

DAVID JONES

Modern Slavery
Statement FY25

David Jones acknowledges the Traditional Custodians and Owners of the lands on which our support centre, distribution centre and stores are located, Australia's First Nations peoples. We pay respect to all First Nations peoples, past and present, for their generosity and custodianship of Country.

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1.0 About this Statement

1.1 REPORTING ENTITIES

David Jones Pty Ltd is an Australian company (ACN 000 074 573) registered in Melbourne, Victoria. David Jones' Modern Slavery Statement (Statement) has been published in accordance with the Modern Slavery Act 2018 (Cth) (MSA) and describes the actions taken from 1 July 2024 to 30 June 2025, by David Jones Pty Ltd, its Australian parent entities (as set out in Table 1), and their owned and controlled entities, to identify, assess and address modern slavery risks.

This joint statement is made on behalf of all reporting entities namely David Jones Pty Ltd, Vela Investments Pty Ltd, ACP Riley Street Pty Ltd, ACP Riley Street Midco Pty Ltd, ACP Riley Street Finco Pty Ltd and ACP Riley Street Group Pty Ltd. This Statement has been approved by the concurrent Boards of these entities.

Table 1: List of relevant reporting entities

Reporting Entity	Type of activities undertaken by reporting entity	Location of reporting entity
David Jones Pty Ltd (ACN 000 074 573)	Retail (fashion, general merchandise, beauty and food)	Australia
Vela Investments Pty Ltd (ACN 168 920 447)	Holding Company	Australia
ACP Riley Street Pty Ltd (ACN 656 969 274)	Holding Company	Australia
ACP Riley Street Midco Pty Ltd (ACN 665 249 543)	Holding Company	Australia
ACP Riley Street Finco Pty Ltd (ACN 665 247 601)	Holding Company	Australia
ACP Riley Street Group Pty Ltd (ACN 656 968 795)	Holding Company	Australia

1.2 STATEMENT CRITERIA

Table 2: List of mandatory reporting criteria

Australian Modern Slavery Act 2018 (Cth) mandatory reporting criteria	Within this Statement
Identify each reporting entity covered by the joint Statement	Page 4
Describe the structure, operations and supply chains of each reporting entity covered by the joint Statement	Pages 7-13
Describe the risks of modern slavery practices in the operations and supply chains of each reporting entity covered by the joint Statement and any entities that each of those reporting entities owns or controls	Pages 4-18
Describe the actions taken by each reporting entity covered by the joint Statement and any entities that each of those reporting entities owns or controls to assess and address these risks, including due diligence and remediation processes	Pages 19-33
Describe how each reporting entity covered by the joint Statement assesses the effectiveness of actions being taken to assess and address modern slavery risks	Pages 34-36
Describe the process of consultation with each reporting entity covered by the joint Statement and with any entities that each of those reporting entities owns or controls	Pages 39-40
Any other relevant information	Pages 37-38, 41-42

2.0 A Message from our CEO



David Jones has undergone a period of purposeful transformation. Over the past four years, we have navigated a complex and challenging retail landscape, shaped by economic uncertainty and the impacts of a global pandemic. Guided by our Vision2025+ framework, we have delivered a series of strategic initiatives designed to modernise our business, enhance customer experience and position us for long-term sustainable growth. This transformation has been underpinned by a strong commitment to ethical business practices, transparency and accountability across all areas of our operations.

David Jones is pleased to report a continued strengthening of our approach to managing modern slavery risks, having delivered nine of our eleven commitments during the reporting period. A number of key initiatives were actioned including:

- Finalised updates to the Supplier Code of Conduct and Toolkit (with an expanded focus on grievance channels and remediation), following supplier feedback across private label, third-party, concession, and non-trade categories and ahead of a formal launch in the year ahead.

- Refined earlier approach to supply chain tracing, surveys, and data management, mapping a process to screen our private label cotton supply chain.
- Concluded a two-year pilot with selected non-trade partners, capturing key learnings to strengthen future engagement and due diligence.
- Rolled out a comprehensive modern slavery risk e-learning module to team members across the business to build general awareness.
- Reviewed our enterprise-wide crisis management plan through a modern slavery lens and identified actions to strengthen incident response procedures specific to modern slavery.
- Performed a gap analysis on existing grievance channels, highlighting ways we can enhance accessibility and effectiveness.

While we acknowledge the challenges in eliminating modern slavery, our progress this year reflects our strong commitment to ethical practices and social responsibility, and we remain engaged in the Government's response to the statutory review of the Modern Slavery Act.

Our focus centres on ensuring that our risk management and reporting frameworks are robust, adaptable, and aligned with evolving stakeholder expectations and international developments in human rights due diligence. We are building on the insights gained from previous years including key projects completed throughout FY25, using these learnings to strengthen our approach and improve the effectiveness of our actions to address modern slavery and broader human rights risks.

As David Jones continues striving to be one of the world's most responsible retailers, I would like to thank our teams for their ongoing commitment and dedication to making progress on this important work.

I am pleased to present this Statement, which was approved by the Board of Directors at David Jones on 15th December 2025.

A handwritten signature in black ink, appearing to read 'Scott Fyfe'. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Scott Fyfe
Chief Executive Officer
David Jones Pty Ltd

3.0 Introduction & FY25 Progress

3.1 INTRODUCTION

David Jones is a premium retailer and the world's longest continuously operating department store still trading under its original name.

We have 40 store locations across Australia and New Zealand, an online store – davidjones.com - and mobile app, as well as a distribution centre and support centre in Australia with brand partners and a value chain that spans globally. We recognise with this footprint, David Jones may be exposed to modern slavery risks, and we are committed to managing these responsibly by taking proactive steps to identify, assess, and address them across our operations and supply chains.

The following is David Jones' sixth statement under the Modern Slavery Act. This statement sets out our continuing efforts to respect human rights and combat modern slavery.

We believe that transparency, accountability, and collaboration are critical to eradicating modern slavery, and we welcome you to learn more about our commitment and the progress we have made by reading our Statement.

Building on the initiatives outlined in our previous Statement, we have continued to strengthen our approach to modern slavery risk management and remain steadfast in advancing these commitments. Our progress is summarised in table 3.

Table 3: List of FY25 actions

Area	FY25 Commitment	Status as at 30 June 25	FY25 Actions
Policy	Finalise and roll out refreshed Supplier Code of Conduct and Toolkit.	●	With extensive updates to our Supplier Code, a decision was made to first complete testing sessions of our new Supplier Code and accompanying guidance Toolkit with key vendor partners, ahead of a formal launch in FY26. More information can be found on page 22.
	Review and benchmark draft Buyer Code of Conduct against peers and competitors.	●	Completed a review and benchmarking of an existing Buyer Code draft, identifying strengths and opportunities for improvement and potential implementation. More information can be found on page 22.
Identifying and Assessing Risk	Refresh our process to screen beyond Tier 1 ¹ and enhance traceability of our higher risk David Jones Private Label (DJPL) suppliers.	●	The process to screen our DJPL cotton supply chain was mapped. More information can be found on page 27.
	Expand Ethical Sourcing Program to include select Non-Trade Procurement (NTP) suppliers through a pilot.	●	Pilot completed with select non-trade partners with findings and key learnings outlined. More information can be found on page 24.
	Update the Request For Proposal (RFP) process to include sustainability and modern slavery considerations.	●	RFP template documents were updated to include sustainability and modern slavery dimensions. However, we were unable to complete the commitment in full with the overall RFP business process under review. More information can be found on page 24.
Managing and Addressing Risk	Establish a supplier evaluation process that incorporates a sustainability dimension (including modern slavery).	●	Sustainability consideration incorporated into the evaluation process for select value chain suppliers. More information can be found on page 16.
	Based on a training needs assessment, develop and roll out a targeted internal awareness program to key business areas.	●	Comprehensive modern slavery e-learning module deployed to team members. More information can be found on page 29.
	Review current vendor agreement architecture to identify gaps and areas for improvement.	●	Vendor agreement architecture reviewed and gaps and opportunities identified. More information can be found on page 22.
Effectiveness and Communication	Integrate new qualitative and quantitative indicators to track progress and include in reporting.	●	Awareness raising and capacity building indicators embedded and reporting capabilities developed. More information can be found on page 36.
	Review the current crisis management plan and assess if it can be used as a tool to manage modern slavery responses. Map gaps.	●	Current crisis management plan reviewed with a modern slavery incident lens; improvements identified for implementation. More information can be found on page 32.
Grievance and Remediation	Complete internal review of grievance mechanisms and channels across business and supply chain.	●	Existing grievance channels reviewed, with gaps and opportunities identified. More information can be found on page 31.

Key ● Not Commenced ● Commenced ● Complete

3.2 PROGRESS AGAINST OUR COMMITMENTS

In our FY24 statement, we outlined 11 forward-looking commitments for the FY25 reporting period. Table 3 lists the actions we have taken to meet these commitments.

¹ Tier 1 refers to the final stage production facility

4.0 David Jones' Structure, Operations and Supply Chains

David Jones is a leading premium Australian retailer that sells apparel, footwear, accessories, homewares, beauty, gifts, electrical products and food.

4.1 OUR STRUCTURE

David Jones Pty Ltd is an Australian company (ACN 000 074 573) headquartered in Melbourne, Victoria. David Jones' ultimate holding company is Anchorage Capital Partners, an Australian-based private equity company.

David Jones Pty Ltd and David Jones (NZ) Pty Ltd are the only customer-facing entities, however, the David Jones corporate structure is made up of 24 companies including numerous non-customer-facing entities that are involved in activities such as property arrangement or are parent/holding entities.

4.2 OUR OPERATIONS

David Jones is a premium Australian retailer selling apparel, footwear, accessories, homewares, beauty, electrical products, and food as well as offering various services such as fashion styling, wellbeing and gifting services under various trading arrangements described in this Statement. These goods and services are delivered under David Jones' proprietary brands or under third-party brands or

services from international and domestic suppliers. Our business operations also include a loyalty program for customers ("David Jones Rewards") and a business-to-business retail media offering ("Amplify").

Our team members working across the business are employed on full-time, part-time, and casual agreements across Australia and New Zealand. We support our operations from our head office, which is located in Melbourne, Victoria and via our satellite office in Manila, Philippines that functions as an extension of our Support Centre and receives induction and training from David Jones leaders.

To support the operations of our store network, we lease and operate one warehouse and distribution centre, located in New South Wales. Along with our direct team members within the distribution centre, the facility uses agency workers to receive, unpack and fulfil stock for our store network as well as pick-and-pack millions of e-commerce parcels for our online customers.

