



Modern Slavery Statement 2025

**Championing
Successful
Independents**

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Reporting Suite



Annual Report



ESG Report



Modern Slavery Statement



Corporate Governance Statement



GRI Content Index

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online at metcash.com/investor-centre



Introduction

Your Voice Matters

Metcash acknowledges and appreciates the efforts of our stakeholders in partnering with us to uphold our commitment to high standards of conduct in relation to ethical sourcing, human rights and responsible business practices across our operations and supply chains. If you have concerns about modern slavery, potential human rights issues or unethical behaviour in our operations or supply chains, we encourage you to contact us. Your feedback is valued, and you can choose to remain anonymous.

Metcash Team Members and Direct Suppliers

www.talkintegrity.com/metcash

Phone: 1800 835 587 (Australia)
0080 5100 5200 (New Zealand)

Address: 1 Thomas Holt Drive,
Macquarie Park NSW 2113 (Australia)

Metcash Supply Chain Workers

Worker Voice Platform: <http://metcash.ethicspoint.com/>



Acknowledgement of Country

Metcash acknowledges the Traditional Custodians of the lands on which we live and operate, and we pay our respects to Elders past, present and emerging.

Introduction continued

Consultation Process and Board Approval

This Statement is submitted in accordance with Section 14(1) of the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) and represents a joint statement by Metcash Limited and the reporting entities listed in the Appendix, covering the period 1 May 2024 to 30 April 2025 (2025 financial year or FY25). Unless otherwise stated, references to 'Metcash', 'the Group', 'our', 'we' and 'us' refer to Metcash Limited and its controlled entities collectively (including all reporting entities).

The Statement was developed in consultation with our owned and controlled entities, including each of the reporting entities, which operate under shared governance structure, policy frameworks and systems. Consultation was coordinated by the Metcash modern slavery working group and included structured engagement with operational leads across our business units and controlled entities. This process involved targeted data requests and risk validation meetings to ensure the perspectives and operations of each controlled entity were adequately represented in this Statement.

Oversight was provided by the Metcash Executive Leadership Team and its ESG Council (a cross-functional governance body comprised of Group Leadership Team members) seeking to ensure consistency, alignment and representation of entity-specific insights throughout the development of this Statement.

While Metcash shares modern slavery guidance and tools with our independently owned and operated retail partners, these businesses are not owned or controlled entities and were not part of this formal consultation process. These partners remain responsible for their own compliance and reporting obligations under the Modern Slavery Act.

This Statement has been reviewed and approved by the Metcash Board on 31 October 2025 in its capacity as the principal governing body of Metcash Limited, which is also the ultimate holding company for each of the reporting entities covered by this Statement.



Doug Jones
Group CEO and Executive Director

Australian Modern Slavery Act Mandatory Criteria		Reference in this Statement
Criterion 1	Identify the reporting entity	Page 33
Criterion 2	Describe the structure, operations and supply chain of the reporting entity	Page 7 - 13
Criterion 3	Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity, and any entities that the reporting entity owns or controls	Page 14 - 19
Criterion 4	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Page 20 - 29
Criterion 5	Describe how the reporting entity assesses the effectiveness of these actions	Page 30 - 31
Criterion 6	Describe the process of consultation with all reporting entities and any entities that the reporting entity owns or controls	Page 32
Criterion 7	Any other information that the reporting entity considers relevant	Page 2

Introduction continued

Group CEO Statement

I am pleased to present the Metcash Modern Slavery Statement for 2025 which reflects our work to date in helping to protect individuals who may be subject to modern slavery risks, and upholding human rights across our operations and supply chains.



This year we made progress in strengthening our governance framework and building on the already solid foundations of our Ethical Sourcing Program. Both our Food and Hardware pillars have taken significant steps to integrate Metcash's Responsible and Ethical Sourcing Principles into their supplier practices, embedding standards that reinforce due diligence as part of regular operations.

We continued to apply oversight of third-party audits, which highlighted some areas for improvement. We worked closely with suppliers to address non-conformances that were identified during ethical sourcing audits and are seeing good progress in closing out these issues, and strengthening remediation processes. Building internal capability has also been a focus, with more of our team members having completed modern slavery training, enhancing awareness across the business.

While challenges remain, I am proud of the progress we have made this year. We are committed to promoting transparency and improvement across our operations and supply chains, working closely with our partners to support the responsible and ethical sourcing of our products. Together, we continue to prioritise building awareness in our direct supply chain, and promoting ethical sourcing principles that seek to reflect Metcash's values and support thriving communities across our entire organisation.

A handwritten signature in black ink, which appears to read 'Doug Jones'.

Doug Jones

Group CEO and Executive Director



Introduction continued

FY25 Key Highlights



We further refined our supplier data set to provide increased visibility of our active tier 1 suppliers.

This represents around 7,500 active partners across all pillars, including ~480 private label suppliers (see Case Study 1: Improving Data Accuracy and Relevance, page 15).



We extended a responsible and ethical sourcing outreach program to 30 key Fresh suppliers, representing over 50% of our Fresh spend.

The initiative promotes engagement on mutual ESG priorities, including ethical sourcing (see Case Study 9: Building Capability through the FRESH Responsible and Ethical Sourcing Program, page 29).



The Food pillar launched MetPlanet, a centralised sustainability communications hub that provides suppliers with free access to ethical sourcing information, training and support resources including a grievance mechanism.

The platform is designed to foster awareness and collaboration around Metcash Food's sustainability priorities, including ethical and responsible sourcing, circularity, and community (see page 30).



Our Hardware pillar integrated the Company's Ethical Sourcing Principles into their private label supplier policies and operational processes.

These Principles reinforce due diligence practices as part of day-to-day operations (see Case Study 5: Remediation Following Critical Audit Findings in Thailand Manufacturing Facility, page 26).



We expanded remediation engagement to include Fresh Food suppliers.

The Fresh Food supply chain continues to be an area of inherent risk, underscoring the need for ongoing vigilance and proactive engagement.

Collaborating with suppliers and commercial teams, we deepened our understanding of supplier performance and industry-specific challenges and provided a valuable learning opportunity for Fresh commercial teams, enhancing their awareness of supply chain risks and strengthening their role in advancing responsible sourcing practices (see Case Study 7: Remediation Actions in the Private Label and Fresh Food Supply Chain, page 27).



We continued to refine our escalation and remediation processes with the Food and Hardware pillars monitoring third party audits on an ongoing basis and maintaining close oversight of unresolved critical findings.

Where higher-risk issues were identified, collaborative case management across the Group supported effective resolution (see Case Study 8: Building Capacity and Awareness Among Sourcing Teams, page 28).



Training program completions increased from 943 employees in FY24 to 1,496 employees in FY25

Raising internal awareness remains a core component of our program. Modern slavery e-learning is mandatory for relevant managers across merchandise, procurement and supply chain roles. Additionally, employees from all business areas across Metcash attended our Human Rights Day awareness session, which featured powerful insights from a modern slavery survivor's personal story (see page 29).

In FY25, we piloted the NAVEX EthicsPoint worker-centred grievance mechanism with selected suppliers, providing workers with a safe and confidential way to raise concerns (see Case Study 4: Strengthening Worker Voice to Address Modern Slavery Risks, page 24).

Introduction continued

Our Progress to Date

Since the introduction of the Modern Slavery Act, Metcash has taken progressive steps to embed modern slavery risk management within our procurement and corporate governance systems. Key steps in our progress are shown below:



About Metcash

We are Australia's leading wholesaler and service provider to independent businesses nation-wide, with Group revenue of ~\$19.5bn in FY25 (including charge-through sales).

In addition to being an integrated wholesaler and scaled logistics operator, we are a retail banner owner, a large and growing retailer, a franchisor and, most recently, a retail media operator.

We service a strong and growing network of ~6,500 bannered independent retailers in Australia and New Zealand across the Food, Liquor and Hardware sectors. Our focus is on helping independent retailers be the 'Best Store in their Town' by providing merchandising, operational and marketing support. Metcash takes pride in having the widest distribution network in Australia, reaching approximately 95% of Australians.

As an ASX-listed company, Metcash is accountable for meeting the expectations of a wide range of stakeholders, including our shareholders, our people, suppliers and customers.



Our purpose

Championing Successful Independents in support of thriving local communities to create sustainable shareholder value.



Our vision

To support independents to be the best store in their town; and their communities to thrive. We aim to be the business partner of choice and help create a sustainable future together. For our team members we aim to provide an environment where they can do work they are proud of.



Our values

We believe: Independence is worth fighting for; in treating our people, retailers and suppliers the way we like to be treated; and in giving back to the communities where we live and work.

