



**ALDI Stores**  
(A Limited Partnership)

# Modern Slavery Statement

2021



# A Word from Our CEO



**Tom Daunt**

CEO  
ALDI Australia

A handwritten signature in blue ink that reads 'Tom'.

This Statement was approved for the year January - December 2021, by the principal governing body of ALDI Stores (A Limited Partnership) on 6 June 2022.

Like most Aussies, I love starting the day with a coffee and some fresh fruit. However, some may not think about the journey these goods have been on and the people who have been involved along the way to get them to the supermarket shelves - from picking and processing, to packing and shipping.

As a business that sources commodities from all corners of the world, we understand our far-reaching impact. Responsibility is one of our core values. It is engrained in the way that we do business which is why we take a range of measures to protect those in our supply chain, both locally and abroad, from the threat of modern slavery.

In 2021, together with our business partners, we remained vigilant and continued to take steps to become more effective in identifying, reporting and reducing the risks of modern slavery in its many forms. With Slave-Free Alliance we conducted a Human Rights Risk Assessment and rolled out Modern Slavery Awareness Training to all our employees with sourcing responsibilities as well as merchandise suppliers. We also participated in a Senate Inquiry into Temporary Migration, where we shared insight into our fresh produce social monitoring practices.

In 2022 we anticipate COVID-19, natural disasters, inflation, the opening of borders and international political unrest will continue to disrupt supply chains. Our top priorities in 2022 are to:

- Implement Slave-Free Alliance's Human Rights Risk Assessments recommendations, including expanding the categories under our Social Monitoring Program
- Expand the Corporate Responsibility Supplier Evaluation Program into our homewares category
- Develop Responsible Purchasing Practices Training for our Buying department
- Introduce grievance mechanisms to high priority supply chains to enable workers to voice concerns in line with the ALDI SOUTH Group's Vision 2030 strategy
- Partner with Issara Institute to support our Thai food supply chains to remediate worker raised issues in collaboration with their employer

**Forced labour and the exploitation of vulnerable workers are abuses of basic human rights and have no place in our business or supply chain. I hope this third iteration of our Modern Slavery Statement sheds light on some of the issues and demonstrates ALDI's commitment to safe and fair working conditions.**

# Covered Entities, Structure, Operations and Supply Chains

## ALDI Australia Operations

This Statement was prepared by ALDI Stores (A Limited Partnership) ABN 90 196 565 019.

ALDI is a grocery retailer which offers 1,800 everyday food and household products.

We offer additional twice weekly 'Special Buys' which range from home and garden appliances to clothing and outdoor equipment.

## ALDI SOUTH Group

ALDI Australia is part of the ALDI SOUTH Group, however operates its business independently in order to cater to local consumer tastes and market expectations.

ALDI Australia:



**580**  
stores



**13,500**  
employees

ALDI SOUTH Group:



**6,500**  
stores



**11**  
countries

Despite autonomy of local management, ALDI Australia collaborates with Corporate Responsibility Departments within the ALDI SOUTH Group.

The ALDI SOUTH Group also has Corporate Responsibility offices in Hong Kong and Bangladesh to be closer to key sourcing countries.

## ALDI Operating Responsibly



Australia-first buying approach



Operations powered by 100% renewable electricity



Reducing plastic packaging by 25% by 2025



Committed to sending zero waste to landfill by 2025



## Partnerships with...



# ALDI's Supply Chain

## Our supply chain consists of:

- ALDI branded products
- Vendor branded products
- Fresh produce
- Fresh meat
- Goods not for resale (non-trade suppliers providing goods and services to support ALDI's operations)



