



DAVID JONES

Modern Slavery
Statement 2024

David Jones acknowledges the Traditional Custodians and Owners of the lands on which our 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 July 1st, 2023 to June 30th, 2024, 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 (Clothing, general merchandise 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 14-18
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 19-38
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 39-41
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 44-45
Any other relevant information	pages 42-43, 46-47

2.0 A Message from our CEO



For almost two centuries David Jones has been at the forefront of innovation, constantly redefining what it means to shop and experience retail in Australia. Innovation is in our DNA, and we've devised a clear strategy, Vision 2025+, to chart our course, preserving our legacy for future generations.

In line with our new Australian ownership, David Jones has taken significant steps in establishing itself as a standalone business, delivering many transformative initiatives and strengthening our approach to managing our social and environmental impacts.

A stronger focus on efforts to stamp out modern slavery across our operations and supply chain has seen us deliver seven out of nine commitments made to improve our approach to mitigating our modern slavery risk during FY24, including:

- **Refreshed Supplier Code of Conduct:** A significant body of work was undertaken to review, benchmark and update our Supplier Code of Conduct, (including our expectations on managing modern slavery risks) and create a new and comprehensive Supplier Code of Conduct Toolkit to support its implementation.
- **Training Needs Analysis Completed:** To identify modern slavery training needs across business areas we completed an enterprise-wide training needs analysis. This will be used to prioritise training for key functions and will help to shape the training content to be delivered.

- **Refreshed Risk Profile:** Our risk profile has been updated to reflect changes in our business, including the establishment of our satellite office in the Philippines.

- **Traceability Beyond Tier One:** We've made progress on our commitment to transparency by reconnecting with select suppliers to better trace our supply chain beyond tier one factories.

- **Effectiveness Framework Review:** Tracking effectiveness is vital to understanding whether our Modern Slavery risk management is fit for purpose. The review included an update to existing indicators as well as the inclusion of several new qualitative and quantitative measures.

- **Training for the Modern Slavery Lead Committee:** Delivered bespoke training to members of our Modern Slavery Lead Committee; a key group of senior functional leaders across the business who are charged with driving actions to help David Jones effectively manage its modern slavery risk.

- **Developing our FY30 Modern Slavery Roadmap:** Following a comprehensive gap analysis David Jones created a five year roadmap to guide annual commitments and actions that will strengthen our approach to managing our risks now and into the future.

While we recognise the complexity and challenges of eradicating modern slavery, our progress demonstrates our deep commitment to ethical practices and social responsibility. We continue to closely follow the Governments review and implementation of any recommendations from the statutory review of the Modern Slavery Act 2018 (Cth) and ensure that our approach continues to meet our obligations and stakeholder expectations.

As we strive to become one of the world's most responsible retailers, I would like to thank to the whole David Jones team for their dedication and commitment to these critical initiatives.

I am pleased to present you with this Statement, which was approved by the board of directors at David Jones on 16th December 2024.

Sincerely,

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

Scott Fyfe
Chief Executive Officer
David Jones Pty Ltd

3.0 Introduction & FY24 Progress

3.1 INTRODUCTION

David Jones is Australasia's leading premium department store retailer. With 41 locations across Australia and New Zealand as well as davidjones.com in Australia and a new mobile app, our operations and value chain may be vulnerable to modern slavery, and we are committed to managing these risks in a responsible manner.

The following is David Jones' fifth statement under the Modern Slavery Act. This statement outlines our ongoing efforts to protect human rights, combat modern slavery, and ensure that our operations and supply chains are free from such practices.

We believe that transparency, accountability, and collaboration are essential tools for eradicating modern slavery, and we invite you to learn more about our commitment and progress in this mission.

A number of initiatives were outlined in our 2023 Statement to strengthen our approach to modern slavery risk management. We remained steadfast to our commitment as we establish David Jones as an independent business and deliver on our transformation ambitions under our Vision 2025+ strategy. Our progress is summarised in table 3.

3.2 PROGRESS AGAINST OUR COMMITMENTS

In our FY23 statement, we outlined nine (9) forward-looking commitments for the FY24 reporting period. Table 3 lists the actions we have taken to meet these commitments.

Table 3: List of FY24 actions

Area	FY24 Commitment	Status as at 30 June 24	FY24 Actions
Policy Commitment	Refresh our Supplier Code of Conduct.	●	Update includes a stronger alignment to frameworks such as the UN Guiding Principles on Business and Human Rights. More information can be found on page 22.
	Refresh our modern slavery risk assessment and update our risk profile.	●	Completed a review and updated our modern slavery risk assessment. We continued to prioritise our responses based on risk ratings. More information can be found on page 17.
	Trial expanding our Ethical Sourcing Program to include select Non-Trade Procurement suppliers through a pilot.	●	While we were unable to complete the pilot, we did identify and connect with key suppliers to outline the pilot requirements. We will complete the pilot and report findings in FY25. More information can be found on page 28.
Identifying and Assessing Risks	Review of our traceability process and current data to further map our David Jones Private Label supply chain beyond Tier 1, focusing on a high-risk area.	●	Reconnected with current suppliers to determine the accuracy of data previously provided, with a focus on our cotton supply chain. More information can be found on page 31.
	Develop and deliver targeted training for the Modern Slavery Lead Committee.	●	Bespoke training developed and delivered to Modern Slavery Lead Committee in May 2024. More information can be found on page 34.
	Undertake an assessment of key modern slavery training needs by business area.	●	Training Needs Analysis completed across business functions, store teams and management levels. More information can be found on page 33.
	Develop and implement processes to ensure that supplier contract renewals include an express reference to modern slavery and the Supplier Code of Conduct.	●	An explicit reference to modern slavery was included in Non Trade Procurement contract renewal templates. Next step is to develop and implement the process to ensure the templates are consistently utilised by our Procurement Teams. More information can be found on page 24.
Managing and Addressing Risks	Undertake targeted supplier deep dives with labour-hire providers engaged by David Jones to better understand potential risks and controls in place.	●	An initial desktop review of the supplier's actions in relation to modern slavery was completed, followed by an informal interview. More information can be found on page 23.
	Review our effectiveness framework and develop a series of qualitative and quantitative indicators to track progress aligned with our planned activities.	●	A series of qualitative and quantitative indicators developed. More information can be found on page 41.
Tracking effectiveness			

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, technology, 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, the 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 leading premium Australian retailer that sells apparel, footwear, accessories, homewares, beauty, gifts, electrical products, technology, and food under various trading arrangements described in this Statement. These goods may be sold under David Jones' proprietary brands or under third-party brands or services from international and domestic suppliers with whom we partner through our stores, or via our e-commerce channel.

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.

During the reporting period, David Jones evolved its operating model by establishing a satellite office in Manila, Philippines. The satellite office team is an extension of our head office support centre; inducted and trained by David Jones leaders.

To support the operations of our store network, we lease and operate a warehouse and distribution center. In addition to this facility we have also

contracted a third party logistics warehouse to streamline direct to store deliveries. Both facilities are located in New South Wales. Along with our direct team members within the distribution centre, these facilities use agency workers to receive, unpack and fulfil stock for our store network and pick-and-pack millions of e-commerce parcels for our online customers.

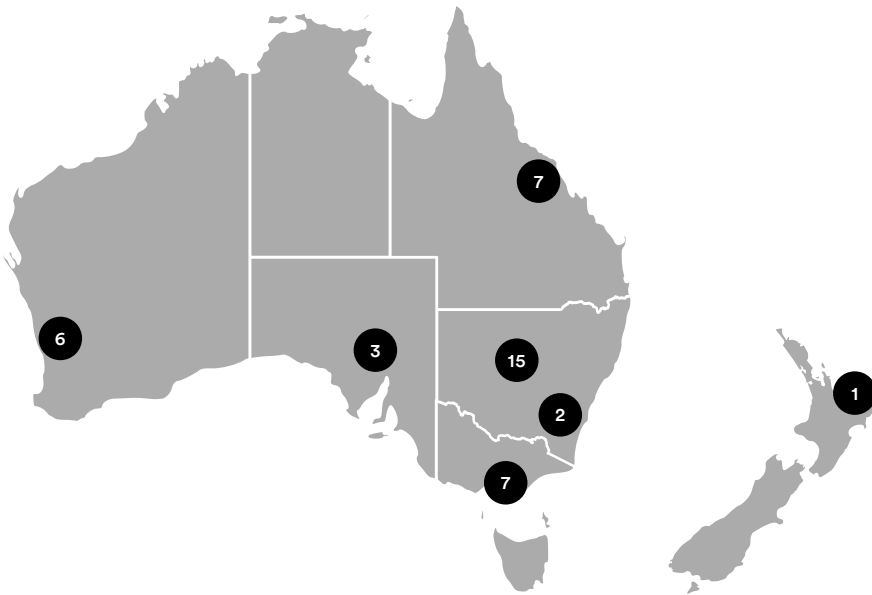
David Jones is currently embarking on a transformational value chain program to improve how we buy, move and sell our products to customers through our network. This program is set to transform our capability and underpin the delivery of our business strategy. The program provides an opportunity for teams to identify any problems and to seek out innovative ways of working collaboratively.

We have partnered with Latitude Finance who provide co-branded credit cards to our customers where David Jones' responsibilities include marketing. Our previous co-branded credit card partner was American Express, this arrangement came to an end in July 2024.

4.2.1 OUR STORES AND TEAMS

In FY24, David Jones' main operations involved managing a network of physical stores across Australia and New Zealand, our online store as well as our warehouse and distribution centre. During this reporting period, David Jones reduced the store portfolio footprint from 42 to 41 stores.

