to chase their sporting dreams and passions.

BCF is a leading outdoor retailer with 162 stores across Australia. With expert knowledge and service, we provide everything you need for your next boating, camping, or fishing adventure, all under the one roof.

Macpac is New Zealand’s original, technical outdoor brand, delivering quality gear, made responsibly, and trusted to last. Tested and proven in the ultimate outdoor test lab – New Zealand – our gear is designed to equip outdoor enthusiasts to adventure better. Launched in 1973, Macpac has 97 stores across Australia and New Zealand and is committed to delivering a great customer experience with expert advice.

OUR OPERATIONS

759 TOTAL RETAIL STORES¹

8 ONLINE RETAIL CHANNELS

341 SUPERCHEAP AUTO
Australia and New Zealand

4 SUPPORT OFFICES

159 REBEL
Australia

7 DISTRIBUTION CENTRES

162 BCF
Australia

97 MACPAC
Australia and New Zealand

3 COUNTRIES OF OPERATION
Australia, New Zealand and China

¹ During FY24, we closed 5 stores and opened 28 new stores.

OUR TEAM

16,063 DIRECTLY EMPLOYED TEAM MEMBERS

113 to 384 LABOUR HIRE FTE² (RANGE) IN OUR DISTRIBUTION CENTRES

~4%³ UNION MEMBERS

78% COVERED BY AN ENTERPRISE AGREEMENT

Note: FY24 data unless otherwise noted.

² We utilise labour hire services to support our Distribution Centre (DC) Team Members. During FY24, the level of support in Full Time Equivalent (FTE) basis varied between 26% (June 2023) and 53% (December 2023) of total DC Team Members, in line with retail seasonal fluctuations.

³ Proportion of the total number of Team Members engaged by SRG in Australia and New Zealand in FY24 who have payroll deductions for union membership. Excludes Team Members based in China.

OUR SUPPLY CHAIN - RETAIL PRODUCTS⁴

Our retail products (including Private Brand, licensed or national brands) are purchased via the following supply chain arrangements:

- A. Products sourced from Factories directly contracted by our group including Direct Imports;
- B. Products sourced from manufacturing partners or Factories - mainly Private Brand goods; and
- C. Products sourced from Trade Partners who manage their own supply chains such as national brands. (This category of products is not managed through our responsible sourcing compliance verification program. These suppliers are responsible for their own compliance obligations).

Suppliers need to meet our Human Rights and Responsible Sourcing Policy and Responsible Sourcing Code expectations.

~\$2.3b
ANNUAL SPEND⁹

930+
TRADE PARTNERS⁵

OUR SUPPLY CHAIN - NON-STOCK PRODUCTS AND SERVICES

Non-Stock products and services include marketing and promotional materials, Team Member uniforms, capital expenditure, professional services, transport and logistics providers, and cleaning services, amongst others.

~\$642m
ANNUAL SPEND⁸

1,700+
SUPPLIERS

PRIVATE BRAND PRODUCTS AND FACTORIES⁶ IN SCOPE OF COMPLIANCE VERIFICATION PROGRAM

10,000+ Group Private Brand products

16 Countries of manufacture

535 Factories⁶, 85 percent in China.

27% Group revenue from Private Brand products⁷

SUPERCHEAP
AUTO

33%

rebel

9%

BCF

27%

macpac

86%

Note: Data for FY24 unless otherwise noted.

⁴ Super Retail Group has retail operations in Australia and New Zealand.

⁵ Refers to retail Trade Partners supplying to the Group. Purchase arrangements vary between ad-hoc orders (short-term) and regular orders (longer-term).

⁶ Factories which supply or manufacture Super Retail Group's Private Brand products; Factories directly contracted by the Group to manufacture products; Factories which supply or manufacture Private Brand Non-Stock products to/for the Group. These Factories are in the scope of our Responsible Sourcing compliance verification program as outlined in our Responsible Sourcing Code.

⁷ Based on approximate percentage of Private Brand products' sales revenue for FY24, in Australian dollars and excluding GST.

⁸ Our Annual Spend on Non-Stock Procurement is calculated including GST or sales tax equivalent. The decrease in our annual spend when compared to FY23 is a result of a review and update to our supplier categorisations that are in scope for reporting. Costs related to taxation, rent and other finance related expenditure have been removed.

⁹ The annual amount used for purchasing our products in Australian Dollars and excluding GST.

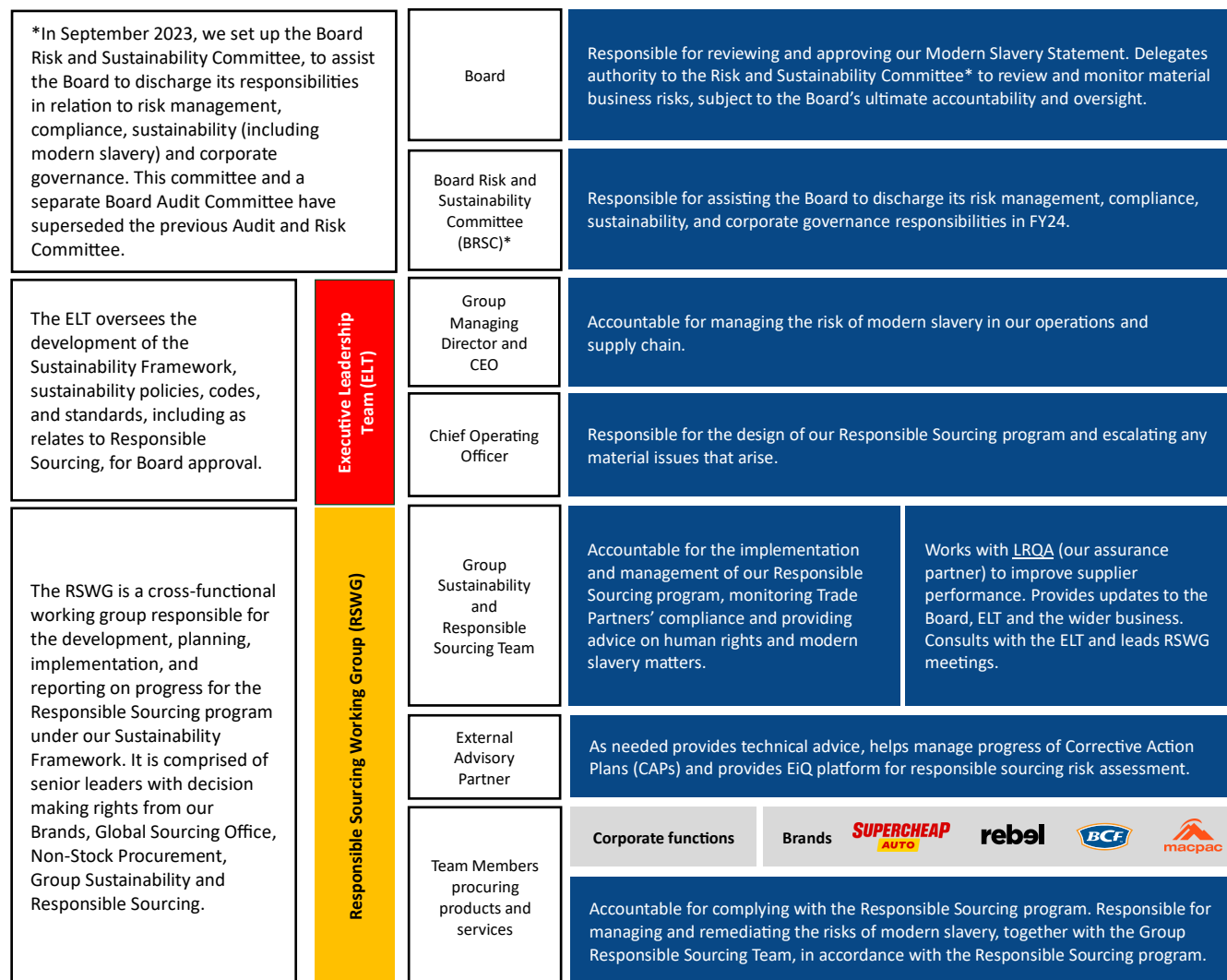
Our governance

HUMAN RIGHTS AND WAYS OF WORKING

Super Retail Group is committed to upholding human rights and fair working conditions for our Team Members, Trade Partners, Service Providers, and people in our Supply Chain. We aim to uphold human rights based on the principles of the following international guidance:

- International Bill of Human Rights including the Universal Declaration of Human Rights (UDHR);
- International Labour Organisation’s (ILO) Declaration on Fundamental Principles and Rights at Work and ILO Conventions;
- United Nations Guiding Principles on Business and Human Rights;
- United Nations Global Compact (UNGC) core values of human rights, labour standards, the environment and anti-corruption; and
- United Nations Sustainable Development Goals (SDGs) and targets relevant to our Operations and Supply Chain.