In 2021 ALDI business partners sourced from production facilities in

**59**  
countries



ALDI supports our local business partner network of more than

**1,000**  
Australian businesses



Argentina	Czech Republic	Israel	Netherlands	Sri Lanka
Australia	Denmark	Italy	New Zealand	Sweden
Austria	Fiji	Japan	Norway	Switzerland
Bangladesh	France	Republic of Korea	Pakistan	Taiwan
Belgium	Germany	Laos	Philippines	Thailand
Bosnia and Herzegovina	Greece	Latvia	Poland	Tunisia
Brazil	Hongkong	Luxembourg	Portugal	Turkey
Cambodia	Hungary	Malaysia	Romania	United Arab Emirates
Canada	India	Malta	Singapore	United Kingdom
Chile	Indonesia	Mexico	Slovakia	United States
China	Iran	Morocco	South Africa	Vietnam
Cyprus	Ireland	Myanmar	Spain	

# Risks



**ALDI has an Australia first buying approach. Where we can't find the quality we are looking for locally, we will source our products from other countries. We recognise there is a risk of modern slavery in supply chains both locally and overseas.**

## Modern Slavery

According to the International Labour Organization and Walk Free Foundation, it is estimated that there are **4.0 million people** living in conditions of modern slavery and of these, 16 million are in forced labour in the private economy. Further, the Global Slavery Index by the Walk Free Foundation estimates that there are **15,000 people** in Australia living in conditions of modern slavery.

The Australian Government defines modern slavery as encompassing eight types of serious exploitation including:

1. Trafficking in persons
2. Slavery
3. Servitude
4. Forced marriage
5. Forced labour
6. Debt bondage
7. The worst forms of child labour
8. Deceptive recruiting for labour or services

# Risks

As a responsible global retailer, modern slavery risk in our operations and supply chains is something we take very seriously. ALDI identifies and assesses potential risk of modern slavery by reviewing country and industry risk indicators provided by expert organisations such as the Ethical Trade Initiative, International Labour Organization, and the Global Slavery Index. We also draw upon the findings of the third party and internal audits we review to identify incidents, risks and trends.

In particular, we use the amfori [Country Risk Classification](#) to assess country level risks. We have also added additional countries for specific categories where our experience has given us reason to re-assess local risks.

## We consider the following merchandise categories to contain potential risks for modern slavery:



Textiles



Shoes



Toys



Housewares



Electronics



Food  
(detailed list on page 10)



Alcohol



Pet food



Fresh produce



Meat

Over the years we have developed a strong understanding of the factors which contribute to a risk of modern slavery. Many non-food items require a high level of labour to produce, and in many instances this production only takes place in countries which are classified as high risk. Many of our sourcing countries do not have a strong rule of law and so legal mechanisms alone are inadequate to mitigate modern slavery risks. We know that modern slavery is a symptom of wider human rights vulnerabilities and we are constantly working to alleviate adverse impacts as detailed in the next section.



**Factors which contribute to modern slavery risk include employment of vulnerable workers, labour intensive work, migrant workers, temporary, seasonal and casual employment relationships, the use of labour hire firms, international recruitment, some conditions of specific temporary work visas and low minimum wages.**

# Risks

## Our Employees

We consider our ALDI Australia employees to be low risk for modern slavery. We pride ourselves on being acknowledged for how we treat employees as a recipient of the Employer of Choice award at the Australian Business Awards for the past three consecutive years.

## Australian Supply Chains and Operations

While Australia overall is considered a low risk country, fresh produce and fresh meat supply chains are identified as having a risk of modern slavery. Further to this, ALDI has identified operational modern slavery risk to exist in the use of labour-intensive contractor services, such as trolley collectors, cleaning services and construction.

## Australian Human Rights Risk Assessment

In 2021 ALDI commissioned Slave-Free Alliance to conduct a Human Rights Risk Assessment (HRRRA) of its Australian operations and supply chains. The HRRRA explored human rights risks, including modern slavery, in fresh produce, fresh meat and poultry, trolley collection, labour service providers, cleaning and construction supply chains in Australia.

