

Modern Slavery Statement by Wonderest Ltd Year Ending 31 March 2022

This Statement is filed by Wonderest Ltd for itself and on behalf of its subsidiaries (Wonderest Ltd (ARBN 078 848 987), Australian Comfort Group Holdings Pty Ltd (ACN 143 785 522), and Australian Comfort Group Pty Ltd (ACN 098 742 584) (referred together as “The Comfort Group”).

This Statement is prepared for the purposes of s.14 of the Modern Slavery Act 2018 (Cth) (“the Act”) and outlines the steps taken by The Comfort Group during the financial year ending 31 March 2022 to minimize the risk of modern slavery occurring in our business including in our supply chain.

Modern slavery is defined in the Act, and includes situations where coercion, threats or deception is used to exploit victims and undermine their freedom and include human trafficking, slavery, servitude, forced labour, child labour, and debt bondage.

The Comfort Group’s main business in Australia is carried out by Australian Comfort Group Pty Ltd (“ACG”). ACG is the manufacturer, importer and distributor of beds, mattresses and bedding products and supplies products to distributors and retailers throughout Australia. ACG has its head office at Deer Park, Victoria and operates 5 manufacturing sites in Australia (Queensland, New South Wales, Victoria, Tasmania and Western Australia) with over 500 employees in Australia.

Our commitment

The Comfort Group does not engage in any aspect of modern slavery and will not condone such behaviour in our supply chain. We acknowledge our role and responsibility in seeking to safeguard human rights through ethical and sustainable business practices and are committed to taking all reasonable and practicable steps to ensure that there is no modern slavery in our business or supply chain.

The majority of our products are manufactured in Australia although some smaller finished products are imported. In order to manufacture our products in Australia we directly import raw materials, components and packaging sourced from a number of countries including China, India, Thailand, Indonesia, Malaysia, South Korea, Taiwan, UK and USA. We also purchase materials from local wholesale importers and resellers who themselves may have imported these items.

Our local supply chain also includes the purchase of products and services required for the day-to-day operations such as office supplies, utilities, cleaning, property services, logistics, professional services, IT, and promotional goods and services.

We continue to take steps to ensure that all of our suppliers, both local and offshore, meet the required standards for ethical practices in their supply chains.

Potential modern slavery risks

Our assessments indicate that the risk of modern slavery within our local business operations and procurement within Australia to be low.

We recognize that there is a higher risk through our international supply chain because we purchase raw materials for our manufacturing operations (particularly fabrics such as mattress ticking and fibre) and finished bedding products (such as sheets, pillowcases). Suppliers of these textile-type products are therefore of particular interest to us when conducting our procurement functions and carrying out Modern Slavery assessments.

Governance of modern slavery risks – management of the risks and assessing the effectiveness of our

actions

We are constantly developing and improving our procurement practices to identify modern slavery risks and ensure we can actively manage modern slavery risk assessments in our processes and build these practices into our supply chain so that we can identify suppliers of concern on an ongoing basis.

We are currently focused on suppliers who may fall within the higher-risk category. A key area of focus is the suppliers who directly supply products and who are located in Asia. When working with suppliers we make it clear that we are committed to operating our business lawfully and ethically with suppliers who will be aligned to our values, and that we will manage modern slavery risk by:

- working directly and closely with suppliers to ensure they understand the expectations we have on them to operate in accordance with all applicable modern slavery laws;
- maintaining positive and open relationships with suppliers so we can monitor the relationship, and suppliers will have a reasonable expectation that we will require the opportunity to ask questions in relation to their operations, also that the suppliers feel able to disclose to us challenges they may be facing in complying;
- working in preference with suppliers who can demonstrate inspection by, or accreditation or membership with, respected international ethical standards audit entities.
- where practicable we aim to visit suppliers to further enhance working relationships and conduct audits (prior to Covid-19 suppliers were able to be visited by our supply team members or SGS on our behalf).


The Comfort Group is also currently undertaking an overall review of all of our policies to ensure that they remain current and demonstrate best practice (including consistency with SMETA best practice guidance). In addition to the specific Modern Slavery policy we have a suite of policies to allow the Group to adopt a broader range of controls and influence organisational and employee behaviours. For example, the Modern Slavery Policy sits alongside and supports the broader Ethical Standards (Sourcing) Policy which aims to ensure that the group is:

- sourcing its products in a responsible manner,
- working with its suppliers to improve their social and environmental practices,
- providing clear guidance to its buying staff, and
- protecting its corporate reputation, the reputation of its individual businesses & brands.

The Comfort Group suite of policies also include other relevant policies such as:

- Whistleblower
- Discrimination Harassment and Bullying
- Workplace Equal Opportunity

This statement was approved by resolution of the Boards of Directors of Wonderest Ltd, Australian Comfort Group Holdings Pty Ltd, and Australian Comfort Group Pty Ltd on 1 JUNE 2022



Craig Turner, Director