



Modern Slavery Statement

Complete Office Supplies Pty Ltd FY25

This statement covers the activities of Complete Office Supplies Pty Ltd (ACN 001 634 715) (**COS**) for the financial year 1 July 2024 to 30 June 2025 (**FY25**).

This modern slavery statement is made under the *Modern Slavery Act 2018* (Cth) and sets out the actions we have taken to assess and address modern slavery risks in our operations and supply chains.

During FY25, COS has continued to improve its approach to modern slavery and has raised awareness of the importance of assessing and addressing modern slavery risks in the business. The working group reviewed and updated the risk assessment methodology for both direct and indirect suppliers, ensuring alignment with the Global Slavery Index. We have also continued to improve our due diligence processes, including by extending our due diligence and induction process to non-trade suppliers, large solution projects and service installation providers and enhancing our audit processes for exclusive label factories located overseas through the completion of sensory audits. There was a continued focus on supplier categories identified as higher risk according to our risk matrix and a supplier governance dashboard was created to track compliance and audits. Training and education have also formed a central role this reporting period, with mandatory modern slavery training and education programs implemented across the workforce. We also expanded our grievance mechanism to allow anonymous reporting by employees, suppliers, and customers.

About us

At COS, we recognise that respecting the human rights of those affected by our business activities is important. We endeavour to make a positive and real difference to our immediate and greater community through our operations and wider supply chain.

We scrutinise every element of the supply chain and place a high level of importance on the behaviour of the total supply chain, as we believe this is where COS can make the most significant impact. A core focus of managing the relationships with our suppliers is ensuring that they share COS' commitment to social and environmental responsibilities. COS places preference with suppliers practicing ethically responsible methods of sourcing and manufacturing whilst maintaining world best practice labour standards.

Our Structure

COS is a company incorporated in New South Wales, Australia and our registered office is located at 25 Nyrang Street, Lidcombe, New South Wales, 2141.

As a wholly owned subsidiary of D & M Lyone Holdings Pty Ltd, COS is a family owned and operated business. COS' employees are engaged by Complete Office Staffing Pty Ltd, a related entity which is also a wholly owned subsidiary of D & M Lyone Holdings Pty Ltd.

Additionally, via two strategic acquisitions COS extended our range of products that we know are needed by workers, patients and students across Australia. From 1st October 2024, COS became the owner of the now wholly owned and operated subsidiary, Kookaburra Audio Visual and Technologies Pty Ltd (ACN: 681 098 859) previously known as Kookaburra Educations Resources: a dedicated Audio-Visual products and installation service provider. In addition, from 1st December 2024 COS took a 50% ownership stake of Office Furniture Group Pty Ltd (ACN: 057 472 330), trading as Schoolfurn extending our offer to schools inside the classroom, offering classroom furniture expertise as a separately operated entity.

COS is Australia's largest privately owned business-to-business cleaning, kitchen, technology, furniture and office products supplier. COS was founded in New South Wales in 1977 by Dominique Lyone, whose visionary leadership and unwavering commitment to service excellence underpinned by social responsibility laid the foundation for everything we do today. Dominique passed away in 2024, but his legacy continues to inspire and guide the values by which the business is operated. Today COS is run by Dominique Lyone's daughters as Co-CEOs Belinda Lyone and Amie Lyone, who proudly continue his legacy as a second-generation family business.

Since establishment, COS has grown to become a national supplier to Government, Corporate and Education institutions, offering a next day delivery service for thousands of products helping workers, students and patients to stay healthy, safe and productive to over 30,000 customers across Australia. COS operations span across Australia, with employees, warehouses and an extensive driver network in every state and territory. We are the proud employer of over 600 Australians. We also engage a variety of transportation services to deliver to our Australia wide network and recruit casual labour via hire agencies during peak periods in our warehouses.

