



2024

# Modern Slavery Statement.



Winc Australia Pty Limited (ACN 000 728 398), along with its related bodies corporate ('Winc'), is one of Australia's leading suppliers of workplace solutions. We take our ethical and social responsibilities very seriously and recognise our role in ensuring ethical conduct and sourcing throughout our supply chain. As a result, we are actively working with our suppliers to track, measure and improve social and ethical performance.

This Statement has been prepared in accordance with the Modern Slavery Act 2018 (Cth) ('Modern Slavery Act') and provides details of the measures Winc has taken to identify and mitigate the risks of modern slavery in our operations and supply chains during the reporting period 1 January 2024 to 31 December 2024.



## Acknowledgment of Country.

In the spirit of reconciliation, at Winc, we acknowledge Australia's First Nations Peoples as the Traditional Custodians of the land on which we conduct our business. We pay our respects to Elders past, present and emerging. We are committed to honouring the unique cultural and spiritual relationships our First Nations Peoples have to the land, waters and seas, and their cultural contribution to society as the oldest continuing cultures in the world.

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## A message from Peter Kelly.

Taking action to trade ethically and protect human rights in the procurement of goods and services on behalf of our customers is incredibly important to Winc. We understand we play a vitally important role in the supply chain of many organisations around the country. That is why ethical sourcing is one of the six pillars of our Winc Social Agenda with tangible, measurable goals to guide our actions and drive our progress.

This Statement sets out the progress achieved during the reporting period in addressing the risks of modern slavery in our operations and supply chain. During the reporting period we have:

- Continued to work with Low-risk Own Brand sites to complete annual Self-Assessment Questionnaires (SAQs) to verify risk status
- Worked with all Own Brand High and Medium-risk sites to conduct independent physical audits, with swift and appropriate action required to address any critical non-compliances identified on a 12-month audit cycle
- Used Informed 365 to collect and analyse National Brand supplier data to determine the maturity of suppliers in managing modern slavery risks in their supply chains
- Provided tailored training, guidance and resources to help suppliers develop a deeper understanding of modern slavery risks and implement effective risk management strategies where gaps are identified

Our company values are fundamental in all our business operations, one of which is to be accountable for today and tomorrow. Putting in place real action to reduce the risk of modern slavery in all its forms is an integral part of this value.

Winc and its related bodies corporate are committed to building on the progress set out in this Statement and we will continue to work together with our suppliers to double down on our efforts.

This Statement has the full support of Winc's relevant stakeholders and has been approved by the Board of Directors of Winc Australia Pty Limited in their capacity as the principal governing body of Winc.



**Peter Kelly**  
Chief Executive Officer

Winc Australia Pty Limited



**Troy Swan**  
Director, General Counsel and  
Company Secretary

Winc Australia Pty Limited



In addition to the information contained in this Statement, our ethical sourcing targets and latest progress can be viewed in our Winc Social Agenda Report by scanning this QR code.





# Winc’s Approach to Modern Slavery.

As one of Australia’s leading workplace supplies providers, Winc recognises the importance of managing the risks of modern slavery within its supply chain.

Governance and oversight, led by the Group General Counsel and Company Secretary, ensure clear accountability across the business. In collaboration with Winc’s Legal Team, the Ethical Sourcing Team actively manages modern slavery risks through regular monitoring and reporting.

Winc partners with suppliers to identify and mitigate potential risks, offering education, training and support in developing ethical sourcing policies. By working closely with suppliers and stakeholders, the company strives to ensure its sourcing practices positively impact both society and the environment, upholding the highest standards of ethics and professionalism.

## Our Committees & Corporate Governance.

Winc’s Modern Slavery Statement reaffirms Winc’s commitment to combating modern slavery across all entities under its control. This commitment is upheld through a robust governance framework, encompassing policies, procedures and programs overseen by key leadership bodies, including the Group General Counsel and Company Secretary, the Winc Social Agenda Committee and the Executive Leadership Team.

Winc adopts a proactive approach to addressing modern slavery risks, engaging with all entities under its control—including related bodies corporate and affiliated entities—to identify potential risks and implement effective mitigation strategies. This collaborative effort ensures a coordinated and comprehensive response across the organisation.

The Ethical Sourcing Team plays a critical role in this process, working closely with key departments to assess activities during the reporting period. By consulting with various teams, Winc identifies potential areas of vulnerability and refines its strategies accordingly.

Additionally, the Ethical Sourcing Team contributes to the development of the Modern Slavery Statement, ensuring it accurately reflects the company’s efforts and achievements in addressing modern slavery.

To fulfil its commitment, Winc collaborates with essential departments, including Category, Supply Chain, Sales, Legal and Human Resource. These teams drive the implementation of initiatives aimed at mitigating modern slavery risks and fostering ethical sourcing practices. The Ethical Sourcing Team works closely with the Category Team to ensure suppliers comply with ethical standards and partners with the Legal Team to keep ESG policies up to date and establish appropriate procedures for handling and investigating potential modern slavery risks.

Furthermore, Winc’s Group General Counsel and Company Secretary actively participate in the Social Agenda Committee to ensure compliance with legal and regulatory obligations related to labour rights and modern slavery. This role also supports risk assessment and management, reinforcing Winc’s adherence to ESG policies and its Code of Conduct.

Through a proactive, collaborative and structured approach, Winc integrates ethical sourcing practices throughout its operations, ensuring accountability at all levels of the organisation.

Board	Board of Directors		
Management responsibility	Group General Counsel Company Secretary	Executive Leadership Team	Social Agenda Committee, chaired by Group HR Director
Business Processes	<b>Ethical Sourcing Team</b> Responsible for the implementation of our modern slavery mitigation program.	<b>Human Resources</b> Responsible for ensuring employees are subject to relevant awards or industrial instruments.	<b>Legal Team</b> Responsible for responding to our whistleblower grievance mechanism.
	<b>Category Team</b> Responsible for the day-to-day management of supplier relationships and supporting the implementations of modern slavery risk management across our supply chain.	<b>Supply Chain Team</b> Responsible for day-to-day interactions with suppliers for stock replenishment and identification of modern slavery risks within our operations and supply chain, consistent with company values.	<b>Operational Team</b> Responsible for the identification of modern slavery risks within our operations and supply chain, consistent with company values.
Stakeholders	Government, regulators, investors, shareholders, employees and the community		

## Our Policies.

Winc endeavours to engage with staff and suppliers who are aligned with the principles of dignity, respect and compliance with relevant laws and environmental sustainability practices in their work practices and operations. In line with this commitment, every stakeholder is required to adhere to Winc's policies and procedures. This policy fosters a culture of transparency, honesty and fairness, outlining the mutual responsibilities of Winc and its suppliers in upholding high ethical standards. It emphasises suppliers' obligation to prevent and mitigate any potential violations of the Winc's Ethical Sourcing Policy, which encompasses provisions addressing modern slavery and underscores Winc's dedication to human rights and ethical sourcing.



### Code of Conduct

At Winc, we have a purpose to help every Australian achieve a better work-life. The Code of Conduct (and related policies and procedures) guide us on doing what is right. No team member is exempt from the Code. The Code of Conduct applies to all of us and establishes the principles our business believes in and the parameters in which we conduct business.