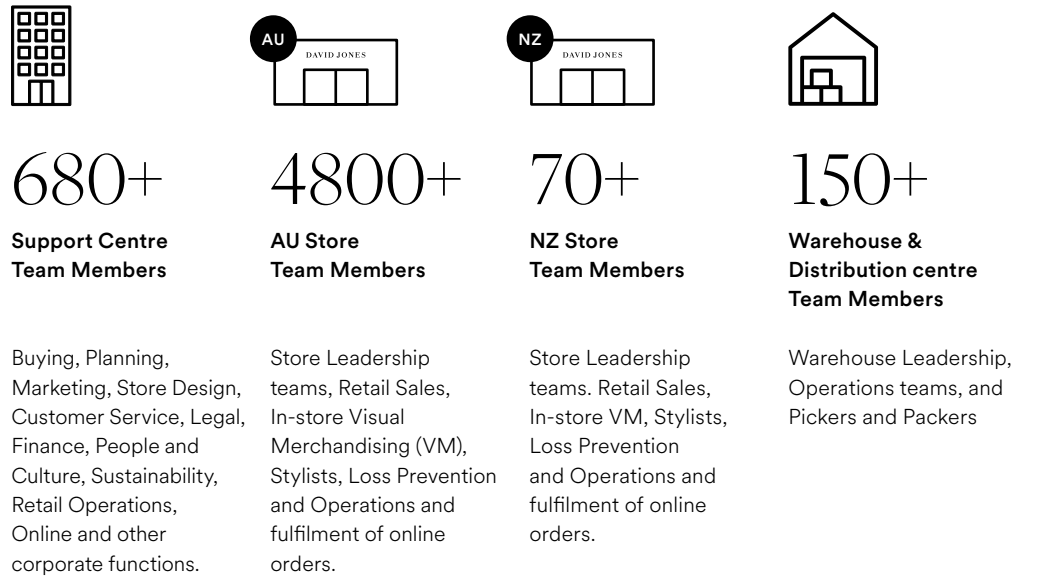
Figure 1: Map of David Jones store network



1 Store count as at June 30, 2024

Our workforce is comprised of approximately 5700 team members across retail stores, distribution centres and Support Centre (Head Office).

Figure 2: David Jones team members



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

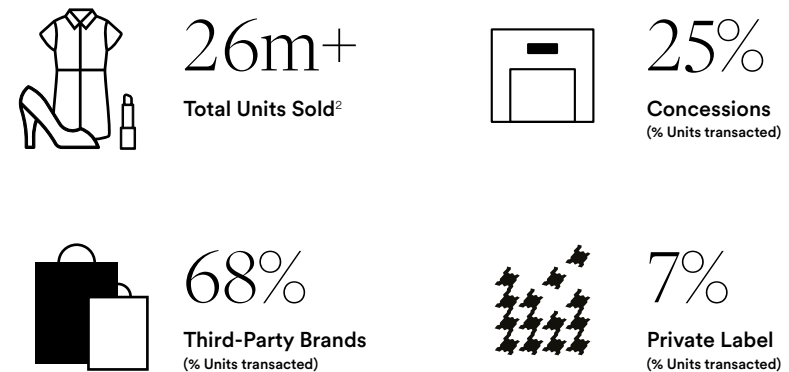
4.3 OUR SUPPLIERS AND SUPPLY CHAINS

As a department store, we have various trading arrangements with our suppliers across our store and online offerings. These are defined in four distinct ways:

Concessions	Third-party brands operate their own 'shop-in-a-shop' area within David Jones stores, including fashion and accessories, beauty treatments, and food services.
Third-Party Brands	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.
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.

The above definitions of our trading arrangements with suppliers, brands and concessions are managed through our business, each with its own set of agreements and procedures. For example, the suppliers who provide the goods we sell are managed through Buying Teams with support from our Legal and Ethical Sourcing Teams. Suppliers engaged in non-trade procurement (NTP) activities are managed by our head office NTP Team with Legal and Ethical Sourcing Teams also supporting activities related to modern slavery risk management for this supply category.

Figure 3: FY24 Products Sold



4.3.1 Our footprint – Private label supply chain

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 who support us in developing and manufacturing these products on our behalf.

In this reporting period, our private label goods were produced by 107 (110 in FY2023) suppliers in 166 (161 in FY2023) Tier 1 factories and sourced from 16 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 will continue to work towards increasing the Tier 1 private label product factories on our interactive [factory map](#), which is routinely updated and available on our corporate website.

In FY24, we maintained the percentage of our Tier 1 factories published (for apparel, footwear & 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 a site

We will continue to increase the percentage of Tier 1 sites published over time.

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: Private label sourcing locations



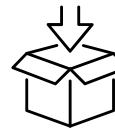
16 Countries

Sourcing Countries²



166

Factories (Tier 1): 140 Merch & 26 Food



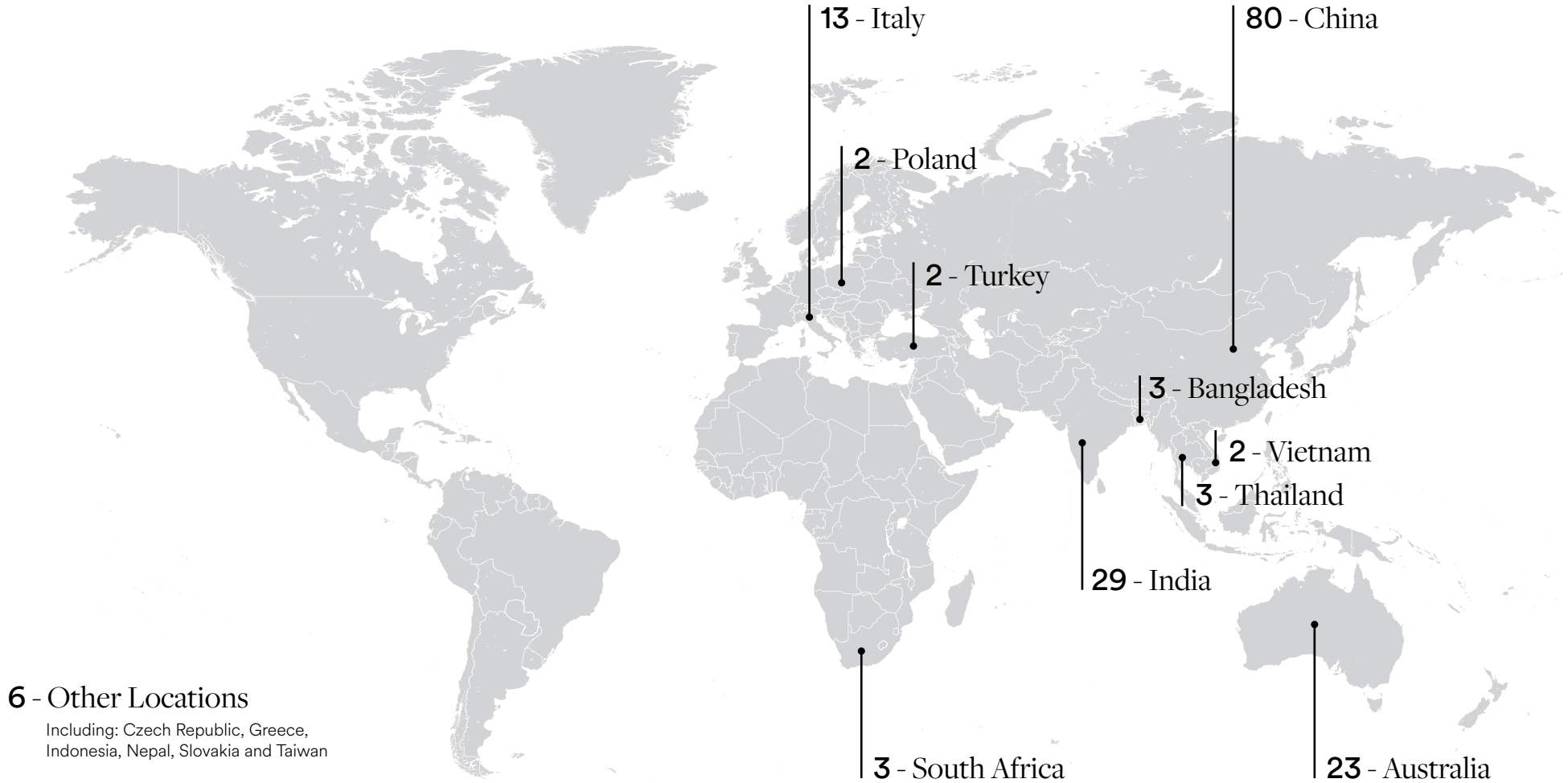
107

Active Merchandise & Food Suppliers

² Unit means an item of merchandise sold for retail sale
³ Based on location of Tier 1 factories.

David Jones Private Label Sourcing Locations

Figure 4: Private label sourcing locations



One hundred and twenty six major suppliers represented 93% of the total non-trade spend for David Jones in FY24

4.3.2 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 126 major suppliers (112 in FY2023) across eight major categories of non-trade procurement. These major suppliers^[4] represented 93% of the total non-trade spend for David Jones in FY24 (96% in FY2023).

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.