Our governance approach promotes ongoing consultation with the Brands and corporate functions on responsible sourcing issues, including human rights and modern slavery risk management. Key issues are reported to the Board as part of the Managing Director’s Report. Overall program outcomes are reported annually in our [Sustainability Report](#) and this Statement. Our FY24 internal governance framework related to Responsible Sourcing and Modern Slavery is outlined on the right.





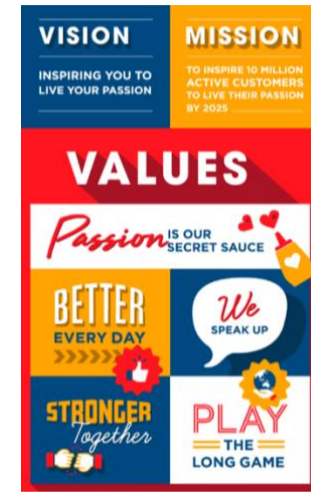
SUSTAINABILITY FRAMEWORK 2030

Our overarching *Sustainability Framework 2030* sets our path forward for our five focus areas: *Team, Community, Responsible Sourcing, Circular Economy, and Climate*. Our work across all areas is guided by strong Governance. These focus areas have 12 goals. **Goals 5, 6 and 7** relate to responsible sourcing and are linked to relevant targets (see below). Given the evolving nature of the sustainability and responsible sourcing landscape we expect to update these as we mature and the external environment changes. Our framework is driven by our vision and connected to our values.

OUR VISION, MISSION AND VALUES

Our vision is to inspire people to live their passion. This is how we create value. Our vision drives our corporate strategy and sits at the centre of what we do and how we do it.

Our vision, mission, and values help steward our organisation in a sustainable manner as we execute our corporate strategy.



PEOPLE



PLANET

Team

Community

Responsible Sourcing

Circular Economy

Climate

- GOAL 1:** Invest in the health, safety and wellbeing of our team
- GOAL 2:** Create an inclusive and diverse team
- GOAL 3:** Support our team with purpose-led career development

- GOAL 4:** Invest in community programs that support our customers' and team's passions

- GOAL 5:** Improve transparency and disclosure of high-risk supply chains
- GOAL 6:** Invest in sustainable supply chains through strategic partnering
- GOAL 7:** Source materials and products more responsibly

- GOAL 8:** Design and procure durable products, with a circular mindset
- GOAL 9:** Reduce waste and unnecessary packaging
- GOAL 10:** Repair, reuse or recycle our products

- GOAL 11:** Develop a decarbonisation roadmap for our operations and customer offering



Goals

2030 Targets

- Implementing a holistic wellbeing program – participation rates
- Health & Safety TRIFR, 1st quartile performer in retail
- Develop Reconciliation Action Plan
- 40:40:20 for Board, executive and senior leadership positions¹⁰
- Develop Access and Inclusion Plan
- Program development for greater diversity and inclusion inc. LGBTQIA+
- Deliver programs for purpose-led career development
- Identify key purpose-aligned community partnerships and agree a strategy for each Brand
- Contribute to conservation and regeneration programs
- Collaborate with and support strategic trade partners to improve their supply chains
- Contribute to industry level change
- Embed responsible purchasing practices in decision making across our business
- Develop a standard for design and procurement of products
- 100% of private brand packaging is reusable or recyclable¹¹
- Adopt the Australasian Recycling Label for private brand packaging
- 50% average recycled content must be included in private brand packaging¹¹
- Problematic and unnecessary single-use private brand plastic packaging must be phased out¹¹
- Increase waste diverted from landfills to 90%
- Net Zero Emissions for Scopes 1 and 2
- Measure, manage and report Scope 3 emissions to avoid and reduce emissions in our supply chain.

GOVERNANCE | GOAL 12: Enhance climate-related disclosures

- Align climate-related reporting to the Task Force on Climate-related Disclosures, and adoption of the proposed Australian Sustainability Reporting Standards (ASRS).
- Understand our priority climate-related risks and opportunities and financial impacts.

¹⁰ The Group has a goal of 40:40:20 representation in Board, executive and senior leadership positions by 2025 (40 percent identifying as female, 40 per cent identifying as male, and 20 per cent identifying as any gender).

¹¹ Our packaging targets are aligned to those set by the Australian Government, with delivery expected by 2025.

POLICY FRAMEWORK

Super Retail Group has several policies and codes that articulate our values and the expectations of our Team Members, Service Providers and Trade Partners.

The policies and codes listed here relate specifically to human rights, modern slavery risk and ethical behaviour generally, with the [Human Rights and Responsible Sourcing Policy](#) and [Responsible Sourcing Code](#) embodying the Group's approach to modern slavery risk management (explained further in *Section 3 Identifying and assessing our modern slavery risks*). Each are subject to approval or oversight from the Board and its Committees, the CEO, or the ELT, as detailed in the table.

In FY24, we reviewed and strengthened our [Human Rights and Responsible Sourcing Policy](#) and [Responsible Sourcing Code](#) which are available on our website. This Policy and Code are underpinned by several recognised international standards and conventions. During the review process, we engaged with an external human rights consultant as well as internal stakeholders. We informed our Trade Partners who attended our annual conference in China regarding the pending review and as we request new audit reports or update applicable contracts, we include the relevant documents in our communications.

Notes: Super Retail Group sets the responsible sourcing policies, codes, and procedures for Reporting Entities.

¹² *These policies and codes are publicly available on our website at www.superretailgroup.com.au.*

¹³ *These are internal policies and documents that are available to Team Members on our intranet.*

¹⁴ *Similar requirements to Trade Partners and Service Providers are documented in our Responsible Sourcing Code.*

POLICY OR CODE	CONTENTS AND PURPOSE	APPLIES TO SUPER RETAIL GROUP	APPLIES TO TRADE PARTNERS AND SERVICE PROVIDERS
Code of Conduct ¹²	Sets out the expected standards of behaviour for business activities and outlines legal and ethical obligations for Team Members, officers, volunteers, work experience students, contractors, and labour-hire workers of Super Retail Group and wholly owned subsidiaries.	✓	N/A ¹⁴
Compliance Policy ¹²	Outlines the Group's expectation and commitment to compliance with all applicable laws and Group values.	✓	✓
Human Rights and Responsible Sourcing Policy ¹²	Updated during the reporting year and approved by the Board in February 2024. Provides a set of high-level expectations of Team Members, Trade Partners, and Service Providers in relation to human rights, modern slavery, business integrity and the environment drawing on international standards. The policy also references the Whistleblower Policy and relevant contact points.	✓	✓
Responsible Sourcing Code ¹²	Updated during the reporting year and approved by the Board in February 2024. This Code supports the implementation of our Human Rights and Responsible Sourcing Policy and promotes business integrity; human rights and fair working conditions; environmental management; and sustainable sourcing throughout our supply chain. It outlines our monitoring programs and verification expectations of Trade Partners and Service Providers.	✓	✓
Responsible Sourcing Procedures ¹³	These detail the Group's internal procedures to assess risk and verify compliance against our Responsible Sourcing Policy and Code, and outline our expectations related to Trade Partner and Service Provider compliance. There are separate internal procedures for Factories (Trade Partners) and Services (Service Providers).	✓	✓

POLICY OR CODE	CONTENTS AND PURPOSE	APPLIES TO SUPER RETAIL GROUP	APPLIES TO TRADE PARTNERS AND SERVICE PROVIDERS
<u>Speak Up (Whistleblower) Policy</u> ¹⁵	<p>Updated July 2024, this policy outlines for Team Members, Trade Partners, Service Providers and others, the mechanisms for reporting and investigating concerns about conduct suspected to be unethical, illegal, or contrary to our values. Concerns may be raised to the Integrity Officer in writing, by phone through the Integrity Line (for our China-based Team Members) or anonymously via '<u>Whispli</u>'.</p> <p>The Board Risk and Sustainability Committee will periodically receive a summary of reports made under the whistleblower program and has oversight of the maintenance of the whistleblower program. Where appropriate, the Committee may escalate issues to the Board.</p>	✓	✓
<u>Anti-corrupt Practices Policy</u> ¹⁵	Outlines our commitment to recognising, reporting, and upholding laws and regulations relating to bribery and corruption.	✓	✓
Workplace Resolution Policy ¹⁶	Sets out our commitment for resolution of workplace issues. This Policy may be used in conjunction with the processes outlined in the Whistleblower Policy.	✓	N/A ¹⁷
Union Representation and Membership Policy ¹⁶	Details our commitment to, and support for, freedom of association within Super Retail Group.	✓	N/A ¹⁷
Managing Young Workers Policy ¹⁶	Outlines minimum requirements and expectations to safeguard workers under 18 years of age directly employed by Super Retail Group.	✓	N/A ¹⁷
Harassment-Free Workplace Policy ¹⁶	Outlines our commitment to maintain a professional work environment that is free from workplace harassment (bullying), sexual harassment and discrimination.	✓	N/A ¹⁷

Notes: Super Retail Group sets the responsible sourcing policies, codes and procedures for Reporting Entities.