During FY25, COS expanded its operations into Far North Queensland through the opening of a new warehouse facility in Cairns and into regional New South Wales through expanded operations in Newcastle. These expansions resulted in the addition of approximately 30 employees across those regions.

COS retains a minority interest in the Muru Group, through our investment in Muru Office Supplies (ACN 601 516 545) (**MOS**). MOS is a majority Indigenous owned company that provides office supplies and stationery, as well as IT products and solutions. MOS use the operations and supply chains of COS to deliver to their customer base. MOS are responsible for the employment of their own employees which in FY25 was five based around Australia. Although we do not manage this joint venture, COS is committed to supporting MOS with assessing and addressing its own risks of modern slavery.

COS also has an annual commitment to donating 1% of annual revenue to the Lyone Foundation. The Lyone Foundation was founded in 2013 and is focused on supporting Australian based charities focused on human welfare in Australia.

Our Supply Chain

We source products from over 400 suppliers from many countries including but not limited to China, Australia, Indonesia, New Zealand and Germany. Our suppliers are primarily located in Australia representing 80% of total supplier spend, however we acknowledge the majority of products we procure are manufactured overseas. We have identified key countries where the products we procure are manufactured (based on a percentage of supplier spend). The most significant countries include China (33%), as well as Australia (26%), Indonesia (7%), New Zealand (5%) and Germany (4%).

The main types of goods and services that we procure are products that are used in any workplace, healthcare or education environment that we resell through to our customers. These can be grouped into a number of key categories including cleaning and bathroom supplies, office products, educational supplies, office furniture, technology, kitchen and catering supplies, mailroom and packaging supplies, personal protective equipment, as well as print and promotional products. During FY25, COS entered two new product categories consisting of managed print services and audio visual & technologies, which were acquired through strategic business acquisitions. These acquisitions represented an increase of approximately 3% of overall revenue and expanded our product offering while maintaining alignment with our existing supply chain risk profile.

We engage our suppliers in an annual supplier management program. Each year suppliers go through an annual review process including the updating of their company information, a recommitment to the current COS Ethical Sourcing Policy as well as an annual product range review.

We also have several other suppliers, including cleaning services for our office and distribution centres, suppliers of packaging goods for our warehouses, and maintenance service providers for our warehouse equipment. As noted above, we also engage a variety of transportation services who deliver to our Australia wide network and recruit casual labour via hire agencies during peak periods in our warehouses.

Modern Slavery Risks

We recognise that modern slavery may impact our business activities and we endeavour to take responsibility for reducing the risk that we might contribute to modern slavery through our operations and supply chains.

COS Risk Assessment Methodology

We utilise a risk assessment methodology which considers several indicators of modern slavery risks including geographic location and the level of automation in the production of goods as well as considering circumstances where accommodation is provided as part of an employment offer as an additional factor.

During FY25 we comprehensively reviewed and updated our risk assessment methodology for both direct and indirect suppliers to ensure alignment with the Global Slavery Index and evolving legislative requirements. This review confirmed our existing framework remains appropriate for COS' operations and supply chains, with enhancements implemented to strengthen our assessment processes.

Using our updated COS Risk Assessment Methodology, during the reporting period we continued to undertake risk assessments of modern slavery risks in our operations and supply chains to consider the extent to which we cause, contribute to, or are directly linked to modern slavery practices. These risk assessments have confirmed that our operations and supply chain continue to have a medium potential for modern slavery risks.

As in previous years, we acknowledge that our recruitment of casual labour via hire agencies has a higher risk of modern slavery, due to reports of some agencies targeting specific individuals and groups from marginalised or disadvantaged communities. Whilst use of labour via hire agencies is relatively low, COS has implemented several safeguards to mitigate this risk including only using Australian agencies who are subject to Australian laws and regulations and imposing minimum standard on these recruitment processes including screening any new labour hire agencies through our due diligence program and requiring them to review and commit to the COS terms and conditions and ethical sourcing policy.