Key facts and data FY25



~6,500

Bannered retail stores across Food, Hardware and Liquor



Food

Largest supplier to independent food businesses in Australia and a nationally scaled foodservice business



1927

Year established



~105,000

Non-bannered stores



Liquor

Second-largest supplier of liquor in Australia



~11,000

Team Members (across 100% owned entities)



~95%

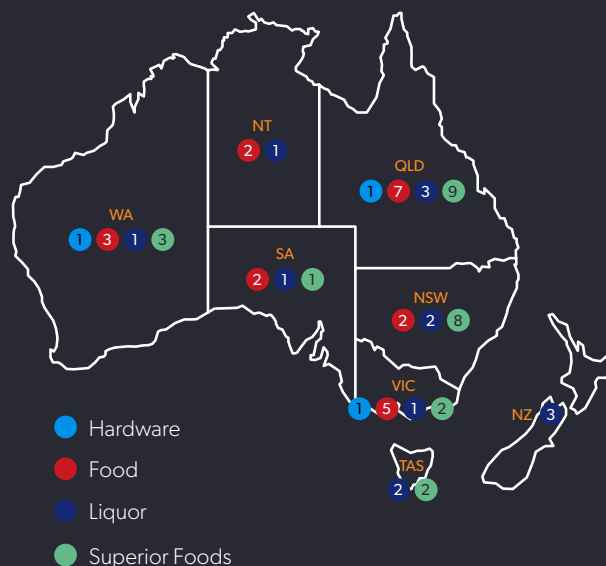
of Australians reached



Hardware

Maintain a strong position in DIY and #1 position in Professional Tools

Our distribution network



About Metcash continued

Our Structure



Metcash Limited (Corporate)

Metcash Limited is the parent company of Metcash. Metcash provides strategic guidance, operational support and centralised services across our three internal pillars.

Metcash Pillars

Our pillars supply and support a network of independent retailers that form part of our bannered network and non-bannered businesses.



Food

Our bannered stores



Liquor

Our bannered stores



Hardware

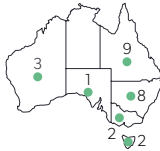
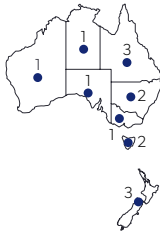
Our bannered stores



About Metcash continued

Our Operations

Metcash operates across Australia and New Zealand, supporting over 6,500 bannered independent retailers and serving tens of thousands of wholesale customers through our vast distribution networks located in major cities and smaller regional centres.

Service	Description	Key Data Points	
Corporate	Metcash Limited is headquartered in Macquarie Park, New South Wales. We provide essential functions that underpin our business operations, including strategic guidance, operational support and centralised services such as procurement, logistics and marketing. This structure seeks to foster efficiency and collaboration throughout the organisation.	1 Corporate head office in Macquarie Park, New South Wales 5 Major distribution centres in Queensland, New South Wales, South Australia, Victoria and Western Australia 16 Distribution centres in metro and regional Australia	
Food	The Metcash Food pillar supports a network of independently owned supermarkets across Australia as well as the Foodservice and Convenience business which includes Campbells and Convenience and Superior Foods sites. The diverse range of stores in the network are tailored to meet the unique needs of local communities by providing fresh food, groceries and general merchandise, such as household essentials. By offering the convenience of a local store while tapping into the advantages of a national network, independent retailers can provide quality products at competitive prices. Our Food pillar serves several large customers known as Multiple Store Owners (MSOs). These customers own and/or operate more than one independent retail store, and in some cases can own and/or operate many stores. Examples include Ritchies Stores Pty Ltd (Ritchies), and Romeo Retail Group. Additionally, our Food pillar is a supplier to several contract customers, one of which is Australian United Retailers (AUR), who operate the Foodworks bannered network. Superior Food Services operates 25 branches across 23 locations nationally and comprising distribution centres across all Australian States (excluding NT), offering a broad and diverse range of product categories.	5 Major distribution centres in Queensland, New South Wales, South Australia, Victoria and Western Australia 16 Regional distribution centres in metro and regional Australia ~1,250 Bannered IGA stores	Food distribution  Superior Foods distribution 
Liquor	The Metcash Liquor pillar is the second-largest supplier in the Australian liquor market, serving approximately 85% of independent liquor stores. Independent Brands Australia (IBA) is the largest network of bannered independent liquor stores in Australia, with strong retail brands including Cellarbrations, The Bottle-O, Porters Liquor and IGA Liquor. Australian Liquor Marketers (ALM) division supplies over 14,000 liquor customers. This includes large and small contract banner groups, non-bannered liquor stores, on-premise establishments and online retailers.	11 Distribution centres in Australia (shared with our Food pillar distribution network) 3 Distribution centres in New Zealand 1,445 Bannered stores	Liquor distribution 
Hardware	The Metcash Hardware pillar includes Independent Hardware Group (IHG), the largest independent hardware wholesaler in Australia. With flagship brands such as Mitre 10 and Home Hardware, IHG caters to Trade and DIY customers. The Hardware pillar also includes Total Tools Holdings, the largest professional tools retailer in Australia. In June 2025, Metcash merged IHG and Total Tools Holdings to form the Total Tools and Hardware Group.	>725 Bannered stores 3 Distribution centres in Queensland, Victoria and Western Australia 127 Total Tools stores 1 Sourcing office in China	Hardware distribution 

About Metcash continued

Our Supply Chains

Metcash is a leading wholesale distributor across the Food, Liquor and Hardware sectors, operating a complex global supply chain.

We source finished goods and services for both trade and non-trade purposes, classified as Goods for Resale and Goods Not for Resale.

Goods for Resale products are sourced through vendors, traders and proprietary brands, which are also classified as Tier 1 suppliers. A single Tier 1 supplier may operate across multiple sites in different countries or locations. Suppliers further upstream in the supply chain, those providing goods or services to our Tier 1 suppliers, are defined as Tier 2 and beyond, and may include both domestic and international suppliers. As with many global retailers, achieving full transparency across these lower-tier suppliers remains a challenge. The diagram below illustrates our business relationships across both direct and indirect suppliers.



We prioritise initiatives that enhance supply chain visibility in areas with inherently higher risks of modern slavery. This approach strengthens our ability to identify and, where necessary, remediate risks to people. Further detail on risk identification is provided in Section 4, and our response strategies are outlined in Section 5.

To illustrate how supply chain tiers are applied within our business, we have mapped the supply chain of a selected product from each pillar (Figure 1). The following examples demonstrate how tier structures and supply chain processes operate across different products. In some cases, specific functions may be carried out at separate sites, depending on the nature of the manufacturing process.

About Metcash continued

Fig. 1 - Private Label Milk Supply Chain: From Farm to Store.



Fig. 2 - Private Label Wine Supply Chain: From Vineyard to Store.



Fig. 3 - Laminated Veneer Lumber (LVL) Supply Chain: From Forest to Store.



Our Tier 1 suppliers are those with contractual relationships with Metcash. These typically involve processing, assembly, packaging or transportation, and include distributors, traders and vendors who import finished goods. These suppliers are central to our operations and fall within our immediate sphere of influence.

Suppliers beyond Tier 1 are those further upstream who are not directly contracted by Metcash. These include finished and semi-finished goods, that are often located overseas where full visibility is limited. These suppliers contribute to the products provided by our direct suppliers but are not directly engaged by Metcash. Further along the supply chain our operations rely on primary processors who handle the initial transformation of raw materials, and raw material and service providers who supply essential inputs. While these suppliers are critical to the integrity of our products, they sit further from our direct oversight.

As traceability improves, we will continue to focus on taking action in areas of elevated risk and where Metcash has influence.

About Metcash continued

Our Procurement Practices

Goods for resale

At Metcash, trade sourcing refers to goods and services that contribute directly to our business' core operations and generation of revenue. In FY25, we worked with 7,500 Tier 1 suppliers in over 35 countries across our Food, Liquor and Hardware pillars. These relationships span both private label products (those manufactured under contract specifically for Metcash Own Brands) and proprietary branded products (developed and marketed by branded business partners under a registered trade name).

 Food	 Liquor	 Hardware
Common goods provided by suppliers		
• Fresh Food, including produce (fruit and vegetables), fresh protein (including meat, poultry and seafood) and bakery items. • Perishable food items including dairy and frozen foods. • Non-perishable food items including canned goods, grains, pasta, spices, and shelf-stable pantry items. • Pet food and animal-based products, which often share sourcing inputs with mainstream food supply chain. • Other consumer staples and personal care products, including cleaning supplies, baby products and other essential. • Tobacco and smoking accessories.	Primarily liquor, including beer, wine, spirits, Ready to Drink (RTDs), cider, liqueurs, liquor sundries, and bonus stock liquor items. Additionally, supplementary products, including non-alcoholic beverages, tobacco and smoking accessories, snacks and dry groceries.	Building, DIY and home supplies: • Timber • Power tools • Cladding • Cement • Paint • Insulation • Outdoor furniture • Gardening equipment.
Nature of supplier engagement		
Stores in our retail bannered network of retailers purchase products in three primary ways: • Direct purchases from Metcash. • Through 'charge-through' purchases, Metcash facilitates the transaction, but the supplier delivers the goods directly to the retailer. • Direct from third party suppliers. The majority of our suppliers are based in Australia, and we have long-established relationships with them. In our Food pillar, we procure goods locally as well as globally (such as Thailand, India, Vietnam, Malaysia, Egypt, Turkey, the Philippines, Indonesia and the United States). Our supplier base includes a mixture of distributors, major international as well as local food manufacturers, and primary producers.	A large number of our suppliers of proprietary products are based in Australia. Suppliers enter multi-year, ongoing relationships, where manufacturing is conducted locally or products are imported from global manufacturers. Regions include the United Kingdom, Europe and the United States.	IHG: Most products are sourced from Australian-based vendors, who procure goods from factories predominantly located in China and Australia. We maintain some direct relationships with product manufacturers in this pillar. TTH: More than 85% of products we stock are sourced from branded suppliers located in Australia. Many of these products are manufactured overseas. 15% of stocked products are procured directly from international suppliers and imported under our own brands. Approximately 90% of products directly sourced, are manufactured in China and Taiwan. Our China-based sourcing office is responsible for these supplier relationships: • Orders, • Quality inspections, • Social audits conducted by accredited third-party providers.