¹⁵ These policies and codes are publicly available on our website at www.superretailgroup.com.au.

¹⁶ These are internal policies and documents that are available to Team Members on our intranet.

¹⁷ Similar requirements to Trade Partners and Service Providers are documented in our Responsible Sourcing Code.

SECTION 3

Identifying and assessing our modern slavery risks

We review our risk profile for modern slavery on a regular basis to inform the actions in our Responsible Sourcing program and mitigate adverse human rights risks and impacts. The potential types of modern slavery risks identified as most relevant to our Operations and Supply Chain are the risk to people of Forced Labour, Debt Bondage, Deceptive Recruitment practices and Child Labour.¹⁸ These practices are prohibited under our Human Rights and Responsible Sourcing Policy and Responsible Sourcing Code. We also identify other human rights related risks including those related to remuneration, working hours, health and safety and other working conditions.

We consider inherent exposures across our Operations and Supply Chains to identify where the risks of modern slavery may be heightened by known factors. Those factors include the geographic location of a factory or service, the type of industry or commodity, or presence of specific workforce vulnerabilities.¹⁹

To better understand our Supply Chain and enhance our approach to risk and factory segmentation, including the impact of high-risk products, we implemented the LRQA EiQ supply chain intelligence platform. This has allowed us

to gain better insight into potential risk at Factories including risk of certain products and it forms part of our overall Responsible Sourcing program review process. The EiQ methodology covers multiple sub-indices across 5 key sustainability dimensions and incorporates risk as a result of various audits conducted by LRQA for their clients as well as public domain data from multilateral organisations and NGOs.

We also consider our potential relationship to modern slavery risks in line with the **United Nations Guiding Principles on Business and Human Rights** “Protect, Respect, and Remedy Framework”. This acknowledges that businesses can *cause, contribute to, or be directly linked to* human rights risks and impacts.

Practices such as Forced Labour are found to be more prevalent in certain industries and sectors, notably manufacturing and its supply chains. Although not a direct operation of our business, manufacturing is a core component of our Supply Chain. Manufacturing therefore constitutes our largest exposure to modern slavery risk.

The Group’s assessment of risks to date has focussed primarily on direct business relationships and the first tier of our Supply Chains. While risks exist beyond these relationships and the first tier, management and oversight are complicated by layers of supply and reduced leverage. Consistent with our principle to focus our efforts where we believe we have the greatest risk and can have the greatest impact, we are focusing our efforts beyond the first tier of our supply chain on identifying the highest risk inputs and

components of our products (e.g. cotton²⁰) that may have links to Child and Forced Labour across Asia.

As defined in the Modern Slavery Act 2018 Guidance for Reporting Entities¹⁹, an important aspect of identifying modern slavery is acknowledging the connection to other potential practices of workplace and labour exploitation. The ILO has outlined the following indicators of Forced Labour, recognising that some of these are enough to constitute Forced Labour, while others are significant warning signs:

1. Abuse of vulnerability;
2. Deception;
3. Restriction of movement;
4. Isolation;
5. Physical and sexual violence;
6. Intimidation and threats;
7. Retention of identity documents;
8. Withholding of wages;
9. Debt bondage;
10. Abusive working and living conditions; and
11. Excessive overtime.

In line with the Modern Slavery Act guidance, our Responsible Sourcing program considers modern slavery on a spectrum with other forms of labour and human rights exploitation and recognises that these other forms of exploitation could be signs that severe practices like Forced Labour may be occurring.

Our commitment to identifying and addressing these and other human rights abuses is reflected in our Due Diligence Process (i.e. the process by which we evaluate and address risks) and our supplier management practices. We outline our efforts to promote compliance with the Responsible Sourcing Code in the following sections.

¹⁸ Definitions for these types of modern slavery can be found in the glossary.

¹⁹ Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities (May 2023 update)

²⁰ For example Macpac continues its support of Fairtrade by sourcing cotton T-shirts from Fairtrade suppliers.

Our Operations

We consider modern slavery risks in our operations in relation to our Team Members and the use of contracted services and labour. Super Retail Group does not own any manufacturing operations. Combined we operate over 760 retail stores, distribution centres and support offices across Australia, New Zealand and China which are leased from property landlords.

Most of our Team Members are employed directly by Super Retail Group. In FY24, we employed 16,063 Team Members, of which 78 percent were covered by enterprise agreements. The remaining Team Members were engaged on individual employment agreements, in accordance with relevant workplace laws. The standards, obligations and worker protections required by Australian and New Zealand labour laws result in a relatively lower risk of modern slavery within our team.

During FY24, between 113 to 384 Full Time Equivalent (FTE) workers at our distribution centres were contracted through labour hire firms. These firms are assessed under our Responsible Sourcing program as part of their onboarding and contract renewal processes for Service Providers.

Our Supply Chain

SUPPLY CHAIN - SERVICE PROVIDERS

Our [Human Rights and Responsible Sourcing Policy](#) and [Responsible Sourcing Code](#) apply across our Supply Chain operations and include Service Providers. As part of our Non-Stock Group Procurement onboarding process, in general we aim to screen new Service Providers who enter into contracts with the Group, against responsible sourcing requirements. Some exemptions may be provided. Further information for assessment may be requested, depending on the residual risk. Data related to the Service Providers we screened can be found in our [FY24 Data and Indices Document](#).

We continue to consider that the following characteristics may present heightened risks for Service Providers in Australia and New Zealand and this is the basis upon which we assess the risk of service types we could receive in our Operations:

- Use of labour brokers and third-party labour providers;
- Higher prevalence of migrant, overseas, other vulnerable or young workers (e.g. office cleaning and catalogue distribution); and
- Multi-layer subcontracting models (e.g. where multiple subcontractors can be involved in completing the work or contractors can in turn subcontract further e.g. construction and fit out works at our stores and DC’s).

The risk rating of the service types used in our operations remained mostly unchanged from FY23. The service type risks were not assessed through the EiQ and followed our original process. General examples of service types and risk ratings are provided in the attached table. Risk ratings for a service type may be adjusted following additional review of information from a supplier. Therefore, Service Providers under similar service types may be allocated different risk ratings.

During FY24, we checked 23 new Service Providers across various service types that went through our Non-Stock Group Procurement onboarding process. Of these, two were exempt and 20 were screened for compliance with our responsible sourcing criteria through contract conditions, self-declarations, or other assessments. The remaining one Service Provider was not screened at onboarding and a review of the Service Provider onboarding process and scope of verification will be conducted in FY25. Data related to the risk rating of Service Providers we screened can be found in our [FY24 Data and Indices Document](#).

In FY24, the Responsible Sourcing Team continued its engagement with our Non-Stock Group Procurement team to help assess and support the management of responsible sourcing issues relating to onboarding of Service Providers.

In FY25, we will conduct a further review of our Responsible Sourcing processes for Service Providers and report on any revised processes.

SERVICE TYPE EXAMPLES THAT COULD BE ONBOARDED - POTENTIAL RISK RATING

Office cleaning (includes distribution centers)
Direct mail marketing – catalogues
Labour hire
Logistics (transport/ freight)
Physical security
IT services (if overseas workers are used)
Fitness equipment installation
Offshore services (i.e. warehousing)
Facilities maintenance (includes construction)
Energy supply ²¹
Insurance
Professional services
Travel
Waste disposal



²¹ Our decarbonisation plan for 2030 incorporates on-site solar panels installed by our landlords or us. We acknowledge the potential risks involved in the procurement of energy infrastructure in this way. We will review these risks as part of our assessments from an operational perspective as well as a supply chain perspective.

SUPPLY CHAIN - OUR PRODUCTS

For our **products**, in FY24 our assessment of risks for the first tier Factories of our Supply Chain included consideration for the following three factors:

- Our proximity to, and business relationship with, the Factory;
- Inherent risks defined by the country of manufacture according to the Corruption Perceptions Index (CPI) rating and other available information; and
- Insights gained through our compliance verification program and work with external partners such as LRQA, the EiQ platform and the media scanning tool Sentinel.