Slave-Free Alliance conducted a desk review and interviews with ALDI employees and business partners. The HRRRA found factors that increase the risk of human rights violations in Australia include:

- Employment of migrant workers especially those with limited English language skills
- Labour intensive work
- Engagement of labour agencies given the lack of transparency due to subcontracting
- Seasonal and temporary work

**Recommendations from the Human Rights Risk Assessment will be prioritised in 2022.**



# Actions

## We have a number of stringent policies, procedures, and partnerships in place to help mitigate modern slavery risks and remediate issues when found.

All business partners producing a product that falls into one of the risk areas (identified in the previous section) are subject to third party and/or internal audits, reviews and questionnaires. We encourage proactivity and transparency and in turn support these partners with training and feedback to help them minimise risks and continually improve their operations.

### Strategy

In March 2021 the ALDI SOUTH Group launched our new International Corporate Responsibility Strategy [Vision 2030](#) with the ambitious vision of making sustainability affordable for our customers. Through our Vision 2030 we will continue to give our customers access to great products, and they can be assured that they have been responsibly sourced. Our Vision 2030 consists of four international focus areas - human rights, resource efficiency, zero carbon, and employer of choice.

We are committed to respecting human rights and improving living and working conditions throughout our supply chains. Our commitment encompasses any adverse impact on human rights that we might cause, contribute to or be directly associated with. We know that mitigating all sorts of negative human rights impacts is foundational to addressing the vulnerabilities that lead to modern slavery.

### Policies and Position Statements

The ALDI SOUTH Group has a number of policies which set out the company's commitment to maintain social standards in the supply chain. These include:

- [International Policy on Forced Labour](#)
- [ALDI Stores Supplier Standards](#)
- [International Policy Statement for Human Rights](#)
- [Corporate Responsibility Principles](#)
- [Child Labour Policy](#)
- [International Position Statement on Living Wages and Living Incomes](#)
- [International Gender Equality Policy](#)

## Our Vision 2030 is to use our buying power to respect human rights. This includes the following human rights commitments:



### Transparency in supply chains

We publish the addresses and number of employees of all our main production facilities used for the manufacturing of garment textiles and shoes [here](#).



### Partner for change

We will support long-term partnerships and impact-led collaborations to improve the livelihoods and working conditions for producers' rights within our high-priority supply chains.



### Public awareness

We will increase public awareness of the importance of human rights by being transparent about challenges and using our voice to advocate for change.



### Upholding human rights

We will work to ensure that the human rights of workers that contribute to our priority supply chains are respected and we strive towards improving their human rights if any issues are found.



### Integrate corporate responsibility into buying

We will use our buying power to respect and support human rights by making our buying practices more sustainable.



# Actions

## Social Monitoring Program

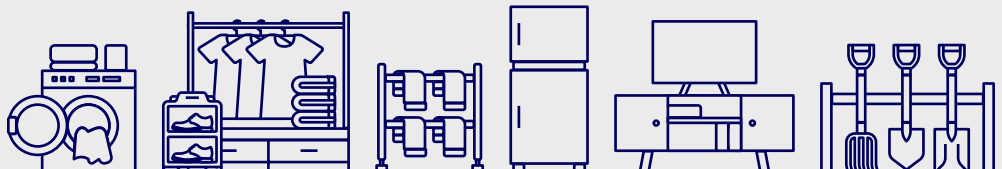
Our Social Monitoring Program promotes continuous improvement of working conditions in production facilities in our supply chain and monitors adherence to our ALDI Stores Supplier Standards. All production facilities in high risk countries and categories are required to have and maintain a valid third party social audit. These on-site audits, performed by independent social compliance auditors, are a key part of our Social Monitoring Program. ALDI recognises audits and certificates from the following standards:

- amfori
- Sedex Members Ethical Trade Audit
- International Council of Toy Industries
- SA8000
- Fair Wear
- Responsible Business Alliance
- BAP Enhanced Social Accountability
- Fair Farms

We review these audits and remediation is conducted when necessary.