Figure 5: NTP suppliers and spend

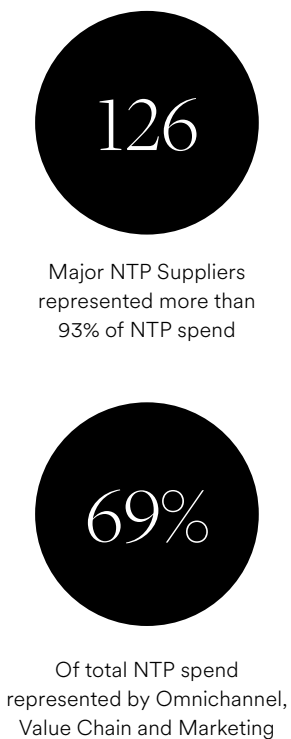
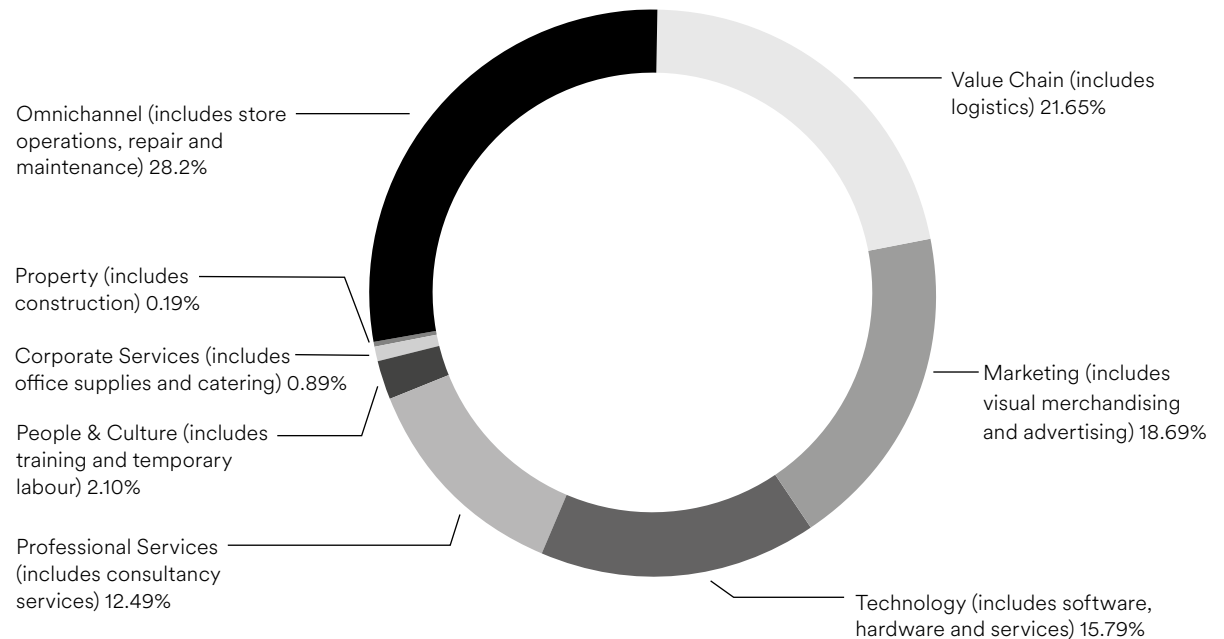


Figure 6: NTP spend by category (%)

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
⁵ During the reporting period, we updated the supplier category labels to align to David Jones business areas, for example, People and Culture was Admin and Human Resources in FY23

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5.0 Identifying our Modern Slavery Risks

5.1 MODERN SLAVERY RISKS IN OUR 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’⁶. The MSA 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

We understand 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.

Consistent with the UNGPs⁷ 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 table following.

Table 4: UNGPs continuum of involvement terms and potential risks

The UNGPs continuum of involvement		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>All our employees are employed on a full-time, part-time or casual basis and covered by Enterprise Bargaining Agreements, relevant Award or Individual Employment Contracts, depending on their position and work location.</p> <p>Prior to commencing employment, every individual is provided with copies of agreements that cover the relevant employment laws that aim to protect them from situations that may lead to modern slavery. 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, this could include where a retail company does not act on evidence that a supplier is engaged in modern slavery, for example, 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 that we might contribute to modern slavery, including through our Approved Factory Program (AFP) and supplier engagement. More information on these steps can be found on pages 29-34.</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 that includes raw materials purchased from a sub-supplier, such as cotton, produced through forced labour.</p> <p>David Jones actively assesses and addresses modern slavery risks in our supply chain. For example, in the reporting period, we continued to utilise the hotspot analysis conducted in FY23 to prioritise our actions.</p> <p>More information can be found on page 16-18.</p>

⁶ Australian Government Guidance for Reporting Entities

⁷ 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.

The global food, clothing and textile industry has been largely dependent on human labour. Globalisation of supply chains has increased the global exposure to modern slavery risks and David Jones is no exception.

In FY23, we undertook a review of our risk profile. The risk assessment indicated that, whilst we were 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 the most relevant types of modern slavery exposure for David Jones through a potential direct linkage in our supply chains to be forced labour, bonded labour, deceptive recruiting and child labour.

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

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

The global food, clothing and textile industry has been largely dependent on human labour. Globalisation of supply chains has increased the global exposure to modern slavery risks and David Jones is no exception.

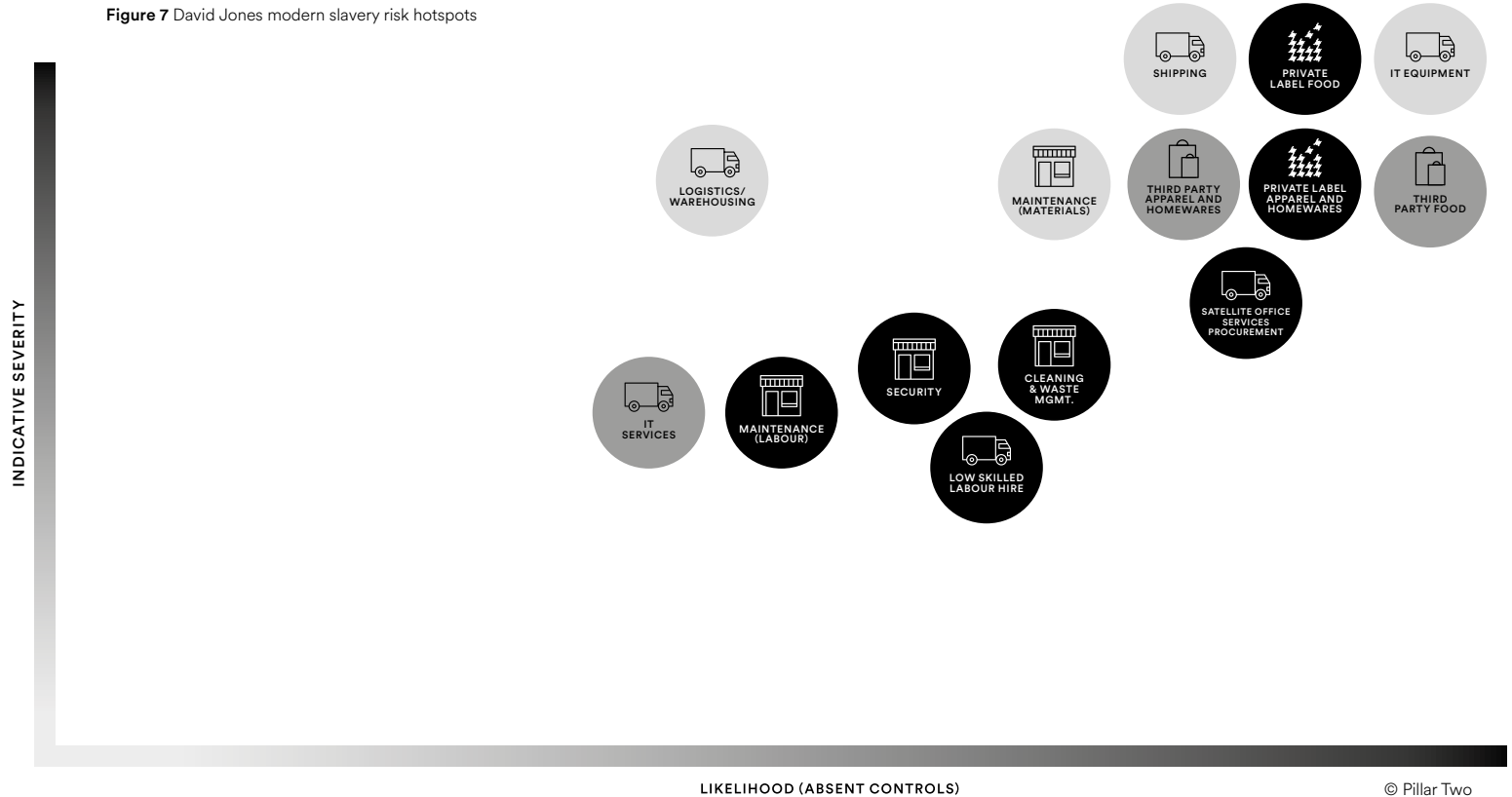
The correlations between low-skilled labour and labour-related issues occurring through the exploitation of a vulnerable workforce have been widely documented.

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

In FY23, David Jones identified ten modern slavery hotspots. These were assessed to be the highest risk in relation to David Jones' operations and value chain.

In FY24 David Jones established a satellite office in Manila, Philippines. Our risk profile depicted in Figure 7 has been updated to recognise the potential modern slavery risk factors of operating an international satellite office. While we are mindful of the risk factors related to the engagement of Philippines-based contracted workers, we have identified services procurement as a hotspot due to the heightened risk of procuring such services from the Philippines, for example, cleaning, security and maintenance services. Risk factors may include, use of low-skilled labour; potential use of migrant workers; reliance on temporary contract workers; high levels of subcontracting; and strong pricing competition for some services.