Therefore, our key area of vulnerability remains our exposure to manufacturing processes as well as some jurisdictions with an elevated risk.

Our broader risk profile is summarised in the table below.

Risk profile

Risk	Description of risk
<i>People Reliance/ Level of Automation in Manufacturing Process</i>	<p>We acknowledge that manufacturing processes that rely heavily on manual labour have an increased risk of unfair labour practices, particularly in developing countries.</p> <p>We have identified certain product categories, that as a result of their manufacturing process, have a higher risk than others.</p>
<i>On Site Dormitory</i>	<p>We understand that providing accommodation as part of an employment offer creates an increased risk of modern slavery. We acknowledge these circumstances have a risk in the exchange of value for the accommodation as well as the potential of the employer to control living conditions and freedom of movement.</p> <p>While COS does not itself provide accommodation in connection with employment, we have identified industries such as product manufacturing which have a higher risk of exposure to on site dormitories or offsite accommodation.</p>
<i>Geographic/ Country of Manufacture</i>	<p>Embedded at the heart of modern slavery is local labour and employment laws of individual countries. Local regulations establish the minimum conditions relating to employment, such as minimum working age, minimum hourly wage and freedoms to terminate employment.</p> <p>We have identified a number of elevated risk jurisdictions in our supply chains, including China, Indonesia, and Malaysia.</p>

Action to Assess and Address Risk

We understand the importance of working collaboratively with our employees, suppliers, and the broader industry to combat modern slavery. Over this reporting period, we continued to assess and address modern slavery in our operations and supply chains.

Due Diligence

As noted above, we undertook risk assessments to identify key modern slavery risks that existed within our operations and supply chains. Consistent with previous reporting periods, the results of our due diligence have confirmed that our highest risk remains in the products we procure and resell to our customers, and this therefore remains our key focus area.

We continue to conduct due diligence on all new suppliers, as well as an annual audit process on existing suppliers. The Annual Audit via the COS Supplier Program is a targeted approach to audit existing suppliers

to ensure all documents and questionnaires have been completed and up to date based off the Program requirements.

Our new suppliers, including both direct and indirect suppliers, undergo a screening process that involves information gathering and audit review for potential modern slavery risks. When a supplier is approved, they are allocated a risk rating in accordance with our Modern Slavery Risk Assessment Framework which as noted above is based on a matrix of geographic location and the level of automation in the production of goods as well as any accommodation arrangements for workers as part of employment.

In FY25, we identified our non-trade suppliers as an area of focus. Non-trade suppliers are considered those companies we engage with as part of our operations and supply chain, but are not related to the procurement of goods for resale. This includes but is not limited to third-party labour hire, cleaning services and maintenance teams (noting these companies are often smaller and are perceived to have a higher risk of modern slavery due to the reported use of migrant labour).

In this reporting period we aligned annual review process reviews for non-trade suppliers with contract renewal cycles to ensure ongoing compliance and strengthen our oversight of these higher risk supplier categories.

During FY25, COS completed eight sensory audits where members of the COS strategic sourcing team visited overseas factories that manufacture private or exclusive label products for COS to conduct in-person sensory audits. The purpose of these audits is to physically observe working conditions using key senses of sight, smell, hearing and light to identify and address risks to those working in the factory, including risks associated with modern slavery.

Governance and Accountability Framework

An internal modern slavery working group leads the assessment of our risks of modern slavery and implements actions to address those risks. The modern slavery working group comprises seven COS employees across the business including our Co-CEOs and the General Manager of Strategic Sourcing who is the responsible for the appointment and management of product suppliers.