### Working Together Respectfully

Winc is a diverse, inclusive and respectful workplace, and we are committed to maintaining this. We maintain a safe and inclusive working environment where we treat each other with respect. We are committed to fostering a workplace environment and culture where all team members can feel free to be themselves without fear of bias, labels or negative behaviour.

### Anti-Corruption Policy

This Policy supplements our Code of Ethics and explains our requirements to help prevent bribery and corruption with the OECD Anti-Bribery Convention in Australia and other applicable laws. Winc does not accept any excuse for behaving unethically, failing to comply with this policy or violating the law. Winc's Group General Counsel and Company Secretary, who is a member of Winc's Executive Leadership Team, has established this policy to make it easier for employees and other individuals acting on our behalf to identify and deal with some of the potential grey areas that could jeopardise our business interests and relationships if not handled properly.

### HSEQ Policy

At Winc, we value the health and safety of all our employees, contractors, customers, the communities, and the environment in which we operate. Our goal is to ensure everyone goes home unharmed. That is the fundamental obligation we have to every employee, and it is an essential building block of Making Winc a Great Place to Work. As such we will ensure our management practices safeguard against adverse health, safety, environmental, or quality (HSEQ) impacts arising from our decisions, actions or behaviours.

### Whistleblower Policy

Managed by Winc's Group General Counsel and Company Secretary, the purpose of this Policy is to encourage the reporting by an Eligible Whistleblower of anyone suspected of fraud or corrupt conduct or any other form of improper behaviour, including, but not limited to, breaches of the Code of Conduct or Ethical Sourcing Policy which refer to modern slavery and other human rights violations (reportable conduct).

### Winc Ethical Sourcing Policy

Our Winc Ethical Sourcing Policy is guided by the UN Human Rights Declaration, the ILO Convention on labour standards and the Ethical Trading Initiative Base Code which sets out key requirements to be followed by our suppliers as a condition of doing business with Winc. The Policy must be implemented in conjunction with local applicable laws and will be regularly audited during inspections.

### Winc Ethical Sourcing Risk Management Procedure

This document covers the Ethical Sourcing Team's risk management plan for recognising and eliminating modern slavery risks through long-term partnership and collaboration between businesses, not-for-profit groups and governments.

# Our Workforce.

Winc employs over 1,000 employees directly, which allows for direct visibility of employment terms and conditions regulated by Australian and New Zealand employment laws and modern awards.



Our head office is located in Mascot, Sydney with a corporate office in Melbourne



We operate from 20 locations across Australia



Erskine Park is our National Distribution Centre (NDC)



We have mid-size Distribution Centres in Melbourne, Brisbane and Perth and smaller regional Distribution Centres in Hobart, Darwin, Adelaide, Townsville and Canberra



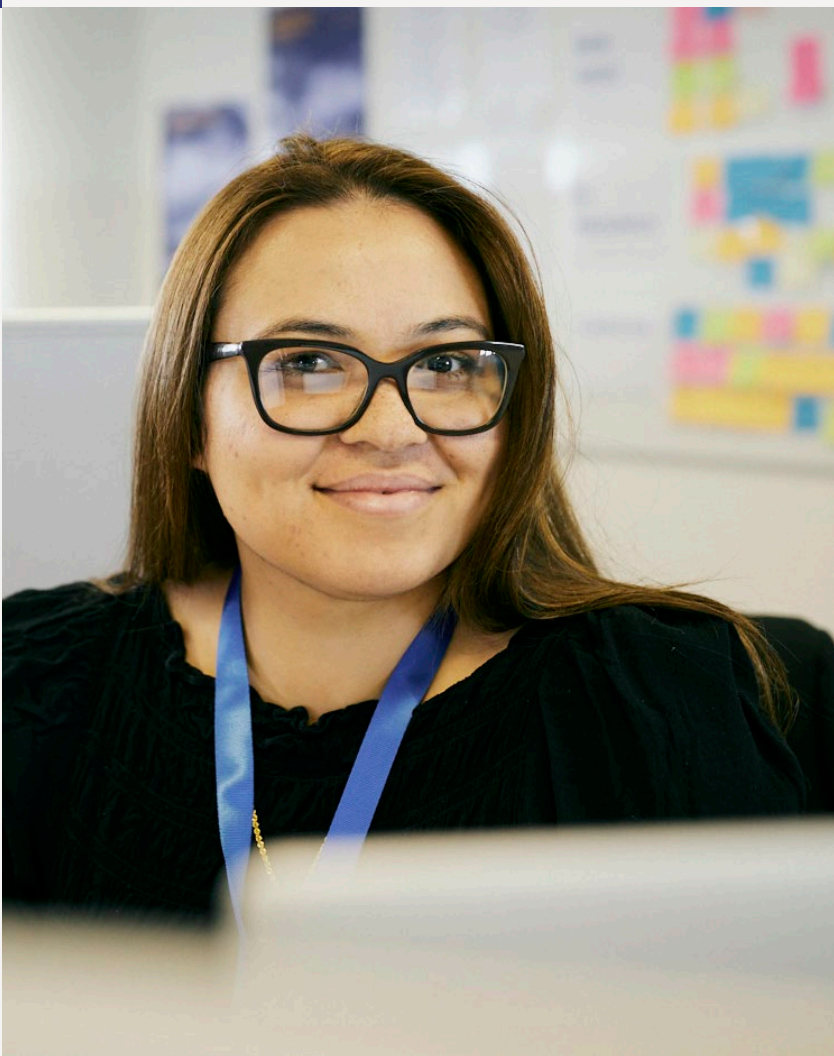
At **50%** representation, men and women hold senior leadership positions in equal measures at Winc.

**2%** of team members identify as First Nations.

**55%** of internal promotions between 1 January 2024 and 31 December 2024 were female.

## Our team members are:

Permanent full-time	Permanent part-time
<b>92%</b>	<b>7%</b>
Fixed term	Casual
<b>1%</b>	<b>0.4%</b>





## Direct workforce processes.

The percentage of Winc's directly employed workforce engaged in warehouse operations or transportation duties is 32%. At Winc, we maintain an uncompromising, organisation-wide commitment to safety and wellbeing, placing paramount importance on all aspects of Health Safety and Wellbeing.

In 2024, we conducted over 7,300 Proactive Safety Interactions, encompassing leader-led safety walks, safe act observations, safety committee meetings, workplace inspections and Chain of Responsibility (CoR) checks. These initiatives ensure that safety remains a constant focus throughout our operations.



### Safety at Winc.

At the end of December 2024, there has been a **64% reduction in injuries** requiring medical treatment since April 2020.

## Here are some of the safety initiatives implemented by Winc in 2024.

- 477 random and for cause Drug & Alcohol tests have been conducted across our sites throughout 2024 with a zero-tolerance approach. This is in addition to pre-employment testing conducted for all new warehouse operations team members and casuals.
- The continued development and training of 10 Authorised Manual Handling Equipment (MHE) Trainers as we further embed our National MHE Framework at all Winc sites.
- Free flu vaccinations were offered onsite in five locations in April and May 2024, with vaccination vouchers offered to all other employees. In all, 252 free flu vaccinations were facilitated.

