

**Modern Slavery
Statement 2025**



Contents

01. Reporting and Consultation	2
02. From Our Group Managing Director	3
03. Mandatory Reporting Criteria	4
04. Highlights from FY25	5
05. About Us	8
06. Structure, Operations, and Supply Chains	11
07. Risks of Modern Slavery Practices	15
08. Managing Modern Slavery Risks in FY25	19
09. Assessing the Effectiveness of Our Actions	21
10. Our Modern Slavery Priorities for FY26	23

Reporting and Consultation

01.

Spotlight Group Holdings Pty Ltd (SGH) has prepared this Modern Slavery Statement to meet its reporting obligations under the *Modern Slavery Act 2018 (Cth)*. This statement outlines the steps taken by SGH during the financial year ending 30 June 2025 (FY25) to consider and respond to potential modern slavery risks within its operations and supply chains.

This statement is submitted as a joint statement on behalf of all reporting entities within the SGH Group, including:

- Spotlight Pty Ltd (ABN 39 564 861 886)
- Spotlight Limited (NZ Company no. 553661)
- Spotlight Pte Ltd (Singapore Registration no. 199504453C)
- Anaconda Group Pty Ltd (ABN 53 955 173 782)
- Harris Scarfe Pty Ltd (ABN 83 095 018 803)

and any other entities owned or controlled by SGH. While not all entities listed above are individually required to report under the Act, SGH has adopted a group-wide approach to ensure a consistent and proportionate response. Relevant policies and processes are applied, where appropriate, across the Group's retail brands and supporting business operations.

This statement reflects SGH's current understanding of potential modern slavery risks based on information available at the time of reporting. SGH acknowledges the inherent limitations in visibility across complex global supply chains and will continue to review and refine its approach as appropriate over time.

Consultation Process

During FY25, SGH consulted with its owned and controlled entities in the preparation of this statement. This process involved input from key management and functional teams, including those responsible for procurement, legal, and compliance, to ensure that relevant information was appropriately captured and reflected.

The Modern Slavery Working Group, which includes representatives from several Group entities, provided assistance in developing this statement by reviewing draft content and contributing feedback on applicable sections.

From our Group Managing Director

02.

During FY25, Spotlight Group Holdings Pty Ltd (SGH) applied a co-ordinated and practical approach to identifying and managing potential modern slavery risks across its operations and supply chains, in line with its obligations under the *Modern Slavery Act 2018 (Cth)*.

Throughout the reporting period, SGH focused on maintaining and improving internal processes that support compliance and accountability. This included reviewing elements of supplier assessment activities and developing plans for future engagement with a small number of suppliers assessed as potentially higher risk. SGH also updated its internal training and staff guidance materials to ensure that relevant team members remain informed about emerging regulatory expectations and areas of potential risk.

Oversight of these activities was maintained by the Modern Slavery Working Group, which met during the year to review progress, consider feedback from across the business, and discuss priorities for the next reporting period.

This, SGH's sixth Modern Slavery Statement, outlines the actions taken during FY25 to meet the reporting requirements of the *Modern Slavery Act 2018 (Cth)*.

As we move into FY26, SGH will continue to take a considered approach, maintaining focus on compliance, staff awareness, and appropriate engagement with suppliers and sourcing partners.

This modern slavery statement was approved by the Board of Spotlight Group Holdings Pty Ltd on 9 December 2025.

Avi Gilboa

Group Managing Director

This modern slavery statement was approved by the Board of Spotlight Group Holdings on 9 December 2025.



Mandatory Reporting Criteria

03.

This Modern Slavery Statement has been prepared in accordance with section 16 of the *Modern Slavery Act 2018 (Cth)*. The statement addresses each of the seven mandatory reporting criteria as follows:

- 01. Identification of the reporting entity**
This is addressed on pages 11-14.
- 02. Description of the entity's structure, operations and supply chains**
This is addressed on pages 15-18.
- 03. Description of the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities it owns or controls**
This is addressed on pages 19-20.
- 04. Description of the actions taken by the reporting entity and any entities it owns or controls to assess and address those risks, including due diligence and remediation processes**
This is addressed on pages 21-22.
- 05. Description of how the reporting entity assesses the effectiveness of such actions**
This is addressed on pages 21-22.
- 06. Description of the process of consultation with any entities the reporting entity owns or controls, or entities it gives a joint statement for**
This is addressed on page 2.
- 07. Any other relevant information**
Included on pages 23-24, where SGH outlines its modern slavery priorities and forward planning for FY26.