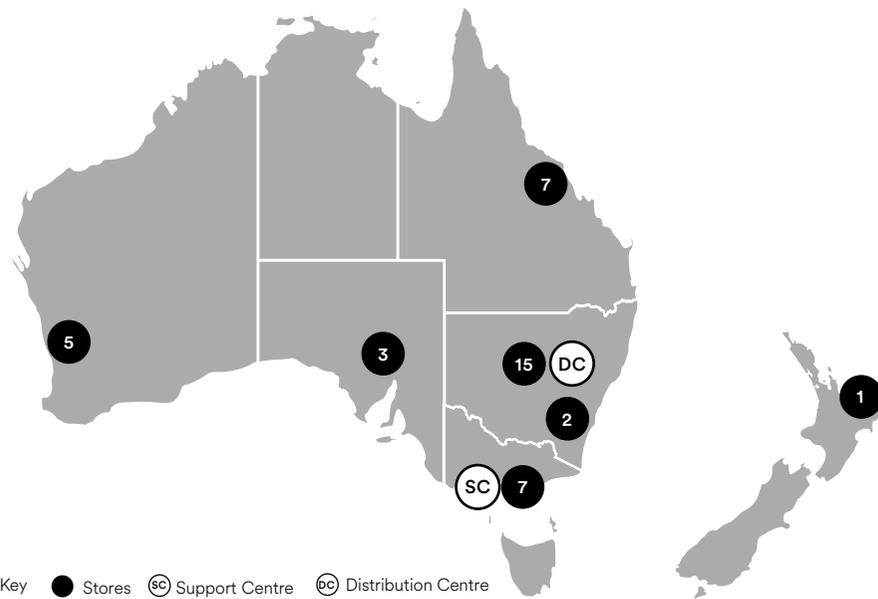
David Jones continued its transformational value chain program in FY25 to improve how we buy, move and sell our products to customers across our network. During the reporting period, we ceased using a previously contracted third-party logistics warehouse, consolidating our distribution operations to one key location; Silverwater, NSW.

David Jones partners with Latitude Finance Services (replacing American Express in July 2024) to provide co-branded credit cards to our customers where David Jones' responsibilities include marketing the credit card to consumers in store and through our digital channels.

4.2.1 Our stores and teams

In FY25, David Jones' main operations involved managing a network of physical stores across Australia and New Zealand, our online store as well as our support centre, warehouse and distribution centre. During this reporting period, David Jones reduced the store portfolio footprint from 41 to 40 stores.

Figure 1: Map of David Jones' store network footprint



1 Store count as at 30 June 2025

Our workforce is comprised of approximately 5600 team members across retail stores, distribution centres and Support Centre.

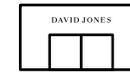
Figure 2: David Jones team members, by business activity



550+

Support Centre Team Members

Buying, Planning, Marketing, Store Design, Customer Service, Legal, Finance, People and Culture, Sustainability, Retail Operations, Online and other corporate functions.



4880+

AU and NZ Store Team Members

Store Leadership teams, Retail Sales, In-store Visual Merchandising (VM), Stylists, Loss Prevention and Operations and fulfilment of online orders.



170+

Warehouse and Distribution centre Team Members

AU Warehouse Leadership, Operations teams, and Pickers and Packers.

The suppliers who provide the goods we sell are managed through Buying Teams with support from our Legal and Ethical Sourcing Teams.

4.3 OUR SUPPLIERS AND SUPPLY CHAINS

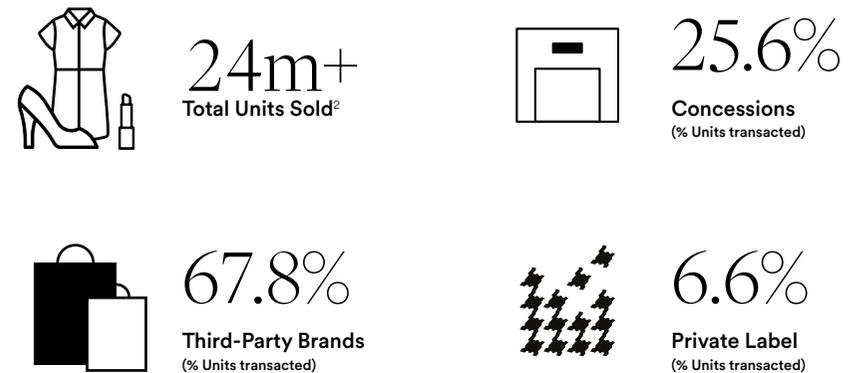
As a department store, we have various trading arrangements with our suppliers across our store and online offerings. Our trading arrangements cover Merchandise and Non-Trade Procurement and are defined as:

Merchandise:	Third-party brands operate their own 'shop-in-a-shop' area within David Jones stores, including fashion and accessories, beauty treatments, and food services.
Concessions	An arrangement through which we buy a selection of domestic and international brand merchandise from wholesalers/suppliers and then sell/retail products to consumers. This includes dropship and consignment arrangements.
Third-Party Brands	
Private Label	Products that are designed and developed under our proprietary brand names, but which are manufactured and sourced on our behalf by a diverse range of third parties in numerous locations. Products include apparel, fashion accessories, food, and homewares.
Non-Trade Procurement	Where goods and services are supplied to David Jones to support the operation of our businesses, including Information Communication Technologies (ICT), logistics, packaging, marketing, cleaning, and security services.

4.3.1 Our third party-brands and concession partners

Our trading arrangements with our third-party brands and concession partners are managed through our business, each with its own set of agreements, procedures and due diligence processes. Brands and concessions that provide the goods and services we sell in store and online are managed by our Merchandise Buying teams with support from our Legal and Ethical Sourcing functions.

Figure 3: Units of Products Sold in FY25, by Merchandise Trading Arrangement Type



² Unit means an item of merchandise sold for retail sale

4.3.2 Our private label supply chain footprint

David Jones does not manufacture goods directly but rather engages with a range of suppliers for the manufacturing of goods sold under David Jones proprietary brands, listed in Appendix 2.

We engage with suppliers and factories from a number of countries worldwide that support us in developing and manufacturing these products on our behalf.

In this reporting period, our private label goods were produced by 99 suppliers (107 in FY24) in 150 Tier 1 factories (166 in FY24) and sourced from 14 countries. This is across all our merchandise categories of food, home, beauty, apparel, footwear and accessories.

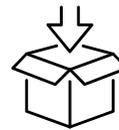
We believe transparency is essential in fulfilling our responsibility to respect human rights, as outlined in the UN Guiding Principles on Business and Human Rights (UNGPs). We continue to work towards increasing the disclosure of Tier 1 private label product factories on our interactive [factory map](#), which is routinely updated and available on our corporate website.

In FY25, we maintained the percentage of our Tier 1 factories published (for apparel, footwear and accessories, beauty and home) at 90%. We will continue to track and publish the following worker information:

- Number of workers at the factory site
- Percentage of women workers
- Percentage of international migrant labour used at the site

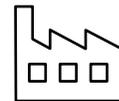
We believe transparency is essential in fulfilling our responsibility to respect human rights, as outlined in the UN Guiding Principles on Business and Human Rights (UNGPs).

Figure 4: Our private label sourcing profile



99

Active Merchandise and Food Suppliers



150

Tier 1 Factories: 138 Merchandise and 12 Food



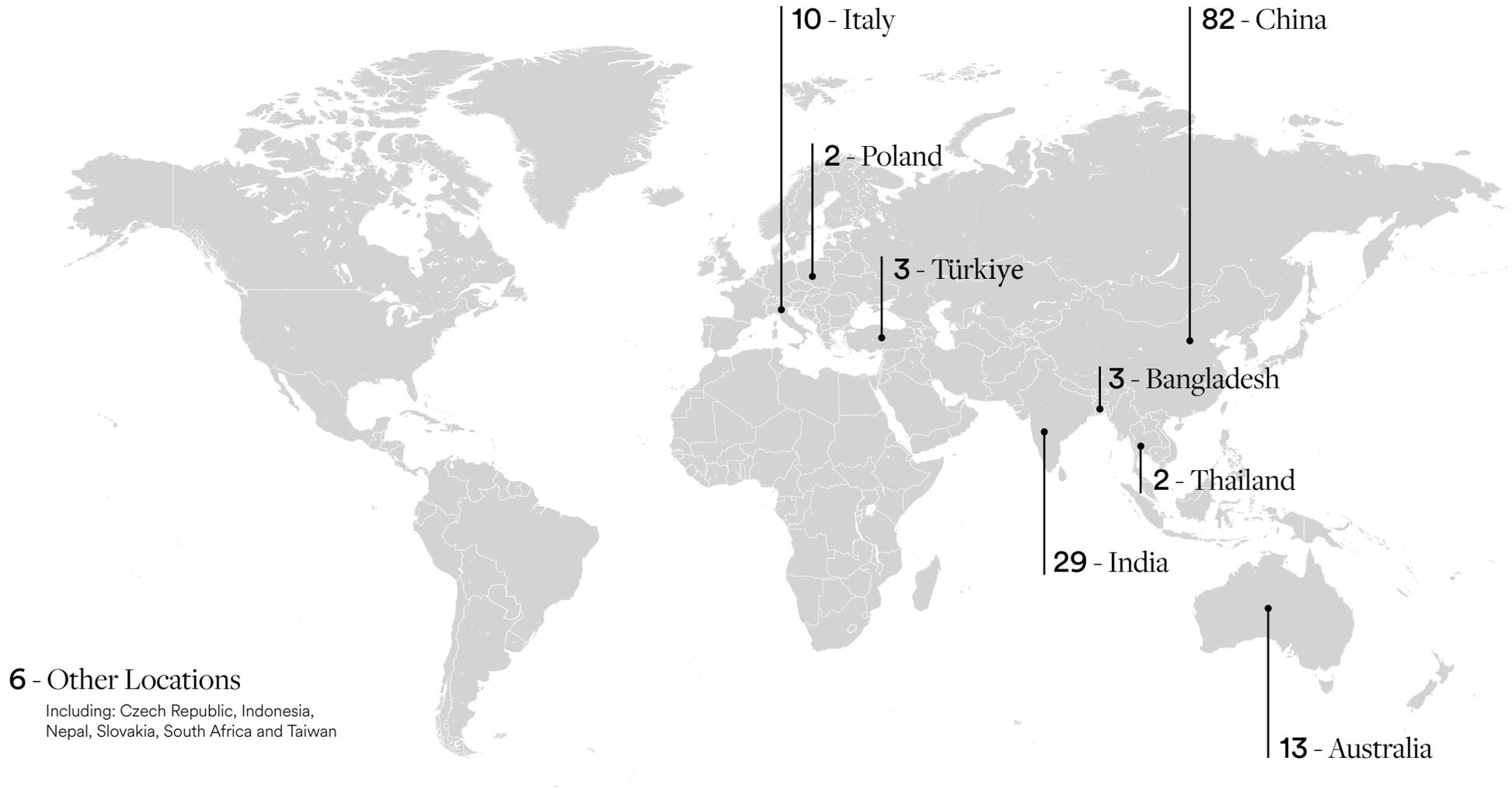
14 Countries

Sourcing Countries³

³ Based on location of Tier 1 factories.