According to Winc's latest employee engagement survey, 90% of team members believe their manager has a genuine care for their safety and wellbeing. We prioritise mental health by providing access to confidential counselling services through the Converge International Employee Assistance Program.

In 2024, Winc continued to train leaders in Mental Health Mastery. We have now trained 222 Leaders equipping them to identify and support team members facing mental health challenges, fostering psychological safety within the organisation. To support a safe and mentally healthy workplace, Winc provided 4,500 hours of safety training in 2024, including Mental Health Mastery for every people leader.

To ensure fair remuneration, Winc conducts annual pay reviews aligned with market and minimum wage standards. Employees and independent contractors are encouraged to join unions voluntarily. For employees covered by Enterprise Agreements, pay rates and conditions are determined accordingly. Shift workers and casual employees have rostered working hours to prevent excessive overtime. The youngest permanent Winc employee is 19 years old.

Additionally, Winc engages casual labour in Distribution Centres to manage demand fluctuations. Service agreements with casual labour providers include robust clauses ensuring compliance with modern slavery laws and mandatory reporting, underscoring Winc's commitment to ethical labour practices.



## Indirect workforce processes.

### Labour hire.

Throughout the reporting period, Winc maintained its due diligence processes concerning the hiring of labour through agencies. In 2024, workers hired via six agencies were engaged across all sites. These workers, employed through Labour Hire Providers (LHPs), operate under the stipulations outlined in relevant Industrial Enterprise Agreements with their health and safety managed per work health and safety regulations.

Winc maintains a documented legal agreement with all LHPs, clearly defining the responsibilities and obligations of each party regarding worker welfare.

All individuals engaged indirectly through an agency receive compensation that is at least equal to or above the pay rates outlined in the relevant Modern Award or applicable Enterprise Agreement.

### Contracted workforce.

Winc engages suppliers for essential services such as cleaning, security and maintenance. Many of these suppliers employ low-skilled and migrant workers who are more vulnerable to exploitation due to factors like limited education, unfamiliarity with workplace regulations, language barriers and lack of support networks. Additionally, some may face challenges related to their immigration status, making it harder for them to report concerns.

To mitigate these risks, Winc actively monitors service suppliers in Australia. During the reporting period, we continued to review our cleaning providers and implemented enhanced controls for procuring labour services.

As part of our ongoing commitment to ethical labour practices, Winc introduced a formal Ethical Sourcing Policy Acknowledgement system as part of the site induction process for all contractors visiting Winc sites. This initiative strengthens our oversight and ensures that all service providers align with Winc's ethical standards, promoting transparency and responsible business practices throughout our supply chain.







## Case Study: Enhancing Worker Safety and Efficiency in the Supply Chain.

### Background.

Worker safety and efficiency are critical considerations in Winc's supply chain operations. A key challenge was identified in the handling and unloading of import shipments that were delivered in loose containers that required manual handling. This presented significant risks to workers, including manual lifting strains that increased the risk of workplace injuries and damaged stock. It also required more time to unload each carton.

### Challenges Identified.

- 1. Hand-Loading Risks:** In cases where shipments were hand-loaded directly into containers, the lack of stability during transit led to shifting stock, increasing the risk of accidents and injuries during unloading.
- 2. Manual Unloading Injuries:** Workers involved in manual unloading faced increased strain, leading to musculoskeletal injuries and overall inefficiencies in warehouse operations.

### Implemented Changes.

To improve worker safety and streamline operations, Winc implemented the following solutions:

- **Switching Hand-Loaded Containers to Palletised or Slip Sheet Loading:** This change ensured greater stability during transit, reducing the risk of shifting stock and making unloading safer for workers.

### Outcomes and Impact.

- **Improved Worker Safety:** Reducing manual handling and unstable stock significantly decreased the risk of workplace injuries. Workers at both ends of the supply chain now face fewer hazards related to lifting, shifting stock and broken pallets.
- **Enhanced Efficiency:** The shift to palletised / slip sheet unloading improved operational efficiency, reducing unloading times and increasing throughput.
- **Better Product Integrity:** Stabilising shipments reduced shifts in transit making unloading safer.

### Conclusion.

By prioritising worker safety and efficiency, Winc successfully enhanced the working conditions in its supply chain. The transition to palletised / slip sheeting and mechanical unloading not only improved operational performance but also demonstrated a strong commitment to ethical sourcing and worker wellbeing. This initiative serves as an example of how thoughtful logistical changes can create safer and more sustainable supply chain practices.

# Our Supply Chain.

Winc provides customers with a diverse range of product categories, including office products, kitchen essentials, health and safety supplies, cleaning and hygiene products, educational resources, technology, furniture and packaging supplies. Additionally, we offer comprehensive solutions ranging from furniture and technology fit outs to print and marketing services.

## Our categories.



Office Products



Kitchen



Cleaning & Hygiene



Technology



Health & Safety



Furniture



Education Supplies



Packaging Supplies

## Our trading arrangements with suppliers are structured as follows:

### National Brand.

Winc classifies products as National Brand when they are developed, owned, produced and marketed by a vendor, and are widely available nationwide under the supplier's brand name. Throughout the reporting period, we partnered with suppliers providing National Brand products across all categories. Given the diverse sizes and capabilities of these suppliers, Winc adopts a flexible approach to engagement.

In 2024, the Ethical Sourcing Team has expanded on the 2023 questionnaire to collect qualitative insights regarding ethical sourcing practices. This includes supplier policies, documentation, supply chain management, traceability efforts and risk assessment processes. Monitoring requirements are then customised based on the identified level of risk.

### Services/Goods Not For Resale.

Goods Not For Resale (GNFR) encompass products or services essential for supporting business operations. Winc actively collaborates with high-risk service suppliers to ensure they are cognisant of and actively addressing modern slavery risks within their operations. Both new and existing suppliers are obligated to adhere to Winc's Ethical Sourcing Policy. Additionally, we have implemented a checkpoint to verify that all contractors working onsite at Winc are fully informed about and have acknowledged their compliance with our Ethical Sourcing Policy.







## Winc Own Brand.

Winc's Own Brand portfolio encompasses a diverse range of brands including Winc, Winc Earth, Business Interiors, Cleera, Codafile, Corporate Express, Office Elements, OfficeMax, Xpress, Simply and Victoria Gardens. Throughout the current reporting period, we collaborated with 73 in-scope Own Brand suppliers operating from 149 sites across 18 countries manufacturing goods across nine distinct categories. To uphold ethical standards, information on these suppliers is updated in our Ethical Sourcing Database every month.



# Evaluating Risk.

Our Ethical Sourcing Team employs diverse multi-factor risk assessment methodologies to evaluate the inherent risks associated with Winc's supply chain and suppliers, aligning with the varied operations and industries represented within our supplier base.

Several factors contribute to determining the level of risk, including product category, raw materials utilised, manufacturing processes, whether the product is Own Brand or National Brand, the geographical location of manufacturing or procurement services and the supplier's spending value.