Figure 7 David Jones modern slavery risk hotspots



© Pillar Two

Key

- Higher Leverage
- Medium Leverage
- Lower Leverage
- Private Label
- Third-Party Brands
- Facilities
- NTP/Supply Chain

Table 5: Modern slavery hotspot hypothetical examples

David Jones areas of business	David Jones modern slavery hotspots	Hypothetical examples, provided for illustrative purposes only
Private Label	Food	Cocoa used in chocolate products could be harvested by a sub-supplier using the worst forms of child labour.
	Apparel and Home	Migrant workers in apparel factories could be exploited through debt bondage and have their passports confiscated.
Third Party Brands	Apparel and Home	Handcrafted ceramic products could be made using the worst forms of child labour by a third-party brand's subcontracted supplier.
Facilities	Cleaning and waste management	Cleaning contractors could be exploited through modern slavery by a services provider at a store.
	Maintenance and refurbishment	Subcontracted workers providing plastering and painting services as part of a store refurbishment could be subject to forced labour.
	Security	A security provider could engage staff from overseas through a recruitment agency, which charges the workers excessive recruitment fees they cannot repay.
NTP & Supply Chain	Manila office services procurement	Workers providing cleaning services at the office location could be below the legal working age and exposed to hazardous chemicals without PPE.
	Labour hire	Workers procured through labour hire contractors could be in situations where they do not have access to their passports and are not paid by the contractor.
	Logistics and third-party warehousing	Workers in a third-party warehouse overseas could be exploited through modern slavery.
	IT equipment and services	IT equipment used in stores could include minerals mined using the worst forms of child labour.
	Shipping	Workers on a ship transporting products could be exploited by the ship owner and forced to continue working after their contract expires.

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

We also recognise that Modern Slavery risks are not static and change over time and David Jones will continue to monitor these risks.

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), we can identify our Tier 1 suppliers by location; no David Jones Private Label products were produced within these highest-risk regions during the reporting period. David Jones will continue to monitor external reports for updated information about modern slavery risks in these regions.

6.0 Assessing and Addressing our Modern Slavery Risks

Human rights responsibilities (including modern slavery) are addressed at the highest level across David Jones.

6.0 ASSESSING AND ADDRESSING OUR MODERN SLAVERY RISKS

In FY24, we continued to utilise a suite of tools to assess and address our risks of modern slavery. 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 explains our due diligence and remediation processes.

6.1 OUR GOVERNANCE STRUCTURE

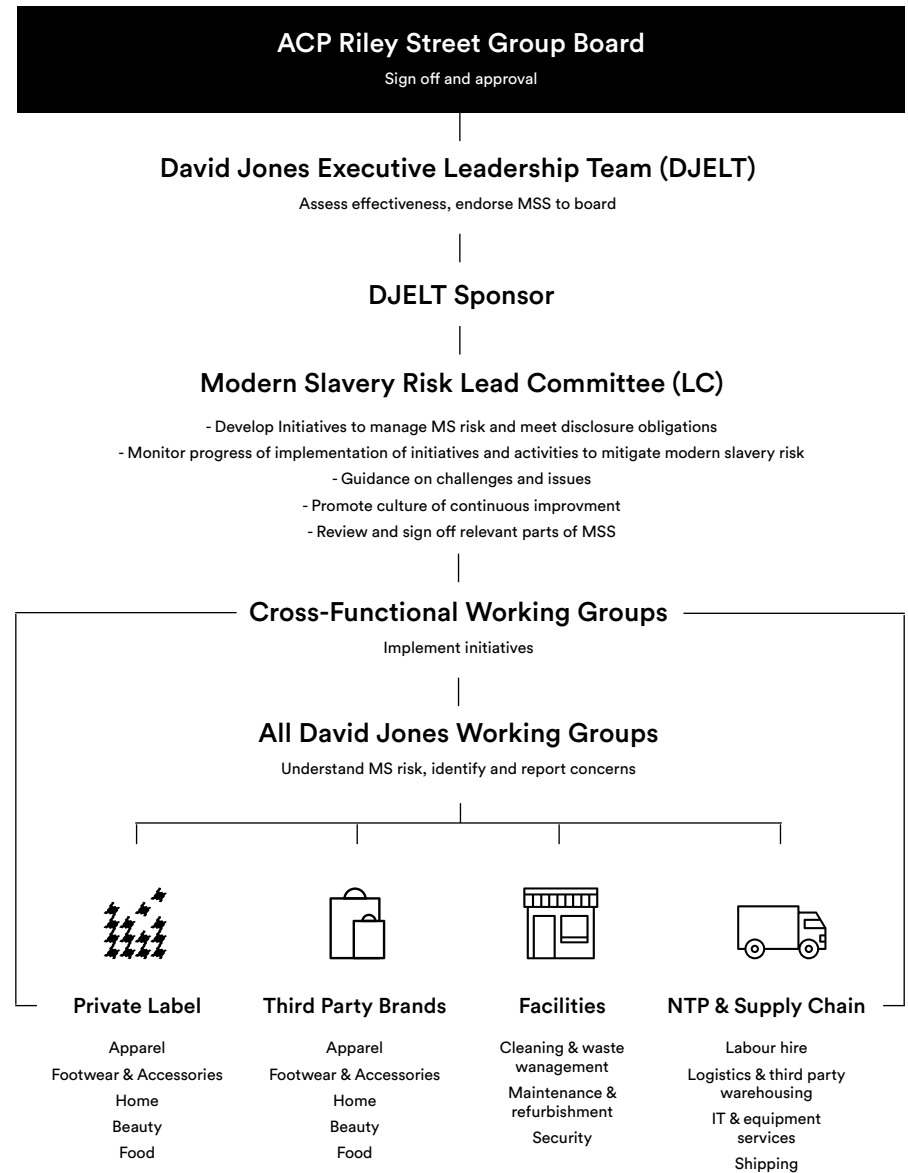
We identify, assess, and manage modern slavery and broader human rights risks in an agile and adaptive manner. This occurs through collaboration between many teams including People & Culture, Legal, Risk & Compliance, Value Chain, NTP, Merchandise and Sustainability & Ethical Sourcing Teams.

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

As outlined in our last statement, David Jones formed a new Modern Slavery Lead Committee in FY23, bringing 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 Leadership Team, forms a key part of the governance framework for David Jones.

Our Modern Slavery Lead Committee convened five (5) times throughout FY24, to review and enable action to progress our FY24 commitments. The Committee has also provided key inputs and consultation in the development of this statement.

Figure 8: Governance structure



6.2 OUR POLICY FRAMEWORK

David Jones has established a clear set of codes, policies, protocols and expectations that need to be met by our people and suppliers across a range of areas, including modern slavery and broader human rights risks. Through the implementation of these policies, we prioritise not only business risks but also preventing and addressing risks to people.

Some of the key control policies, protocols or mechanisms to support our modern slavery risk management are included in this table.

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.w
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 the internal intranet.
Workplace Behaviour Policy	Clearly state any workplace behavioural obligations and provide guidelines on accessing support and resolving a complaint.	Features in annual compliance training and re issued to team members when a breach of the code has been identified or when an issue is raised to David Jones. Housed on internal 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 re issued to team members when a breach of the code has been identified or when an issue is raised to David Jones. Housed on internal 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 internal intranet channels.
Ethics Hotline Procedure	Ethics Hotline calls, emails, complaints/tip-offs and Whistleblower complaints are received, escalated, and appropriately managed.	Updated Hotline details are communicated through internal intranet channels. Updated posters have been strategically across the store network to ensure team visibility.
Grievance and Dispute Resolution Policy	Designed to raise awareness about, and provide a fair and just working environment, by ensuring that team members have access to processes for the resolution of genuine personal grievances relating to the workplace.	Managed by our internal employee relations team confidentially, for both team members and leaders, where appropriate. The policy is housed on internal 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	Sets out the expectations of our suppliers in relation to social, ethical and environmental issues, including 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 corporate website.
Ethical Sourcing - Approved Factory Program	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 that are being onboarded. Our Supplier Code of Conduct also outlines high-level requirements for private label suppliers.
Guiding Principles when Dealing with Critical Non-Compliances	Provide 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.

These formal arrangements bind and 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 internal intranet, as well as publicly on our website.

During the reporting period, our People & Culture Team reviewed and updated several policies to ensure we respond to changing legislation and continue to provide clear guidance on how to create a safe and respectful workplace. The updated policies include; the Workplace Behaviour Policy, Employee Code of Conduct, Grievance and Dispute Resolution Policy & the Discrimination, Harassment and Bullying Resolution Guidelines. The Employee Code of Conduct was updated to include an express reference to modern slavery.

Team members are trained at regular intervals throughout the year. More information on our training and awareness-raising related to modern slavery is on pages 33-34.

Case Study

Supplier Code of Conduct Refresh



An action to strengthen our current Supplier Code of Conduct (Supplier Code) was one of the key recommendations from our modern slavery gap analysis conducted in FY2023. We subsequently committed to refreshing our Supplier Code in our FY24 modern slavery commitments.

Recognising that a Supplier Code of Conduct is an essential tool for businesses to promote ethical practices across their value chain, David Jones invested in engaging external support through sustainability advisory firm ERM, to update our Supplier Code.