David Jones Private Label Sourcing Locations

Figure 5: Private label sourcing locations, by country



120 major suppliers represented 89% of the total non-trade spend for David Jones in FY25

4.3.3 Our Non-trade procurement (NTP) goods and services

The non-trade goods and services that we procure for the support of the operations of our business activities are purchased from 120 major suppliers (126 in FY24) across eight major categories of non-trade procurement. These major suppliers⁴ represented 89% of the total non-trade spend for David Jones in FY25 (93% in FY24).

The majority of NTP suppliers have their businesses incorporated and located in Australia. However, the non-trade goods (including raw materials and components used) and services that we procure may involve international production activities. For example, our in-store bags are produced overseas.

David Jones also engages other NTP services, such as those used in providing logistics and cleaning for David Jones. Non-trade suppliers are managed through formal agreements and by relevant business functions, with our Legal and Ethical Sourcing teams also supporting activities relating to modern slavery risk management.

Figure 6: NTP suppliers and spend

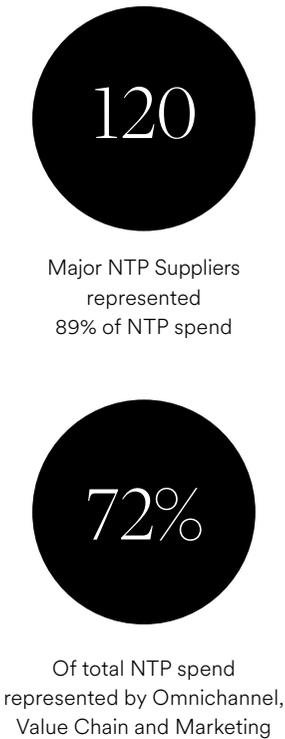
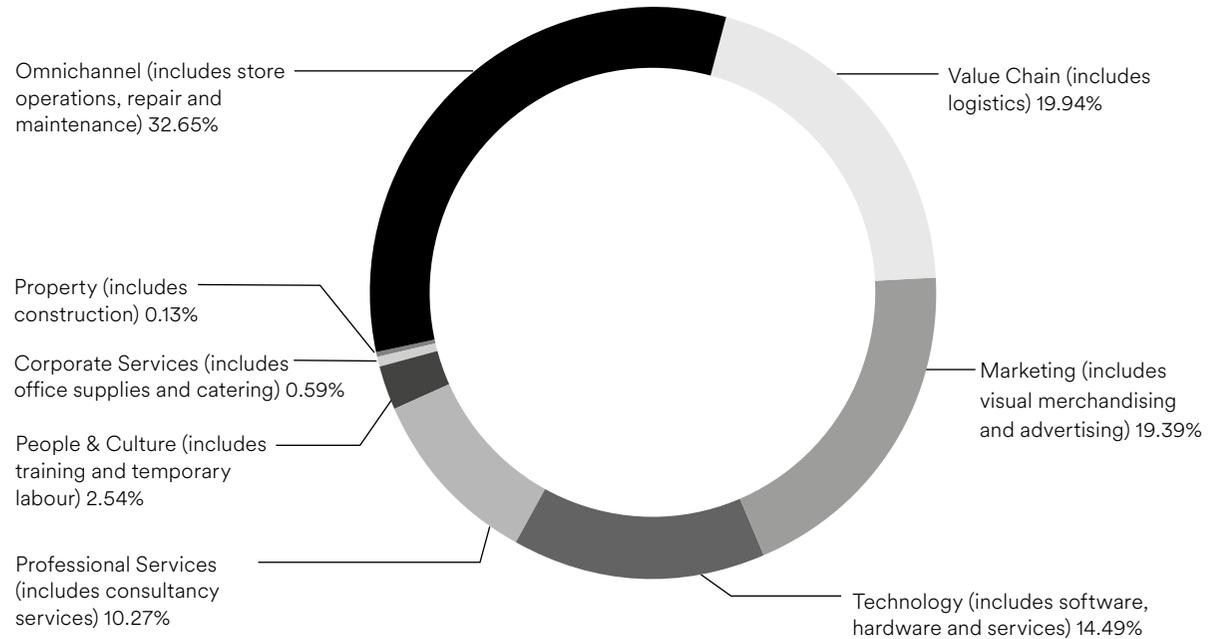


Figure 7: NTP spend by category (%)

The goods and services we procure within our non-trade categories include:



⁴ Major supplier defined as having an annual spend of over \$200,000

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5.0 Identifying our Modern Slavery Risks

5.1 MODERN SLAVERY & RISKS IN RETAIL OPERATIONS AND SUPPLY CHAINS

Modern slavery describes ‘situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom’⁵. The Modern Slavery Act (2018) outlines eight forms of serious exploitation, which are listed below and defined in Appendix 1.

- Trafficking in Persons
- Forced Labour
- Slavery
- Debt Bondage
- Servitude
- Deceptive Recruiting for Labour of Services
- Forced Marriage
- The worst forms of child labour

Consistent with the Guiding Principles on Business and Human Rights (UNGPs⁶) and the Australian Government’s official guidance on the MSA, we understand modern slavery risks as those including situations where we might ‘cause’, ‘contribute to’, or be ‘directly linked to’ modern slavery. These terms are explained in the following table.

Table 4: UNGPs continuum of involvement terms and potential risks

The UNGPs continuum of involvement		Examples of potential modern slavery risks in the retail industry
Cause	A business may cause an adverse human rights impact, such as modern slavery, where its acts or omissions directly result in modern slavery practices occurring.	<p>Retail companies in Australia could cause modern slavery by, for example, employing young workers who are potentially subjected to hazardous work, or by knowingly exploiting workers in distribution centres.</p> <p>While we employ several young workers in our stores, including workers under the age of 18, we have specific policies, procedures and controls to ensure that they are not subjected to any potential risks. These include the application of minimum working standards, as well as specific training and awareness raising related to potentially hazardous work. Through our processes to assess and address modern slavery risks outlined in this Statement, we consider the risk that we cause modern slavery in our operations to be low.</p> <p>More information on these steps, and other policies and steps taken to manage these risks, can be found on page 21</p>
Contribute	A business may contribute to an adverse human rights impact, such as modern slavery, where its actions or omissions significantly facilitate, enable or incentivise modern slavery practices occurring.	<p>Retail companies could contribute to modern slavery in several ways. For example, if a retail company does not act on evidence that a supplier is engaged in modern slavery, such as in an audit report, and does not take action to prevent these practices.</p> <p>We take a number of steps to manage modern slavery risks in our supply chain which help to mitigate the risk of contributing to modern slavery, including through our Supplier Code of Conduct, Approved Factory Program and supplier engagement. More information on these steps can be found on pages 26-28.</p>
Directly Linked	A business may be directly linked to an adverse human rights impact where its operations, products or services are connected to the impact through the actions of another entity with which it has a business relationship (such as a supplier) but the business has not caused or contributed to the harm.	<p>Retail companies could be directly linked to modern slavery through, for example, situations where goods (such as apparel) are purchased from a supplier and include raw materials (such as cotton) that have been purchased from a sub-supplier and produced through forced labour.</p> <p>David Jones actively assesses and addresses modern slavery risks in our supply chain. More information can be found on pages 16-29.</p>

⁵ Australian Government Guidance for Reporting Entities

⁶ The UNGPs continuum of involvement helps to highlight how companies could be involved in a human rights harm through its own activities and business relationships, including its supply chains, and what appropriate action is expected in response.

Globalisation of supply chains has increased the global exposure to modern slavery risks and David Jones is not immune from these risks.

5.2 POTENTIAL MODERN SLAVERY RISK AREAS IN OUR OPERATIONS AND SUPPLY CHAINS

We accept that the risk of modern slavery exists in the operations and supply chains of all companies, including our own. Consequently, we take proactive measures to identify, assess and mitigate the risk associated with modern slavery across our operations and supply chains.

The global food, apparel and textile industry is largely dependent on human labour. Globalisation of supply chains has increased the global exposure to modern slavery risks and David Jones is not immune from these risks. Consequently, we take proactive measures to identify, assess and mitigate the risks associated with modern slavery across our operations and supply chain.

Each year we review our risk profile. Our assessment indicates that, whilst we are less likely to cause or contribute to modern slavery, we may be directly linked to areas of modern slavery risk in our supply chains. We consider forced labour, bonded labour, deceptive recruiting and child labour to be the most relevant types of modern slavery exposure for David Jones through potential direct linkage in our supply chains.

The assessment identified key risk factors for modern slavery relevant to our operations and supply chains:

- Low-skilled labour
- Temporary labour
- Migrant labour
- Subcontracting
- High-risk geographies
- Strong pricing competition

During the reporting period, we integrated sustainability criteria into our procurement evaluation assessment for selected value chain suppliers. We will continue to look for opportunities to review and refine this approach in line with our evolving understanding of modern slavery risks.

Case Study

Strengthening oversight of service procurement in Manila

In FY24, David Jones expanded its operations, establishing our procurement services in Manila, Philippines. This satellite office was identified as having a heightened risk profile, especially in the procurement of competitive local services such as cleaning, security and maintenance services that use low skilled, migrant and temporary labour. To better understand the current controls in place at our Manila based office, we engaged our third-party vendors to assess protections against unauthorised sub-contracting, how those practices are monitored, the existence of grievance mechanisms, incident response procedures and training on modern slavery.

Through this engagement, we confirmed that a number of controls were already established to mitigate risk in their supply chain. For third-party vendors, this included anti-slavery policies, supplier assessments, and the use of self-assessment questionnaires (SAQs). Local suppliers were also subject to annual compliance checks, had grievance mechanisms in place, and followed defined (though not yet fully documented) remediation processes.

While service procurement remains an identified hotspot in our satellite office, we continue to be conscious of risk factors related to the engagement of Philippines-based contracted workers. All employees, regardless of their status (full-time or part-time), are required to complete compliance training, which includes a comprehensive module on modern slavery. Each employee is assigned the training and must acknowledge they have read and understood the anti-slavery policy. During FY25, employee compliance training completion for those working on our account was 67%. While refresher training was not delivered in FY25, it has been scheduled for early FY26.

Recognising this remains a potential area of risk for our business, we will continue to keep an open dialogue with our Manila office. Our approach focuses on collaboration - sharing learnings, maintaining regular engagement, and supporting efforts to strengthen existing controls - so that risks are effectively addressed, and workers remain protected.