Policies and Procedures

Our policies and procedures ensure we have strong frameworks to enable us to assess and address modern slavery risks. These policies and procedures include a:

- Modern Slavery Risk Assessment Framework – which allocates suppliers a risk rating and includes consideration of the additional risk of dormitories. In respect of dormitories, the Framework applies a separate Dormitory rating that identifies the Type of Dormitory and whether a third party audit has been performed. All suppliers were reassessed, and risk ratings modified accordingly;
- Self-Assessment Questionnaires – which were provided to all new and existing:
 - local and import suppliers with which we have preferred supplier arrangement in place, and we spend more than 0.5% of annual purchases (**Local & Import Tier 1 Suppliers**);
 - local and import suppliers with which we have preferred supplier arrangement in place, and we spend more than 0.3% of annual purchases (**Local & Import Tier 2 Suppliers**); and

- local suppliers with which we have preferred supplier arrangement in place, and we spend more than 0.2% of annual purchases (**Local & Import Tier 3 Suppliers**);
- Ethical Sourcing Policy – which includes an overview of modern slavery and has now been entrenched as a mandatory policy for new suppliers. All suppliers receive the policy and are asked to complete the self-assessment questionnaire which is aligned to the requirements of our ethical sourcing policy;
- supplier induction process – for both direct and indirect suppliers and includes a modern slavery risk assessment and policy onboarding. This supplier induction process was also extended in FY25 to capture large solution projects and service installation providers;
- Supplier governance dashboard – was created during FY25 to track compliance and audit completion, with a specific focus on ensuring recent audits for suppliers with dormitories and those located in high-risk jurisdictions including China, Indonesia, and Malaysia; and
- Indirect Supplier Management Framework – we introduced a standalone framework to identify and manage the risks of modern slavery within our indirect supply chains. This includes the development of a separate risk matrix for indirect suppliers.

Grievance Mechanism

We continue to review and enhance our grievance mechanism process, which allows employees, suppliers, customers and members of the public to raise concerns of modern slavery easily and anonymously within our operations and supply chains. This process includes a form to provide anonymous feedback, or report concerns of modern slavery.

COS also maintains a Modern Slavery Register to track and report on suspected incidences reported through the grievance mechanism.

Training

All members of the Modern Slavery Working Group participated in specialised education regarding modern slavery. This training focused on the history of modern slavery, how to identify modern slavery and best practice response in the event a potential risk of modern slavery is identified.

Specialised training continued as part of the induction process for new employees in identified roles in procurement, recruitment, facilities management and compliance to raise comprehensive awareness of modern slavery risks and how they may arise in the COS business. In addition, we continued generalist training on modern slavery that is included in all new employee induction programs. We also ran a refresher training for all members of the sales team.

During the reporting period we also introduced an extra initiative by displaying educational posters regarding modern slavery in all the break rooms in our facilities across the country.

Assessing Our Effectiveness

We are committed to reviewing the effectiveness of our actions by regularly reviewing our modern slavery processes, with senior management meeting periodically to consider whether we are appropriately

identifying and evaluating our modern slavery risks. The modern slavery working group also conducts an annual review of our processes, policies and actions, to ensure we are appropriately identifying and evaluating our modern slavery risks appropriately.

We also monitor our performance against several key performance indicators. These include monitoring:

- the number of suppliers participating in our responsible sourcing program as a percentage of total procurement spend;
- the percentage of our procurement complying with sourcing policies;
- the number of supplier factory audits completed; and
- the number of incident and corrective action measures taken in response to actual or suspected incidences of modern slavery.

Consultation

In preparing this statement, COS consulted with our wholly owned subsidiary; Kookaburra Audio Visual & Technologies Pty Ltd to ensure operational alignment and commitment to the content, including management of operations, supply chain and personnel including future development of the modern slavery framework. For completeness, we have also undertaken this same consultation process with Office Furniture Group Pty Ltd.

Throughout FY25, the executive leadership of COS maintained ongoing consultation and collaboration with a modern slavery working group to ensure a coordinated approach to addressing modern slavery risks.

Prior to the COS board of directors' review and approval, this statement was reviewed by the General Manager of Strategic Sourcing, and the General Manager, Shared Services.

