



FREEDOM

MODERN SLAVERY STATEMENT 2024

2 October 2023 – 29 September 2024 | 5th Reporting Statement | Level 4, 1 Epping Road, North Ryde NSW 2113
Australia

www.greenlitbrands.com.au



About this statement

This is Greenlit Brands Pty Limited's fifth modern slavery statement under the Modern Slavery Act 2018 (Cth). This modern slavery statement covers Greenlit Brands Household Goods Pty Limited and Freedom Furniture Australia Pty Limited (Freedom), the reporting entities that are subsidiaries of Greenlit Brands Pty Limited, and extends to Freedom Logistics Pty Ltd (Freedom Logistics) and Freedom Furniture New Zealand Limited (Freedom New Zealand), both subsidiaries of Freedom. Freedom, Freedom Logistics and Freedom New Zealand are referred to as the Freedom Group.



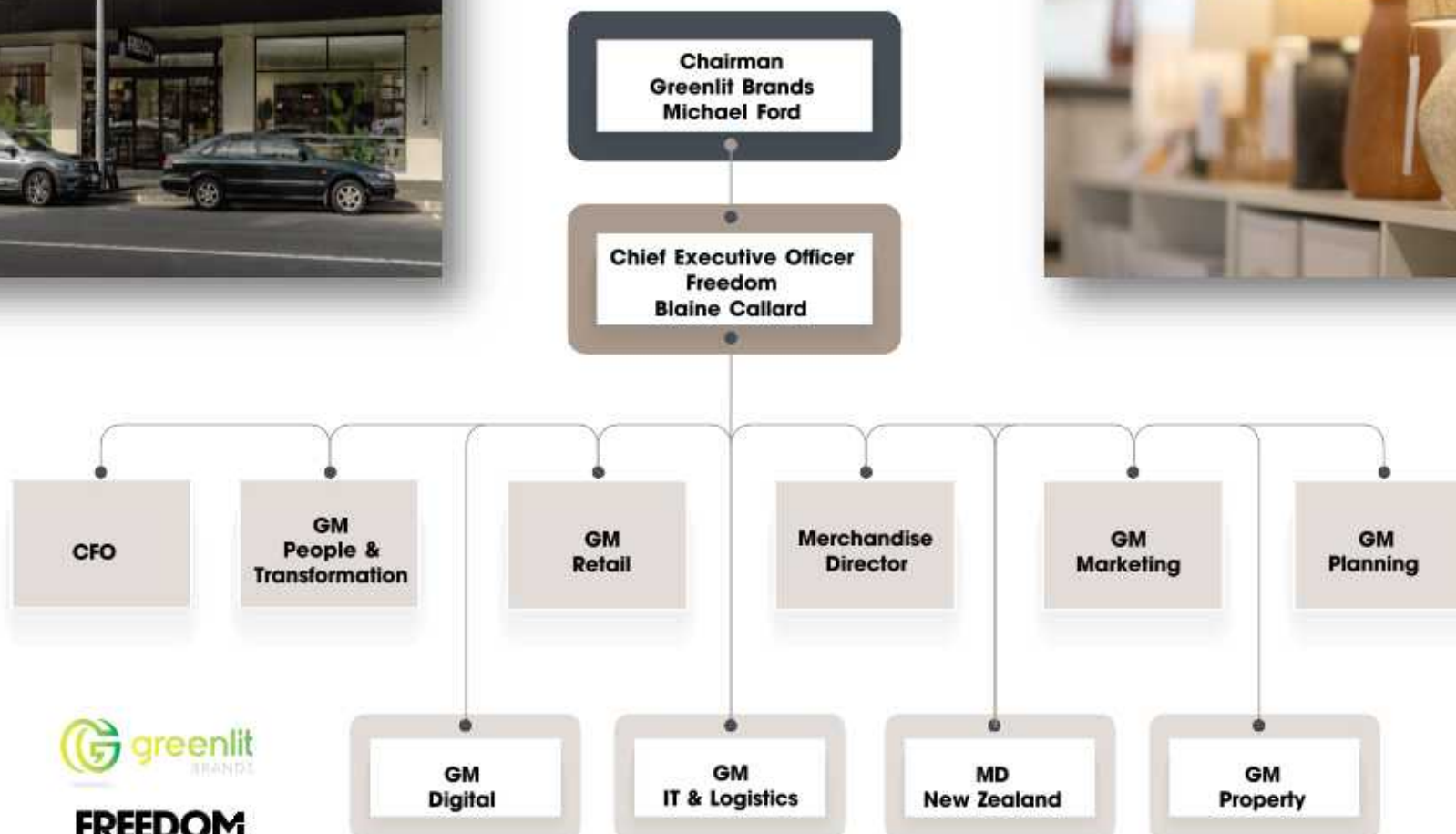
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Section 1 Leadership structure