About Metcash continued



Goods not for resale and services

At Metcash, non-trade sourcing refers to goods and services that support our business operations but are not intended for resale. These are commonly referred to as 'goods not for resale'. We engage with ~4,000 suppliers across our corporate functions and business pillars to purchase items such as personal protective equipment, information technology equipment and marketing materials. We also work directly with domestic suppliers for services such as security, facilities management, employee assistance and office cleaning. Several corporate services such as accounting and IT support are outsourced to international providers. In freight, contracts exceeding \$5 million p.a. are managed by logistics with assistance from Corporate Non-Trade Procurement (NTP); while smaller providers are handled at the site or State level.

As illustrated in above non-trade categories such as uniform supply and related services, these are typically sourced through indirect Tier 2 suppliers. In some instances, these services have been engaged directly by individual business units, outside the Corporate NTP process. While this approach offers flexibility, it may limit visibility over formal contracting arrangements; and although it represents a relatively small component of our procurement activities, it remains an area of focus going forward.



Identifying Risks

Metcash recognises that modern slavery exists in many forms and continues to impact millions of individuals across all regions and industries. Globally, it has been estimated to affect approximately 50 million people, including around 41,000 individuals in Australia on any given day (Global Slavery Index 2023). Understanding where and how modern slavery risks arise is vital to our ability to identify, prevent and respond. Our framework prioritises transparency and accountability and includes the following guiding principles:

- We ensure our internal operations comply with relevant laws and regulations, supported by human resources procedures and controls;
- We engage in ongoing dialogue with suppliers to help identify and mitigate modern slavery risks in our supply chains; and
- We identify and assess actions to address high-risk procurement categories and geographies in our extended supply chains.

Inherent Risks of Modern Slavery

As an integrated wholesaler, retailer, franchisor and retail support business with complex, multi-tiered supply chains, Metcash is aware that risks can arise anywhere within our global footprint. These risks increase where there are limited labour protections, weak enforcement of labour laws or reliance on migrant or informal labour. In such contexts, workers may be vulnerable to exploitative practices, including deceptive recruitment practices, debt bondage, excessive working hours, underpayment, and unsafe working conditions as described in the [United Nations Global Compact’s Business & Human Rights Navigator](#).

These risks may also occur among indirect suppliers of finished goods located overseas where we do not hold direct contractual relationships. This limits our visibility and ability to influence. The risk is further elevated in specific high-risk sectors and product categories, such as:

- Agriculture
- Horticulture
- Seafood
- Workwear and uniforms
- Maritime freight

These sectors often involve labour-intensive processes where high-risk practices can be harder to detect and address.

By drawing on resources such as the UN Global Compact’s Business & Human Rights Navigator, we are deepening our understanding of global human rights risks. This guidance serves as a reference point for identifying key concerns that may pose significant risks to individuals across our operations and supply chain. These include, but are not limited to:

The identified issues include	Groups most at risk include
• Forced Labour • Freedom of Association • Discrimination • Clean, Healthy, and Sustainable Environment • Child Labour • Occupational Health and Safety • Gender Equality • Living Wage • Working Time	• Children • Migrant Workers • Individual employees under temporary work visas, e.g. PALM scheme workers • Indigenous peoples

Risk Assessment, Prioritisation and Drivers

Risk Assessment

Understanding our Risks

Metcash adopts the United Nations Guiding Principles on Business and Human Rights (**UNGP**) to assess modern slavery risks we may cause, contribute to, or be directly linked with. Understanding risks through these three perspectives helps us develop targeted actions to prevent, mitigate or respond to them.

To strengthen our response, we apply a systematic risk management approach that includes:

1. Risk Assessment
2. Risk Prioritisation
3. Determination of Risk Drivers

The following section provides an overview of the tools, methodologies and data sources we use to inform our understanding of modern slavery risk. It also outlines how these tools are applied in practice to support a consistent and evidence-based risk assessment process. By explaining our approach and presenting case study examples, we aim to improve transparency and demonstrate how we reach our conclusions, and provide context for our three-step risk management process.

Identifying Risks *continued*

Risk Assessment Tools

The first step of risk assessment is understanding modern slavery risks in our operations and supply chains, which relies on applying a range of tools and methodologies. These enable us to systematically identify and address potential risks across our business.

Lloyd's Register Quality Assurance's (LRQA) EiQ Software

Introduced in FY24, LRQA's EiQ platform supports our modern slavery risk assessments with advanced supply chain intelligence tools. EiQ's integrated risk assessment platform offers a broad set of tools to support our human rights due diligence. It provides geographic and product-level risk ratings across over 200 geographies and 600+ product and service categories around the world, covering 38 issue areas. We leverage EiQ on demand to inform and enhance Metcash's sourcing strategies, helping to ensure our decisions are guided by timely and data-driven insights. It supports the identification of forced labour indicators and helps assess inherent ESG risks tied to sourcing countries, supplier categories and commodities.

The platform includes Sentinel, an alert tool that uses machine learning to track and report potential modern slavery violations. These near-real-time alerts include local and international media, NGO and government reports, worker allegations, social media and other sources. Sentinel helps strengthen our due diligence by flagging risks early in the sourcing process.

Through EiQ we gain insights into:

- Sourcing country profiles and inherent ESG risks.
- Potential vendor and supplier ESG risks.
- Forced labour risk indicators and due diligence requirements.

Supplier Ethical Data Exchange (SEDEX)

SEDEX is a global non-profit organisation that facilitates responsible sourcing through data-sharing and auditing tools. Our own brand suppliers use the SAQ and SEDEX Members Ethical Trade Audit (SMETA) to report on labour, safety, environmental and ethical standards. These mechanisms help us to understand standards of labour, health and safety, environmental performance and ethics within our operations or at a supplier site. Through the SEDEX platform, we track corrective action status and follow up any unresolved critical non-conformances.

Audits are graded against four possible non-conformance outcomes:

- Business Critical
- Critical
- Major
- Minor

Major and minor non-conformances are addressed during the audit cycle, while our team prioritises business critical and critical non-conformances for additional focus.

Risk Assessment Methodology

This year, we built on the foundational work from our FY24 Statement by strengthening how we apply EiQ in our risk assessments. We refined how we use the platform's features to improve screening accuracy, expand data coverage and enhance supplier-level data. Key improvements included:

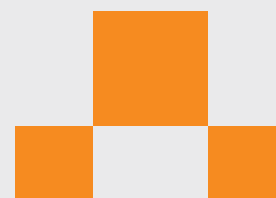
- Identifying opportunities for addressing data gaps in the Alcoholic Beverages category, to improve our understanding of inherent risks across beer, wine and spirits.
- Integrating the above specified audit gradings into the EiQ risk assessment process for flagging and monitoring suppliers deemed higher risk.
- Continuing to work with LRQA to identify optimisation opportunities in our approach to risk assessment across our supply chain.

Case Study 1

Improving Data Accuracy and Relevance

To enhance accuracy and relevance a comprehensive data cleansing exercise was undertaken in FY25. This involved removing inactive, duplicate and non-trade suppliers from our screening pool, while incorporating suppliers from our newly acquired business, Superior Food Services. Our active Tier 1 direct supplier base now comprises approximately 7,500 suppliers across all pillars for trade goods for resale, including ~480 private label suppliers. This refined dataset has enabled a deeper understanding of our supply chain.

Looking ahead, we will further refine our approach in FY26 by applying a double materiality lens, integrating social risk scores with business spend data to understand where we can make the most impact through risk management. We have begun a deeper analysis of Tier 1 suppliers factoring in proximity to global supply chain risk hotspots. This allows us to capture the intersection of product, geography and supplier practices, ensuring our risk mapping reflects actual exposure rather than broad category levels. This provides a stronger foundation for double materiality and future enhancements to our risk assessment methodology.



Identifying Risks *continued*

Case Study 2

Strengthening Due Diligence through Integrated Risk Reviews



As part of our Ethical Sourcing Program, and in response to a case study outlined in our FY24 Modern Slavery Statement, we conducted a thorough review and follow-up of 54 private label food supplier sites identified as highest risk through the EiQ assessments and SEDEX audit results. These initiatives reflect a more integrated and maturing approach to modern slavery due diligence within our private label food supply chain, supported by the roll-out of Metsafe – our Private Label Supplier and Product Lifecycle Management system, alongside ongoing SEDEX monitoring and enhanced operational compliance processes.

Methodology

Fifty-four sites were assessed using four data sources:

- (i) EiQ risk flags,
- (ii) SEDEX SAQ and audit history,
- (iii) internal Metsafe data, and
- (iv) supplier status (active/delisted, compliant or in case management).

Governance Integration – A cross-functional Food Private Label Compliance Working Group meets quarterly to review the actions and progress of any escalated supplier or product issues. This includes SEDEX SMETA performance, along with other key compliance topics.

Review Snapshot

Metric	Result
Total sites reviewed	54
Active sites	46
Sites meeting FY25 PL compliance requirements	42 (91%)
Sites escalated to Compliance Working Group for further action	4
Sites with valid third party social audits	30 (70%)
Audits conducted in FY25	21

Learnings from SEDEX and Audits

- SEDEX Participation as a Signal of Supplier Capability; in a number of instances, suppliers with incomplete or unmanaged SEDEX requirements have also presented other compliance challenges. While this isn't always the case, it does suggest that SEDEX participation can be a useful signal of supplier capability and maturity – particularly when assessing new suppliers for Private Label. We acknowledge that some suppliers may be earlier in their compliance journey; and in such cases, SEDEX onboarding can be supported as part of broader supplier development and engagement.
- Recent enhancements to the SEDEX dashboard have improved the speed and accuracy of identifying high-risk sites and data gaps. Industry, geographic and audit data within SEDEX correlates with EiQ risk insights. Recent enhancements to the SEDEX dashboard have improved the speed and accuracy of identifying high-risk sites and data gaps.
- Both our Food and Hardware pillars have taken steps to integrate Metcash's Responsible and Ethical Sourcing Principles into supplier communications and practices which supports due diligence as part of everyday operations.