Highlights from FY25

04.



Modern Slavery Working Group

The Modern Slavery Working Group met periodically during the year to monitor progress, review existing activities, and consider practical next steps to improve internal coordination on modern slavery-related matters.



Staff Awareness and Training

SGH reviewed and updated its internal modern slavery training materials. The updated content was made available to relevant staff to support ongoing awareness of modern slavery risks and to reinforce existing internal reporting procedures.



Refinement of Supplier Review Process

SGH further developed its approach to supplier assessment by identifying trade partners that may present higher indicators of modern slavery risk, such as those operating in higher-risk regions or industries, or supplying higher-risk goods.



Planning for Future Supplier Engagement

Plans were developed for a small number of higher-risk suppliers to be invited to complete a tailored modern slavery questionnaire and provide supporting documentation, such as relevant policies or grievance procedures. These reviews are planned for a future stage of SGH's due diligence work.



Buyer Guidance Materials

Draft buyer guidance materials were developed and are under consideration to support purchasing teams in engaging with suppliers and identifying potential risk indicators. These materials will assist buyers in approaching supplier discussions with greater consistency and awareness.



Updated Supplier Code of Conduct

SGH updated its Supplier Code of Conduct to clarify expectations regarding lawful employment practices, safe working conditions, and compliance with applicable labour laws. The revised Code does not alter supplier contractual obligations but provides clearer guidance on SGH's expectations.



Review of Supplier Information

Where information was available, SGH undertook preliminary desktop reviews of supplier-provided documentation with support from external compliance advisers. These reviews were used to help inform future planning and the development of SGH's supplier engagement approach.



05.

About us

SGH is best known for its retail division, Spotlight Retail Group (SRG), which manages several established retail brands, including Spotlight, Anaconda, Harris Scarfe, Mountain Designs and Koo. SGH operates over 300 retail premises across three countries and employs over 12,500 team members.

SPOTLIGHT

ANACONDA

Harris Scarfe



SRG Brands

Spotlight is one of Australasia's largest fabric, craft, party and home interiors retailers. The first Spotlight store opened in Malvern in 1973. After more than five decades, Spotlight now operates over 150 stores and employs over 7,300 team members.

Anaconda is one of Australia's leading outdoor adventure and equipment retailers. Established in 2004, Anaconda operates over 90 stores across Australia and employs over 2,900 team members.

Harris Scarfe is one of Australia's longest-running retailers, with a history spanning more than 175 years. It offers a broad range of homewares, kitchenware, apparel and related lifestyle products. Harris Scarfe operates over 60 stores across Australia and employs over 1,900 team members.

Other SGH Operations

Beyond retail, SGH maintains an extensive portfolio of commercial and retail properties across Australia and New Zealand. SGH serves as landlord to key tenants including Bunnings, The Good Guys, McDonald's, Adairs, while also accommodating a number of SRG stores within its property network. SGH has progressively diversified its business interests, including ownership stakes in various enterprises, the development of a broad investment portfolio, expansion of its property finance activities, and continued contributions through the Spotlight Foundation, which provides grants and donations to support community initiatives and charitable causes each year.



Structure, Operations, and Supply Chains

06.

This section addresses Mandatory Reporting Criterion 2 of the *Modern Slavery Act 2018 (Cth)* by describing the structure, operations, and supply chains of Spotlight Group Holdings Pty Ltd (SGH) and the entities it owns or controls.

Structure and Operations

SGH is an Australian privately owned group headquartered in South Melbourne, Victoria. The Group operates a number of well-known retail brands, including Spotlight, Anaconda, Mountain Designs, and Harris Scarfe. These brands collectively form part of the Spotlight Retail Group (SRG), which represents the largest component of SGH's operations.

SGH's retail operations are supported by shared corporate services that provide finance, human resources, information technology, supply chain management, marketing, and property management functions.

SGH's business activities include:

- Retail sales of fabric, craft, homewares, outdoor and adventure goods, apparel, and seasonal products.
- Operation of a network of retail stores and e-commerce platforms across Australia, New Zealand, Singapore.
- Property ownership, development, and management through associated entities within the Group.
- Centralised corporate functions that support retail and sourcing activities.