The Sustainability team led the review and refresh of the Supplier Code which included a desktop analysis, peer review, market research and internal cross-functional stakeholder engagement from David Jones business functions including, sustainability,

merchandise, procurement, legal and responsible sourcing teams subject matter experts (SMEs).

The overall findings of the review suggested that the current Supplier Code largely aligned with industry regulations and covered appropriate issues, however, there were opportunities to improve the clarity of expectations and a need for a stronger focus on implementation and supplier engagement.

A refreshed version of the David Jones Supplier Code has now been drafted, addressing the shortcomings of the current Supplier Code. A comprehensive guidance document and toolkit has also been developed, aimed at assisting effective implementation. Once finalised and approved, we will focus on the implementation of the refreshed Supplier Code internally and externally in FY25.

6.3 OUR APPROACH TO ASSESSING AND ADDRESSING RISKS IN OUR OPERATIONS

The UNGP expect that businesses “identify general areas where the risk of adverse human rights impacts is most significant...and prioritise these for human rights due diligence⁸.” From our risk assessment, we recognise that labour hire is a potential modern slavery risk area in our operations. This is due to the use of lower-skilled labour in services such as cleaning and maintenance, as well as the reliance across the labour-hire industry on vulnerable workers, such as migrant workers or contractors.

Case Study

Labour-Hire Provider Deep Dives

In the FY2023 review of our modern slavery risk management approach, an opportunity was identified to get a better understanding of how labour-hire providers manage their modern slavery risks. In FY2024 we commenced a targeted review with two labour hire providers.

The initial desktop review of the supplier’s approach and actions was conducted in relation to modern slavery. The review included an assessment of publicly available commitments, policies and procedures, modern slavery statements and training. We then followed up with an informal interview with the labour-hire providers to better understand the controls they had in place.

The desktop review of their corporate websites found that one supplier (with a global footprint) had an extensive suite of policies and procedures in place. In a follow-up interview, they were able to elaborate on how these documents are implemented and embedded, which included training at regular intervals for employees.

While the second supplier did not make a lot of information publicly available, in the follow-up interview, we were able to establish the existence of several policies that were in place and that were made available to employees.

Opportunities for improvement were identified with both providers including employee training and awareness, risk management and grievance mechanisms.

These deep dives have given us a level of confidence that modern slavery risks were being managed by these labour-hire providers. The deep dives also supported our understanding of the types of controls that have been implemented and helped us to establish a deeper engagement with our labour-hire providers. During FY25, we will work with providers on progressing key areas for improvement.



⁸ Guiding Principles for Business and Human Rights: Implementing the United Nations “Protect, Respect and Remedy” Framework | UN Global Compact

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

Update



Strengthening Contractual Agreements

In our FY23 Statement, we shared an update on strengthening contractual agreements, which included adding clauses specifically aimed at reducing the risks of modern slavery being used in these services. In FY24, we have included this clause in several new contracts, which included some suppliers in higher risk industries. The clause was not enacted during this reporting period.

Case Study



Non-Trade Procurement Contract Renewals

Based on the modern slavery risk management review, one of our FY24 commitments was to 'develop and implement processes to ensure that supplier contract renewals include an express reference to modern slavery and the Supplier Code of Conduct.'

While we were unable to complete this commitment in full, we did commence work to update our Non-Trade Procurement contract renewal templates to include a more robust modern slavery clause (for high-risk industries). NTP team members can utilise the template and ensure existing suppliers are

made aware of our modern slavery requirements and expectations during the renewal process. While there is more work to be done, we can use the learnings from this first step to continue to identify gaps and implement processes for contract renewals across the business.

We know that contractual clauses are an important tool to support the management of modern slavery risks that may be associated with a particular supplier. While our current NTP contract templates (for new suppliers) already include a modern slavery clause, during the reporting period we took the opportunity to

further strengthen these contracts with additional modern slavery requirements for higher-risk industries.

These requirements include the preparation and implementation of a risk management plan as well as ensuring personnel have access to a grievance mechanism, in the operations and supply chains used by the supplier. We will continue working to upskill our internal procurement teams, providing guidance as well as clear examples for suppliers to reference.

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 beginning their employment, team members are provided copies of agreements that cover the relevant employment laws that aim 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 help ensure modern slavery does not occur 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 & Culture team regularly review our employment agreements. Our internal people policies to ensure that they meet, and, where possible, exceed legal requirements.

David Jones supports the right to the organisation of workers and the active members of two unions within our operating warehouses.

Update

Promoting a Living Wage



A living wage is an important element in addressing various socio-economic issues, including modern slavery. We understand that ensuring an established living wage for workers at every stage of the supply chain may lessen the likelihood of individuals becoming victims of forced labour or child labour⁹.

Living wage is described as “enough to meet basic needs and to provide some discretionary income¹⁰” While it can be a complex and challenging process to ensure a living wage, David Jones is committed to promoting a living wage in our private-label supply chain.

Under our previous ownership, we had established a roadmap for Living Wage. During this reporting period, we engaged Pillar Two, a human rights consultancy, to support us in developing an updated roadmap to identify opportunities to further enhance David Jones’ approach to promoting a living wage as a stand-alone business.

While the project findings will be made available in early FY25, we commenced some work in FY24, including peer benchmarking and selecting key internal interview participants.

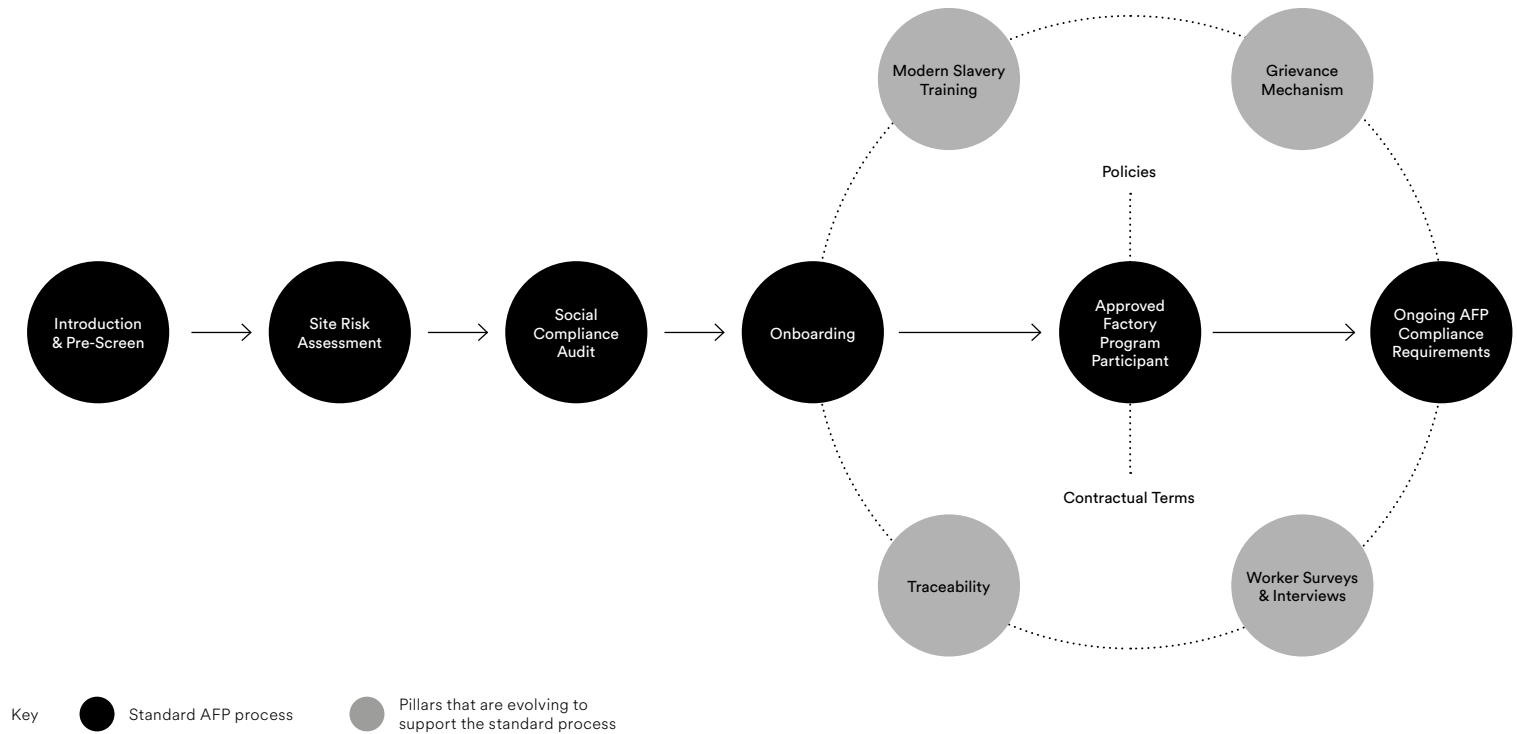
⁹ A living wage: a crucial tool in the fight against modern slavery | Walk Free

¹⁰ A living wage for workers | Ethical Trading Initiative

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

During this reporting period, we continued to review and strengthen our due diligence activities related to modern slavery risk management in our supply chain.