During this reporting period, we continued to utilise the hotspot analysis to prioritise our actions.

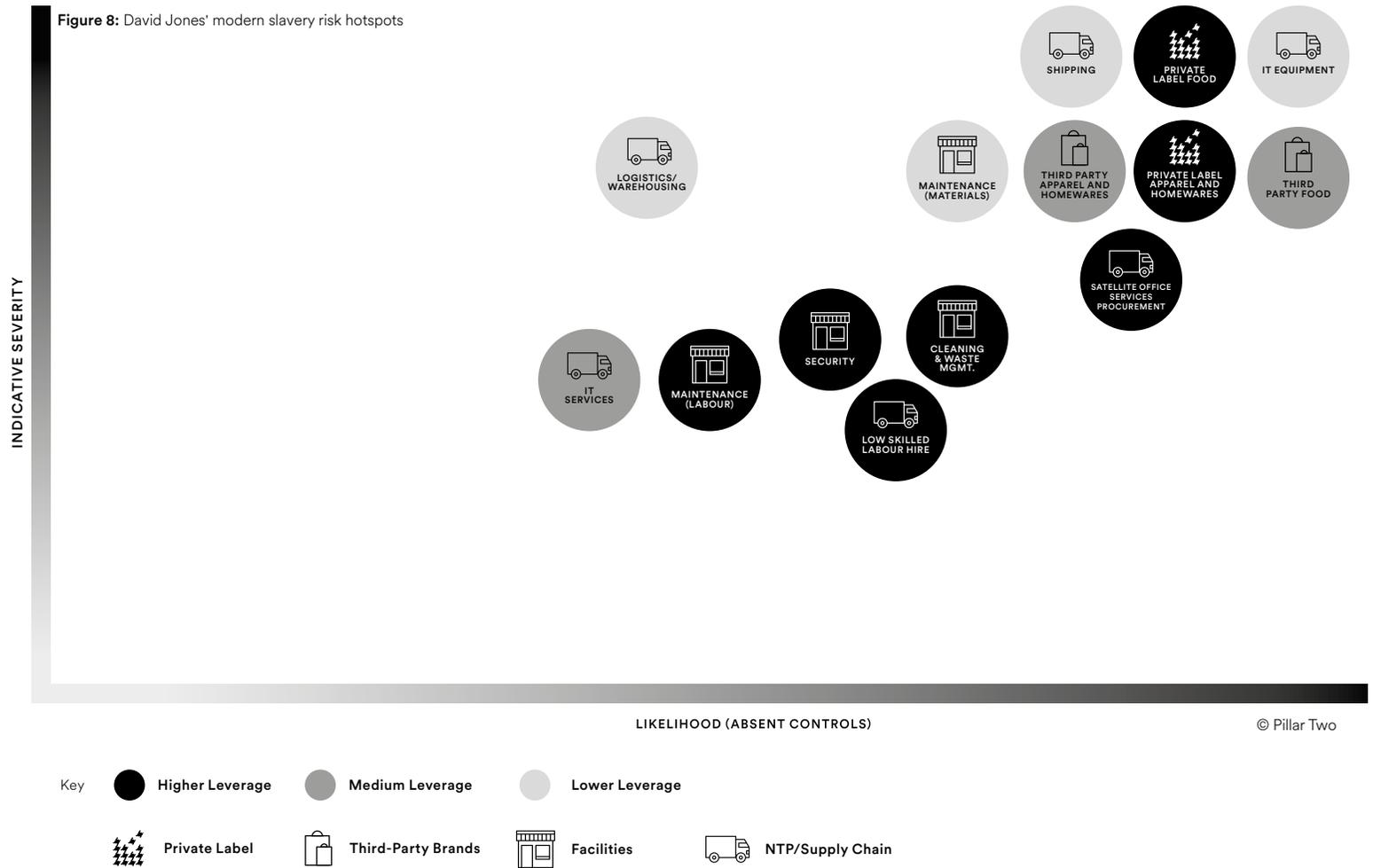


Table 5: Modern slavery hotspot key risk factors

David Jones areas of business	David Jones modern slavery hotspots	Key risk factors corresponding to these hotspots
Private Label	Food	
	Apparel and Home	
Third Party Brands	Apparel and Home	
Facilities	Cleaning and waste management	
	Maintenance and refurbishment	<ul style="list-style-type: none"> • Low-skilled labour • Temporary labour
	Security	<ul style="list-style-type: none"> • Migrant labour • Subcontracting
NTP and Supply Chain	Manila office services procurement	<ul style="list-style-type: none"> • High-risk geographies
	Labour hire	<ul style="list-style-type: none"> • Strong pricing competition
	Logistics and third-party	
	IT equipment and services	
	Shipping	

David Jones is aware of the global focus on high-risk regions for sourcing specific commodities, such as cotton being produced in countries with alleged state-sponsored forced labour.

Through our Approved Factory Program (AFP) for David Jones Private Label merchandise, we can identify the locations of Tier 1 factories. Based on our data and assessment, our Private Label products were not manufactured in regions most commonly associated with heightened risks of state-sponsored forced labour during the reporting period.

We acknowledge, however, the challenges associated with the accuracy and completeness of information declared to us by suppliers and we continue to review and evolve our due diligence processes. We also recognise that risks often sit deeper within the supply chain and are actively working to strengthen our traceability efforts to build greater visibility beyond Tier 1. Alongside this, we continue to monitor external reports for updated information about modern slavery risks in these regions to help us better identify high-risk areas within our value chain.

6.0 Assessing and Addressing our Modern Slavery Risks

6.0 ASSESSING AND ADDRESSING OUR MODERN SLAVERY RISKS

In FY25, we continued to utilise a suite of tools to assess and address our modern slavery risks. These include policies, contractual agreements, self-assessment questionnaires and audits deployed throughout our supply chain.

This section of the Statement explains how we integrate modern slavery into our governance structure, outlines our policy framework and details our due diligence and remediation processes.

6.1 OUR GOVERNANCE STRUCTURE

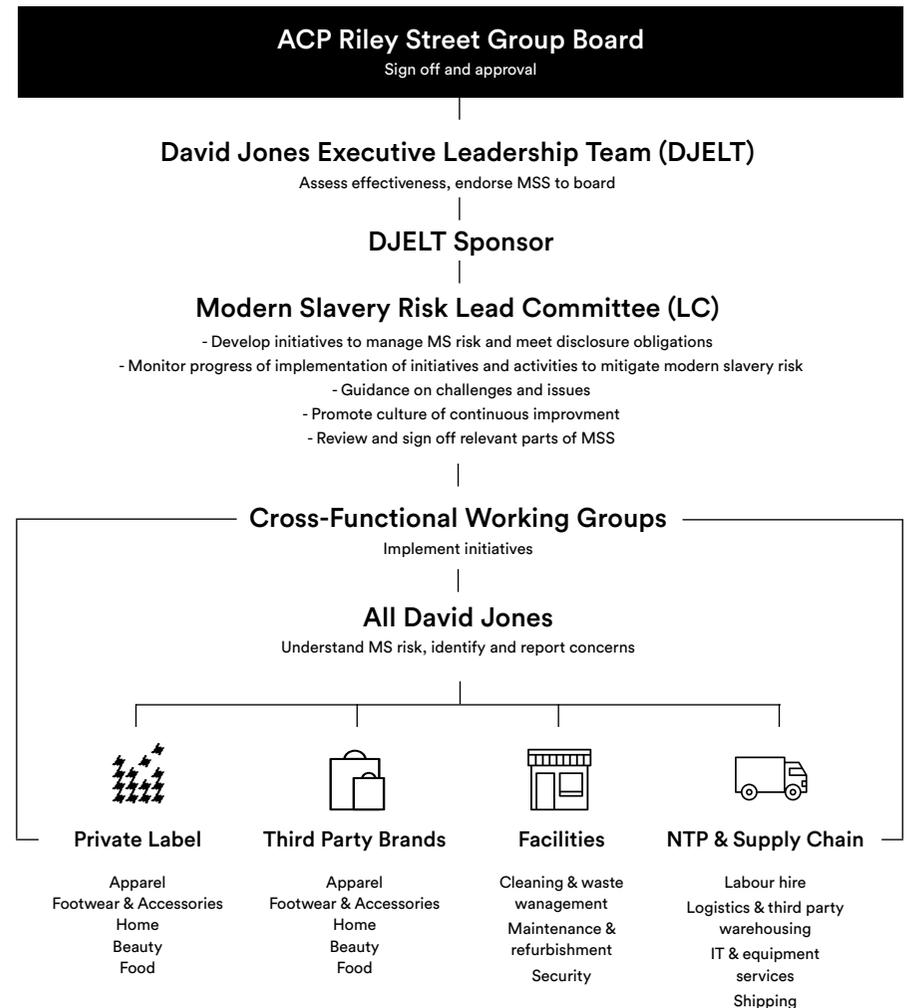
We identify, assess, and manage modern slavery and broader human rights risks in an agile and adaptive manner. This occurs through collaboration between many teams including People and Culture, Legal, Risk and Compliance, Value Chain, Merchandise and Sustainability and Ethical Sourcing teams.

Human rights responsibilities (including modern slavery) are addressed at the highest level across our company. David Jones is accountable for the actions taken by all owned and controlled entities to assess and address modern slavery, including our reporting obligations under the Modern Slavery Act.

Our Modern Slavery Lead Committee brings together senior leaders with decision-making levels of authority across key business functions. David Jones ensures that modern slavery risks are considered at the senior levels of our business and effectively managed. As illustrated on the right, the Committee, alongside cross-functional working groups and the Executive Leadership Team, forms a key part of the governance framework for David Jones.

Our Modern Slavery Lead Committee convened quarterly in FY25 to review and enable action required to progress our FY25 commitments. The Committee has also provided key inputs and consultation in the development of this Statement.

Figure 9: Governance structure



6.2 OUR POLICY FRAMEWORK

David Jones has established a set of clear codes, policies, and protocols that set expectations for our people and suppliers across many social and environmental impact areas including modern slavery and broader human rights risks. These frameworks help us address not only business risks but also, critically, prevent and respond to risks to people. Key control policies and mechanisms that support our modern slavery risk management are outlined in the table 6.

These formal arrangements bind and/or guide our business, team members, and suppliers. These mechanisms help to mitigate the risks of modern slavery occurring in our operations and supply chains. They set clear obligations and expectations on parties and, where stated, these requirements are expected to be promoted and applied beyond Tier 1 of our supply chain. These policies are clearly communicated to team members and suppliers through our onboarding requirements, employment and/or supplier contracts, via the intranet as well as publicly on our website, as appropriate.

Our People and Culture, Legal and Sustainability teams conduct regular reviews of these policies to ensure ongoing compliance with current legislation and proactive responsiveness to emerging regulatory developments.