Key Outcomes

- Data Validation** – All Tier 1 and Tier 2 sites were reconciled in SEDEX and Metsafe. Suppliers with incomplete SAQs, expired audits or missing linkages were contacted or escalated for corrective action.
- Targeted Intervention** – Four active sites with material non-conformances were escalated internally for further action and issued remediation timelines. Delayed or insufficient responses were escalated to the Group's Commercial team.
- Audit Coverage** – Audit coverage increased to 70% of active sites. A total of 21 SMETA audits were completed in FY25 through the SEDEX platform.

Identifying Risks continued

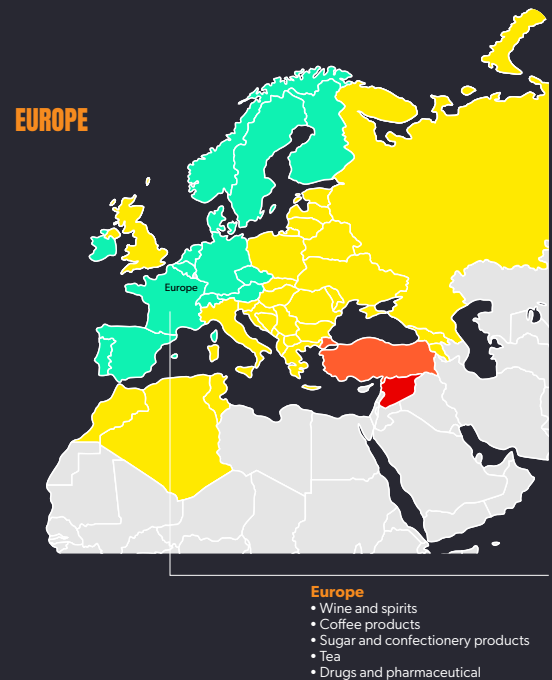
Metcash Risk Landscape

Building on our risk assessment methodology we used insights from the LRQA EiQ platform to identify high-risk product categories and raw materials across our three pillars. The following product risk map, generated using LRQA's EiQ platform, visually illustrates relative modern slavery risks by product categories and sourcing location. It supports our enhanced mapping approach by combining product-level risk insights with geographic exposure.

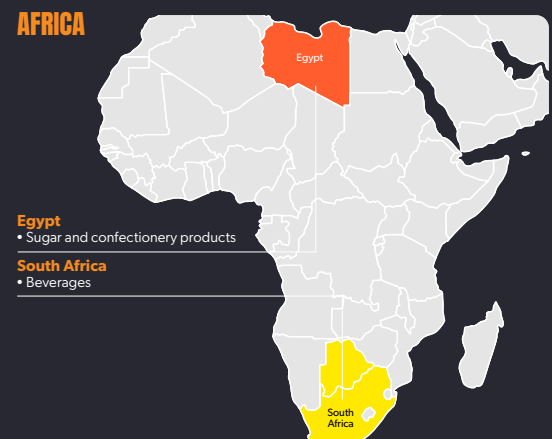
AMERICAS



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AFRICA



ASIA-PACIFIC



Identifying Risks continued

Risk Prioritisation

The second step in our risk assessment framework is risk segmentation. This involves prioritising where to direct resources for the greatest impact, based on where Metcash has the most impact or leverage. This step builds on the data generated from our screening tools and focuses on converting information into action by evaluating the following factors:

- **Human Rights Impact:** The severity, scale and likelihood of harm associated with potential human rights violations across our operations and supply chains.
- **Risk Prevalence:** Geographies, sectors or categories that have the highest prevalence of modern slavery risks.
- **Opportunity for Stakeholder Engagement:** The extent to which we can meaningfully engage with stakeholders to understand their perspectives on modern slavery risks and improve conditions accordingly.

Determination of Risk Drivers and our Relationship to Modern Slavery Risks

The third step in our risk assessment framework involves examining how our business practices may be connected to instances of human rights violations, including modern slavery. Directed by the UNGP framework, we analyse the nature of our involvement in potential harm across three dimensions: whether we may cause, contribute to, or be directly linked to, harm. This approach allows us to move beyond surface-level assessments and critically examine the structures and processes within our operations that may be linked to harm.

Below are practical examples of how we apply the UNGP framework to evaluate risk in our supply chain and prioritise action. Additionally, the indirect nature of labour hire used in our distribution centres or retail operations may limit visibility and oversight, increasing the risk of modern slavery issues. Recognising these inherent risks is critical for prioritising our due diligence efforts, strengthening supplier engagement and continuing to evolve our sourcing practices to help safeguard vulnerable workers across our supply chain.

Operations	Suppliers	
Cause Where a business may cause modern slavery or other human rights violations through its actions resulting directly in modern slavery.	Contributor Where a business may contribute to modern slavery or other human rights violations through its actions or omissions facilitating or incentivising modern slavery.	Direct Link Where a business may be directly linked to modern slavery through its products, services or operations. This includes modern slavery risks that may occur in the extended supply chain of a business.
Hypothetical Example A distribution centre (DC) employs under-age, or young workers which could potentially subject them to hazardous work.	Hypothetical Example Indirect labour provided by Labour Hire Providers is used at our sites, such as our distribution centres and operation services, carrying a higher modern slavery risk due to a lack of oversight.	Hypothetical Example The use of third party international shipping for any maritime freight within our supply chain carries a higher modern slavery risk due to a lack of oversight or leverage.
This could cause modern slavery.	This could contribute to modern slavery.	This could directly link our business to modern slavery.

Identifying Risks *continued*

Detailed below are examples of how we apply the UNGP to our operations and supply chain:

Risk Focus	High Risk Areas	Key Risk Factors	Relationship to the Risk
Migrant Workers in our domestic operations and supply chains	• Agriculture • Horticulture • Fresh Produce 	• Reliance on seasonal and migrant labour • Labour hire agents with limited oversight • Workers from vulnerable backgrounds	Contribute We may unintentionally contribute to modern slavery by placing pressure on suppliers due to turnaround expectations and demanding costs or timelines. This may lead to unethical subcontracting or inappropriate hiring practices. Directly Linked If we engage suppliers that source fresh products from farms flagged with forced labour indicators, we become directly associated with these risks.
Complex Global Supply Chains in Seafood Fishing and Processing	Canned Seafood 	• Difficulty tracing origins due to fragmented, international sourcing • Known risk of forced labour in fishing vessels and seafood processing facilities	Contribute We may unintentionally contribute to modern slavery if we engage suppliers that use forced labour or create cost pressures that drive suppliers to compromise on labour rights to deliver low-cost seafood. Directly Linked If we engage intermediaries or suppliers from regions or countries with known instances of forced labour within our seafood supply chain, such as where a supplier without a robust due diligence process purchases seafood from regions where forced labour is prevalent, we become directly associated with these risks.
Vulnerable Labour Conditions in Viticulture and Winemaking	Wine 	• Crops and harvest work might involve vulnerable labour conditions • Inadequate oversight in vineyard and winery operations	Contribute We may unintentionally contribute to modern slavery if we engage suppliers that fail to enforce our minimum supplier standards. Directly Linked If we engage wineries where grapes are sourced from vineyards with documented exploitative practices or lacking labour rights safeguards, we become directly associated with these risks.
Offshore Manufacturing with limited supply chain oversight	Hand Tools from Overseas Suppliers 	• Limited supply chain transparency and rapid production turnaround expectations • Use of labour hire agents with minimal oversight	Contribute We may unintentionally contribute to modern slavery by engaging overseas suppliers that prioritise low cost and fast delivery over fair labour conditions, particularly in high-risk regions including forced labour and exploitation. Directly Linked If we source hand tools from overseas suppliers in high-risk regions where labour exploitation is documented and oversight is weak, we risk becoming directly associated with those conditions through our supply chain relationships.
Procurement of Garments from High-Risk Regions	Work Uniforms 	• Limited traceability of third party suppliers and offshore manufacturing • Use of labour hire agents with minimal oversight • Sourcing from production regions known to be associated with forced labour risks	Contribute We may unintentionally contribute to modern slavery by procuring from regions where forced labour is prevalent without performing adequate due diligence. Directly Linked If we engage a uniform supplier that subcontracts part of their production to facilities or manufacturers in forced labour, or fail to uphold fair labour standards, we become directly associated with these risks.
Third Party Freight Services and Offshore Labour Conditions	Maritime Freight 	• Limited visibility of third party shipping carriers and working conditions for sea crew • Use of labour hire agents with minimal oversight in crewing and vessel staffing	Contribute We may unintentionally contribute to modern slavery by subcontracting transportation services to providers that exploit maritime crew or fail to uphold fair labour practices. Directly Linked While we do not charter vessels directly, our reliance on third party freight providers creates indirect exposure. If crew members are subject to labour abuse or exploitation, we are directly linked to that risk through our supply chain.