Supply Chains

SGH's supply chains are diverse and reflect the nature of its retail and commercial operations. Procurement is primarily coordinated by teams based in Melbourne, supported by internal and external sourcing partners.

A significant proportion of our international sourcing is facilitated through Glowstar Global Sourcing Organisation (Glowstar), which provides product development coordination, supplier engagement, quality assurance, and logistics management services across multiple sourcing regions. Glowstar works with approximately 380 supplier factories across China, India, Pakistan, Vietnam, and other countries. These suppliers produce a wide range of soft and hard goods for SGH's retail and commercial use.

In addition to international procurement, SGH sources a significant number of products and services domestically within Australia, including local suppliers of finished goods, packaging, marketing materials, and professional services.

Product Categories

SGH's retail brands source products across a broad range of categories, including:

- Homewares
- Kitchenware
- Outdoor and Adventure Gear
- Apparel and Footwear
- Craft and Fabrics
- Party and Seasonal Supplies
- Camping and Hiking Equipment



06.
Structure, Operations, and Supply Chains



Service Categories

To support its retail operations and corporate functions, SGH engages a variety of services both in Australia and internationally. These include:

- Cleaning, maintenance, and waste management
- Freight, logistics, and warehousing
- Information technology and systems support
- Security and loss prevention services
- Marketing and advertising
- Human resources, payroll, and recruitment
- Customer service and call centre operations
- Legal, accounting, and compliance support
- Facilities and property management
- Training, safety, and development programs
- Utilities management and sustainability initiatives

Procurement and Governance

SGH's procurement activities are managed through internal sourcing policies and procedures that guide supplier selection and engagement. These policies are designed to promote consistent and responsible procurement practices across the Group.

While supplier relationships and engagement methods may differ across brands, SGH applies shared governance principles through its corporate support functions. This ensures alignment with the company's broader business objectives and operational standards.

Risks of Modern Slavery Practices

07.

This section addresses Mandatory Reporting Criterion 3 of the *Modern Slavery Act 2018 (Cth)* by describing the risks of modern slavery practices that may be present within Spotlight Group Holdings Pty Ltd (SGH)'s operations and supply chains, including those of entities it owns or controls.

SGH recognises that potential modern slavery risks may vary across its operations and supply chains, influenced by factors such as the type of goods and services procured, the geographic locations of suppliers, and the level of visibility over different tiers of production. The business acknowledges that certain sourcing regions and product categories may present higher inherent risks due to complex international supply chains, varying labour standards, and reliance on lower-wage or migrant labour in some sectors.

SGH understands that limited transparency in some overseas markets can make it difficult to fully assess or monitor working conditions in the deeper tiers of its supply chain, such as in raw material or component production. These challenges can heighten the potential for modern slavery risks to occur. SGH also recognises that potential risks are not confined to product manufacturing but can also arise within service-based activities, particularly where subcontracting, temporary labour, or high staff turnover is common.

Consistent with its practical approach to compliance, SGH continues to build its awareness of potential modern slavery risk areas and to strengthen its internal understanding of how these may relate to its supply chains. This includes providing training for relevant employees, engaging with suppliers where appropriate, and maintaining proportionate oversight across procurement functions.

07. Risks of Modern Slavery

Product Supply Chains

SGH acknowledges that modern slavery risks may be present within global product supply chains, particularly in industries that depend on complex international manufacturing or material sourcing processes. SGH has not identified any specific modern slavery incidents within its product supply chains but is aware of the broader risks identified by organisations such as the U.S. Department of Labor and the Walk Free Foundation.

To support responsible sourcing, SGH provides training to relevant buyers and procurement staff to help them recognise indicators of potential modern slavery risk. SGH also works with Glowstar Global Sourcing Organisation, which provides product development, supplier engagement, and logistics support across multiple sourcing regions.