Team members are trained at regular intervals throughout the year. More information on our training and awareness-raising activity related to modern slavery can be found on page 29.

Table 6: List of policies, protocols and mechanisms

Policy, Protocol or Mechanism	Description	How is it implemented in practice?
Employment Contracts	Formal legal agreements between David Jones and team members that specify each party's responsibilities including adherence to laws, codes and policies.	Contracts are sent to successful applicants upon the completion of all appropriate right-to-work in Australia checks and verbal acceptance of verbal offers.
Award/Enterprise Agreements (EA)	Formal agreements setting our terms and conditions of employment, wage rates, overtime rules and leave arrangements for team members.	Negotiated periodically as per the agreed terms. Documentation is shared with each employee whose employment conditions are governed by the EA.
Employee Code of Conduct	Details the standards of behaviour and ethical conduct expected of team members.	Details are shared upon the acceptance of their employment contract and housed on internal intranet channels.
Workplace Behaviour Policy	Clearly states any workplace behavioural obligations and provides guidelines on accessing support and resolving a complaint.	Features in annual compliance training and reissued to team members when a breach of the Code has been identified or when an issue has been raised to David Jones. Housed on intranet channels.
Discrimination, Harassment and Bullying Resolution Guidelines	Set expectations and provide guidelines and processes for the resolution of discrimination, harassment and bullying concerns.	Features in annual compliance training and reissued to team members when a breach of the Code has been identified or when an issue has been raised to David Jones. Housed on intranet channels.
Whistleblower policy	Provides guidance on how improper or criminal conduct (such as instances of modern slavery) can be confidentially disclosed and how they may be investigated.	Features in annual compliance training and housed on intranet channels.
Ethics Hotline Procedure	Ethics Hotline calls, emails, complaints/tip-offs and whistleblower complaints are received, escalated, and appropriately managed.	Hotline details are communicated through intranet channels. Posters have been strategically placed across the store network to ensure team visibility.
Grievance and Dispute Resolution Policy	Designed to raise awareness and provide a fair and just working environment, by ensuring that team members have access to processes for the resolution of personal grievances relating to the workplace.	Confidentially managed by our internal employee relations team, for both team members and leaders, where appropriate. The policy is also housed on intranet channels.
Supplier Agreements	Formal legal agreements between David Jones and suppliers that clearly specify each party's responsibilities, including in regard to adherence to laws, codes and policies..	Negotiated and signed prior to becoming a David Jones supplier.
Supplier Code of Conduct	Clear expectations of our suppliers in relation to social, ethical and environmental issues, such as health and safety and labour rights, including those related to modern slavery.	The Supplier Code of Conduct is integrated with Supplier Agreements. Suppliers agree to the Code when they sign their Supplier Agreement during the onboarding process. This process is housed on our intranet and public corporate website.
Ethical Sourcing - Approved Factory Program	A framework for all private label suppliers and factories to adhere to when supplying goods for sale to our business.	The Ethical Sourcing Program Requirements Manual is sent to private label suppliers at time of onboarding. Our Supplier Code of Conduct also outlines high-level requirements for private label suppliers.
Guiding Principles when Dealing with Critical Non-Compliances	Provides practical guidance to support the management of critical non-compliances.	An internal document utilised by the Ethical Sourcing team when working with suppliers and factories to address and remediate critical non-compliances.

At David Jones, we have mapped and identified several stages in the supplier journey where contractual levers can be used to address modern slavery risks; from the RFP stage, to onboarding, to contract renewal. In FY25, we began a gap analysis of our agreements, contracts, and vendor trading terms architecture to identify where we could improve, and where modern slavery and Supplier Code of Conduct requirements could be better integrated.

While we had already made improvements in certain areas, this review allowed us to take a more holistic view of the contractual process. We identified several key templates across our documentation architecture that could be strengthened, and we will continue to update these documents in the coming years in line with our roadmap.

We also recognise that updating templates is only part of the solution. For contractual commitments to be effective, they need to be embedded into day-to-day practice. This means equipping our teams with the knowledge, resources, and confidence to raise these issues with suppliers at different stages of the journey, as well as educating them on how to identify higher-risk suppliers from a modern slavery perspective.

Through this work, we are building a stronger contractual framework that not only sets clear expectations but also supports more meaningful engagement with suppliers on shared human rights risks.

We are also aware that our purchasing practices directly influence working conditions in our supply chain.

In FY25, we benchmarked our draft Buyer Code of Conduct—originally developed under prior ownership—against two retail peers using the Ethical Trading Initiative’s CFRPP framework. The draft showed partial alignment with all five principles, with opportunities to strengthen areas like training, monitoring, and reporting.

We also engaged our Buying teams to understand implementation challenges and identify where further support is needed. In FY26, we’ll review and refine the Code and our approach to inform a clear way forward.

A key part of this will be considering how to support and upskill our Buying teams, ensuring they are equipped with the knowledge and tools needed to embed responsible purchasing practices over time.

Case Study

Refreshing our supplier code of conduct



At David Jones, our Supplier Code of Conduct is a critical tool to promote ethical practices, sustainability, and stronger partnerships across our value chain. Beyond commercial negotiations, it sets out the minimum standards we expect from all suppliers covering human rights, labour practices, and environmental responsibility. While the Code was last updated in February 2021, our 2023 modern slavery gap analysis identified opportunities to strengthen it further, making its refresh a key FY24 commitment.

During the reporting period, we finalised updates to the Code and developed a new toolkit designed to support suppliers with implementation by providing detailed guidance on key principles. Recognising the importance of supplier input, we also conducted feedback sessions with a cross-section of suppliers across

private label, third-party, concession, and non-trade procurement. These sessions confirmed at a high level that the Code was clear and the toolkit useful, while also providing valuable insights into the final version.

Recognising that awareness and engagement are critical for compliance, we will be supporting suppliers to meet new expectations by providing a comprehensive toolkit, a dedicated digital helpdesk post launch, an information pack outlining key changes, and supplier education sessions on topics such as modern slavery, grievance mechanisms, remediation, and living wages. Together, these steps ensure that the refreshed Code not only sets standards but also equips suppliers to embed them in practice.

6.3 OUR APPROACH TO ASSESSING AND ADDRESSING RISKS IN OUR OPERATIONS

The UNGPs expect that businesses “identify general areas where the risk of adverse human rights impacts is most significant and prioritise these for human rights due diligence⁷.”

6.3.1 Employment contracts

Our direct team members are employed on a full-time, part-time or casual basis and are covered by Enterprise Bargaining Agreements, relevant Awards or Individual Employment Contracts, depending on their position and work location.

Prior to commencing their employment, team members are provided copies of agreements that cover the relevant employment laws aimed to protect them from situations that may lead to modern slavery.

These employment provisions, along with our policies detailed in this Statement, provide a strong framework to mitigate against modern slavery in our direct operations. Furthermore, as our operating businesses are bound by national laws including the Fair Work Act and National Employment Standards, we assess the risks of modern slavery occurring in our direct operations as low.

Our People and Culture team regularly reviews our employment agreements. Our internal people policies ensure that they meet or, where possible, exceed legal requirements. David Jones supports the right of workers to organise and their participation in two unions within our operating warehouses.

Update

Progressing our living wage roadmap

Living wage continues to be an important focus area and although it does not constitute modern slavery, there is a widely recognised link between low wages and heightened vulnerability to exploitation⁸.

In our last Statement, we shared an update on the development of a living wage roadmap designed to identify opportunities for us to further enhance our approach as a stand-alone business.

The outcome of this work is a multi-stage roadmap through to FY30, underpinned by targeted and practical actions that allow us to test, learn, and strengthen our approach over time.

The roadmap is structured around two key focus areas: the identification and calculation of a living wage, and the achievement of this across our supply chain. We are continuing to refine and formalise this roadmap.

During the reporting period, we made progress through an updated public commitment on living wage, confirming appropriate benchmarking calculations methodologies and joining industry peers to progress toward a living wage. These steps lay the foundation for implementation and collaboration in the years ahead, aligned with our roadmap to FY30.

⁷ Guiding Principles for Business and Human Rights: Implementing the United Nations

“Protect, Respect and Remedy” Framework | UN Global Compact.

⁸ [A living wage: a crucial tool in the fight against modern slavery | Walk Free](#)

Contractual clauses are an important tool to support the management of modern slavery risks.

6.3.2 LABOUR HIRE

Our risk assessment identified labour hire as a potential modern slavery risk within our operations, alongside other risk factors. This relates to the use of lower-skilled roles in services such as cleaning and maintenance, and the reliance of the labour hire sector on vulnerable groups, including migrant workers and contractors. As a result, labour hire providers were included in our pilot to expand the Ethical Sourcing Program. The case study below provides more detail on how labour hire providers were included in the pilot and the actions we will take in FY26.

In FY25, we began updating our Requests for Proposal (RFPs) templates and process to embed sustainability and modern slavery considerations, recognising the tender stage is a critical moment to set clear expectations to prospective suppliers. We focused on embedding practical, sector-relevant questions to assess supplier risk controls and awareness efforts - including those pertaining to its modern slavery risk. These updates were integrated into two key RFP documents: our high-level requirements and supplier questionnaire.

While we did not finalise a supporting process for consistent application, this remains a priority. In FY26, we will work with business teams to embed the updated approach into standard practice and identify tools to support effective supplier review and assessment.

Case Study

Expanding our Ethical Sourcing Program to non-trade goods and services

Non-trade goods and services such as cleaning, waste, maintenance, security, and labour hire are recognised modern slavery risk areas. In FY24, we piloted the expansion of our Ethical Sourcing Program to selected higher-risk Non-trade suppliers.

Four suppliers from cleaning, labour hire and packaging manufacturing participated, with requirements including Sedex registration and completion of the SAQ.

The two-year pilot, completed in FY25, showed participating suppliers had moderate to strong management systems, resulting in low to medium risk scores.

Key learnings included strong existing Sedex participation and the need to better engage smaller, less resourced suppliers. In FY26, we will launch the expanded program, onboarding higher-risk NTP suppliers and supporting pilot participants through capacity building and two-way learning.



Update

Transition to a new supply chain risk management platform

During the year, we transitioned to a new supply chain risk management platform for contractors who visit our sites, such as cleaners and maintenance providers. The platform helps ensure we are working with safe and qualified suppliers and workers by assessing health and safety, sustainability, and broader business risks.

Suppliers complete their compliance requirements through the platform, which includes an ESG self-evaluation.

Alongside sustainability considerations such as greenhouse gas emissions, the self-evaluation also addresses policies on child labour and forced labour.

As we approach the 12-month mark of the transition, we are continuing to refine our data capture and reporting, with a focus on optimising the system for more effective insights.