Our Social Monitoring Program currently applies to the following categories where production takes place in a high risk country according to the amfori Country Risk Classification:

### All non-food categories (including store employee uniforms)



### Food categories include:

- Dressing, oils and sauces
- Fish and seafood (including frozen, chilled, fresh)
- Herbs and spices
- Canned food (fish, fruit, vegetables, meats, mushrooms)
- Potato products (processed and frozen)
- Frozen fruit and vegetables

### Final Production in Thailand Categories:

- Alcohol (this includes beer, wine, spirits etc)
- Soft drinks and juices (also includes water and coconut water)
- Frozen food
- Pet food
- Chips, snacks and nuts
- Rice
- Peanut and nut spreads
- Coffee



**In 2021 we reviewed and changed several processes in our Social Monitoring Program to increase effectiveness. The program was also enhanced with increased expertise and capacity added to our Hong Kong Corporate Responsibility office which are geographically closer to many of our key sourcing locations.**

# Actions

## Australian Fresh Produce Social Monitoring Program

ALDI has an Australia first sourcing approach for all our fresh produce. There is an increased risk of modern slavery in the fresh produce sector due to outsourcing work through the use of temporary labour service providers, and the increased vulnerability of temporary, seasonal and migrant workers. We continue to work with our business partners to monitor the supply chain's social standards. In 2021 we worked closely with business partners to remediate indicators of bonded labour through improved transparency.

We acknowledge the various challenges and supply chain disruptions our producers have faced in the past year to get food to our customers. Travel restrictions and border closures limited our ability to conduct some of our social monitoring activities in 2021 as auditors were often unable to visit sites.

## Corporate Responsibility Supplier Evaluation

The Corporate Responsibility Supplier Evaluation (CRSE) is focused on working with business partners and driving improvements through integration into our buying practices. Categories which fall under CRSE in 2021 were:

- Apparel
- Store employee uniforms
- Shoes
- Tuna (pilot program)
- Housewares (pilot program)

The fulfillment of our Corporate Responsibility requirements is a key criterion during supplier evaluation and selection in the above listed categories. Business partners are rated from A-D regarding key Corporate Responsibility topics, such as their support for and relationship with production facilities, and their human rights and environmental due diligence. To evaluate and support our business partners we ask them to participate in a series of activities including a Self-Assessment Questionnaire, ALDI Social Assessment and capacity building.

We take transparency seriously therefore we share CRSE results with the respective business partner. They are then able to use this information to develop plans and strategies to improve their social and environmental management systems. The ratings influence our buying decisions; business partners with a D rating have to improve their Corporate Responsibility performance. ALDI aims to understand the challenges that business partners face and support them to develop potential solutions. However if they do not demonstrate improvements over two consecutive years, ALDI will exit the business partnership.

The CRSE supports long-term relationships with those business partners who demonstrate a strong Corporate Responsibility record and provides incentives for continuous improvement. In our Vision 2030, we have committed to sourcing 80 per cent of our buying volume in high-risk supply chains from A and B rated business partners. Our A rated business partners are expected to continue their efforts year-on-year and focus on improvement measures to maintain their score.

## ALDI Social Assessments

ALDI Social Assessments (ASAs) are assessments of main production facilities that are carried out by ALDI employees together with external social compliance auditors and business partner representatives. These ASAs mainly take place in high risk countries as identified by amfori's Country Risk Classification, and also occur in countries where we conclude there is a high risk of human rights violations.

In 2021 our Corporate Responsibility offices in Hong Kong and Bangladesh facilitated 70 ASAs for production facilities which supply to our Australian stores.



# Actions

## Sustainable Sourcing of Cocoa, Coffee and Tea

To mitigate modern slavery and environmental risks within our cocoa, coffee and tea supply chains we require third party certification from either Fairtrade or Rainforest Alliance. 100 per cent of our own-label cocoa and tea, and more than 80 per cent of our own-label coffee is now sourced from certified supply chains.