SGH understands that some product categories may be associated with higher levels of modern slavery risk due to raw material origins or manufacturing locations. In general terms, these may include:

- **Homewares** - Use of cotton and timber from regions where labour rights concerns have been reported.
- **Kitchenware** - Metal and ceramic manufacturing in countries where occupational safety and wage protections may vary.
- **Outdoor and Adventure Gear** - Production involving low-wage or migrant labour, particularly in seasonal or high-volume factories.
- **Apparel and Footwear** - Sector-wide issues such as long working hours, underpayment, and unsafe conditions in garment manufacturing.
- **Craft and Fabrics** - Risks associated with cotton harvesting and textile production in lower-wage economies.
- **Party and Seasonal Supplies** - Heightened risk during peak production periods that can increase worker vulnerability.
- **Camping and Hiking Equipment** - Manufacture of synthetic and metal-based goods in countries with differing labour enforcement practices.

SGH considers these risk factors when assessing supplier relationships and when developing internal processes to improve awareness and due diligence practices over time.

Service Supply Chains

SGH also recognises that potential modern slavery risks may exist within service supply chains, both in Australia and internationally. These risks are particularly relevant in industries that rely on contracted, temporary, or lower-wage labour.

SGH's engagement with service providers is guided by its internal procurement policies, which are designed to promote compliance with lawful and ethical employment practices. The business continues to monitor sector trends and government guidance relevant to higher-risk service industries.

Certain categories of services may be associated with higher potential risks, including:



- **Cleaning and Waste Services** - Possible risks relating to underpayment or poor working conditions, particularly among lower-wage or migrant workers.



- **Freight, Transport, and Logistics** - Sector-wide risks of long working hours, low pay, and safety concerns, particularly in subcontracted roles.



- **Security Services** - Potential exposure to underpayment or limited workplace protections among casual or agency-hired staff.



- **Customer Support and Call Centres** - Risks relating to excessive working hours or job insecurity, especially in outsourced or offshore operations.



- **Facilities Management and Maintenance** - Risks connected to subcontracting in fit-outs, repairs, and maintenance, where temporary labour may be used.



- **Warehousing and Distribution** - Risks of poor working conditions or underpayment, particularly in casual or seasonal employment settings.

Managing Modern Slavery Risks in FY25

08.

This section addresses Mandatory Reporting Criterion 4 of the *Modern Slavery Act 2018 (Cth)* by outlining the actions taken by Spotlight Group Holdings Pty Ltd (SGH) during FY25 to assess and address potential modern slavery risks across its operations and supply chains.

During FY25, SGH continued to strengthen its approach to identifying and managing potential modern slavery risks. The focus for the year was on improving the coordination of internal processes, supporting staff awareness, and preparing for future engagement with selected suppliers. SGH maintained a practical and proportionate approach consistent with its operational structure and available resources.

SGH's Modern Slavery Working Group met periodically during the year to monitor progress, review key risk areas, and consider future priorities. The working group supports coordination between business units and provides oversight of SGH's broader compliance and reporting obligations under the Act.

Supplier and Trade Partner Reviews

SGH refined its supplier review framework during FY25 to better identify trade partners that may present higher indicators of modern slavery risk. This included focusing on suppliers operating in higher-risk countries or industries, or those providing goods with higher inherent risk factors.

Plans were developed to invite a small number of higher-risk suppliers to complete a tailored modern slavery questionnaire and to provide supporting documentation such as relevant policies or grievance mechanisms. These supplier reviews are scheduled for a future phase of SGH's due diligence activities.

SGH also continued its broader Trade Partner Review, which aims to increase visibility of supplier practices across both product and service supply chains. The review gathers information on supplier employment practices, health and safety, and management systems. Insights from this process help SGH identify areas where further engagement or capacity-building may be beneficial.

Policies, Training, and Internal Guidance

During FY25, SGH updated its internal modern slavery training materials for relevant staff. The training focuses on recognising potential risk indicators, understanding escalation procedures, and ensuring that procurement and buying staff can identify issues in supplier interactions.

SGH also prepared draft Ethical Sourcing Principles for internal consideration and updated its Supplier Code of Conduct. The revised Code clarifies expectations regarding lawful employment, safe working conditions, and the prevention of exploitative practices.

Engagement with Sourcing Partners

SGH continued to work with its international sourcing partner, Glowstar Global Sourcing Organisation (Glowstar), which provides procurement and supply chain support across Asia. Glowstar manages supplier engagement, product development, and logistics coordination in countries such as China, India, Japan, Pakistan, and Vietnam. SGH understands that Glowstar maintains governance processes designed to support compliance with applicable labour laws and responsible sourcing practices in the markets where it operates.