Proximity to supply

We focus our due diligence efforts where they will have the most impact. We do this by focusing on those business relationships where we have more influence on, and proximity to, the manufacture of the goods. We believe this provides us with the greatest potential to both understand how we might cause or contribute to modern slavery practices in our Supply Chains, as outlined by *United Nations Guiding Principles on Business and Human Rights*²², and work with Trade Partners and Factories to effect positive change in the areas of human rights and modern slavery.

We have assessed Super Retail Group's ability to influence its Supply Chain as highest in relation to:

- (a) Private Brand products, Direct Imports, licensed products that the Group is responsible for manufacturing; and
- (b) Non-Stock products with corporate branding.

For these types of products, Super Retail Group has greater transparency on pricing inputs, demand planning and further leverage to influence Trade Partners to improve performance.

Country risk

In FY24, we completed the implementation of the LRQA EiQ supply chain intelligence platform for our first tier Factories, which allows us to adopt a more nuanced approach to how we assess risk. With this tool, we have greater insight into risk factors such as regional differences, inherent product and industry risks, factory performance, leverage and other Environmental, Social, and Governance (ESG) risk ratings. The EiQ platform geography risk ratings form part of LRQA's supply chain ESG risk ratings portfolio that includes ratings for over 100 geographies, over 350 products, as well as

controversy intelligence and risk scores for more than 170,000 suppliers.

Since we were transitioning and our compliance verification audit cycle is a two-year process, we also considered risks inherent to country of manufacture by reference to the Corruption Perceptions Index (CPI)²³, as well as other publicly and internally available information as done previously.

We have previously considered countries with a CPI rating of less than 70 to have a higher risk of human rights violations, weaker protections for workers, and inadequate governance and enforcement of the rule of law. The CPI was cross-referenced with other data sources such as the Global Slavery Index, the US Department of Labor List of Goods Produced by Child Labor and Forced Labor as well as geography risk ratings obtained through the EiQ platform to determine the scope of compliance verification for the Factories.

²² As guided by *United Nations Guiding Principles on Business and Human Rights* the "Protect, Respect and Remedy" Framework.

²³ As reported by Transparency International – see <https://www.transparency.org/en/cpi/2023>

We will use the EiQ tool as part of our overall Responsible Sourcing program review process in FY25 to enhance our program's effectiveness and our targeted approach to supply chain risk management. The tool will allow us to better focus our efforts where there are higher risks at Factories and where we can have more impact.

At the end of FY24, our relevant retail and Non-Stock products were sourced from 535 active Factories located across 16 manufacturing countries.

The following table identifies for each manufacturing country the FY24 risk rating, compliance verification program inclusion and the number of Factories from which our Private Brand products, Direct Imports and licensed brands that we are responsible for manufacturing are sourced.

Given the concentration of our Factories in higher risk countries as well as other factors, most of our relevant Factories (93%) were considered to be inherently higher risk and in scope of our compliance verification process requirements in FY24. Refer to *Section 4 (Our actions to address key modern slavery risks)* for further details on how we manage these risks.

FY24 First Tier Factories by Country and Risk Rating

Country	Number of Factories ²⁴	Country of Factories in Scope of Compliance Verification FY24	EIQ Country Risk Rating ²⁵
Australia	31	Exempt	Medium
Bangladesh	3	Yes	High
China	455	Yes	High
England	1	Exempt	Low
India	7	Yes	High
Indonesia	3	Yes	High
Italy	2	Yes	Medium
Malaysia	1	Yes	High
New Zealand	6	Exempt	Low
Philippines	2	Yes	High
Slovenia	1	Yes	Low
South Africa	1	Yes	Medium
South Korea	3	Yes	Medium
Taiwan	6	Yes	Medium
Thailand	5	Yes	High
Vietnam	8	Yes	High
	535		
	Total		

²⁴ Number of Factories relate to our Private Brand products, Direct Imports and licensed brands that Super Retail Group is responsible for manufacturing. These are first tier Factories.

²⁵ Country risk based on EiQ ratings

SECTION 4

Our actions to address key modern slavery risks

APPROACH TO RISK MANAGEMENT

Our Responsible Sourcing program and relevant policies, in conjunction with our processes for compliance verification, remediation, grievance reporting mechanisms, and capability building activities, together form our approach to managing and mitigating modern slavery risks.

Our Human Rights and Responsible Sourcing Policy and our Responsible Sourcing Code require Team Members, Trade Partners and Service Providers to:

- Conduct business with integrity, honesty, transparency, in compliance with laws and our Group policies;
- Respect human rights, labour standards and fair working conditions to protect the people across our operations and supply chains; and
- Implement environmental protection and management measures to reduce our impact on the on the people and planet.

New contracts and contract renewals utilising our General Business Agreement generally require inclusion of a responsible sourcing clause which requires Trade Partners and Service Providers to comply with our Human

Rights and Responsible Sourcing Policy and Responsible Sourcing Code.²⁶ Compliance and monitoring of this requirement across the Group is ongoing and we are exploring options on how we can best communicate our Responsible Sourcing requirements to existing Trade Partners who are not under written contractual arrangements.

We continue to work with Team Members across the Group to improve their understanding of our expectations and compliance when negotiating new contracts and contract renewals.

Trade Partners that we consider to be higher risk in the context of Responsible Sourcing including human rights and modern slavery are asked to:

- Disclose to us the Factories being used to manufacture the relevant products, including name, address, and factory contact details;
- Complete a third-party social audit according to our accepted requirements²⁷; and
- Complete Corrective Action Plans for identified non-conformances, particularly critical non-conformances.

FACTORY AUDITS

For those Factories that require audits as part of our Responsible Sourcing program, we have incorporated several allowances to reduce

duplication and audit fatigue, ensuring we are not placing undue burden or unnecessary costs on suppliers. We accept third-party audit reports and certification conducted by accredited auditors, in accordance with the following internationally recognised programs:²⁷

- Sedex SMETA 2 or 4-Pillar audits;
- Social Accountability International (SA8000) audit or Certification;
- Worldwide Responsible Apparel Production (WRAP) Certification;
- amfori Business Social Compliance Initiative (BSCI) audits;
- International Council of Toy Industries (ICTI) Ethical Toy Program Certification;
- Responsible Business Alliance (RBA) audits;
- Fair Labour Association (FLA) monitoring reports;
- ILO Better Work Programme;
- Social & Labor Convergence Program (SLCP) assessments that are verified by approved third-party auditors; and
- Other audit reports issued by SAAS accredited or amfori-BSCI approved audit companies that meet the requirements of our Responsible Sourcing Code.

²⁶ Discretionary exemptions can be provided in some circumstances. Exemptions can also be given from audit protocol on a discretionary basis for orders with a value below \$10K USD and must be approved by the Responsible Sourcing Team based on risk (this exemption cannot be made more than once biennially).

²⁷ Audit reports must include details of non-conformances and must not be older than nine months. Certifications must have a minimum of three months validity when provided.

Relevant Factories are currently required to renew their audit reports biennially based on the date of their last approved audit. Factories that do not complete the audit on time, without an acceptable explanation, may have their rating downgraded. Extensions to due dates or exemptions based on consideration of circumstances can be provided at the discretion of the Responsible Sourcing Team.

Our Responsible Sourcing process requires relevant audit reports and certifications to be reviewed prior to order placement with a factory. After review, our team assigns a rating of ‘Approved’, ‘Conditionally Approved’, ‘On Probation’ or ‘Not Approved’. Rating definitions can be found in *Appendix 1 - Glossary*.

Trade Partners that fall outside the risk criteria set out in our Responsible Sourcing Code (as outlined in *Section 3 (Identifying and assessing our modern slavery risks)*) are not required to disclose their factory details and are not subject to our Responsible Sourcing Audits. However, they are required to comply with our Responsible Sourcing Policy and Responsible Sourcing Code.

AUDIT CORRECTIVE ACTION PLANS (CAPS) AND REMEDIATION

Relevant Factories can only receive an ‘Approved’ status once audit critical non-conformances have been addressed. Exceptions

may apply when the Factory can provide a genuine reason and demonstrate continuous improvement. Critical non-conformances are those that present significant risk to the workers’ health, safety and rights, or which can often be legal breaches or significant risks to the environment. Examples include potential Forced Labour related non-conformances, failure to provide minimum wage or adequate overtime pay, failure to maintain a safe workplace, illegal or hazardous waste management issues, lack of required permits etc.