Addressing Risks

Our Ethical Sourcing Program Framework

Metcash's Ethical Sourcing Program is a comprehensive framework that aims to support the protection of human rights, the prevention of modern slavery and the promotion of ethical practices throughout our supply chains. The program fits within the Metcash governance structure and is supported by policies that guide our approach to risk identification, supplier engagement and performance monitoring. Through structured risk assessments and policy alignment, we evaluate supplier practices and address any non-conformances or grievances brought to our attention.

Our due diligence framework continues to be refined based on the information from our risk assessment processes. We recognise that data gaps of Tier 2 manufacturing sites sourced by our vendors, traders and proprietary brands (mentioned in Case Study 1) continue to limit our visibility and oversight, and that addressing these is critical. Our most effective interventions are concentrated at the Tier 1 level of our private label supply chain, where we have the greatest visibility and influence. This is primarily due to our ability to shape supplier practices through contractual terms, private label requirements and specifications of the products we procure. Our influence over proprietary product suppliers and extended supply chains is comparatively limited; however, engagement with proprietary fresh food suppliers within our Food pillar is increasing, enhancing our oversight and control.

Our focus remains on building foundational capabilities through training, capacity building and awareness initiatives. Stakeholder engagement shapes our approach, and we are committed to improving transparency and responsiveness as the program matures. This foundational work is essential to enabling Metcash to support meaningful change and uphold ethical standards in the long term.

Ethical Sourcing Program Framework



Addressing Risks continued

Due Diligence Process

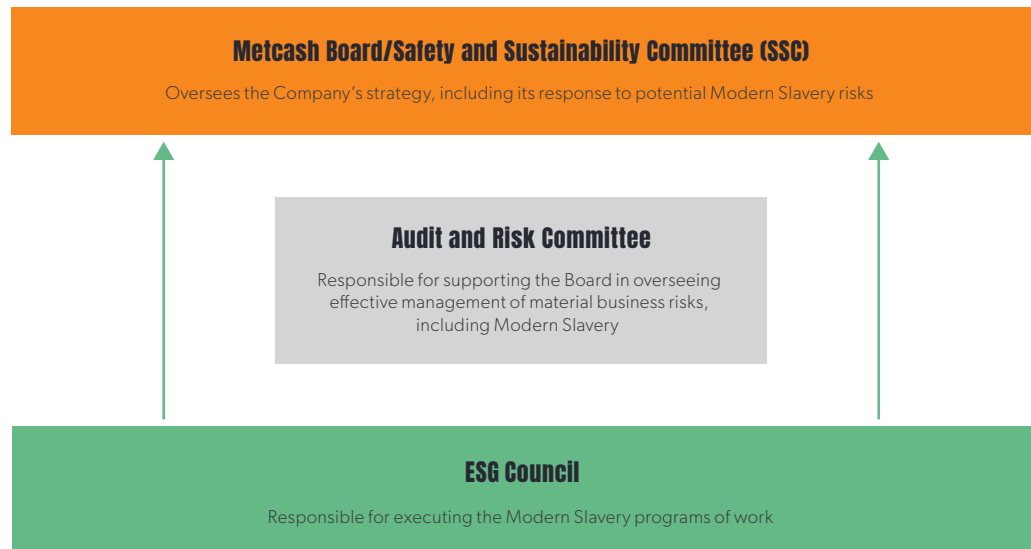
 1	Identifying Modern Slavery Risk This means gaining a clear understanding of the inherent risk profile of our products, sourcing regions and site compliance performance, targeting high-risk suppliers as a result.	How do we achieve this? We use a risk-based approach to assess modern slavery risks, prioritising suppliers based on inherent factors such as high-risk product types, sourcing geographies, and site compliance data from platforms like SEDEX and EiQ. Our internal teams are supported with training and practical tools, including onboarding risk flags, SAQs, SEDEX/EiQ dashboards, and internal sourcing guidance to support consistent application of risk appetite when selecting and managing suppliers.
 2	Alignment of Expectations This means promoting supplier understanding of modern slavery risks and to align with Metcash's expectations for responsible business conduct.	How do we achieve this? We promote alignment with Metcash's ethical sourcing expectations by clearly communicating our minimum standards to private label suppliers from the outset. Team members use a combination of standard onboarding requirements, contractual terms and supporting guidance to reinforce expectations on responsible business conduct, including modern slavery risk management.
 3	Evaluating Performance This means regularly evaluating evidence of supplier controls to monitor alignment in our business practices, including the treatment of team members.	How do we achieve this? We assess whether suppliers have the systems and controls in place to meet our expectations on ethical sourcing and modern slavery risk management. For private label and exclusive brand suppliers in high-risk categories, we collect information through SAQs, third party audit reports and SEDEX platform disclosures. These insights help us understand a supplier's risk profile and operational maturity, supporting informed decisions during onboarding and contract award. Where appropriate, we engage further to clarify gaps or confirm alignment with our sourcing standards.
 4	Monitoring Performance This means monitoring supplier performance in their risk management capacities by sharing ethical sourcing audit results.	How do we achieve this? We maintain oversight of our higher-risk suppliers by tracking their ongoing efforts to manage modern slavery risks. Currently, suppliers of private label food products are requested to link on SEDEX where they can voluntarily share third party ethical sourcing audit reports for Metcash to view. For hardware private label suppliers, it is now a mandatory requirement to provide an active third party audit report for overseas manufacturing sites involved in the supply of hardware private label products. We regularly review updated audit reports, monitoring supplier scores and red flags through platforms like EiQ and SEDEX, and following up on corrective actions. Where significant incidents occur, such as a serious Sentinel alert or a breach of our policy, we reassess the supplier's practices and determine whether further engagement or escalation is required.
 5	Addressing Issues This means proactively addressing specific risks by escalating and assigning corrective actions when necessary.	How do we achieve this? When modern slavery risks or serious non-conformances are identified, we initiate a structured response. Private label suppliers with poor performance scores or critical audit findings are required to submit corrective action plans, which are reviewed by our ethical sourcing team in collaboration with the relevant category manager. Depending on the severity and supplier response, the matter may be escalated through internal governance channels. Our objective is to promote meaningful remediation, reduce future risk, and protect the rights of potentially affected workers.
 6	Review Progress This means reviewing a supplier's modern slavery risk profile and performance before contract renewal, which helps us to maintain supplier relationships with a focus on mitigating modern slavery risks.	How do we achieve this? During contract renewal we assess if there is sufficient evidence to confirm suppliers' efforts to mitigate risks, such as their completion of a SAQ or satisfactory audit results. We identify actions required from the supplier for us to maintain the business relationship, such as completing a SAQ or providing audit results.

Addressing Risks *continued*

Metcash Governance Structure

Fig. 4: How each stakeholder group, department and team support putting our strategy into action.

Our Governance



Business Support



Our Stakeholders



Metcash's governance structure was refined in FY25 to elevate oversight of ESG Priorities. The ESG Working Group now makes submissions to the ESG Council, which includes the Group CEO, pillar CEOs and the Group CFO. The ESG Working Group plays a key role in driving execution, preparing recommendations and ensuring feasibility of implementation. Working Group members provide specialist input on key ESG areas, including energy efficiency, responsible sourcing, modern slavery, reporting standards and emissions reduction.

Addressing Risks continued

Policies

At Metcash, our core values are supported by a policy framework that guides our operations and sets clear expectations for our team members and suppliers. We aim to engage suppliers transparently and collaboratively and ensure compliance with these policies. Key policies include the Speak Up Policy and Human Rights and Anti-Slavery Policy. These policies are reviewed annually and form a key part of our strategy to address modern slavery risks.

Policies	Relevance to Modern Slavery
Recruitment Policy	Promotes fairness, equity and legal compliance in recruitment. Metcash workers are eligible to work and be protected under labour laws.
Employee Code of Conduct	Sets ethical standards and expected behaviours, empowering employees to act responsibly and report misconduct, including modern slavery concerns.
Speak Up Policy	Provides channels for team members, officers, suppliers (including employees of suppliers), associates and their dependents and relatives to report unethical or illegal behaviour, including modern slavery, harassment and discrimination.
Supplier Engagement Terms	Communicates expectations for fair treatment and respect for human rights across our supply chain.
Supplier Onboarding Procedures	Requires private label food suppliers to complete a SAQ aligned with our ethical sourcing expectations.
Responsible and Ethical Sourcing Principles	Sets expectations for suppliers to respect the protection of internationally proclaimed human rights, ensuring that they are not complicit in human rights abuses.
Hardware Private Label Ethical Sourcing Policy and IHG Ethical Sourcing Supplier Code of Conduct	Notifies suppliers about expectations regarding responsible sourcing practices, audits and ongoing compliance.
Human Rights and Anti-Slavery Policy	Defines our commitment to human rights and modern slavery prevention, with specific protections for vulnerable groups.
Grievance Mechanisms Toolkit (developed in FY25)	Encourages workers to report exploitation, using anonymous reporting channels which reduce the modern slavery risks for workers across the supply chain.
Remediation Guidance (developed in FY25)	Provides a structured approach internally and, for suppliers, step-by-step guidance on addressing and resolving instances of modern slavery requiring timely corrective actions, restitution for affected individuals, and continuous improvement in supplier practices.



Addressing Risks *continued*

Case Study 3

Strengthening Policy and Governance to Improve Due Diligence and Remediation

In FY24, Metcash introduced its Ethical Sourcing Principles as part of the Company's broader ethical sourcing framework. In FY25, we continued to enhance our internal policies and guidance through tools such as the Grievance Mechanisms Toolkit and Remediation Guidance. These resources support teams and suppliers in identifying, addressing and continuously improving responses to modern slavery risks.