Section 2

Our structure, operations and supply chains

Greenlit Brands Pty Limited and its subsidiaries (together the Group) is a retailer of household goods across Australia and New Zealand. The Freedom brand has been in operation for several decades. The Group sells a range of household consumer goods, including sofas, homewares, rugs, mattresses, bedding, upholstery, cleaning products, tables, and chairs. The Group operates the Freedom brand, both in Australia and New Zealand.

The Group is part of the IBEX Group (previously named the Steinhoff International Group) which is required to report under the United Kingdom's Modern Slavery Act 2015.

We operate in:

60 stores

6 distribution centres



The Group's premises are located throughout Australia and New Zealand. A range of services are provided to our operations from third parties. These third parties include cleaning services, waste services, property management, uniforms, transport and freight, security services, information technology services and products, communications and marketing, financial and superannuation services, and website and cloud storage.

The countries that we directly source and manufacture materials, products, and services from include Australia, New Zealand, China, Malaysia, India and Turkey. Our tier two and three supplier countries include Australia, China, Pakistan and Vietnam.

Section 2

Our structure, operations and supply chains

Freedom

Freedom Group's leadership team comprises of a Chief Executive Officer, a Chief Financial Officer, and General Managers in Marketing, People & Transformation, Retail Operations, Information Technology & Logistics, Digital, Merchandise, Planning, and Property. Freedom also has a Managing Director and Financial Officer for its New Zealand operations. The leadership team is supported by a General Counsel and Company Secretary. Freedom Group's leadership team is responsible for overseeing strategic objectives, operational requirements and initiatives for the Freedom Group.



Freedom Group operates 47 stores across Australia and 13 stores across New Zealand.

Freedom	Freedom New Zealand	Freedom Logistics
705 Full time/Part time	152 Full time/Part time	87 Full time/Part time
4 Casual	24 Casual	19 Casual
40 Company stores in Australia	11 Company stores in New Zealand	0 Factories
7 Franchise stores in Australia	2 Franchise stores in New Zealand	6 Distribution centers in Australia and New Zealand

Section 3

Risks of modern slavery in our operations and supply chains

Supply Chains

As with last year's report, the two main modern slavery risks continue to be forced labour and child labour in the manufacturing of products for retail sale or of raw materials such as textiles, foam, metals, timber, plastics and adhesives sectors, or associated sectors where the material is used in product manufacturing. The risk of corruption across material-sector- countries that we source from remains an issue. Notwithstanding the above, we recognise that modern slavery is not limited to these sectors, materials or countries, and can occur at any time and place.

The Group remains on the path of continual improvement. We are taking on-going steps to identify gaps in our management systems and supplier management systems aimed at addressing human and labour rights.

None of the audits this year raised specific concerns in our supply chain in relation to forced labour, debt bondage, child labour or human trafficking.



Operations

Beyond tier one operational supply chains there is a lack of visibility, including unknown contractors and sub-contractors.

As identified in last year's Statement, most of Freedom Group's trade supplies come through our offshore quality assurance and compliance partner, Blue Rock Sourcing Solution Limited (BlueRock). BlueRock is responsible for monitoring quality and compliance with all applicable laws in regards to the suppliers it manages on our behalf. Due to this relationship, Freedom does not have direct control over certain areas of quality assurance and compliance in its supply chain. However, the risk is mitigated (but not eliminated) through a detailed SLA between Freedom and BlueRock and frequent, on-going communications.