Where audits identify non-conformances with our Responsible Sourcing Code, we require our Trade Partners and Factories to take appropriate action to address our requirements, particularly for critical non-conformances. Where relevant, we communicate the actions required to address the non-conformances by preparing and issuing a Corrective Action Plan (CAP); support capability requirements by delivering selected e-learning modules to some suppliers, through our advisory partner LRQA; and by engaging directly with Trade Partners and Factories if our expectations are unclear.

We require our Trade Partners and Factories to remediate key issues identified in CAPs within an appropriate timeframe, depending on the nature and severity of the non-conformance. Most non-conformances can be closed with photographic evidence or provision of electronic copies of documents, records and plans.

However, an on-site re-audit may be required to verify some corrective actions. We work with our suppliers to address critical non-conformances and if we are unable to reach an acceptable resolution, we seek alternative sourcing options.

For Macpac, relevant Trade Partners are managed by the Macpac team. The [Group Human Rights and Responsible Sourcing Policy](#) and [Responsible Sourcing Code](#) apply equally to all brands’ suppliers. As part of our FY24 internal control processes, areas of improvement identified included the provision of LRQA online learning modules to select Macpac suppliers, as well as Group initiated sample second or third-party audits. We will continue to implement these initiatives in FY25.

FY24 FACTORY PERFORMANCE FOR PRODUCTS, BASED ON AUDITS

At the end of FY24, we had 535 active Factories in 16 countries.

- 92 of these Factories were onboarded during the year. These Factories were screened against our Responsible Sourcing Code requirements as part of our mandatory review process.
- 497 Factories were subject to our compliance verification audit program requirements due to being higher risk, with 95 per cent of these having had audits in the past two years.

Areas of improvement identified during the year

As part of our internal responsible sourcing due diligence processes, during FY24 we identified areas of further improvement, such as:

- Consistency in data capture and management of non-conformances, data reported and corrective action plan management processes:
 - A Factory with a recruitment-related fee non-conformance in FY23 was not managed in accordance with our requirements. Despite efforts to work with the Trade Partner to address this issue, they were unwilling to make changes. The Trade Partner and its Factories will not be used by the Group any further.
 - In FY23, two Factories were reported as having had audits where they had only had self-assessments. During the year, the issue was rectified and audits completed.
- Gaps in onboarding processes:
 - Seven Factories under one Trade Partner had not been onboarded in line with our processes. This resulted in two of the Factories being placed On Probation due to the findings in the audit reports. One finding included migrant worker recruitment-related fees where workers were paying the fee for renewal documents, work permits and passports without reimbursement by the Factory. The Trade Partner has been cooperative and has since addressed the issues. We have initiated additional independent onsite verification which will be completed in FY25.
 - Two Factories used by one Trade Partner were not disclosed to us. When we assessed these Factories we determined they could not be onboarded.
 - Orders were placed for private brand Non-Stock and Stock products with two Factories that had not been onboarded according to our requirements. Process improvements have been initiated.
- Systems requirements to enhance our capability in managing the risks in supply chains. Internal processes and systems are being strengthened to help track detailed findings more consistently and improve reporting.

Longer term improvements identified during the year are considered as part of the overall Responsible Sourcing program continuous improvement processes.

FACTORY STATUS (end of FY24)

484

**FACTORIES
APPROVED**

49

**FACTORIES CONDITIONALLY
APPROVED**

2

**FACTORIES ON PROBATION /
NOT APPROVED**

General key areas requiring improvement identified in the various audit reports include those relating to health and safety, working hours, wages, payroll, and social insurance. We require Corrective Action Plans in each case and work with our Trade Partners and Factories to resolve or improve critical issues.

Examples of key findings during the year

Our ongoing due diligence processes in FY24 included us receiving and assessing audit reports commissioned by Factories as well as undertaking independent audits and Second Party Audits to strengthen our compliance verification processes.

We commissioned and funded four independent audits of Factories. During the year we also conducted 26 Second Party Audits and two Factories were placed On Probation following these audits:

- At a Factory in China, a child worker (15 years old, under the legal age of 16) and three young workers (aged between 16-18) were identified during the audit. In addition, the Factory did not meet a number of other legal requirements, or the requirements of our Responsible Sourcing Code. In response to this, we have been working with the Factory to address the issues and engaged external services from LRQA to support and monitor the situation. The child worker has returned to school and the Factory has addressed the majority of the non-conformances and is now Conditionally Approved.
- At a second Factory in China various critical non-conformances were identified, including issues relating to payroll, attendance records and health and safety. The Factory would not cooperate to implement corrective action plans and will not be used in the future.

As part of our general compliance verification processes, we also identified another Factory with recruitment-related fees being paid by migrant workers for passports, identification cards, work permit, visa, and other documentation fees. The Factory would then reimburse the fees to workers over a 10-month period which did not meet our requirements. The Trade Partner and Factory have since addressed this issue. Outstanding fees have been reimbursed and the Factory has established a policy to prevent the issue from reoccurring. Further onsite independent verification will be conducted in FY25 to check ongoing compliance.

Subsequent to the FY24 reporting period closure, we identified that a Factory supplying Private Brand products had not disclosed that they fully outsourced the production of some of these products, which contravenes our Responsible Sourcing Code requirements. We are investigating this matter, and any material updates will be reported in our FY25 disclosures.

We continued to work with Factories in our responsible sourcing verification program to address various audit findings relating to human rights and potential modern slavery practices, critical health and safety concerns and issues related to working hours, wages, and payroll. Where required by the circumstances, we have extended deadlines by which Factories must demonstrate progress against agreed corrective action plans. We engage external providers, where necessary, to assist us in investigating some of the findings further and checking on progress. If we are unable to reach an acceptable resolution with our Trade Partners, we seek alternative sourcing options.

GRIEVANCE REPORTING MECHANISMS

Super Retail Group recognises both the importance of, and challenge in, establishing an effective grievance reporting mechanism.

As outlined in *Section 2 Policy Framework*, our [Speak Up \(Whistleblower\) Policy](#) provides protection and support to enable whistleblowers to raise concerns, including those related to human rights and modern slavery. Anyone with information about Potential Misconduct is encouraged to Speak Up. This Policy applies to the Group and all of the Group's current and past employees, volunteers, officers, contractors, consultants, suppliers (including employees of suppliers), work experience participants, students on placements, and associates, as well as these people's dependants (or their spouse's dependants) and their relatives.

To support this, the Group has established the following mechanisms:

- Integrity Officers who oversee the application of the Policy and the protection of whistleblowers;
- Various reporting channels, including post, email, and ['Whispli'](#) (an online platform) to facilitate anonymous and confidential reporting; and
- A dedicated telephone line service to facilitate anonymous and confidential reporting in English or Mandarin for our China-based Team Members and Trade Partners.

At Super Retail Group, we are committed to ensuring our team members work in a safe and equitable environment where everyone is treated fairly and with respect. One of our core values is 'We speak up'. Speaking up is an important part of our culture, embedded in our values, and we are committed to creating and maintaining a safe Speak Up culture. Providing an effective and accessible grievance mechanism for such issues is a critical aspect to maintaining a safe and respectful working environment for our Team Members.

Super Retail Group takes the core principles of the [respect@work](#) legislation and expands the scope to all categories of serious misconduct relating to the behaviour of our team. In FY24, SRG had 34 substantiated serious misconduct matters. Overall, we experienced year-on-year growth in the number of complaints relating to serious misconduct, however findings that specifically related to sexual harassment, bullying, discrimination, victimisation and other harassment in FY24 reduced by 34 per cent from the prior year, with less than 0.3 per cent of our team being subject to this inappropriate conduct.

As part of our Responsible Sourcing Code, we also ask that our suppliers provide and maintain their own effective grievance mechanisms so their workers and stakeholders in their community can access in their native language. The Responsible Sourcing audits we accept from Factories would generally include verification of the existence of grievance reporting mechanisms at Factories, but they do not offer detailed insight into the efficacy of those mechanisms in resolving workers'

concerns. To improve our understanding of workers' grievances, where possible we conduct independent workers' voice/worker sentiment surveys as part of the independent audits we commission and fund.

Throughout FY25 we will:

- Continue to include independent workers' voice surveys in relevant compliance verification programs for those Factories where we commission independent audits with LRQA; and
- Further engage with industry and third-party providers to explore whether there are more effective grievance mechanisms.

TEAM MEMBER WELLBEING

We continue to support our team members with access to various programs, briefings, and training modules such as [Respect@Work](#) training, a [Respect@Work](#) council, and our new Employee Assistance Program, [Sonder](#) (effective July 2024), that focuses on personal safety, health and wellbeing to ensure the number of these types of incidents are reduced.