Building on this foundation, Hardware reviewed and updated key policies, including enhancements to the Hardware Private Label Ethical Sourcing Policy and the development of a new Supplier Ethical Code of Conduct. These updates incorporate group Ethical Sourcing Principles and clearly define severe critical breaches and minimum compliance requirements. The policy also outlines the remediation actions and re-audit frequencies, along with potential business consequences for suppliers that fail to demonstrate improvement within agreed timeframes. The Supplier Ethical Code of Conduct defines the ethical standards that all Hardware suppliers must meet in order to be eligible to provide products and services. Additionally, the Supplier Ethical Code of Conduct clearly outlines our zero tolerance for non-conformances, promoting compliance with IHG's ethical expectations.

A key focus for Hardware has been improving due diligence across its private label supply chain. Suppliers were required to submit overseas manufacturing addresses, and overseas suppliers were required to submit third party ethical audit reports. We have mapped 100% of private label suppliers, with 36% of all suppliers providing audit reports. These reports primarily represent our overseas suppliers. All non-conformance issues stated in the submitted reports have been flagged in the EiQ risk tool based on severity, helping us to identify high-risk suppliers more effectively. Additionally, Hardware piloted the EiQ SAQ at an Australian manufacturing site to assess modern slavery risks. The results indicated that local sites pose a lower risk compared to the manufacturers sourcing from overseas regions.

Case Study 4

Strengthening Worker Voice to Address Modern Slavery Risks



Grievance mechanisms are a vital tool in identifying and remediating modern slavery risks. They provide workers with an anonymous way to raise concerns, enabling early detection of issues such as exploitation, wage theft and unsafe working conditions. During supplier engagement meetings, we actively promoted the Metcash Speak Up whistleblower platform to Food private label suppliers.

NAVEX EthicsPoint is a confidential and anonymous reporting service developed by NAVEX Global for employees and management to report abuse and other workplace misconduct. In FY25, we developed a Grievance Communication Toolkit to help suppliers establish effective and confidential reporting channels. The toolkit includes step-by-step guidance, NAVEX EthicsPoint posters, training modules and protocols to help safeguard the privacy of workers who raise concerns.

To test effectiveness, we piloted the NAVEX EthicsPoint solution with a supplier of Fresh Food and a supplier of cleaning services. Posters were placed in discreet, accessible areas to encourage workers to report concerns. We expect feedback from affected stakeholders to provide valuable insights into workplace conditions and the practical impact of our modern slavery response. Their voices will be essential in shaping our evolving ethical sourcing practices.

Addressing Risks continued

Addressing Risks through Ethical Audits

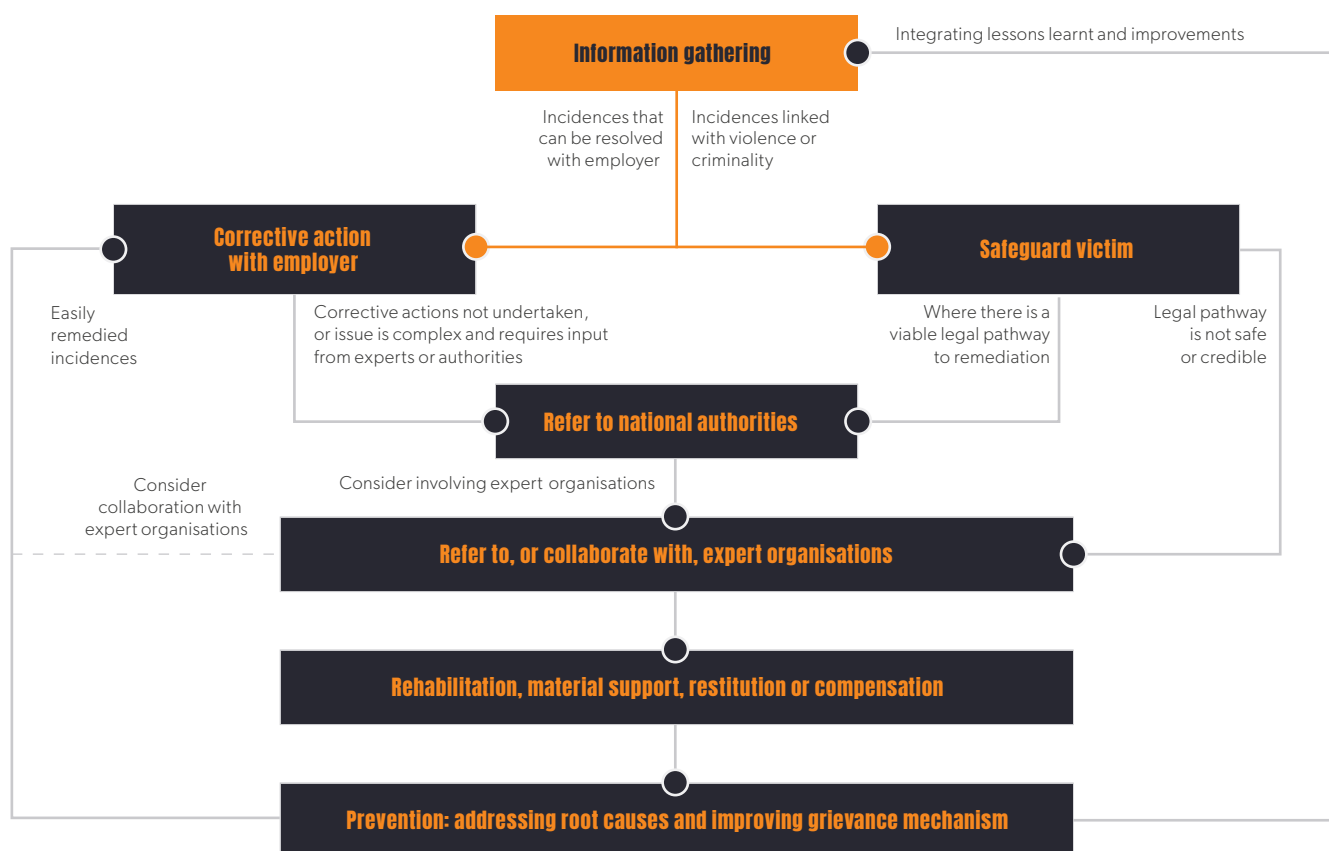
Ethical audits play a crucial role in identifying and addressing modern slavery risks such as forced labour, unsafe working conditions and wage violations. These audits monitor whether suppliers meet compliance standards, promote transparency and protect vulnerable workers, supporting responsible and ethical sourcing and long-term sustainability across the supply chain. Metcash applies a structured risk assessment and audit framework to evaluate supplier risk levels and monitor alignment with our Ethical Sourcing Principles. Private label suppliers provide us with third party ethical audit reports such as SEDEX SMETA, BSCI and others that are widely recognised across the industry, and enable ongoing oversight of supplier practices. These audits support our assessment of modern slavery risks and help us evaluate suppliers' alignment with our compliance standards.

Remediation Framework

We recognise that effective and timely remediation is critical to addressing the harm experienced by individuals affected by human rights violations, including modern slavery. Our remediation framework is grounded in a victim-centred approach and includes a range of coordinated actions intended to be delivered in collaboration with national authorities, civil society organisations and independent experts. These actions may include access to medical care, legal assistance, psychosocial support, safe repatriation or relocation, financial compensation and formal acknowledgements such as apologies or other measures to recognise the harm caused and promote accountability.

The Metcash Remediation Framework below sets out how we effectively manage incidents, seek to ensure the physical and mental wellbeing of individuals impacted by modern slavery, remediate harm and act to prevent similar incidents from reoccurring.

Fig. 5: Metcash remediation framework



Addressing Risks *continued*

Case Study 5

Remediation Following Critical Audit Findings in Thailand Manufacturing Facility

In line with our commitment to addressing modern slavery risks, Hardware responded to a critical non-conformance issue identified from a third party audit assessment of a Thai manufacturing facility supplying a small number of private label homewares.

In September 2024, a third party audit revealed critical issues involving the retention of worker documents and the charging of recruitment fees to migrant workers. At the time, our Private Label Ethical Sourcing Policy was under development and supply had commenced prior to formal auditing. Upon receiving the audit findings, Hardware engaged with the Australian-based vendor to ensure immediate corrective action. The factory implemented a comprehensive remediation plan, including ceasing recruitment fees, reimbursing affected workers, returning identity documents and reforming recruitment practices. A follow-up audit conducted in January 2025 confirmed that all critical issues had been resolved. To support long-term improvements, the factory owner completed training on preventing forced labour through LRQA EiQ Learn. Based on the satisfactory remediation and audit outcomes, Hardware approved the facility for continued supply. This case highlights the importance of supplier engagement, risk mitigation and capacity building in alignment with our ethical sourcing commitments.

It also reinforces the importance of securing satisfactory third party social audits prior to commencing private label supply relationships, particularly in high-risk geographies and sectors. In response, Hardware finalised and circulated its Private Label Ethical Sourcing Policy in March 2025. This policy now requires third party audits as a precondition for onboarding new suppliers. A six-month transitional period is now in place to support suppliers in aligning with the updated requirements.



Case Study 6

Enhancing Transparency and Ethical Sourcing with China's Total Tools Suppliers

In FY25, Metcash reviewed third party social audit reports and conducted on-site visits at several Total Tools manufacturing sites in China, as part of our ongoing efforts to strengthen ethical sourcing and manage modern slavery risks. By cross-referencing audit findings against evidence collected from site visits, we identified inconsistencies and varying levels of transparency across suppliers. This prompted more direct engagement with selected sites to better understand the underlying challenges.