Awareness and Reporting Mechanisms

SGH maintained its commitment to supporting staff awareness and internal reporting. Modern slavery training was delivered to relevant team members to reinforce awareness of ethical sourcing obligations and appropriate escalation procedures.

Employees continued to have access to reporting channels through SGH's Whistleblower Policy and its long-standing 'Talk Back to the Boss' program. These mechanisms provide avenues for raising concerns, including those related to ethical or workplace issues, in a confidential manner.

Assessing the Effectiveness of Our Actions

This section addresses Mandatory Reporting Criterion 5 of the Modern Slavery Act 2018 (Cth) by outlining how Spotlight Group Holdings Pty Ltd (SGH) assessed the effectiveness of its actions during FY25 in identifying and managing potential modern slavery risks.

SGH recognises that measuring the effectiveness of modern slavery initiatives is a gradual process that depends on the maturity of systems, data availability, and the ability to access reliable information from suppliers. During FY25, SGH focused on maintaining oversight of its internal processes and identifying practical ways to monitor progress over time.

Governance and Oversight

Oversight of SGH's modern slavery activities continued to be managed through the Modern Slavery Working Group. The group met during the reporting period to review progress against planned activities, consider information received from across the business, and discuss appropriate next steps. Its role is to coordinate actions, maintain visibility of modern slavery-related work, and ensure relevant matters are recorded and reviewed as part of broader compliance monitoring.

The Modern Slavery Working Group also considered updates from key functional areas, including procurement, legal, compliance, and human resources, to ensure that modern slavery considerations are appropriately integrated into existing business practices.

Supplier and Partner Feedback

SGH continued to gather supplier information through its Trade Partner Review process. This activity provided general insights into supplier awareness of modern slavery risks and the level of maturity in their internal management systems. The findings have supported SGH in identifying areas for potential further engagement or clarification in future review cycles.

Training and Awareness Tracking

The Modern Slavery Working Group received updates on participation in modern slavery training to monitor engagement and ensure relevant staff maintain awareness of potential risks. Feedback from employees undertaking this training has helped SGH identify areas for improvement in how information and guidance are presented.



Reporting and Escalation Channels

SGH maintains several channels through which information relating to potential ethical or labour concerns may be raised. These include the company's Whistleblower Policy and its customer care centre, both of which are available for use by employees, suppliers, and other stakeholders.

Continuous Improvement

SGH recognises that assessing effectiveness is an ongoing process. The business plans to continue refining its internal coordination and monitoring arrangements in FY26 to improve how modern slavery-related data is captured, reviewed, and reported. Future efforts may include developing more structured key performance indicators to track training participation, supplier engagement, and the completion of due diligence activities.

SGH will continue to take a practical approach to evaluating its progress, ensuring that lessons learned from previous reporting cycles inform future priorities and help strengthen its overall governance framework.

Our Modern Slavery Priorities for FY26

10.

The Modern Slavery Working Group will remain responsible for coordinating SGH's modern slavery activities. It will meet during the year to review progress, consider priorities for upcoming reporting periods, and ensure that relevant information from across the business is captured and assessed in a consistent manner.

SGH recognises that managing modern slavery risks remains an ongoing challenge, particularly within complex global supply chains where visibility and accountability beyond first-tier suppliers can be limited.

Differences in legal frameworks, languages, and supplier capacity continue to affect transparency and the flow of accurate information.

Building on progress achieved in FY25, SGH will continue to strengthen its systems, data quality, and engagement processes to improve supplier traceability and ethical oversight.

Key areas of focus for FY26 include:

- **Conducting a focused review of cotton and textile suppliers** across SGH brands to improve visibility and confirm responsible sourcing practices.
- **Reviewing services procurement** to ensure ethical labour standards are upheld across indirect supply chains.

- **Working to integrate modern slavery assessment into vendor onboarding**, embedding due diligence and compliance early in the supplier lifecycle.
- **Updating and consolidating first-tier supplier data** and continuing supplier reviews to enhance oversight and traceability across the Group.
- **Monitoring forthcoming amendments to the Modern Slavery Act 2018 (Cth)** and adapting SGH's compliance framework to align with evolving legal and regulatory standards.
- **Refreshing the SGH Modern Slavery Training Program** for rollout to staff in FY26, ensuring awareness materials remain relevant and practical.



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