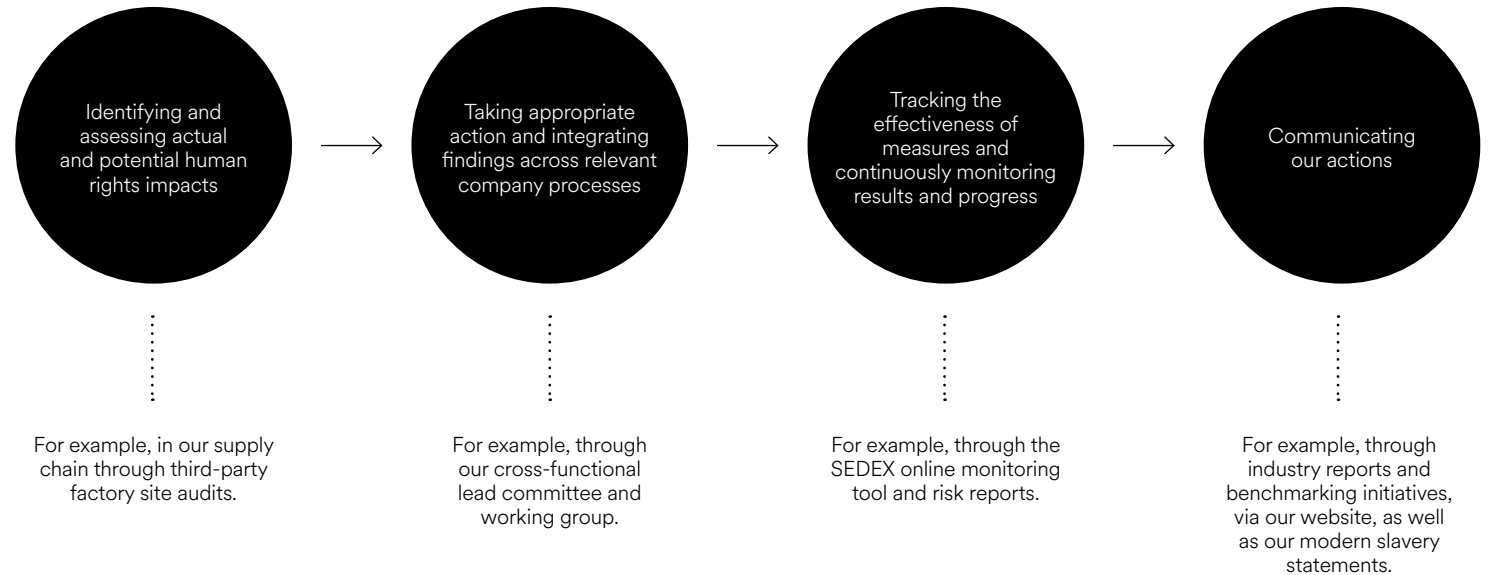
Figure 9: Risk assessment framework



6.4.1 Our Due Diligence processes to assess and address modern slavery 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: Risk assessment framework



David Jones is a member of SEDEX, along with many other global companies. We use this platform to improve our social compliance management for private label suppliers, including modern slavery risk management.

6.4.2 David Jones Approved Factory Program Overview

We recognise that our private label is the area in our supply chain where we potentially have the most leverage and therefore, where our own actions and decisions are more likely to influence the actions and decisions of our suppliers relating to modern slavery risk management. These private label suppliers also present a high risk that David Jones may be directly linked to adverse human rights impacts, including modern slavery. For this reason, we take several steps to manage modern slavery risks in our private label supply chain. This includes the Approved Factory Program (AFP).

The AFP is our due diligence process for private label suppliers and provides ongoing access to assessments of the factory sites that produce our goods. All private label suppliers must be onboarded to our AFP. This program requires suppliers to register their Tier 1 factories on the SEDEX platform, complete self-assessment questionnaires, and where required provide a social compliance audit that covers the fundamental principles within our Supplier Code of Conduct. These principles are aligned with the ETI (Ethical Trade Initiative) Base Code, which is an internationally recognised code of labour practice.

David Jones is a member of SEDEX, along with many other global companies. We use this platform to improve our social compliance management for private label suppliers, including modern slavery risk management. SEDEX is an online platform that houses social and ethical audit reports and responsible sourcing data on supply chains. The platform enables factories to share self-assessment and audit data with multiple customers, reducing the frequency of audits required, and making it easier for factories to manage their social compliance audits. SEDEX also provides a clear way to manage the corrective action tasks and share information on the progress suppliers are making on any issues raised.

Recognising that smaller suppliers and factories (such as those David Jones may only use seasonally) may struggle with cost and time to fulfil this requirement, David Jones initiated an offer to sponsor smaller suppliers in FY22, covering the cost of their membership in the first year as a way of encouraging participation on the SEDEX platform. While there was no uptake of the SEDEX sponsorship offer in the reporting period, we will continue to demonstrate our commitment to supporting and collaborating with our suppliers and nominate factories for sponsorship where needed.

Our AFP requires all private label suppliers above our set spend threshold to provide a valid full audit report for each of their Tier 1 facilities¹¹. We currently work on a two-year audit cycle and require updated audits for Tier 1 factories every two years from the initial audit date. Through these audits, factories are assessed to identify workplace conditions indicators that may lead to, or be a red flag for, modern slavery. This program provides our business and the suppliers' factories with clear corrective action plans to verify, remedy and close non-compliance issues.

These assessments are administrated and monitored by our Head Office Ethical Sourcing Team, and findings from these assessments are recorded and reported in both ad-hoc and regular reporting processes. The most critical issues (i.e. those where immediate interventions are required) are escalated to relevant stakeholders and our executive level for awareness, consultation and approval of resolution actions. Resolution may include termination of supplier relationships where required, but our aim is always to work with suppliers to resolve issues where possible.

In FY24 we committed to trial expanding our Ethical Sourcing Program to include select Non-Trade Procurement (NTP) suppliers through a pilot. Utilising our refreshed risk profile, we identified potential suppliers to include. During this phase, we learned that Sedex was in the process of updating their Service Providers SAQ in FY25, a key element of our trial. After careful consideration, we decided to delay the pilot so that the suppliers could complete the most up-to-date SEDEX SAQ.

¹¹ Tier 1 factory refers to the final stage in production

6.4.3. Approved Factory Program (AFP) in FY24

During the reporting period, we onboarded 26 new factories to the AFP, and made 20 inactive, as they were no longer used for David Jones Private Label production. As of 30th June 2024, all Tier 1 Private Label factories (across food and non-food) were registered with SEDEX. However, 3% of facilities had allowed their membership to lapse. In the instance where an audit was due to be submitted, we worked with suppliers to review their audit offline. We continue to work with suppliers to renew and keep their SEDEX memberships up to date.

Most of our factory base fulfilled the basic requirements of AFP, with 99% of food and non-food Tier 1 factories meeting our expectations as of 30th June 2024.

At the end of the reporting period, one (1) non-food private label factory was identified as having an overdue audit. Where we have not received an audit by the due date, we work closely and collaboratively with our suppliers to schedule an audit and have it provided within a mutually agreed timeframe.

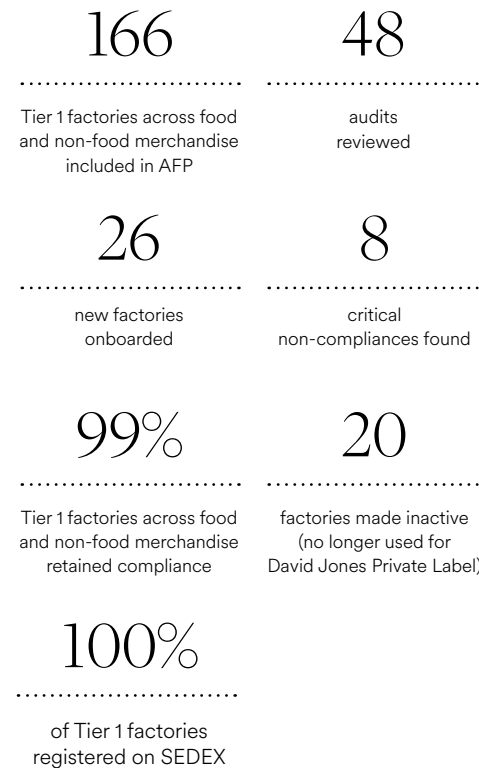
Despite the shortcomings associated with moment-in-time audits, social compliance audits remain an important tool for engaging our suppliers and factories.

In the reporting period, 48 social compliance audits (for existing Tier 1 factories), representing 29% of all factories were reviewed and assessed by the Ethical Sourcing Team. This is slightly lower than reported in FY23 (56 audits). We attribute this decrease to the audit cycle (the number of factories due for re-audits within their two-year audit cycle window) being different from year to year.

Where an audit is not required, we still at minimum 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 FY23 across private label¹²



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

- Utilising the Supplier Risk Assessment Tool (Radar) on the SEDEX platform, alongside our AFP onboarding process.
- Maintaining a Critical Issues Tracking tool where our Ethical Sourcing Team track critical issues within our AFP. The tool is then used during internal non-compliance meetings to monitor and drive remedial action with suppliers.
- Maintaining the de-registration list for factories that have been off-boarded due to unresolved critical issues or unresponsive to remedial actions. The list can then be used to crosscheck applications for new factories and to prevent relisting those deemed unsuitable and inappropriate based on historical evidence.

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

¹² Includes all categories of merchandise: Fashion, General Merchandise, Beauty and Food

6.4.4 Addressing critical issues identified through audits

In FY24, 8 critical non-compliances with our Supplier Code of Conduct were found during audit reviews in our AFP. The critical issues found in AFP Tier 1 factory audits included building/site maintenance, health & safety risk assessments and fire safety (fire alarms, evacuation, exits and electrical risk). 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 significant decrease in the critical non-compliances found during this reporting period (compared with 21 in FY23). This correlates to the decrease in audits undertaken and reviewed. In addition to a change in the total number of

critical non-compliances identified, we have noted a decrease in the number of non-compliance category types, for example, in FY23, our critical non-compliances were across 6 types of non-compliance categories whereas for FY24, all critical non-compliances were related to safe and hygienic working conditions.