The Group 'I Am Here' program helps create a culture where 'it's ok not to feel ok, and it's absolutely ok to ask for help'. The program is designed to help us look out for ourselves and others to create a supportive work environment for team members, every day. More than 4,000 Team Members participated in the "I Am Here" mental health program. Its objectives are awareness, education, support services, social response, research/education and compliance.

CAPABILITY BUILDING – PARTNERING WITH OUR FACTORIES AND TRADE PARTNERS

We work collaboratively with our Trade Partners, Service Providers and Team Members to improve conditions in our Operations and Supply Chains. Throughout FY24, our Responsible Sourcing Team and our Global Sourcing Office remained an accessible contact for Trade Partners, Service Providers and Team Members, with a dedicated inbox to assist with concerns or queries.

We prioritise capability building across our Factories. We partner with LRQA to provide e-learning modules to support relevant suppliers that go through the LRQA CAP management process to better understand our expectations for working conditions based on the types of non-conformances they have in their audit reports. Examples of e-learning topics included health and safety, working hours, social insurance and chemical management. During FY24, representatives from 125 suppliers completed various online training modules.

To enhance capability, we will be rolling out additional training through the LRQA online training platform to selected team members and suppliers in FY25.

As part of our ongoing strategic engagement with our Trade Partners, we provided an update on our Responsible Sourcing program at our annual Trade Partner conference in China. 138 participants representing 60 Trade Partners and Service Providers were present at the conference.

CAPABILITY BUILDING – INTERNAL

We continue to build our own internal capability. Our Board and Responsible Sourcing Working Group receive updates on the performance of our Responsible Sourcing program and emerging trends or issues.

We deliver Responsible Sourcing training to key Team Members involved in procurement activities where modern slavery risk may be present. This enables our Team Members to better implement our policies and identify risks in their day-to-day roles.

In FY24, we delivered Responsible Sourcing training to 90 team members involved in the procurement of products and services on behalf of the Group.

The training also allows us to improve the program through any Team Members' feedback and provides the opportunity to communicate any major updates or changes to the broader team.

SECTION 5

Assessing the effectiveness of our actions

At Super Retail Group, we monitor our progress against our Sustainability goals and targets for responsible sourcing and assess the effectiveness of our work.

GOVERNANCE

The governance frameworks outlined in *Section 2* aim to support accountability for program delivery, program quality and target execution.

The Responsible Sourcing Working Group (RSWG) is comprised of senior leaders with decision making rights from each of our Brands, Global Sourcing Office, Non-Stock procurement, and Group Sustainability and Responsible Sourcing.

The RSWG oversees the implementation of the responsible sourcing goals and targets, set out in our Sustainability Framework 2030. The RSWG also provides a forum to discuss risks and issues related to our Responsible Sourcing program, including modern slavery risks. Risks are escalated to the Executive Leadership Team (ELT) where required. They are reported monthly, by

the Group Managing Director (the CEO) to the Board.

CONSULTATION WITH EXPERTS AND KEY PROGRAM ENHANCEMENTS

We work with external experts to get specialist advice and help us continuously improve our approach. In FY24, we finalised the review of our [Human Rights and Responsible Sourcing Policy](#) and [Responsible Sourcing Code](#). These documents were approved by the Board in February 2024.

During FY24 other key program enhancements included:

- Introducing a Zero Tolerance non-conformance rating effective from FY25;
- Strengthening our approach to risk identification by using LRQA's supply chain intelligence platform, EiQ, and adverse media scanning tool, Sentinel; and
- Enhancing our due diligence processes by introducing Second Party Audits; Investing in additional access to LRQA online learning platform modules as part of our knowledge and capacity building initiative which we will roll out to relevant team members and priority suppliers in FY25.

INDEPENDENT AND SECOND PARTY AUDITS AND TRACKING

Our Responsible Sourcing Team verifies the extent to which our Factories maintain or exhibit an improvement of audit results through the completion of re-audit cycles and Corrective Action Plans. We also commission and fund a limited number of independent audits to verify the status of selected Factories and completed actions. The majority of these independent audits include a workers' voice/ workers sentiment survey, giving workers a voice to tell us their concerns and opinions.

In FY24, we expanded our Responsible Sourcing Team to include an additional lead auditor based in China to support our second party audits and monitoring of our suppliers. Through our second party audits we are identifying non-conformances and further areas of improvement such as the child worker case (refer to page 20).

GRIEVANCE REPORTING MECHANISMS

Our [Speak Up \(Whistleblower\) Policy](#) facilitates anonymous and confidential reporting if issues arise. It is designed to provide opportunity for transparency and allow workers to report complaints without fear of reprisal. Through our work with external advisors, we continue to look

for opportunities to improve grievance reporting mechanisms, resolve issues that are identified and learn from these.

PARTNERING WITH INDUSTRY

We partner with and learn from industry, including through our participation in the United Nation's Global Compact Network Australia – Modern slavery Community of Practice, the Australian Retail Association and The Collaborative Advantage in New Zealand. We also continued to partner with external advisors, both in Australia and in the countries where our Factories operate.

CHALLENGING OURSELVES THROUGH TRANSPARENCY

Macpac actively engages in the Better Buying Purchasing Practices Index (BBPPI), which provides a platform for Partners to anonymously rate the purchasing practices of the companies that procure their products. The Better Buying Institute utilises data to foster stronger relationships between Trade Partners and buyers. The aim is to enhance purchasing practices that not only drive profitability but also safeguard workers and the environment.

In May 2024, Macpac participated in the BBPPI for the third consecutive year. It invited 33 of its top manufacturing Trade Partners to

anonymously rate its purchasing behaviour against best practice and recorded a record 78 per cent participation rate. Following this year's survey, Macpac is engaging with internal teams to review purchasing practices throughout FY25, with the goal of identifying targeted improvement opportunities for FY26. Additionally, key members from Merchandising, Planning, and Design teams will complete the Better Buying Institute's Five Principles of Responsible Purchasing training during FY25.

By participating in the BBPPI, Macpac aligns with its aspiration to establish transparent and mutually beneficial sustainable partnerships with suppliers.

We also publish the list of first tier Factories for Macpac which can be accessed via this [link](#).

CONSULTATION WITH OWNED AND CONTROLLED ENTITIES

Consultation with the Reporting Entities and the Entities owned and controlled by them on the matters set out in this Statement, occurred throughout the reporting period as well as for the purpose of preparing this Statement.

Super Retail Group's [Human Rights Responsible Sourcing Policy](#) and [Responsible Sourcing Code](#) apply to all wholly owned entities of the Group. These cover the requirements of our

Responsible Sourcing program including issues related to modern slavery. Implementation and oversight of the Group's Responsible Sourcing program are managed by a centralised Responsible Sourcing Team for Supercheap Auto, BCF and rebel, and for Macpac, by Macpac's in-house team in New Zealand.

Relevant members of the Responsible Sourcing Working Group (RSWG), and Executive Leadership Team (ELT) were consulted at various stages of the ongoing process. Refer to *Section 2 (Our governance)* for further details on governance, accountabilities and responsibilities including those related to this Modern Slavery Statement.

From a management perspective, the Managing Directors of Supercheap Auto, BCF, rebel and Macpac are directors of their respective Brand's trading entity. Under the Responsible Sourcing program, the Managing Directors of these Brands and their teams are kept informed by the centralised Responsible Sourcing Team or, in the case of Macpac, by their own in-house team, throughout the reporting period on modern slavery risks and issues in our Supply Chain and Operations, as well as actions taken or proposed to be taken to address any non-conformances. This in turn facilitates an effective and meaningful consultation process for the

management of modern slavery risks and the preparation of this Statement.

In June 2024 we conducted a Responsible Sourcing material risk deep dive to identify areas of further improvement and risk treatment plans. This was presented to the Board Risk & Sustainability Committee in July 2024 and relevant actions will be implemented in FY25.

In preparing this Statement, Super Retail Group consulted representatives from the Reporting Entities to confirm that the included information is relevant and accurate. This consultation took place through discussions with the Reporting Entities, the Responsible Sourcing Working Group, and circulation as appropriate of summaries of program performance throughout the reporting period. We also distributed draft version of this Statement to the Managing Directors of the Reporting Entities, our Responsible Sourcing Working Group and members of the Executive Leadership Team for review.

The Board of Directors were provided opportunity for input and feedback prior to final approval of this Statement.

A declaration of principal governing body approval can be found in *Appendix 2* in accordance with the Act.