We believe the risk of slavery occurring in our non-trade suppliers is lower than it occurring in our trade suppliers. This is due to the fact that the vast majority of service providers we engage are in Australia or New Zealand. However, we recognise that modern slavery can still occur domestically. Industries particularly at risk are those that engage a high percentage of migrant workers, such as the cleaning services industry. Freedom started a review of the service providers it engages in this industry in FY24, which is continuing in FY25, to identify and address any modern slavery risks.

Section 4

Actions to assess and address modern slavery risks, including due diligence and remediation

In this section we outline Freedom's actions and priorities to remedy situations where they may cause, or contribute to, modern slavery or modern slavery risks. The specific actions addressed in this section include:

- Dedicated roles
- Training
- Internal management systems
- Supplier's management systems
- Supplier self-assessment questionnaires
- Social auditing

The Group is continuing to build its knowledge of modern slavery risks associated with the Freedom Group businesses and operations. As this knowledge grows, so too will the goals and targets of the business.

Dedicated roles to modern slavery

The allocation of time and resources to roles and the working group that are responsible for driving and implementing our actions in respect of modern slavery is critical to Freedom.

The Freedom Merchandise Director, and Chief Financial Officer, are responsible for compliance with modern slavery laws, with day to day responsibility held by the Merchandise Director and the Freedom Merchandise team with regards to trade suppliers, and the Chief Financial Officer and associated teams across the Freedom Group with regards to non-trade suppliers.

Freedom has moved its modern slavery monitoring from the Product Safety & Quality Committee to the newly formed Responsible Sourcing Committee, which is co-chaired by the Merchandise Director and Chief Financial Officer (or their delegate/s), and attended by the Quality Manager, Head of Merchandise Operations, Audit Supervisor, Senior Program Manager and General Counsel. All matters relating to modern slavery are discussed, monitored and addressed by this Committee.

Freedom's partner, BlueRock, will continue to be engaged to ensure there is deeper discussion and action across Freedom's supplier network. While it has not happened this year due to a change in personnel in the Quality Manager role, Freedom will ensure that in FY25 its Quality Manager spends time with key stakeholders and that regular meetings are held, an actions register is created and minutes documented in relation to modern slavery matters.



Our process for continual improvement

The Group remains alert to the real possibility of modern slavery occurring in its supply chains and operations. Further, we are aware of the need to ensure that modern slavery risks are handled delicately and in a manner that does not jeopardise anyone's safety. We are mindful of our obligation to contact local authorities in the event of any severe cases.



Section 4

Actions to assess and address modern slavery risks, including due diligence and remediation

Training

Freedom takes its responsibility to ensure staff and suppliers are aware of what modern slavery is and how to respond in incidences of modern slavery seriously. Modern slavery training was undertaken on an ad hoc basis by the Merchandise team and department heads in FY24. Freedom intends to ensure this occurs on a more formal basis in FY25. In this regard, Freedom intends to ensure formal training is rolled out more broadly across its staff members, and that its suppliers are also encouraged to undertake modern slavery training.



Internal management systems

Freedom has in place the following policies within its business:

- SpeakUp! (Whistleblower) Policy
- Grievance Policy
- Anti-Bribery, Corruption and Fraud Policy
- Appropriate Workplace Behaviour Policy

All employees are inducted in these policies during orientation. Further, all employees and a range of contractors are required to complete mandatory training (including refresher training) on their rights and obligations under the policies. The SpeakUp! Policy is available in staff public areas, such as amenities.

Freedom's online platform, called 'Workplace', is where team members can post issues, complaints, and/or improvements on day-to-day operations. Stores are also encouraged to log any incidents. The continued success of 'Workplace' has ensured that the gap between functions has been bridged, and it is easier for team members to express their feedback or concerns.

Last year, Freedom reviewed its trade supply agreement template to include new clauses dealing with modern slavery. The new agreement template has been rolled out across trade suppliers this year, and we will continue to do so in FY25.



Suppliers' management systems

It is important for us to understand our suppliers' management systems in order to mitigate and remediate modern slavery risks in our supply chains and operations.

The majority of Freedom's trade suppliers are managed through our partner, BlueRock. As with last year, BlueRock conducts factory audits on Freedom's behalf at the start of the relationship, performs ongoing quality checks before products are shipped, and makes periodic visits each year to the factories.