To gauge inherent risk, our Ethical Sourcing Team examines Self-Assessment Questionnaires (SAQs) completed by suppliers, conducts independent audits, and external research to understand supplier risk profiles. This research encompasses various reports, including the Withhold Release Orders and Findings List from the US Department of State, the Global Rights Index from the International Trade Union Confederation, the Global Slavery Index from Walk Free, labour statistics from the International Labour Organisation's ILOSTAT and the Global Estimates of Modern Slavery published by the International Labour Organisation. Furthermore, we review Third-Party Audit Reports from supplier ethical trade membership organisations such as Sedex.

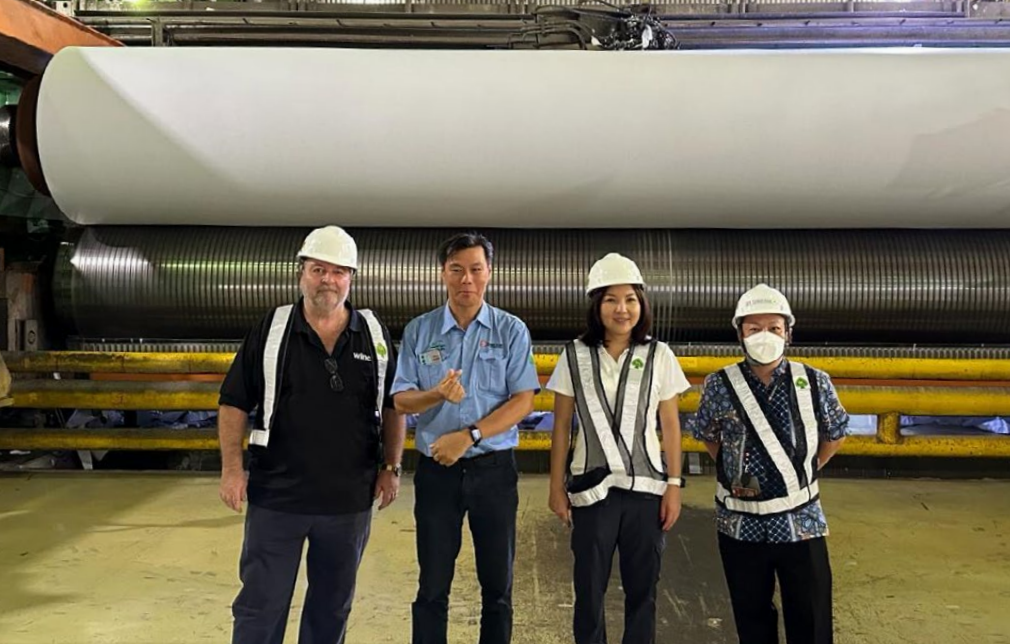
We recognise that our exposure to modern slavery risk is not static and may evolve over time, prompting us to adopt a continuous approach to risk management.

## Risk management plan for Ethical Sourcing.

International human rights reports underscore the prevalence of modern slavery in certain countries, often due to factors like weak rule of law, inadequate governance practices, conflicts, migration patterns and socio-economic disparities such as poverty. Utilising data from The Global Slavery Index 2024, we assess the risk associated with countries from which we source goods, categorising those with an estimated prevalence rate exceeding 2.5 per 1,000 population as high risk. Additionally, certain industries, irrespective of location, are inherently more susceptible to modern slavery risks, characterised by informality, lack of regulation, dependence on low-skilled labour and low wages. Leveraging insights from the Global Slavery Index 2023, the Ethical Sourcing Team categorises the risks of product categories and solutions, enabling targeted mitigation strategies to ensure ethical practices across our supply chain.







**Self-Assessment Questionnaire** have been sent to **185 suppliers (94% COGS).**

## National Brands.

Winc uses an ethical sourcing platform, Informed 365, to collect and analyse supplier data to determine the maturity of suppliers in managing modern slavery risks in their supply chains. All National Brand suppliers were required to complete a customised Winc Self-Assessment Questionnaire (SAQ) through the platform. The SAQ is an important tool for evaluating compliance and identifying areas for improvement.

In 2024, Winc utilised SAQ responses to gain deeper insights into suppliers' risk profiles. Based on the information provided, the Winc team took a proactive approach to ensuring the completion of the SAQ by engaging directly with National Brand suppliers through one-on-one meetings. These meetings served as a platform to address any challenges suppliers faced in completing the questionnaire, clarify expectations, and reinforce the importance of ethical sourcing. By maintaining open communication and providing guidance, the Winc team was able to drive higher participation rates, ensure accurate data collection and support suppliers in identifying areas for improvement. This hands-on approach not only facilitated SAQ completion but also strengthened supplier relationships and reinforced Winc's commitment to mitigating modern slavery risks through collaborative engagement.

- Suppliers accounting for **86% of our total COGS** have submitted their **SAQ responses**.
- **SAQs** sent to suppliers covering **94% of COGS** (185 suppliers)
- **Number of respondents: 165**
- **Number of completed SAQs: 152**
- We are actively working with our Category team to close out our remaining suppliers.

## Key findings.

- Beyond assessing supplier risk, the Self-Assessment Questionnaires (SAQs) facilitated meaningful discussions focused on strengthening anti-modern slavery efforts during the reporting period. Through these one-on-one meetings, Winc engaged with National Brand suppliers to gain deeper insights into their initiatives, exploring the measures they have implemented to prevent exploitation and uphold ethical standards.
- One of the key challenges identified during our assessments was the lack of understanding of modern slavery risks within businesses. Some suppliers demonstrated limited awareness of how modern slavery can manifest in their operations and supply chains, as well as the necessary steps to identify and mitigate these risks. This knowledge gap underscores the need for targeted education and capacity-building initiatives to ensure that businesses not only comply with ethical sourcing requirements but also actively contribute to the prevention of modern slavery. Winc works to address this challenge by providing tailored training, guidance and resources develop a deeper understanding of modern slavery risks and implement effective risk management strategies.
- 60% of suppliers (111 out of 185) confirmed that they have an Ethical Sourcing Policy in place, showing a solid commitment to ethical practices. However, this also means that 40% of suppliers (74 out of 185) do not have formalised policies that outline their commitment to ethical sourcing. The lack of an Ethical Sourcing Policy may indicate that these suppliers need further support to develop a clear, consistent framework for addressing key ethical issues like modern slavery, labour rights and environmental impacts. Winc can assist these suppliers in implementing these essential policies to ensure they meet the standards for responsible and ethical sourcing across the supply chain. Addressing these gaps will be a priority for Winc moving forward to achieve 100% compliance in modern slavery risk assessments and Ethical Sourcing Policy adoption. Please refer to the section covering our future activities for more information on how we will address these gaps.