FY25 AND BEYOND

Our Sustainability Framework 2030 sets out our responsible sourcing goals, whereby we aim to:

- **GOAL 5:** Improve transparency and disclosure of high-risk supply chains;
- **GOAL 6:** Invest in sustainable supply chains through strategic partnering; and
- **GOAL 7:** Source material and products more responsibly.

We remain committed to driving positive change across our supply chain. In FY25, we will enhance our compliance verification through improved Trade Partner risk assessment and segmentation using LRQA's EiQ platform. We will continue to invest in strategic relationships with relevant Trade Partners, Factories, and industry to foster change, with the shared goal of enhancing the program's effectiveness and strengthening our supply chain.

Appendix 1 – Glossary

TERMS AND ABBREVIATIONS

Term	Definition
Act	Modern Slavery Act 2018 (Commonwealth).
Brand(s)	The four retail Brands of Super Retail Group: Supercheap Auto, rebel, BCF, Macpac.
Child Labour	<p>Child labour refers to work that is mentally, physically, or morally harmful to children; and interferes with their schooling by:</p> <ul style="list-style-type: none"> • depriving them of the opportunity to attend school; • obliging them to leave school prematurely; or • requiring them to attempt to combine school attendance with excessively long and heavy work. <p>Key areas of risk for Super Retail Group are where children are engaged in hazardous work including night work, work with machinery and chemicals.</p>
CPI	Corruptions Perception Index.
Controlled Entities	The subsidiaries, controlled entities, and investments of the Reporting Entities.
Corrective Action Plan or CAP	A plan issued by Super Retail Group setting out non-conformances of a Factory with our Responsible Sourcing Policy and Responsible Sourcing Code, the date by which evidence must be provided to the Group demonstrating corrective actions have been completed and non-conformances remediated.
Debt Bondage	Payment of excessive recruitment fees or associated costs, and retention of documents.
Deceptive Recruitment	False promise of a job, benefits, or conditions.
Direct Imports	Products we source or import direct from the Factories which manufacture them.
Due Diligence Process	The process by which we evaluate and address risks.
Executive Leadership Team or ELT	The Group’s Managing Director and CEO and his direct reports.
Factories	Focus of our Responsible Sourcing program is Factories which supply or manufacture Super Retail Group’s Private Brand products; Factories directly contracted by Super Retail Group to manufacture products; Factories that supply or manufacture Private Brand Non-Stock products to/for the Group.
First tier Factories	Factories supplying finished goods directly to the Group or through our Trade Partners.
Forced Labour	Restrictions of movement, intimidation, threats, including human trafficking. It includes situations in which persons are coerced to work through the use of violence or intimidation, or by more subtle means such as accumulated debt, retention of identity papers or threats of denunciation to immigration authorities.

the Group	Super Retail Group Limited and its Reporting Entities.
ILO	International Labour Organisation.
Non-Stock	Non-Stock products and services include marketing and promotional materials, Team Member uniforms, capital expenditure, professional services, transport and logistics providers, and cleaning services, amongst others.
Operations	The operations of Super Retail Group.
Private Brand	Products manufactured specifically for our Brands, using product brand names owned or licensed by Super Retail Group.
Reporting Entity	Super Retail Group follows the definition of a reporting entity as outlined by the Act: Any entity with a consolidated annual revenue of at least AU\$100 million over the twelve-month reporting period and is at any time in the reporting period either an Australian entity or a foreign entity carrying on business in Australia.
Responsible Sourcing Audit	An audit we may require of a Trade Partner, Factory or Service Provider following consideration of our Due Diligence process.
Responsible Sourcing Code	Sets out specific criteria for our Trade Partners to comply with the Responsible Sourcing Policy regarding business integrity; human rights and fair working conditions; environmental management; grievance mechanisms; and provision of remedy.
Human Rights and Responsible Sourcing Policy	Provides a set of high-level expectations of Team Members, Trade Partners, Service Providers and associated supply chains in relation to human rights, modern slavery, business integrity and the environment, drawing on international standards.
Responsible Sourcing Procedures	Sets out the processes used by Super Retail Group to verify compliance with its Responsible Sourcing Policy and Code.
Responsible Sourcing Team	Team responsible for managing and supporting the delivery of the Group's Responsible Sourcing program.
Second Party Audit	Second Party Audits are external evaluations conducted by one organisation on another. These audits are usually performed by customers or clients to ensure that their suppliers or service providers meet their requirements.
Service Provider	Providers of services to Super Retail Group, such as information technology, cleaning, security services, etc.
Statement	This Modern Slavery Statement.
Supply Chain	The products and services (including labour) that contribute to our retail and Non-Stock products and services. Includes products and services sourced in Australia or overseas and extending beyond our direct suppliers, including indirect suppliers for raw materials, manufactured componentry and freight.
Team Members	All employees of Super Retail Group.
Trade Partners	<ul style="list-style-type: none"> • Suppliers of retail products, including agents and Factories which supply or manufacture Super Retail Group's Private Brand products; • Factories directly contracted by Super Retail Group to manufacture products; and • Suppliers of Non-Stock products to/for Super Retail Group.

RESPONSIBLE SOURCING STATUS²⁸ DEFINITIONS:

Rating	Description	Effect of Rating
Approved	The Factory has no critical but some major and minor non-conformances.	An order can be placed with the Factory.
Conditionally approved	The Factory has some critical non-conformances (excluding child and Forced Labour) as well as major and minor non-conformances.	An order can be placed with the Factory. Group Responsible Sourcing will issue a Corrective Action Plan to the Factory including completion timeframes.
On probation	Renewed audit: repeated critical non-conformances. Conditionally approved Factory: critical non-conformances overdue by 3 months OR audit renewal over 30 days overdue.	Allow existing orders to complete. No new orders until all critical non-conformances are closed out. Re-audit may be required before new orders are placed.
Not approved	New Factory (i.e. no current orders) with critical non-conformances relating the use of child and Forced Labour. 'On Probation' Factory that has critical non-conformances overdue by more than 6 months. New Factory that has not provided an audit report for evaluation. Existing 'Conditionally Approved' Factory overdue for audit renewal (over 60 days).	Orders must not be placed. Audit/Re-audit is required before placing any orders.

²⁸ Extensions to due dates and status (based on considering circumstances) can be provided at the discretion of Group Sustainability (Responsible Sourcing Team).

Appendix 2 – Modern Slavery Act 2018 (Cth) Annexure

MODERN SLAVERY STATEMENT APPROVAL

PRINCIPAL GOVERNING BODY APPROVAL

This Modern Slavery Statement was approved by the Board of Super Retail Group Limited as the principal governing body²⁹ of Super Retail Group on behalf of all Reporting Entities specified in the Statement on 26 November 2024.

SIGNATURE OF RESPONSIBLE MEMBER

This Modern Slavery Statement is signed by a responsible member³⁰ of the Super Retail Group Limited Board of Directors as defined by the Act:



Anthony Heraghty
Group Managing Director and Chief Executive Officer
26 November 2024

²⁹ Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

³⁰ Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorized to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the Corporations Act 2001—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.

MANDATORY REPORTING CRITERIA

This statement has been prepared to meet the mandatory reporting criteria set out under the Modern Slavery Act 2018 (Cth). The table below summarises where each criterion is disclosed in this Statement.

Mandatory Reporting Criteria	Reference in this statement
1. Identify the reporting entity.	Reporting Entities Page 2 and Page 31.
2. Describe the reporting entity's structure, operations and supply chains.	Section 2. Our structure, operations and supply chain Page 5-7.
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Section 3. Identifying and assessing our modern slavery risks Pages 12-16.
4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Section 4. Our actions to address key modern slavery risks Page 17-22. Grievance reporting mechanisms Page 21. Capability building Page 22.
5. Describe how the reporting entity assesses the effectiveness of these actions.	Section 5. Assessing the effectiveness of our actions Page 23-25.
6. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	Consultation with owned and controlled entities Page 24-25. Governance and Policy Framework Page 8-11. Principal Governing Body Approval Page 2 and Page 29. Signature Of Responsible Member Page 4 and Page 29.
7. Any other information that the reporting entity, or the entity giving the statement, considers relevant.	Team member wellbeing Page 21. FY24 and beyond Page 25. Link to FY24 Sustainability Report . Link to Macpac list of first tier Factories .