With 5 critical non-compliances identified through an audit late in the reporting period, the percentage of closed critical non-compliances (within the reporting period) decreased to 25% (from 43% in FY23). However, it is important to note that these critical non-compliances, were closed within 12 months of the Ethical Sourcing Team identifying the non-compliance.

Case Study

Overtime Support



We know that working excessive hours is one of the most common labour standard problems in many parts of the world and is a complex and challenging issue to resolve. While we understand overtime is not considered a modern slavery practice, if left unchecked can lead to serious exploitation of workers in our supply chain.

During the reporting period, we engaged external expert support to ensure our approach to excessive work hours was effective and to provide us with some general guidance and recommendations on how to improve our approach. It was found that our approach was in line with our peers, which included understanding the root cause of such instances and setting expectations with suppliers. We will continue to work with suppliers to address issues of excessive work hours when they are identified through our supply chain partners.

Case Study

Beyond Tier 1

In 2017, David Jones began working towards increasing knowledge and visibility of its private label supply chain, beyond tier 1. The Ethical Sourcing team, requested suppliers provide information on their tier 2 facilities (inputs suppliers) and where known, tier 3 (raw materials production). The survey went out to 90 suppliers (across home, beauty, apparel, footwear and accessories) with approximately 77% participating in the survey. From the responses, we identified 408 facilities; 364 being tier 2 and 44 being tier 3 facilities. The information provided included facility name, address, product, processes (used in the facility) as well as any audit or other information (e.g. ISO 9001 & 14001 Certified).

While traceability in garment supply chains is complex, we wanted to build on the work that had previously been completed and commenced a review in FY24 to understand if any of the original data supplied was still accurate. This would allow us to continue tracing our garment supply chains.

We reviewed the list of suppliers and were able to determine which suppliers were still active. Based on our recent risk assessment refresh, we prioritised tracing our cotton supply chain. We also focused on active suppliers that produced private-label products using or were likely to use cotton.

Of the 90 suppliers that were included in the original traceability project, 22 were identified as still being active and were likely to use cotton in the private-label products they supply. We re-engaged these suppliers with a follow up survey.

With a supplier response rate of 86%, we confirmed that 65% of the data previously provided was still accurate, and sought updates where required. We were able to identify 146 facilities beyond tier 1, across 19 suppliers. For tier 2, we identified 126 facilities located across China (75%), Italy (18%), Pakistan (5%) and Bangladesh (2%). For tier 3, we identified 20 facilities located across multiple countries and 60% located in Pakistan.

While there is still much work to be done on traceability, we will be able to utilise key learnings from this exercise to build a streamlined process, focusing on other higher-risk areas, to trace our supply chain beyond tier 1.



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

For 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 both laws and David Jones standards;
- b) Provide David Jones with full contact details for any sub-contractors engaged or assisting in the manufacturing of the David Jones goods and/or any components of the David Jones goods so 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 depending on 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 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.

Case Study

Vendor Trading Terms Review

During the reporting period, a review of our Vendor Trading Terms (VTT) was conducted. This review led to several updates to key internal documents as well as improvements to existing processes. These changes enable more effective management of vendor relationships as well as continuing to meet legal and regulatory compliance requirements. With our VTTs referencing our Supplier Code of Conduct, suppliers continue to be made aware of our expectations related to modern slavery management.



Update

Digitised Supplier Application Form

During the reporting period, the automation of our supplier application process went live, significantly reducing the time taken to approve onboarding requests. A cross-functional working group was engaged to provide insight and support which resulted in a new streamlined process to reduce the administrative effort for team members and improve the experience for suppliers.

The new digitised application form removes the paper-based forms and improves the accuracy of our data capture. Reference to our Supplier Code of Conduct remains and now suppliers are required to check a mandatory field, confirming they have read and agree to our Supplier Code, a link to download the document is available as well.



6.5 OUR TRAINING AND AWARENESS RAISING

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

Case Study

Training Needs Analysis

Providing the right level of modern slavery training and awareness for our different workforce segments across the David Jones business is a key priority. To ensure that our workforce receives fit-for-purpose training relevant to their role, level and expectations, we undertook a comprehensive Training Needs Analysis (TNA) in FY24.

Working with key SME's and Lead Committee members, we collectively worked on the training needs analysis, which was broken down into the following elements, so we could pull together a fit-for-purpose and sustainable training plan:

Target Audience – Identifying the different workforce segments, levels and roles the training would be required for.

Objective – Articulation of what we are trying to achieve with the training for each workforce segment

Role(s) – Identifying the actual positions (if relevant) that aligned with each of the audiences.

Current State – Understanding what current training we have or had in place for different workforce segments and when this occurred to give us a view of the current state and criticality of learning.

Skills & Knowledge – A breakdown of what skills, knowledge and learning objectives may be required to learn to support the relevant behaviours we should expect to see. Each learning objective was assessed as High; Medium; or Low against each of the audiences to enable us to understand the need and method of training.

Need for Training – Identifying the overall need for training (High; Medium; Low) based on the accumulative view of the skills and knowledge assessment.

Training Recommendation – Assessing the type of training required based on the Need for Training outcome to close the knowledge gap (i.e. Face to Face; Virtual Workshop; eLearn; Statement & Awareness).

From this analysis, we were able to produce a specific, bespoke and detailed training plan. The TNA identified eight (8) different audience types that would require different levels of information, knowledge and learning. This included what the learning objectives were, the ideal method of delivery given the depth of learning need, and a proposal of the next steps. For example, it was identified that the Modern Slavery Lead Committee had high training needs and would benefit from bespoke training delivered face to face or virtually.

In the upcoming year, we will need to put training plans in place for the identified target audiences. We will continue to measure, monitor and ensure that the necessary training is developed and delivered.



In collaboration with the People & Culture team, we were also able to include a modern slavery statement and link to a short video in new starter onboarding e-learning modules.

Case Study

Targeted Training



Our Modern Slavery Lead Committee plays a critical role in mitigating our Modern Slavery Risk at David Jones. With new members joining the Committee in FY24, we prioritised training for this cohort.

David Jones engaged Pillar Two, a business and human rights advisory firm, to develop and deliver the bespoke training virtually to the Lead Committee. Prior to the session, the Lead Committee was provided with some eLearning set a foundational understanding before they participated in the 90-minute training session.

The session covered modern slavery definitions, legislation, our key risk areas and potential red flags as well as two hypothetical scenarios related to potential instances of modern slavery. The Lead Committee worked through the scenarios including exploring and testing the role and responsibilities of Lead Committee members and how David Jones would respond.

The session wrapped up with both groups coming together to share key learnings from the two exercises and a summary of key takeaways. Post the training session, we sent out a survey to Lead Committee members to understand if their learning needs were met. Of the participants that responded, 100% selected 'yes', confirming they were feeling more confident in applying their learnings. Regarding their knowledge and understanding of the subject matter, all participants responded that their knowledge had increased. On a scale of 1 to 5 (with 1 = low, 5 = high), data shows that, on average, participants rated the extent their knowledge had increased to four (4). The training was deemed as effectively meeting its objectives.

In FY23, it was announced that an updated e-learning module for team members was in development. We decided to pause the rollout of this until the Training Needs Analysis (TNA) was concluded, as part of our FY24 commitments, to ensure that we are prioritising and delivering training based on the needs of the different business functions across David Jones.

In collaboration with the People & Culture team, we were also able to include a modern slavery statement and link to a short video in new starter onboarding e-learning modules. This helped to increase the foundational level of awareness of expectations and behaviours that all team members in the David Jones business should demonstrate and follow.

During the reporting period, we were able to include a Sustainability module in the Merchandise Capability Foundations Program. The objective of this program is to build technical skills in buying and planning that set consistent standards and a benchmark across the junior merchandise cohort. This includes monthly learning modules for buying and planning team members, to build technical competency in our junior merchandise team. Through this Sustainability module, we were able to introduce modern slavery terminology, definitions and examples to establish a basic understanding of the topic.

We look forward to sharing more in future statements as we continue to roll out training to our team members.

6.6 OUR COLLABORATION AND STAKEHOLDER ENGAGEMENT

We understand that stakeholder engagement and collaboration are two of the key ways that we can increase our leverage and support our actions to drive progressive change. We therefore engage with 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 learnings and benefit by learning from others.

To build our understanding and capacity and refine our approach to managing our 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 (NRA) ESG committee.
- Engaged Pillar Two, a business and human rights advisory firm, to support us in making improvements to better manage our modern slavery risks.
- Facilitated team members to attend seminars and webinars on modern slavery and broader human rights issues.

- Signed the newly renewed International Accord and its country program (Bangladesh). Continued to stay informed and aware of remediations being conducted within relevant factories and remained connected through attending Accord Cluster and Brand Caucus meetings.
- Continued 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 5th Edition of the Chocolate Scorecard (retailer edition).
- Submitted the Baptist World Aid 2024 Ethical Fashion Report Survey. Continued consultation with peers, NGOs, multi-stakeholder initiatives (MSIs) and industry experts to understand further actions to assess and address modern slavery risks.
- Monitoring the Government's response to the recommendations outlined in the Independent Review of the Modern Slavery Act.

Through these associations and collaborations with external stakeholders, we have gained more confidence that our approach to identifying and addressing modern slavery indicators is on track. This has given us the opportunity to share our experiences with our peers as well as learn from them.