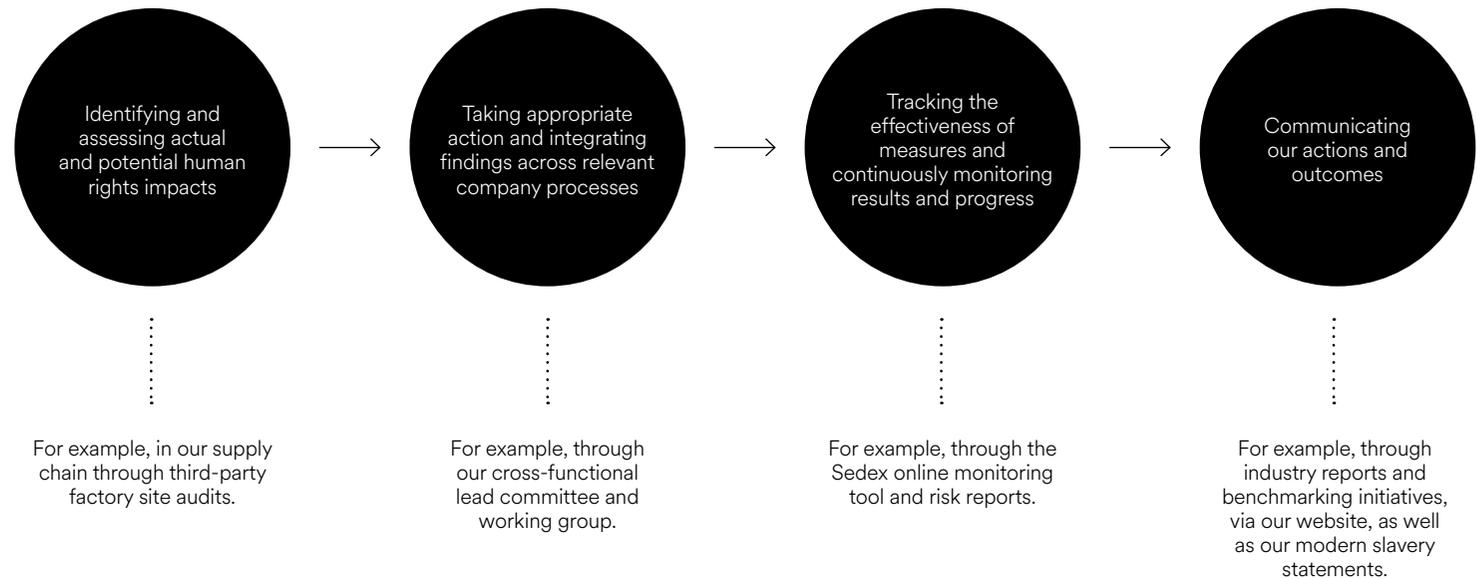


David Jones continues to review and strengthen our due diligence activities related to modern slavery risk management in our supply chain.

6.4 OUR APPROACH TO ASSESSING AND ADDRESSING RISKS IN OUR PRIVATE LABEL SUPPLY CHAIN

Our human rights due diligence approach, which includes preventing and addressing modern slavery, is aligned with the due diligence steps outlined in the UNGPs and the Australian Government Modern Slavery Guidance. This includes:

Figure 10: Due diligence framework



6.4.1 David Jones Approved Factory Program overview

We recognise that our private label supply chain carries both the highest leverage and the greatest risk of direct linkage to adverse human rights impacts. To manage these risks, all David Jones' private label suppliers must participate in our Approved Factory Program (AFP). The AFP, at minimum, requires Tier 1 factories to register on Sedex, complete self-assessment questionnaires, and provide social compliance audits aligned to our Supplier Code of Conduct and the Ethical Trade Initiative (ETI) Base Code – an internationally recognised code of labour practice.

Audits are conducted on a two-year cycle, identifying potential red flags for modern slavery and providing corrective action plans where issues are found. Findings are monitored by the Ethical Sourcing team at our support centre, with critical issues escalated to executive level. We continue to offer smaller suppliers Sedex sponsorship where needed and, where possible, we work with suppliers to remediate concerns while retaining the right to terminate relationships if issues remain unresolved.

6.4.2 Approved Factory Program and Sedex in FY25

During the reporting period, we onboarded 20 new factories to the AFP and deactivated 38 as they were no longer producing for David Jones private label.

As of 30 June 2025, 96% of Tier 1 private label factories (across food and non-food) were active on Sedex. We continue to work with suppliers to renew and keep their Sedex memberships current.

Our factory base fulfilled the minimum requirements of our AFP, with 100% of food and non-food Tier 1 factories meeting our expectations as of 30 June 2025.

6.4.3 - Compliance audits and assessment questionnaires

While we acknowledge the shortcomings associated with moment-in-time audits, social compliance audits remain an important tool for engaging our suppliers and factories.

In the reporting period, 47 social compliance audits (for existing Tier 1 factories representing 31% of all factories, were reviewed and assessed by the Ethical Sourcing team. This is one less than what we reported in FY24 (48 audits). We attribute this variance to the audit cycle (the number of factories) due for re-audits within their two-year audit cycle window)fluctuating from year to year.

Where an audit is not required, we still continue to utilise Self-Assessment Questionnaires (SAQs) as a method for gathering information, identifying and assessing risk and continually reinforcing expectations.

While there may be times where our expectations are not being met, we are committed to working with our supply chain partners to achieve change over time. If a supplier is unwilling to remedy breaches, David Jones has the right to terminate the trading arrangement if required.

Figure 11: Summary of our Approved Factory Program for FY25 across private label⁹



6.4.4 - Other AFP controls and tools

In this reporting period, we also maintained controls and utilised valuable tools to monitor and manage modern slavery risks in our private label supply chain. These included:

- Utilising the Supplier Risk Assessment tool on the Sedex platform, alongside our AFP onboarding process.
- Maintaining a Critical Issues Tracking tool to enable our Ethical Sourcing team to monitor critical issues within our AFP and drive remedial action with suppliers.
- Maintaining the de-registration list for factories that have been off-boarded due to unresolved critical issues or being unresponsive to remedial actions. The list is used to crosscheck applications for new factories and prevent relisting those deemed unsuitable or inappropriate.

We continue to explore processes and systems to strengthen our controls as part of our initial onboarding and continuous monitoring of suppliers and their factories.

No instances of modern slavery were identified through AFP audits during the reporting period. However, we did identify broader issues relating to health and safety which, if left unaddressed, could potentially lead to modern slavery practices. The following section explains how we are working to address these issues.

⁹ Includes all categories of merchandise: Fashion, General Merchandise, Beauty and Food

6.4.5 Addressing critical issues identified through audits

In FY25, seven critical non-compliances with our Supplier Code of Conduct were found during AFP audit reviews. The critical issues found in Tier 1 factory audits related to unsafe and unhygienic working conditions (including lack of health and safety training, fire and structural safety certificates, fire fighting equipment and electrical safety) as well as unpaid wages and owed leave entitlements.

While these non-compliances are not necessarily examples of modern slavery, understanding these risks supports David Jones in identifying potential indicators and supports broader modern slavery risk management.

There has been a negligible decrease in the critical non-compliances found during this reporting period (compared with eight in FY24) due to a decrease in audits undertaken and reviewed in FY25.

To strengthen our program, we will be reviewing our AFP and exploring ways to improve the capture and analysis of non-compliance data. This will support more effective capacity building, remediation, and long-term risk management (see our FY26 commitments on page 38).

Of the seven critical non-compliances identified during the reporting period, 70% were closed within 12 months of David Jones identifying the critical non-compliance (compared to 25% in FY24). This is due to identifying the critical non-compliances earlier in the year and giving the factories sufficient time to develop and complete remediation actions.

¹⁰ Tier 2 refers to sites that produce or finish materials for use in final products

Case Study

Deepening cotton traceability beyond Tier 1



In our previous Modern Slavery Statements, we highlighted the early steps taken to trace our private label supply chain beyond Tier 1. While our existing due diligence systems provided visibility of the Tier 1 factories used for David Jones private label production, they did not go deeper in the supply chain where many of the significant risks often sit, particularly those linked to labour rights and modern slavery in value chains such as cotton.

Building on work first undertaken in 2017 and revisited in 2024, we reviewed the strengths and weaknesses of our earlier approaches to tracing, surveying and managing data. This process provided a strong foundation and blueprint for next steps. We carried out a scoping exercise, surfacing approximately 30 cotton suppliers that were not part of the previous survey engagements.

Our refreshed approach is designed to be phased, multi-year and sustainable. It centres on mapping the cotton supply chain more deeply and bringing suppliers along on the journey. This means not only collecting information, but ensuring our suppliers understand why transparency matters and how it contributes to stronger due diligence for our respective businesses.

Looking ahead, our next step will be to engage suppliers through a more comprehensive survey in FY26. This will allow us to extend traceability efforts further, strengthening our visibility of Tier 2¹⁰ actors in the cotton supply chain. These insights will guide our future engagement and inform targeted actions to address modern slavery risks more effectively.

6.5 Other critical controls to monitor and manage modern slavery risks in our supply chain, including third-party brands.

All of our concession arrangements, third-party brands and private label suppliers are bound by various sets of contractual arrangements. We use these arrangements as part of our modern slavery risk management.

For example, where a private label supplier is manufacturing goods that will be sold under the David Jones brand, they must, under the David Jones Standard Supply Terms:

- a) Permit David Jones (or its agent) to inspect the supplier's factories or facilities where the goods are being manufactured to ensure compliance with relevant laws and David Jones standards;
- b) Provide full contact details for any sub-contractors engaged or assisting in the manufacturing of the David Jones goods and/or any components so that David Jones can conduct its own due diligence in relation to such sub-contractors; and
- c) Only source raw materials that comply with the specifications provided by David Jones.

For third-party and concession arrangements, reference to the Supplier Code of Conduct is included in contracts and application forms for new suppliers. We continue to review these processes and look to update in a tiered approach aligned to the risk level for modern slavery management.

As David Jones has no direct nor contractual relationship with third-party supply chains, we acknowledge the greater challenges in identifying, evaluating and tackling risks of modern slavery within the supply chain of products supplied by third-party brands. Though many suppliers to David Jones are global and high-profile brands, David Jones is aware that only a portion of these third-party suppliers are also subject to modern slavery reporting requirements.

The wide assortment of brands using a complex array of factories, materials, distributors and extended services makes the process of analysing and influencing the product supply chains for multiple third-party brands difficult. However, the David Jones Supplier Code of Conduct still forms part of the engagement process for all new third-party brand suppliers.

6.6 OUR TRAINING AND AWARENESS RAISING ACTIVITY

David Jones continues to engage with our team members, suppliers and brand partners through various avenues to promote awareness of modern slavery risks. We recognise that internal training is especially critical for the teams that are directly involved in decision making. We also remain committed to promoting broader modern slavery awareness across our supply chains and operations.