## Cotton

By 2025, we will use 100 per cent sustainable cotton for our ALDI-exclusive garments and household textiles. The cotton will be of either recycled origin or certified according to internationally recognised sustainability standards such as Fairtrade and the Better Cotton Initiative. We also exclude cotton from countries that are systematically associated with human rights violations in any of our products. More information can be found [here](#).








## 2021 Actions

### Slave-Free Alliance Partnership

Together with Slave-Free Alliance, a social enterprise which supports businesses in working towards a slave-free supply chain, we implemented a range of activities including:

#### 1. Human Rights Risk Assessment

Slave-Free Alliance conducted a Human Rights Risk Assessment (HRRRA) of ALDI's Australian operations and supply chains. The HRRRA focused on product areas of:

-  Fresh produce
-  Fresh meat and poultry
-  Labour requirements in trolley collection
-  Cleaning
-  Construction

The HRRRA found the following factors increase the risk of human rights violations in Australia: migrant workers, limited English language skills, labour intensive work, labour hire firms, lack of transparency due to subcontracting, and seasonal and temporary work. We are working to implement the recommendations from the HRRRA in 2022.

#### 2. Modern Slavery Awareness Training for employees and business partners

We delivered a tailored training module to all our team members with sourcing responsibilities as well as merchandise business partners to help them understand risks, identify the signs of modern slavery, and take action to address them. The training included case studies, and passing an assessment was required in order to complete the module.

### Senate Select Committee on Temporary Migration

We participated in a Commonwealth Parliamentary Inquiry by appearing before the Senate Committee on Temporary Migration and shared our experience from our fresh produce social monitoring in Australia. We outlined the methods ALDI has in place to maintain high standards and how we place importance on working collaboratively with our business partners.

# Actions



## ALDI SOUTH Group

The ALDI Australia Corporate Responsibility Department works closely with the ALDI SOUTH Group's Corporate Responsibility International (CRI) Department. Our international supply chains benefit from our collective efforts on the below initiatives:

### Global Tuna Alliance

In May 2021 ALDI SOUTH Group partnered with the [Global Tuna Alliance](#). This partnership supports the sustainable development of our supply chains and ensures that the tuna ultimately meets the highest standards of environmental performance and social responsibility.

### Improving Incomes for Coffee Farmers

In July 2021 ALDI SOUTH Group began a four year project in Honduras which aims to help reduce the living income gap of coffee farmers by improving market access and coffee quality.

### Sustainable Nut Initiative

ALDI SOUTH Group is the first discount retailer to join the Sustainable Nut Initiative demonstrating the company's commitment to fostering fair working conditions and environmentally friendly production in the cultivation and processing of nuts. More information can be found [here](#).

### Brazil Nuts and Coffee Human Rights Impact Assessments

In 2021 ALDI SOUTH Group commissioned Human Rights Impact Assessments (HRIAs) to develop a deeper understanding of the actual human rights risks present in key food supply chains. These HRIAs help us build a detailed understanding of the potential positive and negative ways business activities can impact

internationally recognised human rights, such as working conditions, gender equality or land tenure. Our goal was to fully understand the areas where we could make a difference for workers in our supply chains. The HRIAs have been published in full so they may be used in the wider industry who share these human rights risks.

- [Brazil Nuts](#)
- [Coffee](#)

### Partnership for Sustainable Textiles

As a member of the Partnership for Sustainable Textiles, the ALDI SOUTH Group is active in the Partnerships initiative on living wages since 2019. We are working on improving our purchasing practices, as these can negatively affect the working conditions and wages in production facilities. As a first step, we conducted a purchasing practices assessment, involving our international buying, design and quality departments as well as direct and indirect business partners. The anonymous feedback on ALDI's purchasing practices allowed us to create a gap analysis and develop a comprehensive roadmap towards more responsible purchasing practices. In 2021, the ALDI SOUTH Group also joined the Partnership for Sustainable Textiles' "Living Wage Lab" together with 16 other members, including brands, retailers, trade unions and civil society organisations. More information on this initiative can be found [here](#).