Appendix 3

LIST OF REPORTING ENTITIES

Super Retail Group Limited (ACN: 108 676 204) makes this Statement on its own behalf and on behalf of the following entities for which it is the ultimate holding company (Reporting Entities):



Super Cheap Auto Pty Ltd ACN 085 395 124



Rebel Group Limited ACN 110 006 678 (Rebel Group), Foghorn Holdings Pty Ltd ACN 122 558 874 (Foghorn), and Rebel Sport Limited ACN 003 283 823 (Rebel Sport), noting that Rebel Sport is the trading entity and Rebel Group and Foghorn are Reporting Entities because of their ownership of Rebel Sport



SRG Leisure Retail Pty Ltd ACN 110 667 411



Macpac Holdings Pty Ltd ACN 609 407 436 (Macpac Holdings), MP Finco Pty Ltd ACN 634 448 598 (MP Finco), Macpac Group Holdings Pty Ltd ACN 638 577 625 (Macpac Group Holdings), and Macpac Retail Pty Ltd ACN 129 716 025 (Macpac Retail), noting that Macpac Retail is the trading entity, and Macpac Holdings, MP Finco, and Macpac Group Holdings are Reporting Entities because of their ownership of Macpac Retail

For the reporting period, there were no other Reporting Entities (such as joint ventures, wholly or partially owned entities) required to be named in this joint Statement.

The subsidiaries, controlled entities, and investments of the Reporting Entities (Controlled Entities) can be found on page 142 and 143 of our [FY24 Annual Report](#) and have also been included on the next pages.

INVESTMENTS IN CONTROLLED ENTITIES (Extract from page 142 of our [FY24 Annual Report](#))

SUPER RETAIL GROUP LIMITED ANNUAL REPORT FY24

CONSOLIDATED ENTITY DISCLOSURE STATEMENT

For the period ended 29 June 2024

Name of entity	Body corporate, partnership or trust	Principal activities	Country of incorporation	% of share capital held	Tax residency	
					Australian or foreign	Foreign jurisdiction
Super Retail Group Limited	Body corporate	Parent entity	Australia	n/a	Australian ⁽⁴⁾	n/a
A-Mart All Sports Pty Ltd ⁽¹⁾	Body corporate	Dormant	Australia	100	Australian ⁽⁴⁾	n/a
Auto Trade Direct (NZ) Limited	Body corporate	Dormant	New Zealand	100	Foreign	New Zealand
Auto Trade Direct Pty Ltd ⁽¹⁾	Body corporate	Dormant	Australia	100	Australian ⁽⁴⁾	n/a
BCF New Zealand Limited	Body corporate	Dormant	New Zealand	100	Foreign	New Zealand
Coyote Retail Pty Limited ⁽¹⁾	Body corporate – trustee of the Rowe & Jarman Unit Trust	Trustee	Australia	100	Australian ⁽⁴⁾	n/a
Foghorn Holdings Pty Ltd ⁽¹⁾	Body corporate	Holding company	Australia	100	Australian ⁽⁴⁾	n/a
Goldcross Cycles Pty Ltd ⁽²⁾	Body corporate	Dormant	Australia	100	Australian ⁽⁴⁾	n/a
Infinite Retail Pty Ltd ⁽¹⁾	Body corporate	Dormant	Australia	100	Australian ⁽⁴⁾	n/a
Macpac Enterprises Limited	Body corporate	Dormant	New Zealand	100	Foreign	New Zealand
Macpac Group Holdings Pty Limited ⁽¹⁾	Body corporate	Holding company	New Zealand ⁽⁵⁾	100	Australian ⁽⁴⁾	n/a
Macpac Holdings Pty Ltd ⁽¹⁾	Body corporate	Holding company	Australia	100	Australian ⁽⁴⁾	n/a
Macpac Limited	Body corporate	Dormant	New Zealand	100	Foreign	New Zealand
Macpac New Zealand Limited	Body corporate	Outdoor retail	New Zealand	100	Foreign	New Zealand
Macpac Retail Pty Ltd ⁽¹⁾	Body corporate	Outdoor retail	Australia	100	Australian ⁽⁴⁾	n/a
MP Finco Pty Limited ⁽¹⁾	Body corporate	Holding company	New Zealand ⁽⁵⁾	100	Australian ⁽⁴⁾	n/a
Mouton Noir IP Limited	Body corporate	Dormant	New Zealand	100	Foreign	New Zealand
Mouton Noir Management Pty Ltd ⁽¹⁾	Body corporate	Dormant	Australia	100	Australian ⁽⁴⁾	n/a
Oceania Bicycles Pty Ltd ⁽¹⁾	Body corporate	Dormant	Australia	100	Australian ⁽⁴⁾	n/a
Oceania Bicycles Limited ⁽³⁾	Body corporate	Dormant	New Zealand	100	Foreign	New Zealand
Ray's Outdoors New Zealand Limited	Body corporate	Dormant	New Zealand	100	Foreign	New Zealand
Ray's Outdoors Pty Ltd ⁽¹⁾	Body corporate	Outdoor retail	Australia	100	Australian ⁽⁴⁾	n/a
Rebelsport.com Pty Limited ⁽¹⁾	Body corporate	Dormant	Australia	100	Australian ⁽⁴⁾	n/a
Rebel Group Limited ⁽¹⁾	Body corporate	Holding company	Australia	100	Australian ⁽⁴⁾	n/a
Rebel Management Services Pty Limited ⁽¹⁾	Body corporate	Dormant	Australia	100	Australian ⁽⁴⁾	n/a
Rebel Pty Ltd ⁽¹⁾	Body corporate	Dormant	Australia	100	Australian ⁽⁴⁾	n/a

INVESTMENTS IN CONTROLLED ENTITIES (Continued)
(Extract from page 143 of our FY24 Annual Report)

SUPER RETAIL GROUP LIMITED ANNUAL REPORT FY24

CONSOLIDATED ENTITY DISCLOSURE STATEMENT

For the period ended 29 June 2024

Name of entity	Body corporate, partnership or trust	Principal activities	Country of incorporation	% of share capital held	Tax residency	
					Australian or foreign	Foreign jurisdiction
Rebel Wholesale Pty Limited ⁽¹⁾	Body corporate	Dormant	Australia	100	Australian ⁽⁴⁾	n/a
Rowe & Jarman Unit Trust	Trust	Trust	Australia	100	Australian ⁽⁴⁾	n/a
SRG Equity Plan Pty Ltd ⁽¹⁾	Body corporate	Investments	Australia	100	Australian ⁽⁴⁾	n/a
SRG Leisure Retail Pty Ltd ⁽¹⁾	Body corporate	Outdoor retail	Australia	100	Australian ⁽⁴⁾	n/a
SRGS (New Zealand) Limited	Body corporate	Dormant	New Zealand	100	Foreign	New Zealand
SRGS Pty Ltd ⁽¹⁾	Body corporate	Product acquisition and distribution	Australia	100	Australian ⁽⁴⁾	n/a
Super Cheap Auto (New Zealand) Pty Limited	Body corporate	Auto retail	New Zealand	100	Foreign	New Zealand
Super Cheap Auto Pty Ltd ⁽¹⁾	Body corporate	Auto retail	Australia	100	Australian ⁽⁴⁾	n/a
Super Retail Commercial Pty Ltd ⁽¹⁾	Body corporate	Auto retail	Australia	100	Australian ⁽⁴⁾	n/a
Super Retail Group Services (New Zealand) Limited	Body corporate	Dormant	New Zealand	100	Foreign	New Zealand
Super Retail Group Services Pty Ltd ⁽¹⁾	Body corporate	Support services	Australia	100	Australian ⁽⁴⁾	n/a
Super Retail Group Trading (Shanghai) Ltd	Body corporate	Product sourcing	China	100	Foreign	China
VBM Retail (HK) Limited	Body corporate	Dormant	China (Hong Kong)	100	Foreign	China (Hong Kong)
Workout World Pty Limited ⁽¹⁾	Body corporate	Dormant	Australia	100	Australian ⁽⁴⁾	n/a

⁽¹⁾ These controlled entities have been granted relief from the requirement to prepare financial reports in accordance with ASIC Corporations (Wholly-owned Companies) Instrument 2016/785 issued by the Australian Securities and Investments Commission.

⁽²⁾ Investment is held directly by Infinite Retail Pty Ltd.

⁽³⁾ Investment is held directly by Oceania Bicycles Pty Ltd.

⁽⁴⁾ This entity is part of a tax-consolidated group under Australian taxation law, for which Super Retail Group Limited is the head entity.

⁽⁵⁾ Macpac Group Holdings Pty Limited and MP Finco Pty Limited were incorporated in New Zealand but redomiciled to Australia on 20 January 2020 and 1 July 2019 respectively.

Super Retail
Group 

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Super Retail Group Limited

ABN: 81 108 676 204

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www.superretailgroup.com.au