# Winc Own Brand.

Winc’s Ethical Sourcing Program ensures that Own Brand suppliers fully understand the company’s standards and expectations. This initiative includes an onboarding process with contractual agreements and mandatory social compliance evaluations. In 2024, Winc enhanced its onboarding procedures and plans to offer additional supplier training sessions to further clarify its ethical standards and assessment criteria, while providing suppliers with opportunities to improve their social and environmental compliance. As part of the 2024 Modern Slavery Statement, Winc has implemented several measures to mitigate the risk of modern slavery:

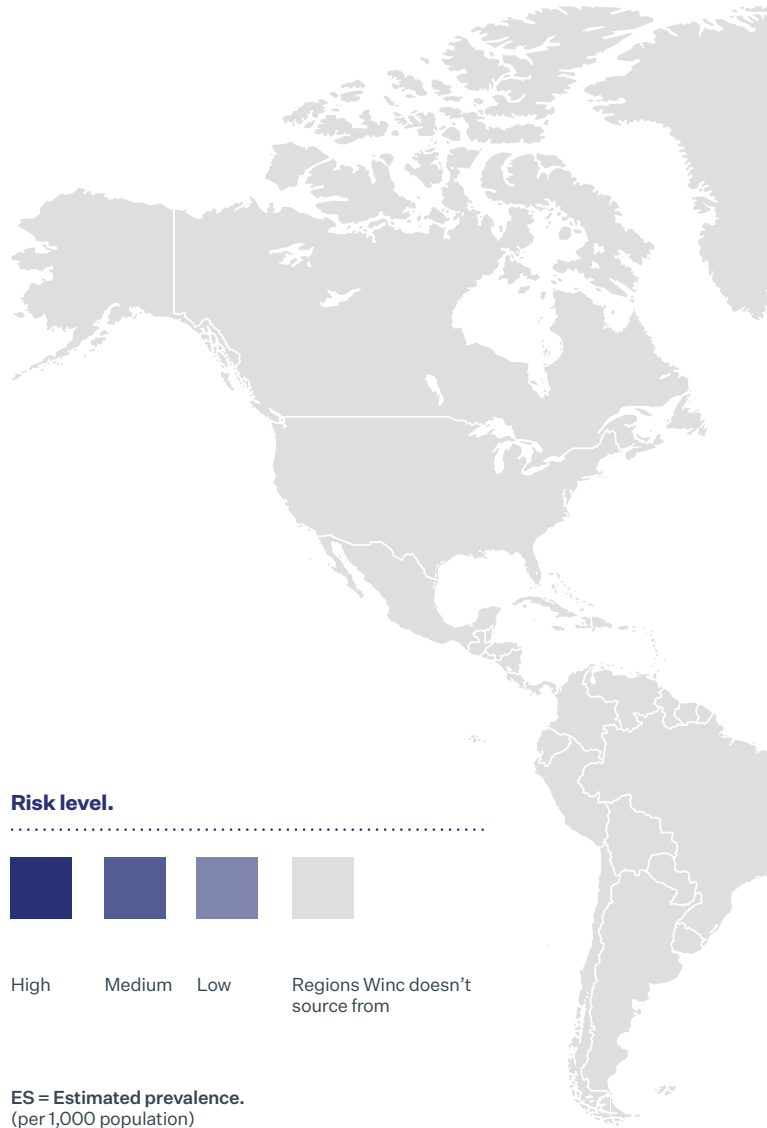
1. Low-risk sites continued to complete annual Self-Assessment Questionnaires (SAQ) to confirm their risk status on Sedex.
2. A focus on all Own Brand High and Medium-risk sites to conduct independent physical audits, addressing any critical non-compliances within a 12-month audit cycle.
3. Collaboration with the Winc Ethical Sourcing Team to address non-compliances identified through accepted standards:
  - Sedex 4 Pillar (preferred)
  - Sedex 2 Pillar
  - BSCI
  - WRAP
  - SA8000
  - Office Depot Social Compliance Audit
4. Creation and implementation of long-term Corrective Action Plans.

To the right is a list of countries where Winc sources its Own-Brand SKUs, along with their respective risk ratings based on the current Global Slavery Index data which was last published in 2023, with the addition of six countries in 2024.

These risk ratings are an important part of Winc’s ongoing efforts to mitigate modern slavery risks within its supply chain. The company continuously evaluates and works with suppliers in higher-risk countries to implement strategies that prevent exploitation and promote ethical practices.

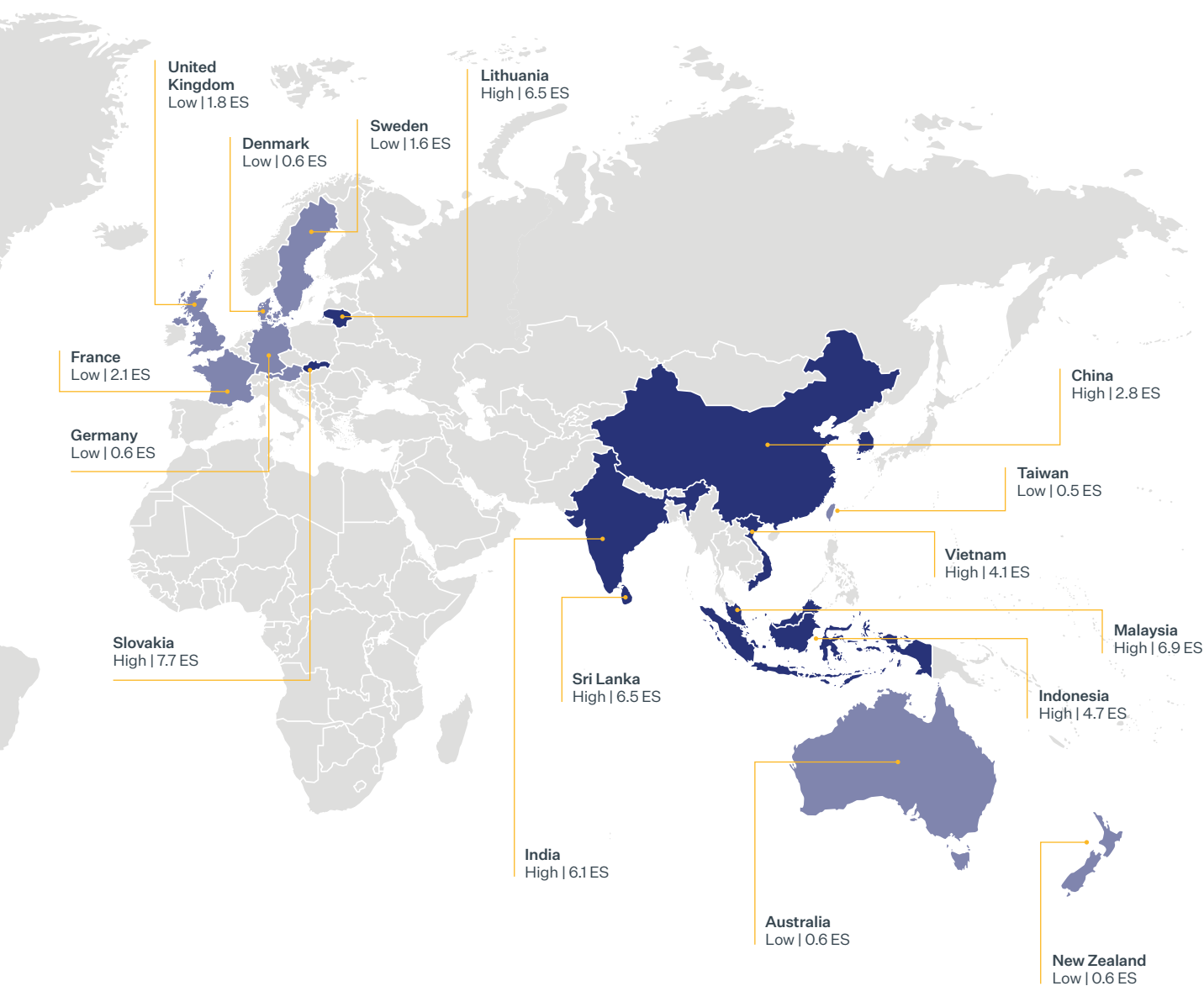
## Key findings.