**Comprehensive information about the Corporate Responsibility efforts of ALDI SOUTH Group can be found on our International Corporate Responsibility website [here](#).**

# Actions



## Grievance Mechanism

As part of our Vision 2030 we will introduce *grievance mechanisms* to at least three-high priority supply chains. The introduction of these mechanisms will enable workers in ALDI supply chains to speak up and voice concerns and complaints.

### Issara Institute

ALDI is partnering with the Issara Institute, an independent NGO based in Southeast Asia and the United States tackling issues of human trafficking and forced labour through worker voice, partnership, and innovation. Together we are also working on a pilot project to provide support to both workers and businesses in our supply chain. The collaboration and introduction will provide access to grievance mechanisms and remediation actions in ALDI's Thai food supply chains. The partnership is strengthening current processes and empowering workers to speak up if they have concerns about their working environment. It also helps ALDI to generate learnings on addressing potential barriers in accessing grievance mechanisms and remedies that workers are facing. Potential barriers are being addressed through remediating worker raised issues in collaboration with their employer, ALDI and the relevant business partner. For example, through building capacity to look into grievances, talking safely with workers or through other specific training provided by Issara Institute.

### Speak for Change Grievance Mechanism

The ALDI SOUTH Group is partnering with amfori to roll out their "Speak for Change" pilot grievance mechanism in Vietnam. By providing workers with access to a grievance mechanism, ALDI is upholding workers' human rights and actively contributing to continuously improve working conditions.

This project creates a trustworthy mechanism for workers in ALDI food and non-food supply chains to speak up and voice concerns and complaints. Moreover, we are also committed to investigating and resolving potential complaints together with our business partners.

The project was rolled out for all amfori certified factories in Vietnam in September 2021.

# Effectiveness

Effectiveness measurement is imperative to ensure we continue to reduce risk as well as prevent and remediate instances of modern slavery. We do this in a number of ways including:

- Through governance, we hold our responsible business units accountable for our corporate responsibility commitments and activities through regular reporting to our senior leadership team.
- Our Modern Slavery Awareness Training for buyers includes a test in order to complete the training module.
- ALDI Factory Advancement Project is an initiative we ran between 2013 and 2021 which strengthened cooperative working relations between workers and managers at production facilities that produce our textile goods in Bangladesh. An extension of the program in 2018 tackled the shortage of adequate childcare for working parents. The program was successful at improving communication in the workplace, supporting workers to understand their salaries, and ensuring a safer workplace. More details about the success of this project are published [here](#).
- In the context of Modern Slavery we identified seven indicators of bonded labour in 2021.

## 2021 Findings - Modern Slavery Indicators

We know our monitoring activities are working when we identify and remediate indicators of modern slavery. In 2021 our monitoring activities found indicators of modern slavery in seven production facilities which our team remediated in partnership with our business partners, and our teams in Hong Kong and Bangladesh as necessary. In three instances, after exhausting all attempts to work with business partners to remediate the situation, we blocked future use of a production facility when they were unwilling to remedy cases found. One facility has since conducted remediation sufficient that we are comfortable to use it again. All seven incidents were remediated and the cases were closed by the end of the year.



## Case Study - Indicator of Bonded Labour

An unannounced ALDI Social Assessment in a production facility detected an indicator of bonded labour as well as coercion and harassment of workers. The interview with workers conducted as part of the audit found that production management withheld identity cards to coerce unwilling workers into working overtime. Further to that, some workers were forced to resign due to a failure of the facility to meet production targets set by the General Manager of the production facility.