Related Activities

We passionately support the Lyone Foundation which was established to assist small to medium sized Australian charities, with a focus on human welfare to create a more prosperous future for disadvantaged, vulnerable and marginalised Australians.

As our customer based continued to grow in line with our strategic plan, we are fortunate to develop and maintain strong relationships with many of Australia's largest commercial, Government, Education and Health organisations and associated industry bodies. With a foundation of contractually based partnerships, including the measurement and reporting of incremental efforts on an annual basis, the COS Commercial and Category Teams team lead by our Commercial Director and General Manager of Strategic Sourcing have leveraged more than 200 of these strategic relationships to actively participate in forums reviewing progress within Government and Industry in Australia relating to steps taken to prevent and address modern slavery. Key examples of such forums include:

- support of a three-step independent assessment of our practical application of commitments as part of recent resign of long-term Government supply agreements;

- our Commercial Director presented to more than forty Federal Government Agencies and more than twenty State Government Agencies across three events on the opportunities to collaborate on mutual approaches;
- active participation in three party collaborative meetings with seven of our largest clients and leading reporting organisations to assess auditing and reporting standards;
- inclusion of our modern slavery statement in more than 400 Quarterly Business Review meetings with our clients, supporting collaborative discussions on approach and opportunities;
- inclusion of our statement and commitment risks in 100 new tender and contract processes; and
- attendance to three Modern Slavery workshop forums run by our customers providing procurement networking and discussions on opportunities in proactive approach.

FY2026 Focus

In FY2026 we will continue to improve our initiatives and strategies, including:

- reviewing our current COS Risk Assessment Methodology against all product suppliers to affirm the risk matrix is appropriately assessing and addressing potential modern slavery risks;
- extending and implementing a review of the COS Risk Assessment Methodology and companywide compliance, particularly as it applies to indirect suppliers;
- continuing the rollout of sensory audits in overseas factories, achieving a minimum of five sensory audits during FY26, with a focus on modern slavery review process for the top suppliers in each category that have not had a sensory audit in the past three years;
- implementing a focused review process aligned to contract renewal cycles for cleaning services and third-party labour hire agencies;
- reviewing our mechanisms to capture and identify active modern slavery concerns in our supply chain to mitigate risks where suppliers have not proactively notified us of current identified concerns;
- participating in a minimum of three external roundtables or industry conferences to assist in awareness and education of modern slavery;
- continuing the evaluation of large installation providers for furniture and capturing one-off large purchases for solutions projects with a specific focus on service providers;
- conducting a comprehensive review and evaluation of the recently acquired subsidiary, Kookaburra Audio Visual & Technologies, including a focused review of new suppliers in the Education and Audio Visual Technology categories through our Supplier Management Program, with particular attention to Audio Visual installers;
- Explore and potentially support charities relating to modern slavery in Australia; and

– continuing to refine our governance dashboards and reporting mechanisms to track compliance and effectiveness of our actions for product suppliers.

Approval

This statement was approved by the board of Complete Office Supplies Pty Ltd (ACN 001 634 715) in their capacity as principal governing body of Complete Office Supplies Pty Ltd on 11th December 2025.

This statement was signed by Belinda Lyone in her role as a director of Complete Office Supplies Pty Ltd on 12th December 2025.



Belinda Lyone
Co-CEO & Director

Mandatory criteria

This statement complies with the mandatory criteria for a modern slavery statement outlined in section 16 of the *Modern Slavery Act 2018* (Cth). The below table indicates where each requirement is addressed in this statement.

Requirement	Page Number
(a) Identify the reporting entity.	1
(b) Describe the structure, operations and supply chains of the reporting entity.	1 – 3
(c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	3 – 4
(d) Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	4 – 6
(e) Describe how the reporting entity assesses the effectiveness of such actions.	6 – 7
(f) Describe the process of consultation on the development of the statement with any entities that the reporting entity owns or controls (if a joint statement has been made under section 14, also describe the process of consultation with the entity giving the statement).	7
(g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	7 – 8