As part of our ongoing commitment to ethical sourcing and responsible supply chain management, Winc regularly evaluates its suppliers based on risk assessments and third-party audits. The breakdown on the following page provides a snapshot of our supplier risk categories for 2024, reflecting our continued efforts to identify and mitigate potential risks such as modern slavery and unsafe working conditions. This data highlights our proactive approach in auditing suppliers, addressing non-compliances, and ensuring that all suppliers adhere to the highest ethical standards.



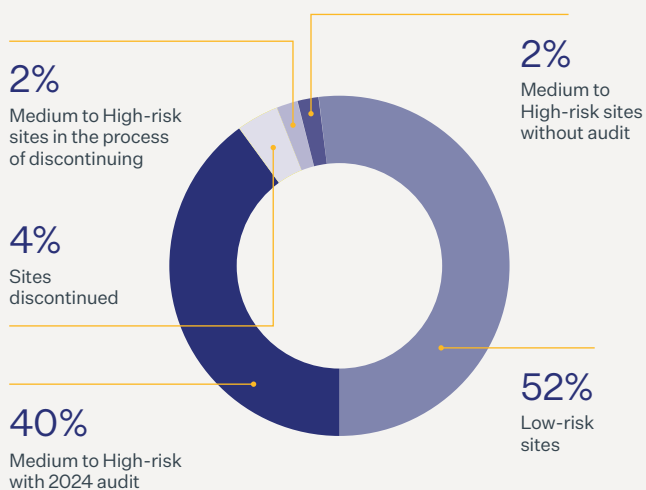
Country	Risk	Estimated prevalence. (per 1,000 population)
Taiwan	Low	0.5
Australia	Low	0.6
Denmark	Low	0.6
Germany	Low	0.6
New Zealand	Low	0.6
Sweden	Low	1.6
United Kingdom	Low	1.8
Austria	Low	1.9
France	Low	2.1
China	High	2.8
Republic of Korea	High	3.5
Vietnam	High	4.1
Indonesia	High	4.7
India	High	6.1
Lithuania	High	6.1
Sri Lanka	High	6.5
Malaysia	High	6.9
Slovakia	High	7.7





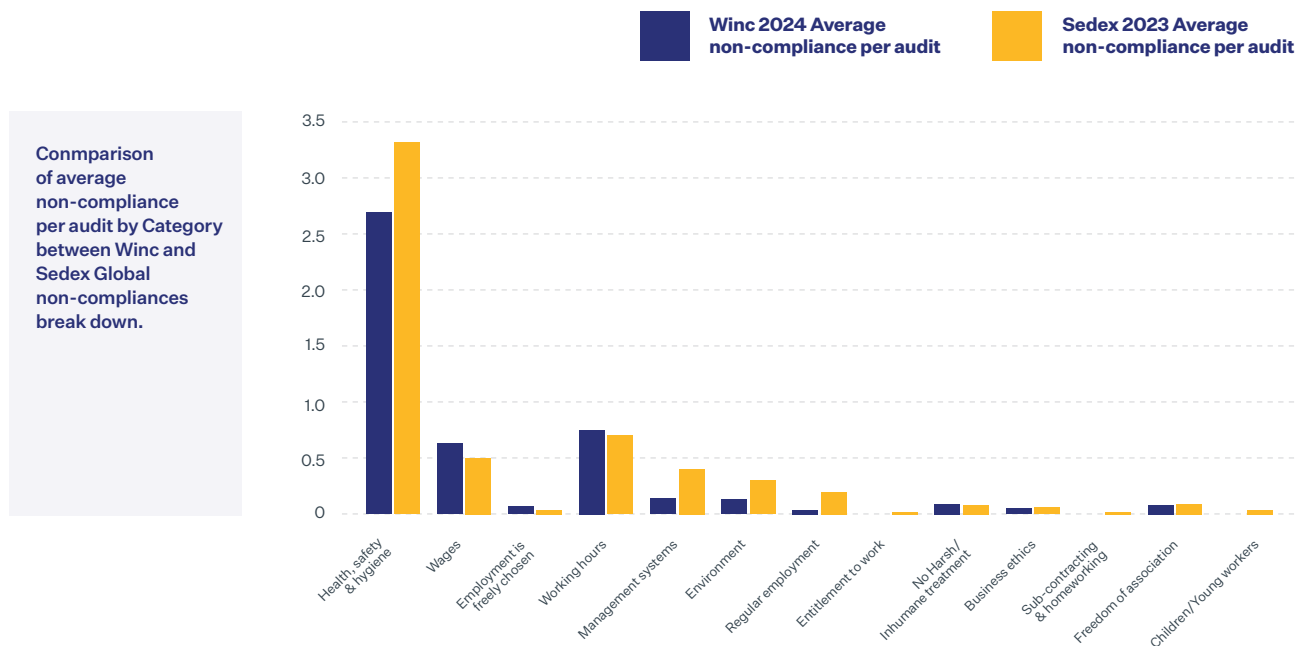
## 98% of High-risk sites audited in 2024.

Of these:



This reflects Winc's strong commitment to auditing High-risk sites, with 98% of all High-risk sites audited in 2024. This is an improvement from 2023, where the completion rate of High-risk sites audited was 92.5%. By consistently monitoring these outcomes, Winc underscores its dedication to responsible supply chain management and maintaining high ethical sourcing standards. In line with our commitment to uphold the highest ethical standards, Winc has taken decisive action with suppliers who have refused audits. Any High-risk factories that declined third-party audits over the past two years have been removed from our supply chain. This action reaffirms our commitment to transparency, accountability and safeguarding our supply chain from unethical practices like modern slavery. By discontinuing these factories, we continue to prioritise supply chain integrity and remain steadfast in adhering to ethical and legal standards.

## Trends of common findings by category.



Winc's suppliers demonstrate stronger compliance compared to the Sedex 2023 benchmark across several key areas:

- Management systems (0.14 versus 0.4), indicating better governance and oversight in ethical sourcing practices.
- Environment (0.13 versus 0.3), reflecting better adherence to sustainability and environmental management expectations.
- Regular employment (0.04 versus 0.2), showing stable and legally compliant employment contracts with low risks related to precarious work arrangements.
- Sub-contracting & homeworking (0 versus 0.02), with no recorded non-compliance in unauthorised subcontracting, suggesting better control over supply chains.
- Children/young workers (0 versus 0.04), where the absence of non-compliance highlights strong implementation of child labour policies.

Winc's suppliers show slightly better performance than the Sedex benchmark in several areas, but there are still notable challenges.