Update

Chocolate Scorecard



In FY24, we participated in the 5th Edition Chocolate Scorecard, a survey of the world's chocolate companies that aims to promote transparency, accountability, and responsible practices within the industry.

The new survey format specifically designed for retailers included more stringent questions and thresholds. It helped David Jones to identify gaps and opportunities for improvement, placing us in the 'first quintile' of the 5th Edition Chocolate scorecard key. Even though David Jones is a relatively small player in the global cocoa market, we remain committed to participating in industry benchmarking initiatives such as the Chocolate scorecard, recognising that transparency and disclosure is an important driver for improvement toward more responsible practices and industry.

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.

6.7 OUR GRIEVANCE MECHANISMS AND REMEDIATION

6.7.1 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 our 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 outcomes and remedies are provided.

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

Update

Comprehensive Complaints Mechanism Pilot

RMG Sustainability Council (RSC) is an independent, national, and tri-partite safety monitoring organisation for the Ready Made Garment (RMG) sector in Bangladesh. They implement the safety inspections and remediation program, safety committee and safety training program, and the complaints mechanism previously implemented by the Accord in Bangladesh.

During the reporting period, the RSC launched the Comprehensive Complaints Mechanism (CCM) Pilot Program aimed at expanding the

scope of the occupational safety and health (OSH) Complaints Mechanism in Bangladesh beyond OSH, to include complaints concerning:

- Freedom of Association and Collective
- Bargaining;
- Child Labour;
- Forced Labour;
- Discrimination;
- Minimum Wages, Benefits and Leave;
- Human Resources; Unfair Employment Contracts and Separation;
- Environment.

During the pilot program, the RSC will provide the CCM service to selected brands and factories. As signatories to the International Accord, two tier 1 factories that are used to produce David Jones Private Label products were selected to participate in the pilot.

With the pilot due for completion in August 2024, we look forward to receiving an update on the results of the program and potential implementation of the non-OSH program for all signatory brands and factories.



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

6.7.2 Our Grievance and Dispute Resolution Policy

David Jones is committed to our people and 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 about, and provide a fair and just working environment, by ensuring that team members have access to processes for the resolution of genuine personal grievances relating to the workplace.

The policy applies to all team members, including concession brand team members, visitors and persons engaged as contractors and applies 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 52 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 exploitation.

6.7.3 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 recognise that it is important that team members, suppliers and contractors have an opportunity to report their concerns safely, confidentially, and without fear of retribution.

David Jones provides this opportunity through our "Ethics Hotline". The Ethics Hotline is an important tool that we use to help 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 a facility for suspicious activities such as the following to be anonymously reported and investigated:

- 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 or suspicions of improper or illegal use and treatment of workers within David Jones operations 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 will analyse the information received and decide whether to conduct a formal and in-depth investigation of the matter. This includes whether to refer the disclosure to another person or body, internal or external to David Jones if that disclosure could be investigated or dealt with more appropriately. We have in place an escalation structure that ensures that in the event the complaint was to relate 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 those 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 12 concerns reported through our Ethics Hotline, which is a decrease from the 21 reported in FY23. The nature of these concerns pertained to workplace relations or personal matters only.

6.7.4 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 (UNGP). 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 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 to ensure 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 FY24, 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 understanding of issues and the challenging processes 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.

Update

Grievance Mechanism Webinar



In FY22 our Ethical Sourcing team hosted a grievance mechanism webinar for private label suppliers and their factories. Post the webinar a survey was sent to attendees to self-assess their current grievance procedures against the best-practice principles shared during the webinar. During the reporting period, we checked back in with these suppliers to see if those grievance mechanisms were still in place.

Reviewing the list of supplier attendees, we were able to determine that seven (7) suppliers were still active and from those 7, all were able to confirm grievance mechanisms were still in place.

In FY25, we will complete an internal review of grievance mechanisms across our operations and supply chain as outlined in our looking-forward commitments on page 44.

6.7.5 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 also 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, following 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 possible.

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 REVIEW OF OUR MODERN SLAVERY RISK MANAGEMENT

In FY23, David Jones undertook a review of the existing modern slavery risk management approach to understand if it continued to be fit for purpose as we transitioned to a stand-alone business, under new ownership. The purpose of the project was to identify gaps and opportunities in the UNGP aligned categories outlined below, and develop a roadmap to guide our response over the next one to five years:

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

Our risk management approach was reviewed against standards set out in the UNGPs, as well as a high-level review against external stakeholder expectations (including investors, civil society organizations and business partners).

The report outlined 18 recommendations (based on the gaps identified) to further strengthen David Jones' modern slavery risk management approach, with ten recommendations highlighted as key priorities. Priority areas included strengthening controls to better identify, manage and address our risks, as well as a focus on tracking effectiveness and building internal capacity.

This review helped us to understand key areas for improvement and determine key immediate and long-term actions and has formed the foundations of a five year modern slavery strategy that we continue to develop.

7.2 REVIEW OF OUR FRAMEWORK FOR ASSESSING EFFECTIVENESS

We understand that tracking effectiveness is important to determine whether our modern slavery risk management is fit for purpose, and to continuously improve our approach. In FY24, we engaged Pillar Two, an external human rights for business consultancy to review our effectiveness framework which included an assessment of our existing indicators, as well as our full risk management approach to develop a comprehensive set of qualitative and quantitative indicators. This aligns with expectations for companies to track the effectiveness of their modern slavery risk management set out in frameworks such as UN Guiding Principles on Business and Human Rights (UNGPs) and Australian Modern Slavery Act 2018 (MSA).

The draft review of the framework includes:

- Eight (8) key areas, with three (3) new focus points developed, including Governance and Board/Senior Executive engagement, supplier engagement, communicating on progress.
- The proposed indicators included a strategic mix of outcome and output measures, both new as well as updates to existing indicators.

While the assessment was completed in FY24, we continue to review the recommendation and will look to finalise the framework during the next 12 months.

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 FY24, we measured our effectiveness in key areas against the following indicators:

Table 7: Below are the measures we utilise to assess our effectiveness

Area	Objectives	Effectiveness indicators	Outcomes in the reporting period
Policies & 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 Ensure policies are meaningfully implemented Policies to provide modern slavery prevention and protection for workers against it 	<ul style="list-style-type: none"> Policies reviewed on regular basis (internal and external) Percentage of suppliers and staff covered by agreements/ contracts and our codes 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 page pages 21-22, 29.
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 page 11 & 31.
Awareness raising and capacity building	<ul style="list-style-type: none"> Modern slavery awareness training for internal staff and suppliers to ensure appropriate staff have knowledge of risks, prevention and remediation Improve external awareness and transparency relating to modern slavery risks 	<ul style="list-style-type: none"> Number of staff trained on modern slavery and broader human rights risks and review of feedback from training sessions* Number of suppliers trained on modern slavery and broader human rights risks External public assessments of our public reporting through NGOs or multi-stakeholder initiatives (MSIs) and any changes over time* 	Information on outcomes in the reporting period can be found on pages 22, 34-35.
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 Number of Non-Trade Procurement (NTP) suppliers who publish modern slavery statements Reviewing ethical audit data trends over time, including number and % of non-compliances by type* 	Information on outcomes in the reporting period can be found on pages 23, 29-30.

*new or updated indicator for FY24

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8.0 *Looking Ahead*

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

We have set out the following commitments to be implemented and progressed in FY25:

Table 8: Our FY25 commitments

Area	FY25 Commitments
Policy Commitment	Finalise and roll out refreshed Supplier Code of Conduct & Toolkit
	Review and benchmark draft Buyer Code of Conduct against peers and competitors
Identifying & Assessing Risks	Refresh our process to screen beyond Tier 1 and enhance traceability of our higher risk DJPL suppliers
	Complete trial to expand ES Program to include select NTP suppliers through a pilot
	Update the Request For Proposal (RFP) process to include Sustainability & Modern Slavery considerations
	Establish a supplier evaluation process that incorporates a sustainability dimension
Managing and Addressing Risks	Based on training needs assessment, develop and roll out targeted internal awareness program to key business areas
	Review current vendor agreement architecture to identify gaps and areas for improvement
Effectiveness & Communication	Integrate new qualitative and quantitative indicators to track progress and include in reporting
	Review current crisis management plan & assess if it can be used as tool to manage MS responses. Map gaps.
Grievance & Remediation	Complete internal review of grievance mechanisms and channels across business and supply chain

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

David Jones continues to closely follow the Government’s review and implementation of any recommendations from the statutory review of the Modern Slavery Act 2018 (Cth). We remain alert and agile to ensure our modern slavery risk management and reporting frameworks are adequate to potential future changes in the legislation as well as evolving stakeholder expectations. We are also cognisant of developments around modern slavery and broader human rights due diligence legislation globally and we will continue to monitor these to ensure we understand what this means for our operations and supply chains.

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 risk.

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 & 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 & 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 Slavery¹³

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 & Children's
Milana	Accessories - Women's & 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
EA	Enterprise Agreement
ESG	Environment, Social & Governance
ETI	Ethical Trade Initiative
FY	Financial Year
ICT	Information Communication Technologies
LC	Lead Committee
LRC	Legal, Risk & 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
SME	Subject Matter Expert
TNA	Supplier Code of Conduct
UNGP's	Training Needs Analysis
VM	Visual Merchandising
VTT	Vendor Trading Terms
WHL	Woolworths Holdings Limited

¹³ Definitions are as taken from the official Commonwealth guidance document, Australian Government Guidance for Reporting Entities.

DAVID JONES