Site visits provided valuable context. Many issues, including underpayment of overtime and excessive working hours, appeared to be systemic. Contributing factors included cost pressures, tight production timelines and audit fatigue from conflicting customer requirements.

One case highlighted the complexity of these issues. A supplier was unable to meet agreed remediation actions, citing operational and financial strain caused by inconsistent buyer expectations. Their inability to set sufficient corrective actions was made more challenging by the fact that some of their overseas customers did not require audits, while Metcash did. This lack of alignment increased the supplier's operational costs, including compliance, management and labour expenses, creating a competitive imbalance. Ultimately, due to the site's unwillingness to collaborate in remediating identified issues, Total Tools ceased working with the affected factory.

Based on these findings, Metcash is increasing engagement with high-risk suppliers and offering targeted training and capacity-building initiatives. This case reinforced the importance of combining audit oversight with direct supplier relationships, industry collaboration and practical support to drive sustainable, long-term improvements across the supply chain.

Addressing Risks continued

Case Study 7

Remediation Actions in the Private Label and Fresh Food Supply Chain



In FY25, 161 SEDEX SMETA audits were conducted at ~340 Food private label sites. A total of 938 non-conformances were identified by the SEDEX SMETA criteria:

Business Critical	0
Critical	131
Major	556
Minor	229

The most common issues related to health and safety practices, wage records and excessive overtime, business certificates and licences, lack of proper documentation and inadequate policies and employee awareness of rights including access to grievance mechanisms. No business-critical issues were identified.

Ethical sourcing audits are commissioned independently by suppliers through their chosen certification bodies. Metcash Food retains visibility of supplier audit outcomes via SEDEX but does not directly prescribe or manage the audit process. Risk-based oversight focuses on supporting continuous improvement, and engaging suppliers where elevated issues are identified.

By the end of the period, 81% of all non-conformances raised had been resolved through the third party audit process, with 763 issues closed. Resolution timelines varied depending on the severity and complexity of the issue, ranging from a few days to several months. Some examples of supplier outreach and intervention, addressing the critical non-conformances, included:

- Canned goods factory in China: Inconsistent working hours and wage records were addressed by the supplier introducing transparent payroll systems, updating internal policies and conducting staff training.
- Household supplier in China: Missing building safety certification issue was resolved at time of verification follow-up to ensure supplier was compliant prior to commencing trade.
- Fresh supplier in Australia: Recruitment fees and wage deductions affecting migrant workers were remediated and supplier policies refined. The supplier changed service providers and improved recruitment processes.
- Local supplier in Australia: Occupational health and safety improvements and fire safety issues were rectified through a prioritised action plan.
- Local supplier in Australia: Following a Fair Work Ombudsman (FWO) prosecution, we worked with the Merchandise Trading Team to reassess the supplier's suitability for supply. The supplier confirmed it had taken measures such as changed labour hire policies, strengthened internal oversight and completed a social audit. This incident also prompted closer industry surveillance with relevant buying teams now registered to receive FWO industry updates and media alerts to enable real-time monitoring across the industry.

These learnings highlight the importance of day-to-day oversight, proactive due diligence and strong communication and collaboration between Metcash and suppliers.



Addressing Risks *continued*

Building our Capability and Awareness

In FY25, we identified Metcash managers involved in buying, supplier tendering, merchandising, procurement, trading, category management, supply chain management and hiring, across our pillars, headquarters, distribution centers and Company-operated stores. These individuals were required to complete Metcash's Modern Slavery e-learning module.

Our Progress

Initiative	FY25	FY24	FY23	FY22
Total number of internal team members who have completed the Modern Slavery Awareness training to date	1496	943	361	177
Total number of external suppliers who have undergone the Modern Slavery Awareness training to date	139	135	97	69
Number of internal staff who joined the webinar related to anti-slavery topics each year	Over 180 employees from all business areas attended our Human Rights Day awareness session.		30 team members from our merchandise and procurement teams joined the tailored training event delivered by the NSW Antislavery Commissioner.	

Case Study 8

Building Capacity and Awareness Among Sourcing Teams

In FY25, Hardware expanded its modern slavery training program to strengthen internal awareness and embed ethical sourcing principles across procurement functions. As part of our continuous improvement efforts a one-hour tailored awareness and capacity-building session was delivered to our category sourcing teams.

The session aimed to:

- Reinforce the importance of ethical sourcing in the context of human rights risk management;
- Outline current and updated due diligence processes for private label suppliers;
- Clarify the roles and responsibilities of sourcing managers in supporting these frameworks; and
- Engage the team through a real-world case study to ground the issue in practical terms.

The session featured the case study 'Remediation Following Critical Audit Findings in Thailand Manufacturing Facility' (detailed earlier in this Statement). This case illustrated how serious non-conformances, particularly retention of worker identity documents and charging of recruitment fees, can directly contribute to forced labour and debt bondage of migrant workers. The walkthrough of the remediation actions taken demonstrated the steps taken to resolve the issue, and highlighted the real-world impact of ethical sourcing decisions.

Feedback from the session revealed that the case study was particularly effective in helping sourcing managers connect policy requirements with real-world consequences. The session built stronger internal support for due diligence practices and reinforced the role of procurement teams in preventing harm. Building on the positive engagement and outcomes from this session, Hardware will facilitate ongoing capacity-building sessions using practical remediation case studies to increase awareness of issues and the remediation process.



Addressing Risks *continued*

Case Study 9

Building Capability through the FRESH Responsible and Ethical Sourcing Program

In FY25, Metcash launched the FRESH Responsible and Ethical Sourcing Program (RES) to strengthen ethical and responsible sourcing practices across our Fresh Food supply chains. Focusing on the top 50% of category spend, we commenced a supplier outreach program focusing on 30 key suppliers across Fresh Produce and Protein (Meat, Poultry and Seafood) to build shared understanding of the supply landscape, key areas for targeted action and improved transparency.

This work included high-level supply chain mapping and gathering insights into supplier policies and approaches, particularly in high-risk areas such as labour hire and the Pacific Australia Labour Mobility (PALM*) scheme. Discussions focused on supplier practices including Metcash's ethical sourcing expectations. Structured Responsible Ethical Sourcing (RES) meetings brought together commercial, technical and sustainability teams to raise awareness and start to embed ESG considerations into business planning and supplier relationships.

As part of the process, we held several roundtable sessions with supplier sustainability leads and our corporate team for further shared learning on topics such as ethical sourcing in produce, deforestation, and emissions reporting in meat. An objective of the program is to help build supply chain resilience, supplier capability and support more ESG-informed sourcing decisions and strategies. It forms a key component of our broader capability-building work.

This initiative aligns with Metcash's Responsible and Ethical Sourcing Principles. These are grounded in internationally recognised frameworks such as the UN Guiding Principles on Business and Human Rights and the International Labour Organization's Standards.



* The PALM scheme enables eligible Australian businesses to recruit workers from nine Pacific Island countries and Timor-Leste for short-term or long-term roles in unskilled, low-skilled, and semi-skilled positions.

Case Study 10

The Freedom Hub Webinar for Human Rights Day

Awareness is being raised not only through Metcash's e-learning platform, but also via webinars delivered in partnership with external organisations such as The Freedom Hub. The Freedom Hub is an Australian-based NGO that works to end modern slavery by providing support to survivors and partnering in the global fight against modern slavery. The Freedom Hub works to achieve this through providing a range of services, such as survivor school for those who have experienced modern slavery, ethical business training and their own ethical retail and wholesale.

Metcash collaborated with The Freedom Hub on a Human Rights Day webinar focused on Modern Slavery in supply chains and operations. The purpose of the webinar was to bring awareness to the prevalence of modern slavery in Australia, and within global supply chains. It included interactive and informative online activities that provided information on what Modern Slavery looks like, where it occurs and where it has most potential to take place in Metcash's supply chains and operations. The webinar also included modern slavery survivor accounts of their experience, providing real world insights. This element of the webinar granted insight into the impact of modern slavery offences on individual people, communities and companies.

Bringing awareness to modern slavery across Metcash is a critical step in strengthening our ability to identify, understand and respond to modern slavery risks. Equipping employees with the knowledge to question, determine and help address modern slavery risk within operations and supply chains is a positive step. Metcash's collaboration with experts in modern slavery plays an important role in deepening organisational awareness of this complex issue. The Freedom Hub's insights have helped lay the foundations for a more transparent, ethical and informed future at Metcash.



Measuring Effectiveness

At Metcash we are taking deliberate steps to embed human rights considerations across our supply chain. Annual reviews of our Human Rights and Modern Slavery Policy by the Safety and Sustainability Committee reinforce accountability at the Board level. Insights from the Monash University Modern Slavery Disclosure Quality Guide inform enhancements to our Modern Slavery Statement. Additionally, a cross-functional group comprising Legal, Risk, People and Culture, and the Modern Slavery Working Group works collaboratively to identify our most salient human rights risks, seeking to ensure our efforts align with international standards.

Metcash defines effectiveness as making a measurable impact in reducing modern slavery risks across our operations and supply chains. We assess our progress by tracking changes in awareness, behaviour and due diligence practices, while identifying opportunities to strengthen our response over time.