An abbreviated modern slavery statement is now incorporated as part of the onboarding e-learning modules alongside a short educational video. This helps to build a foundational level of understanding around the expectations and behaviours that all team members are expected to uphold. During the reporting period, 46 new team members completed their first-week induction module.

We also continued to leverage opportunities within the business to build awareness of modern slavery through sustainability-focused education sessions. During the reporting period, this included an introductory *Sustainability at David Jones* session for new graduates, as well as a company-wide Learning Bites session delivered as part of David Jones' professional development and learning series.

Case Study

Building awareness through modern slavery training



Providing the right level of modern slavery training and awareness across our workforce is a key priority for David Jones. To ensure our training is fit-for-purpose and relevant to different roles, levels, and responsibilities, we undertook a comprehensive Training Needs Analysis (TNA) in FY24. A key action from this analysis was to roll out a broad awareness program before delivering more targeted training for priority business units.

Partnering with our Legal team in FY25 we leveraged an opportunity to use an “off-the-shelf” module as part of a compulsory compliance training rollout. The training was designed to provide a general understanding of modern slavery, the highest risk areas, how to identify potential issues, and how to report concerns. It concluded with a short test to confirm understanding.

The program was deployed to support centre staff and regional managers, achieving a completion rate of 71%. We also surveyed a small group of participants to measure its effectiveness. Encouragingly, 80% reported an increase in awareness, and all were able to recall at least one key takeaway from the session. Feedback on the content highlighted that the training could be more concise and would benefit from additional examples and case studies relevant to our business.

This feedback will inform the continued development of a dedicated awareness e-learning module, to be rolled out to new starters.

Stakeholder engagement and collaboration are two of the key ways that we can increase our leverage and help drive progressive change.

6.7 OUR COLLABORATION AND STAKEHOLDER ENGAGEMENT

Stakeholder engagement and collaboration is important to drive progressive change. We therefore engage with Non Governmental Organisations (NGOs) and participate in multi-stakeholder initiatives to not only support their efforts in raising awareness of modern slavery issues but also to share our experiences and learn from others.

To build our understanding and capacity, and refine our approach to managing modern slavery risks, we joined collaborative efforts and undertook the below actions in this reporting period:

- Continued as a foundation member of the National Retailers Association ESG Committee.
- Engaged Pillar Two, a business and human rights advisory firm, to support us in better managing our modern slavery risks.
- Facilitated team members to attend seminars and webinars on modern slavery and broader human rights issues.

- Continued our membership with the International Accord and its country program (Bangladesh), which helped us stay informed and aware of remediations being conducted within relevant factories and remain connected through attending Accord Cluster and Brand Caucus meetings.
- Maintained our membership with Sedex.
- Continued as signatories to the Pledge Against Forced Labor in the Cotton Sector of Turkmenistan (originally signed in FY20).
- Participated in the Baptist World Aid 2024 Ethical Fashion Report Survey.
- Continued consultation with peers, NGOs, multi-stakeholder initiatives (MSIs) and industry experts as well as regular media scans to understand and address modern slavery risks.
- Continued to monitor and assess the Government's response to the recommendations from the Independent Review of the Modern Slavery Act.

These associations and collaborations have strengthened our approach to identifying and addressing modern slavery indicators, while also creating opportunities for shared learning.

6.8 OUR GRIEVANCE MECHANISMS AND REMEDIATION

6.8.1 Our grievance mechanisms and policies

David Jones has internal and external grievance channels to enable concerns to be raised by our staff, workers in our supply chain, customers, partners, and the general public.

Within our supply chain, grievances can also be raised via an Ethical Sourcing email address listed in our Supplier Code of Conduct. Grievances are assessed and managed by our Legal and Ethical Sourcing teams to ensure adequate outcomes are provided.

Factories based in Bangladesh, engaged to produce our private label goods, continue to have access to the complaints mechanism through the International Accord.

Case Study

Reviewing and strengthening grievance mechanisms

Grievance mechanisms are an important tool for identifying potential instances of modern slavery relevant to our business and supply chain. In FY25, we committed to completing an internal review of our existing grievance mechanisms and channels, with the goal of mapping what is already in place and identifying opportunities to strengthen.

As part of this review, we mapped the channels currently operating across our business, outlined in section 6.8 of this Statement. For each channel, we assessed who it was designed for, how it was implemented, and whether a remediation procedure was in place. This analysis revealed some common challenges, particularly low levels of awareness and limited accessibility for certain groups.

From this work, we identified several areas where our existing grievance mechanisms could be improved. In FY26, we will build on these findings by strengthening existing channels and developing a remediation procedure to ensure the consistent and effective resolution of grievances raised by suppliers and their workers. These steps will help align our approach more closely with the UN Guiding Principles on Business and Human Rights (UNGPs), ensuring that our grievance mechanisms are accessible, trusted, and effective.



6.8.2 Our Grievance and Dispute Resolution Policy

David Jones is committed to providing an environment where our team members and others in the workplace feel safe and are treated fairly, with dignity and respect. Our Grievance and Dispute Resolution Policy is designed to raise awareness and provide a fair and just working environment, ensuring that team members feel empowered to raise personal grievances relating to the workplace.

The policy applies to all team members, including concession brand team members, visitors and persons engaged as contractors regardless of location. The scope of grievances that may be raised under the policy includes any type of problem, concern or complaint related to a team member's work or work environment. Grievances can be raised to a leader in the business, a People and Culture representative or by contacting the Ethics Hotline. The complaint or grievance will be addressed as promptly and confidentially as possible.

During the reporting period, a total of 44 matters were received and resolved by David Jones. These were lodged via the Ethics Hotline or raised directly to the People and Culture team. The nature of these concerns related to workplace relations or personal matters only, with no instances of modern slavery or labour related exploitation being reported.

The Ethics Hotline is an important tool that we use to help identify potential instances of modern slavery, relevant to our business.

Update

Reviewing our existing crisis management plans through a modern slavery lens



Crisis management plans are an important tool for businesses to respond to unexpected events, including potential incidents of modern slavery.

In FY25 we reviewed our crisis management plan to assess its suitability for managing reports of modern slavery, reflecting on Committee training scenarios explored in FY24. This review identified opportunities to strengthen procedures and highlighted the greater risks within complex supply chains compared to direct operations. The gaps will be mapped and addressed in FY26 as part of our work program, aligning with efforts to strengthen grievance channels and develop a consistent remediation process that places the victim(s) at the heart of our response.

6.8.3 Our Ethics Hotline

David Jones strives to be an ethical business with robust policies and procedures to reduce the likelihood of causing, contributing to or being directly linked to adverse human rights impacts, including modern slavery. However, we are aware that instances of ethical misconduct may still arise. We acknowledge the need for concerns to be reported safely, confidentially and without fear of reprisal.

The Ethics Hotline is an important tool used to identify potential instances of modern slavery relevant to our business. Fundamentally, the purpose of the Ethics Hotline is to enable us to investigate these instances appropriately and to take remedial action as necessary. The Ethics Hotline provides an avenue for suspicious activities to be anonymously reported and investigated.

Activities may include:

- Improper conduct such as an actual or potential crime, failing to comply with legal obligations or jeopardising health and safety;
- Highly sensitive issues in the workplace such as sexual harassment, bullying or racism;

- Disregard for internal policies or abuse of company property;
- Supply chain irregularities such as collusion or offering kickbacks to gain a tender;
- Abuse of authority such as using a position of power against team members or for personal gain; and
- Concerns of improper or illegal use and treatment of workers within David Jones operations or supply chain partners, including cases of suspected modern slavery.

All matters reported to the Ethics Hotline are referred to a member of our Legal, Risk and Compliance (LRC) team who will analyse the information received and decide whether to conduct a formal and in-depth investigation of the matter. If it is deemed that disclosure could be investigated or dealt with more appropriately by another person or body, internal or external to David Jones, the matter will be referred on. We have in place an escalation structure that ensures that in the event the complaint related to a member of the LRC team, the complaint would instead be referred to another senior stakeholder.

All reports made to the Ethics Hotline, including any potentially related to modern slavery, are reviewed and where necessary investigated in a timely manner and appropriately documented. Where needed, we also ensure that we keep the disclosing party (to the extent that they can be contacted) and any other relevant stakeholders regularly updated regarding the status, expected timeframes and outcomes of the review or investigation.

All appropriate persons appointed to conduct investigations have access to all records, data and information relevant to the investigation, subject to rigorous confidentiality protections. Employees of David Jones about whom reports have been made will generally be given the opportunity to respond to the relevant allegations made.

During the reporting period, we received a total of 11 concerns reported through our Ethics Hotline, which is a slight decrease from the 12 reported in FY24. The nature of these concerns pertained to personal work-place matters only.

6.8.4 Our Supplier Grievance Remediation Policy

David Jones recognises the importance of providing access to remedy as described in the United Nations Guiding Principles for Business and Human Rights (UNGPs). The UNGPs set out expectations for businesses to respect human rights and establish or participate in effective operational-level grievance mechanisms that enable the identification, remediation and remedy of any adverse human rights impacts.

In FY22, David Jones finalised its grievance remediation policy for factory grievances of private label factories, titled 'Factory Grievances - Remediation Procedure'. This document remains relevant and outlines steps that suppliers should take to remediate worker grievances. This policy also provides guidance for the role that David Jones plays in supporting suppliers as they address factory-level grievances. The remediation process outlined within provides a complete step-by-step guide for the Ethical Sourcing team, starting from when a grievance is first received, through to the completion of all subsequent stages to work toward effective remediation.

This procedure includes:

- How an issue or grievance is identified, captured, assessed and escalated;
- How issues may be investigated;
- How remediation actions will be developed and agreed upon, which may include legal considerations;
- How the procedure is designed to protect the complainant's anonymity to prevent possible retaliation from employers or individual workers; and
- Any follow-up training and monitoring required to ensure closure of the issue and no future harm to others.

This procedure remains an important policy within the Ethical Sourcing Program. It promotes effective mechanisms for factory-level grievances to be raised, investigated and remediated, including grievances that represent or are indicators of modern slavery. In FY25, no grievances were received or remediated through this remediation procedure.

Where we identify that we have caused or contributed to adverse human rights impacts, including modern slavery, we are committed to providing or participating in remediation. To date, we have taken steps to address non-compliances found through our AFP, supplier agreements, codes and policies and instances of work-related violations, but none were identified as instances of modern slavery.

The knowledge acquired through developing this remediation process has been used to support the remediation of all types of non-compliance across our AFP. It has provided our Ethical Sourcing team with added skills and an understanding of the challenges that may be involved in identifying and managing precarious situations, as well as how to provide or support the provision of adequate remedies to victims.