- Wages (0.63 versus 0.5) show slightly higher non-compliance, highlighting the need for stricter wage compliance, fair pay assessments and better oversight of payment practices.
- Working hours (0.75 versus 0.7) points to ongoing challenges with excessive overtime, underscoring the need for better scheduling and enforcement of Winc's 60-hour cap.
- Employment is freely chosen (0.07 versus 0.04) reveals a minimal difference but emphasises the continued priority of preventing forced or bonded labour.

Winc sits well below the Sedex average of 3.3 with **2.68** being the **highest non-compliance by category (Health, safety & hygiene)**. This demonstrates a strong commitment to safety standards and a positive trend in compliance practices.





## Case Study: Good examples.

In addition to addressing risks and non-compliances, it is equally important for Winc to analyse and highlight positive examples of ethical sourcing practices within its supply chain. This approach has helped us foster a culture of accountability, where ethical behaviour is celebrated and becomes an integral part of our collective commitment to combatting modern slavery and promoting sustainable, responsible sourcing.

In the reporting period, we had 77 good examples raised in the factories in our supply chain and we identified several factories that are going above and beyond in supporting their employees and communities:

- 1. Additional Economic Support:** One factory provides an additional allowance to support employees during the country's prevailing economic crisis.
- 2. Physical Wellbeing Program:** A factory has launched a comprehensive physical wellbeing program, where 25 volunteers participate in a 16-week program in collaboration with QBE and Recover (Return to Work Third Party). The program includes health check-ups, individualised wellbeing plans and regular progress monitoring by health professionals. This program is free to participants.

**3. Employee Recognition:** Another factory provides an extra monthly salary and gifts for employees on their birthdays, recognising the importance of employee appreciation and wellbeing.

**4. Certifications for Labour and Human Rights:** 22 sites within our supply chain hold relevant certifications that address labour rights, human rights, environmental impact and anti-corruption efforts, demonstrating a commitment to responsible sourcing and ethical practices.

We plan to collaborate with these companies to understand how we can incorporate their successful initiatives into the wider Winc supply chain network and find ways to support both our suppliers and their workforce.





# Effectiveness & Performance Indicators.

To measure the effectiveness of our approach to managing the risk of modern slavery in our supply chain, we use a number of metrics.

## Self-Assessment Questionnaire Results.

Winc collaborates with suppliers in implementing essential policies to ensure they meet the standards for responsible and ethical sourcing across the supply chain. Addressing these gaps is a key priority, with a focus on achieving 100% compliance in modern slavery risk assessments and Ethical Sourcing Policy adoption. Through targeted support, training and regular engagement, Winc aims to equip suppliers with the necessary tools and knowledge to proactively manage risks, strengthen ethical practices and drive long-term improvements in supply chain transparency and accountability.

The results of the SAQ highlight the fact that 0% of suppliers (0 out of 185) reported involvement in any incidents, proceedings or Withhold Release Orders (WROs) related to modern slavery or other restrictions in the past five years, which is a positive indicator of the ethical conduct within the supply chain. This suggests that Winc's suppliers have been diligent in avoiding serious legal or compliance violations related to modern slavery practices. While this is a positive result, continuous monitoring and proactive measures are necessary to ensure that this trend remains consistent and that any potential risks are identified and addressed swiftly.

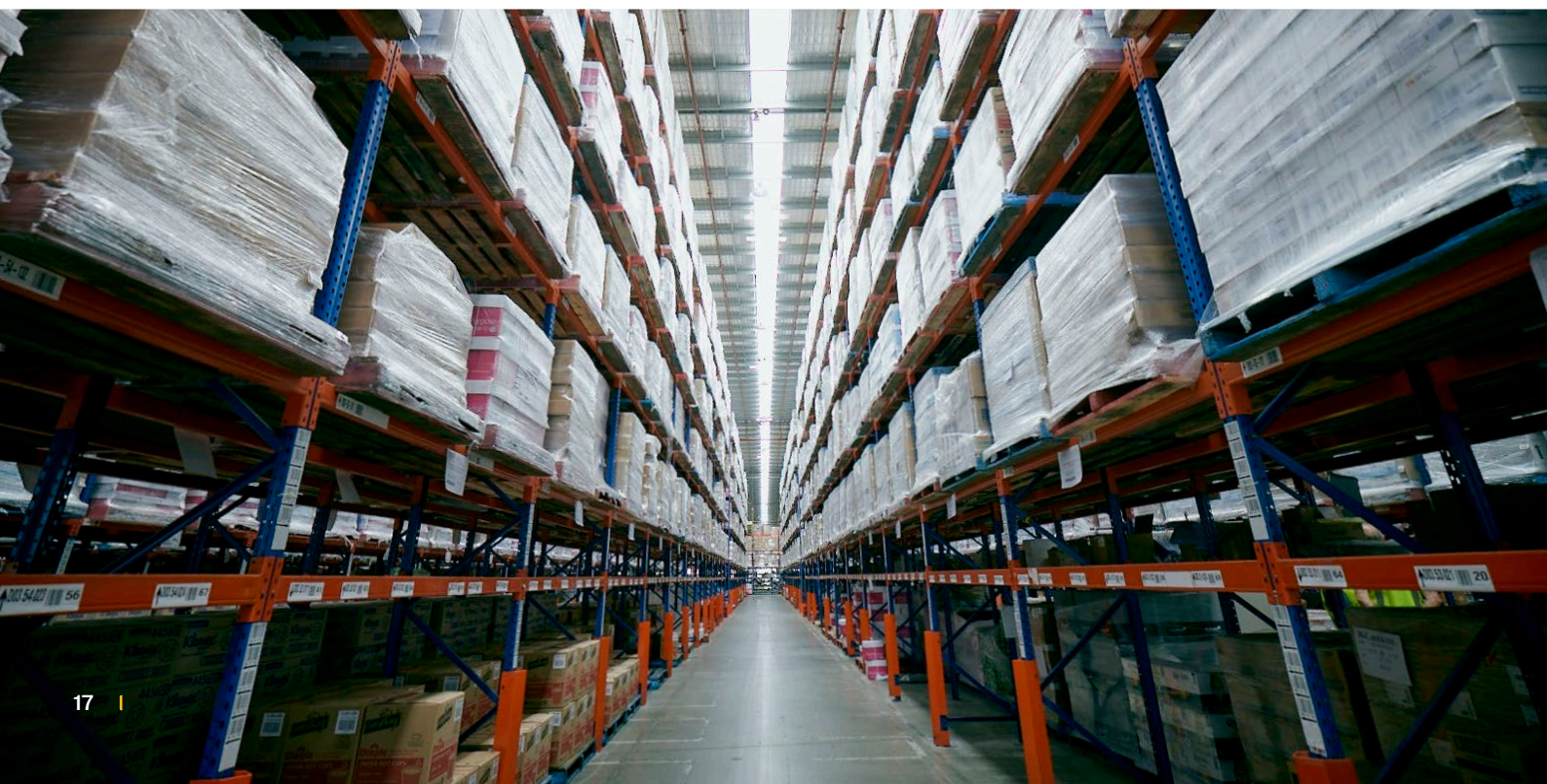
An increasing number of suppliers since 2023 have demonstrated strong engagement in ethical compliance. Out of 185 suppliers, 128 (69.5%) have conducted a

modern slavery risk assessment within their operations and supply chains, showcasing their commitment to responsible sourcing. Similarly, 81.6% of suppliers have established ethical sourcing risk management framework reinforcing their dedication to ethical business practices.