Supplier self-assessment questionnaires

A supplier self-assessment questionnaire or declaration is utilised by Freedom to improve communications, actions, and due diligence with our suppliers about modern slavery. The questionnaire helps Freedom gain an understanding of its supplier's policies, processes, and procedures regarding modern slavery, labour rights, human rights, environmental compliance, anti-corruption, and quality management.

Freedom continues to work with its partner to ensure that questionnaires are sent out to suppliers.



Social audits

A social audit by a recognised third party may also be conducted with respect to a trade supplier. This involves a combination of document reviews, interviews and observations that seek to understand the supplier's knowledge of modern slavery including what current procedures and policies they have in place.

The audits look at a supplier's social management system, worker's involvement and protection, the rights of freedom of association and collective bargaining, fair remuneration, decent working hours, child labour, bonded labour, and ethical business behaviour.

Freedom's partner provides third party social audits to Freedom on an ad hoc basis. This information is then used by Freedom to monitor modern slavery risks and encourage continuous improvement.

Section 5

Assessing the effectiveness of our actions

The Group recognises that modern slavery risk is ongoing. While there has been no evidence of modern slavery across Freedom's operations and tier-one suppliers in this reporting period, Freedom intends to continue to improve its practices around the identification and remediation of modern slavery risks in its supply chains and operations in FY25.

Dedicated roles and working group

Freedom established the Responsible Sourcing Committee in FY24, which will continue to operate throughout FY25 in order to address and monitor any matters relating to modern slavery.

Training

Freedom intends to create and roll out formal modern slavery training across the Merchandise Team, and the broader Freedom team members throughout FY25.

Internal management system

The Freedom Group implemented its Responsible Sourcing Framework in FY24, which addresses the roles and responsibilities in respect of modern slavery across the business. In FY25 the Freedom Group will roll out its Modern Slavery Policy and Process.

The new trade supplier agreement template which has been updated to reflect appropriate compliance requirements with regards to modern slavery will continue to be rolled out across remaining trade suppliers in FY25.

Supplier relationships

In FY25, our Modern Slavery Policy will be made available on our website and will be communicated to all suppliers and their employees across the Freedom network. The policy provides details of Freedom's confidential reporting hotline, SpeakUp!, where suppliers and their employees can report, anonymously if they wish, any concerns they have with regards to modern slavery matters.

The Group will continue to focus on collaborating and building engagement with suppliers.

The updated Freedom Supplier Code of Conduct and Questionnaire, addressing modern slavery risks, will be rolled out across the business. Number of questionnaires returned, and suppliers' responses, will continue to be monitored, and factory audits by our partner will continue to occur.

Social audits will continue to be conducted and action plans created throughout FY25.



Section 6

Process of consultation

The process of consultation to develop our modern slavery statement for the 2023-2024 financial year is outlined below:

- Freedom's merchandise, finance and legal departments commence process.
- The Freedom team engages with Greenlit Brands.
- Freedom appoints a project manager (Quality Manager) to collate information.
- Draft statement is sent to Greenlit Brands for review and editing.
- Final draft created from feedback.
- Board of Directors approve final draft in March 2025.
- The statement is submitted to the Australian Border Force,



This statement was approved in March 2025 by the board of directors of Greenlit Brands Pty Limited, which is a higher entity (as referred to in section 14 of the Modern Slavery Act 2018) of the reporting entities detailed herein. This statement is signed below by Michael Robert Stransham Ford as responsible member of Greenlit Brands Pty Limited.

Michael Robert Stransham Ford
Chairperson
Greenlit Brands Pty Limited

This statement is also signed by the Director of Greenlit Brands Household Goods Pty Limited, however his signature is not included as a responsible member for the governing body of the reporting entity.

Michael Robert Stransham Ford
Chairperson
Greenlit Brands Household Goods
Pty Limited

This statement is also signed by the Chief Executive Officer of Freedom Furniture Australia Pty Limited, however his signature is not included as a responsible member for the governing body of the reporting entity.

Blaine Callard
Chief Executive Officer
Freedom Furniture Australia Pty Limited