6.8.5 Customer Complaints Escalation Process

Whilst David Jones strives to be an ethical business, with robust policies and procedures to reduce the likelihood of our involvement in adverse human rights impacts, including modern slavery, instances of ethical misconduct may still arise. David Jones recognises the importance of ensuring that there is a source of escalation for risks and incidents, including modern slavery, identified by our customers. A risk may be identified by a customer following an instore experience, an interaction with marketing or promotional content, in the course of making or receiving a purchase, or in other public forums including social media.

The primary point of contact for our customers with any such concern is through any of the available points of contact with David Jones' Customer Care team. This team will determine the appropriate course of action in accordance with internal policies and will refer the matter internally as appropriate, keeping the customer informed of the matter to the extent appropriate.

As above, all investigations into customer complaints will be dealt with fairly, in a timely manner and be appropriately documented. During the reporting period, no concerns were raised by customers to the Customer Care team related to modern slavery.

7.0 Assessing the Effectiveness of our Modern Slavery Risk Response

We understand that a continuous improvement approach is needed to maintain a strong response to modern slavery risk management. As such, we are committed to continuously improving our methods of assessing and addressing our modern slavery risks. We do this by assessing the effectiveness of our actions to help us to identify areas for improvement.

7.1 OUR MODERN SLAVERY RISK MANAGEMENT APPROACH

Our current UNGP-aligned roadmap guides how we intend to strengthen our modern slavery risk management approach over the next five years across the following areas:

- Policy commitment
- Identifying and assessing risks
- Integrating responses and addressing risks
- Tracking effectiveness
- Communicating actions
- Grievance mechanisms and remediation

Our roadmap provides a clear understanding of both immediate and long-term areas for improvement and lays the foundation for a five-year modern slavery approach, which we continue to develop and embed across the business.

7.2 OUR FRAMEWORK FOR ASSESSING EFFECTIVENESS

We recognise that tracking effectiveness is essential to determining whether our modern slavery risk management approach is fit-for-purpose and supporting continuous improvement. In our last Statement, we outlined the review of our effectiveness framework, which included assessing existing indicators and our broader risk management approach in order to design a comprehensive set of qualitative and quantitative measures.

In FY25, we committed to integrating new indicators to better track progress and report on outcomes. During the reporting period, we delivered on this commitment by adding and strengthening both awareness-raising and capacity-building indicators, supported by new reporting capabilities.

The result is a more strategic mix of indicators that reflect both actions taken and the impact achieved. For further detail on specific indicators, please see the table on page 38.

Looking ahead, we will continue to build on this foundation by integrating additional indicators over the coming years, in line with our roadmap, to ensure our effectiveness framework remains robust and adaptive.

7.3 HOW WE MEASURED OUR OUTCOMES IN THIS REPORTING PERIOD

We continually monitor our key programs and activities using a combination of both quantitative and qualitative measures. We understand these indicators need to be reviewed and adapted as our actions mature and as our understanding of modern slavery continues to develop and evolve.

In FY25, we measured our effectiveness in key areas against the following indicators:

Table 8: Below are the measures we utilise to assess our effectiveness

Area	Objectives	Effectiveness indicators	Outcomes in the reporting period
Policies and contractual controls	<ul style="list-style-type: none"> Ensure policies set clear expectations around preventing and addressing all forms of modern slavery across our operations and supply chains 	<ul style="list-style-type: none"> Policies reviewed on a regular basis (internal and external) Percentage of factories audited against compliance with relevant policies Staff have ready access to policies related to modern slavery Suppliers have ready access to policies related to modern slavery 	Information on outcomes in the reporting period can be found on pages 21 and 26.
Risk assessments	<ul style="list-style-type: none"> Understanding and monitoring our exposure to modern slavery risks 	<ul style="list-style-type: none"> Number of supply chain actors traced Number of risk assessments conducted Number of supplier sites in high and extreme risk ratings 	Information on outcomes in the reporting period can be found on pages 11 and 17.
Awareness raising and capacity building	<ul style="list-style-type: none"> Modern slavery awareness training for internal staff and suppliers to ensure adequate understanding of risks, prevention and remediation Improve external awareness and transparency relating to modern slavery risks 	<ul style="list-style-type: none"> Percentage of staff trained on modern slavery and broader human rights risks and review of feedback from training sessions* Percentage of staff training participants reporting increased awareness* Adhoc feedback from participants in relation to training* External public assessments of our public reporting through NGOs or multi-stakeholder initiatives and any changes over time 	Information on outcomes in the reporting period can be found on page 29.
Audits and issue monitoring	<ul style="list-style-type: none"> Supply chain monitoring and assurance (AFP) Ensure quality and effectiveness of audit types Audit corrective actions are undertaken, improved, or closed 	<ul style="list-style-type: none"> Percentage of factories approved in our auditing program Number of critical issues identified Number of modern slavery issues identified Reviewing audit data trends over time, including number and percentage of non-compliances by type 	Information on outcomes in the reporting period can be found on pages 26-27.
Remediation processes	<ul style="list-style-type: none"> Access to effective grievance mechanisms for workers in our operations and our supply chains Grievances effectively remediated Required actions taken against actual modern slavery violations 	<ul style="list-style-type: none"> Number of audit issues remediated in line with AFP criteria and percentage remediated (out of total audit issues identified) Remediation of any actual modern slavery instances 	Information on outcomes in the reporting period can be found on page 27.

*new or updated indicator for FY25

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8.0 *Looking Ahead*

We continue to utilise learnings from previous years, as well as learnings from the key projects undertaken throughout FY25. We remain committed to improving and strengthening our actions in tackling modern slavery and broader human rights issues.

We have set out the following commitments to be implemented and progressed in FY26:

Table 9: Our FY26 commitments

Area	FY26 Commitments
Identifying and Assessing Risks	Trace remaining private label cotton supply chain to Tier 2 and identify highest risk profiles within the cotton value chain.
	Launch Non-Trade Procurement Responsible Sourcing Program.
	Review Approved Factory Program, including opportunities to strengthen how we identify and manage modern slavery risks.
Managing and Addressing Risks	Based on the training needs assessment, develop and roll out a general awareness program internally.
	Develop and deliver an education and engagement session with key supplier partners on modern slavery risk and due diligence.
	Update Supplier Code of Conduct references and modern slavery clauses across vendor agreement architecture.
Effectiveness and Communication	Update crisis management plan, ensuring it is fit-for-purpose from a modern slavery perspective.
Grievance and Remediation	Following an internal review of grievance mechanisms, work to strengthen channels and develop a remediation procedure to ensure consistent and effective resolution of grievances raised by suppliers and their workers.

We look forward to reporting on our progress against these commitments in our next Modern Slavery Statement.

David Jones continues to monitor the Government’s progress in implementing the recommendations from the statutory review of the Modern Slavery Act, including those accepted in full, in part, or in principle.

Our focus is on ensuring that our risk management and reporting frameworks remain fit-for-purpose and adaptable to any legislative changes, while also keeping pace with evolving stakeholder expectations and international developments in human rights due diligence.

9.0 Consultation and Approval Process

We engaged with our Modern Slavery Lead Committee which continues to evolve and strengthen our approach to managing and mitigating our modern slavery risks.

David Jones and its subsidiaries operate and are managed as an integrated group with overarching policies, standards, systems and processes designed to be applied to our owned and controlled entities. In accordance with this operating model, we engaged with our Modern Slavery Lead Committee which continues to evolve and strengthen our approach to managing and mitigating our modern slavery risk. The Lead Committee includes representatives from Corporate Communications, Merchandise, Value Chain, Legal, Risk and Compliance, People and Culture, Facilities, and Sustainability.

Prior to submission to the ACP boards and David Jones CEO for review and approval, the Statement was reviewed by each member of the Modern Slavery Lead Committee including the General Manager of Value Chain, Head of Facilities, Head of Corporate Communications and Head of Sustainability. In addition to members of our Lead Committee, the Statement was also reviewed by the Head of Legal, Risk and Compliance and the Chief Marketing Officer.

This Statement has been reviewed and approved by the board of ACP as the highest Australian holding company of David Jones and all subsidiary entities.

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10. *Appendices*

Appendix 1.

Definitions of types of Modern Slavery¹⁰

Type of Exploitation	Definition
Trafficking in Persons	Describes the recruitment, harbouring and movement of a person for exploitation through modern slavery.
Slavery	Describes situations where the offender exercises powers of ownership over the victim, including the power to make a person an object of purchase and use their labour in an unrestricted way.
Servitude	Describes situations where the victim's personal freedom is significantly restricted, and they are not free to stop working or leave their place of work.
Forced Marriage	Describes situations where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.
Forced Labour	Describes situations where the victim is either not free to stop working or not free to leave their place of work.
Debt Bondage	Describes situations where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.
Deceptive Recruiting for Labour of Services	Describes situations where the victim is deceived about whether they will be exploited through a type of modern slavery.
The Worst Forms of Child Labour	Describes situations where children are: <ul style="list-style-type: none"> • Exploited through slavery or similar practices, including for sexual exploitation, or • Engaged in hazardous work which may harm their health, safety or morals, or • Used to produce or traffic drugs.

Appendix 2.

List of proprietary brands David Jones owns and considers "Private Label".

Brand Name	Product Category
Alta Linea	Accessories - Men's
Agenda	Accessories - Women's
David Jones	Home Beauty Food Accessories - Women's
David Jones Classic Collection	Home
David Jones Collection	Home Accessories - Men's Apparel - Women's, Men's and Children's
Milana	Accessories - Women's and Men's
Saffron & Clover	Apparel - Children's Accessories - Children's

Appendix 3.

Abbreviations table

Abbreviations	Detail
ACP	ACP Riley Street Group Pty Ltd
AFP	Approved Factory Program
AU	Australia
CFT	Cross Functional Team
DJPL	David Jones Private Label
EA	Enterprise Agreement
ESG	Environment, Social and Governance
ETI	Ethical Trade Initiative
FY	Financial Year
ICT	Information Communication Technologies
LC	Lead Committee
LRC	Legal, Risk and Compliance
LY	Last Year
MS	Modern Slavery
MSA	Modern Slavery Act 2018 (Cth)
MSS	Modern Slavery Statement
NTP	Non-Trade Procurement
NZ	New Zealand
SAQ	Self-Assessment Questionnaires
SCoC	Supplier Code of Conduct
SME	Subject Matter Expert
TNA	Training Needs Analysis
UNGPs	United Nations Guiding Principles on Business Human Rights
VM	Visual Merchandising
VTT	Vendor Trading Terms

¹⁰ Definitions are as taken from the official Commonwealth guidance document, Australian Government Guidance for Reporting Entities.

DAVID JONES