Area	FY25 Outcomes/Commitments	How we assess our effectiveness (key metrics)
Governance Framework	In FY25, Metcash expanded governance by introducing an ESG working group within its business structure.	The ESG working group closely collaborates with other internal pillars within the business, as this allows us to easily assess the effectiveness of the group.
Capacity building and awareness	Supplier Communication – Food Pillar In FY25, Metcash's Food pillar created and launched Metplanet, a digital sustainability communications hub for supply partners. While the hub broadly supports environmental and social sustainability, it also serves as a platform to raise awareness of human rights and modern slavery risks. It provides a central space to communicate responsible and ethical sourcing priorities and initiatives, promote food supplier engagement, and offer resources and inspiration to support supplier collaboration and sustainability progress. Access our sustainability hub here: https://metconnect.metcash.com/food/s/metplanet	The focus of this resource has been its development and execution, meaning the level of effectiveness assessment has not been thoroughly established. Further development and promotion of Metplanet will continue in FY26. Currently, verbal feedback from suppliers has been positive, and the resource has been given significant exposure support across a range of suppliers, especially Fresh Food. This supplier engagement will be ongoing.
Risk assessment process	In FY25, we built on our FY24 goals by implementing a granular data analysis approach to identify a more accurate picture of sourcing origins (domestic vs international) and improve supplier data accuracy, to enhance transparency.	We continue to assess the accuracy and traceability of our supply chain and sourcing regions. IHG mapped 100% of private label manufacturing sites, a total of 64 sites were identified – 45 overseas and 19 in Australia. Total Tools engaged 96 exclusive overseas suppliers, representing approximately 80% of their supply chain. ALM reached out to private label suppliers for third party ethical sourcing audit reports.
Due diligence processes	Metcash's Food private label team further embedded policies into standard operating procedures, including stage-gate sign-off processes by trained staff, Metsafe detailed product specifications and established reporting mechanisms. The implementation of the 'Metsafe' Product Lifecycle Management Tool has been a valuable initiative for data reporting and supporting team efforts.	We assess the effectiveness of meeting our Food private Label Responsible Sourcing Requirements in a variety of ways: - Seafood suppliers verified by SEDEX SMETA scheme; - Ethical sourcing communications via supplier engagement. As part of the ethical sourcing due diligence process, completion of the SEDEX SAQ and availability of SEDEX audit reports are tracked during onboarding for suppliers under the Food pillar.

Measuring Effectiveness continued

Area	FY25 Outcomes/Commitments	How we assess our effectiveness (key metrics)
Due diligence processes (continued)	Hardware and Total Tools updated their Ethical Sourcing Policy incorporating the Metcash Ethical Sourcing Principles, LRQA ERSAs standards, and other industry benchmarks.	IHG uses performance trackers to stay up to date with supplier factory social compliance status with 90% of overseas private label suppliers, i.e. 36% of all private label suppliers, providing valid ethical audit reports or SAQs. 59% of Total Tools exclusive overseas suppliers and 33% of ALM private label suppliers shared third party ethical audit reports.
Remediation and escalation process	As part of our due diligence and risk management approach for Food private label retail, we maintain close oversight of the SEDEX audit platform to identify actual and potential social impacts, both negative and positive, across our supply chain. Several sites were escalated for case management during the period, and routine oversight processes continue to engage suppliers in addressing outstanding critical non-conformances.	During the reporting period: • 161 third party audit reports were shared across the private label supplier base. • A total of 938 non-conformances were evident via the SEDEX SMETA audits: - Business Critical: 0 - Critical: 131 - Major: 556 - Minor: 229 • Resolution Status: By the end of the period, 763 non-conformances had been resolved through the third party audit process, with 175 non-conformances remaining open.
Collaborations and partnerships	In FY25 the Food pillar deepened its focus on responsible and ethical sourcing by partnering internally with its Fresh Food business to create and launch the RES program.	The program was developed and launched within the period. Effectiveness measures will be applied in FY26 as the program continues to operate.
Logging of incidents and grievances	In FY25, we enhanced incident reporting by adding a modern slavery category to the Evotix Safety and Risk Management platform.	Evotix Safety and Risk Management platform enables centralised recording of incidents and management actions.

Assessing the effectiveness of our actions

We have continued to review our due diligence framework considering regulatory expectations, international human rights standards and corporate governance principles. Throughout this Statement we have reported not only on corrective actions taken; but also on outcomes of such actions, where measurable. This approach supports greater accountability and helps us assess the tangible impact of our efforts.

Updates on our approach and progress are provided to the Board's Safety and Sustainability committee as part of regular reporting cycles. In addition, effectiveness of actions is discussed in quarterly ESG Council and ESG Working Group meetings, which provide an opportunity to review progress and highlight areas requiring further focus. While this work remains at an early stage, initial assessments have helped us identify priority areas for further strengthening, including supplier engagement and supplier data granularity.

Collaborations

Consultation and collaboration with industry experts

As part of our commitment to continuous improvement, we engaged with the research team at Monash University, whose independent benchmarking study assesses the quality of modern slavery disclosures by ASX-listed companies. Their assessment highlighted areas for stronger transparency and alignment with better practice. In response, we maintained detailed reporting on our due diligence processes, strengthened our approach to remediation through the development of new tools such as a Grievance Mechanisms Toolkit and Remediation Guidance, and improved the clarity of our supply chain descriptions – particularly at the category and regional levels. Work is ongoing to further improve contracting transparency and supplier data visibility across our operations.

As highlighted in Case Study 10, Metcash strengthened its ethical sourcing framework through tailored e-learning for procurement and merchandise teams, alongside a Company-wide Human Rights Day webinar delivered in partnership with The Freedom Hub. We will continue collaborating with industry experts to promote awareness and integrate expert-led insights into modern slavery risks.

Building a Strong Foundation for Supplier Collaboration and ESG Integration

Strong engagement from our teams and suppliers is helping to build a solid foundation for meeting compliance and reporting requirements. This collaboration includes working closely with suppliers on remediation efforts to address modern slavery risks, raising awareness through targeted communications, meetings and training sessions, and enhancing policies to provide clear guidance and expectations. Looking ahead, insights gained through ESG integration will continue to inform Metcash's sustainability strategy and supplier engagement initiatives. To support this, the program incorporates structured feedback loops, regular supplier engagement activities, and a third party dashboard and risk assessment to capture real-time data and shifting priorities. These tools enable agile decision making and ensure that both supplier and ESG strategies remain responsive to emerging risks, regulatory developments and innovation opportunities. Importantly, this is a dynamic and evolving framework – designed for continuous improvement, where supplier input directly shapes updates to engagement models, reporting tools and sustainability benchmarks in alignment with the ever-changing landscape of responsible sourcing.

Case Study 11

Collaboration with Total Tools China Suppliers

In May 2024, at the invitation of the Total Tools Sourcing Team, the Sustainability Manager (Ethical Sourcing) travelled to China to deliver in-person training to Total Tools suppliers on modern slavery risks and broader human rights topics. The session was part of the Total Tools China Suppliers Annual Conference which welcomed 99 participants from 59 suppliers.

The training aimed to build awareness and capability among suppliers to address these gaps, strengthen ethical sourcing practices, and reduce exposure to modern slavery risks. By fostering open dialogue and aligning supplier expectations with Metcash's standards, we continue to support meaningful collaboration and drive continuous improvement across our supply chain.

Prior to the training, we conducted a grievance mechanism survey to assess the presence and effectiveness of worker voice channels across the supplier base. The results revealed a lack of sufficient mechanisms for workers to safely raise concerns or report issues, highlighting an area for improvement in supplier practices. To help close this gap, Metcash showcased our NAVEX solution and how suppliers can access this as an option.



Appendix: Reporting Entities Covered in This Statement

Entity Name	ACN
Australian Liquor Marketers (QLD) Pty Ltd	010 756 519
Australian Liquor Marketers (WA) Pty Ltd	009 196 614
Australian Liquor Marketers Pty. Limited	002 885 645
Bianco Construction Supplies Pty Limited	152 933 750
Bianco Hardware Pty. Limited	152 645 406
Cantala Holdings Pty Ltd	009 121 359
Danks Holdings Pty Limited	004 295 532
Fagg's Group Pty Ltd	130 782 802
Hardings Hardware Pty. Ltd.	064 548 349
Home Timber & Hardware Group Pty Ltd	004 037 049
HTH Stores Pty Limited	131 802 465
IGA Distribution (WA) Pty Limited	008 667 650
Independent Hardware Group Pty Ltd	141 010 906
K&B Timber and Hardware Pty Ltd	162 232 162
Karloo Holdings Pty Ltd	009 121 402
M-C International Australia Pty Limited	080 064 099
Metcash Food & Grocery Convenience Division Pty Limited	000 226 399
Metcash Food & Grocery Pty Ltd	004 391 422
Metcash Limited	112 073 480
Metcash Trading Limited	000 031 569
Mitre 10 Australia Pty Ltd	009 713 704
NFD Holdings Pty Ltd	160 029 381
Sealanes (1985) Pty Ltd	009 121 331
SFG Finance Pty Ltd	607 436 920
SFG Group Holdings Pty Ltd	607 436 386
Sunshine Hardware Pty Ltd	129 140 085
Superior Food Group Pty Ltd	607 519 737
Tasman Liquor Company Limited	A/K 828300 New Zealand
Tasmania Hardware Pty Ltd	159 847 462
Total Tools Holdings Pty Ltd	138 595 525
Total Tools Stores Pty Ltd	617 752 806
Zircon (WA) Pty Ltd	109 738 703

MtCash