ALDI's Corporate Responsibility team worked with our business partner to remediate the situation and improve conditions for

workers at the production facility. Unfortunately, the management of the production facility weren't open to working with us to rectify the issue so ALDI Australia and all companies in the ALDI SOUTH Group blocked the use of the facility. At our request, our business partner moved production of our product to another compliant facility.

# Effectiveness



## Case Study - Indicator of Bonded Labour in Australian Fresh Produce

A routine social audit found that seasonal worker accommodation provided by a third party company had terms and conditions which appeared to tie workers to their employer, complicating their freedom to resign. ALDI and the auditor had constructive conversations with the business partner about our concerns that this could be considered an indicator of bonded labour. The accommodation forms were updated to remove any reference to the term of employment in order to better communicate to workers that their employment obligations are entirely separate to their accommodation contract. The auditor then validated and confirmed to us the changes made in the accommodation terms and conditions.

The business partner also recognised there was a gap in their human resources and put in place more staff, policies and systems to ensure that they are better able to detect and remedy any issues in future.

## External Assessments

ALDI's performance in social monitoring and corporate responsibility is periodically evaluated and reported on by multiple governments, non-governmental organisations and other civil society groups. We value the work of these entities to drive improved performance across our industry and organisation. In 2021 ALDI was evaluated and compared to its competitors in the following publications:

## Assessment Feedback



The Independent Reviewer under the [Food and Grocery Code of Conduct](#) reported:

"If there was an award for which Code signatory 'always treats suppliers fairly and with respect', the winner would be ALDI - by a considerable margin."



In the Be Slavery Free [Easter Chocolate Shopping Guide](#) we were recognised for our contribution to best practice. ALDI also featured in their [Supermarket Seafood Shopping Guide](#) in 2021.



Baptist World Aid's [Ethical Fashion Report](#) rated our efforts to address the risks of modern slavery and environmental impacts in our apparel supply chain. We maintained a B rating this year.



ALDI Australia was awarded Employer of Choice at the [Australian Business Awards](#) 2019, 2020, and 2021.

# Consultation and Related Activities

## Consultation

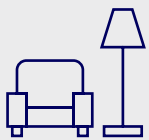
Throughout the development of this Modern Slavery Statement, the senior leadership of relevant business units from entities we own and/or control were consulted.

ALDI's ongoing actions and commitments to address modern slavery are tabled and presented at the Managing Director's Meeting each June. In addition, information is shared as relevant to the responsible business units throughout the year. Our Managing Director Buying oversees the implementation of our commitments and policies to identify and mitigate human rights risks, including modern slavery, within our supply chains.

In addition, our Buying, Procurement and Property Departments undertook training on Modern Slavery, this included relevant case studies and an assessment. This training was designed by Slave-Free Alliance to help employees understand risks, identify signs of modern slavery, and take action to address them.



## Activity Planned in 2022



Corporate Responsibility Supplier Evaluation will continue to be expanded into homewares.



Responsible Purchasing Practices Training will be rolled out to buying teams responsible for apparel and shoes.



Recommendations from the Human Rights Risk Assessment Slave-Free Alliance conducted in 2021 will be implemented.



# Statement Annexure

## Principal Governing Body Approval

This Modern Slavery Statement was approved by the principal governing body of ALDI Stores (A Limited Partnership) ABN 90 196 565 019 as defined by the Modern Slavery Act 2018 (Cth) on 6 June 2022.

## Mandatory Criteria

The following table indicates the page numbers of the statement that addresses each of the mandatory criteria in section 16 of the Modern Slavery Act.

Mandatory Criteria	Page Numbers
a. Identify the reporting entity.	3
b. Describe the reporting entity's structure, operations and supply chains.	3-4
c. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	5-7
d. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	8-13
e. Describe how the reporting entity assesses the effectiveness of these actions.	14-15
f. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls.	16
g. Any other information that the reporting entity, or the entity giving the statement, considers relevant.	16