The Winc Ethical Sourcing Team has prioritised key indicators - such as the presence of an ethical sourcing policy and completion of a risk assessment - because they reflect a supplier's commitment to responsible practices and their ability to identify and manage modern slavery risks. By tracking progress in these areas, Winc can provide tailored support to ensure all partners meet ethical sourcing standards and strengthen risk management across the supply chain.

- Number of suppliers with an ethical sourcing policy: 128
- Number of suppliers who have conducted a risk assessment on their suppliers: 151

These figures highlight areas where further support and engagement are needed to strengthen ethical sourcing practices and risk management within the supply chain. Winc will continue to work closely with these suppliers to help develop and implement ethical sourcing policies and conduct comprehensive risk assessments to mitigate modern slavery risks and enhance overall supply chain transparency.







### Closure of non-compliances.

Winc has successfully closed 187 non-compliances (NCs) as part of its ongoing efforts to enhance ethical sourcing and supplier accountability. Winc remains committed to addressing critical non-compliances (NCs) and ensuring that suppliers take meaningful steps toward ethical sourcing. As part of this commitment, we have identified 35 critical non-compliances, of which 20 have already been successfully resolved. Work is underway to address all other non-compliances with 13 factories currently enrolled in our remediation program to address outstanding compliance issues. Two critical NCs are not yet due for resolution.

Through continuous monitoring and targeted interventions, Winc works closely with these factories to implement corrective actions, ensuring compliance with ethical sourcing standards. The remediation program provides structured support, including guidance on policy improvements, worker welfare enhancements and operational changes needed to eliminate risks. By maintaining an active role in remediation efforts, Winc reinforces its commitment to improving labour conditions and strengthening supply chain accountability.

As part of Winc’s remediation policy, four factories that refused to address critical non-compliances and showed no improvement were removed from our supply chain. This decisive action reinforces our zero-tolerance approach to unethical practices and ensures that all suppliers meet our compliance expectations without any improvement.

By replacing these factories, Winc prioritises partnerships with suppliers who are committed to continuous improvement, ethical labour practices and responsible business operations. This step also serves as a strong message that suppliers must take corrective actions seriously, as failure to comply with ethical and social responsibility standards will result in disengagement from our supply network.

Below is the percentage table of the non-compliances closed for in-scope suppliers in the reporting period.

For some of the major non-compliances, Winc is in the process of creating long term action plans – please see the case studies for suppliers.

Category	Percentages for non-compliances already addressed.
Universal Rights covering UNGP	4.3%
Business ethics	0.5%
Environment	2.7%
Freedom of association and right to collective bargaining are respected	1.6%
Legal wages are paid	5.9%
No discrimination is practiced	0.5%
No harsh or inhumane treatment is allowed	0.5%
Responsible recruitment and entitlement to work	0.5%
Working conditions are safe and hygienic	78.7%
Working hours are not excessive	4.8%

# Case Study: Journey of continuous improvement in labour conditions.

## Introduction.

At Winc, we’ve embraced a journey of continuous improvement to create fair and ethical labour conditions for the migrant workforce in our supply chain. Our focus has been on sustainable changes over time, addressing key challenges like housing, recruitment fees and excessive work hours in factories for our suppliers, especially in the high-risk countries.

Over the years, one of the supplier’s factories has encountered challenges common in labour-intensive industries, particularly in areas such as accommodation, recruitment fees and excessive working hours. Winc has worked with the supplier to improve conditions for the workers. Rather than implementing surface-level fixes, we embraced a strategy of continuous learning and refinement, ensuring that each step we take builds upon previous progress. This case study outlines our multi-year commitment to better labour practices, highlighting our improvements. Rather than treating these as isolated issues, we recognised them as symptoms of a larger opportunity.

## Before-and-after comparison of key areas.

### Accommodation.

Oct 2019 (Initial Challenges)	Aug 2022 (Midway Improvements)	Jan 2024 (Final Improvements)
Migrant workers weren’t provided with accommodation, and the monthly housing allowance wasn’t enough to cover rent. Workers expected the company to pay for their full rent.	No new foreign workers had been recruited since the pandemic. Existing workers reported paying recruitment fees to agents in their home countries for services like passports, accommodation, transportation and flights. They were not given clear details about the fees.	The factory had a recruitment policy, but it lacked specific details about how recruitment agencies were vetted, and how to address misconduct or policy violations, especially concerning recruitment fees charged to workers.
<b>Corrective Action:</b> The factory started offering accommodation for those who wanted it. However, many workers preferred to rent their own housing and requested an increase in the housing allowance to 70 Malaysian Ringgit per person per month, which was granted.	<b>Corrective Action:</b> The factory covered all recruitment costs for migrant workers (after completing three years of service). The factory also insisted that recruitment agencies provide detailed receipts and signed contracts to ensure transparency and ethical sourcing.	<b>Corrective Action:</b> The factory developed a more detailed recruitment procedure, ensuring due diligence on recruitment agencies and stronger policies to prevent any unethical practices.

### Recruitment Policy.

Oct 2019 (Initial Challenges)	Aug 2022 (Midway Improvements)	Jan 2024 (Final Improvements)
No policy on recruitment ethics or agency monitoring.	Policy drafted but lacked due diligence details.	Policy finalised, including agency misconduct prevention measures.



Managing work schedules requires balancing production demands with worker wellbeing. Initially, in October 2019, workers faced excessive overtime, often working 12-hour shifts and up to 60 overtime hours per month. Lacking a weekly rest day, this exceeded the local legal limits in the respective country, leading to fatigue. The situation worsened in 2022 during COVID-19, with overtime peaking at 78 hours per month.

In response, Winc worked with the supplier to take a phased approach to refining work schedules. Early adjustments failed to bring overtime below the legal limit of 65 hours per week, prompting stricter measures aligned with Winc’s Ethical Sourcing Policy. By January 2024, overtime was capped at two hours per day and 29 hours per month, with a strict 60-hour weekly limit and enforced rest days. This ongoing review process helped ensure compliance and a healthier work environment for employees.

Overtime.

Oct 2019	Aug 2022 (post COVID)	Jan 2024
2.5 hours per day 12 hours per week 60 hours per month	4.5 hours per day 24 hours per week 78 hours per month	2 hours per day 8 hours per week 29 hours per month



## Whistleblower Policy.

Winc's Whistleblower Policy, overseen by the Group General Counsel and Company Secretary, facilitates the reporting of any improper behaviour, including modern slavery and other human rights violations, by employees and suppliers. An independent and confidential whistleblowing hotline ([winc.com.au/hotline](http://winc.com.au/hotline)) is accessible to all employees and suppliers. Reports to the hotline are thoroughly reviewed and, if necessary, investigated in compliance with legal requirements. Corrective actions are implemented as needed.

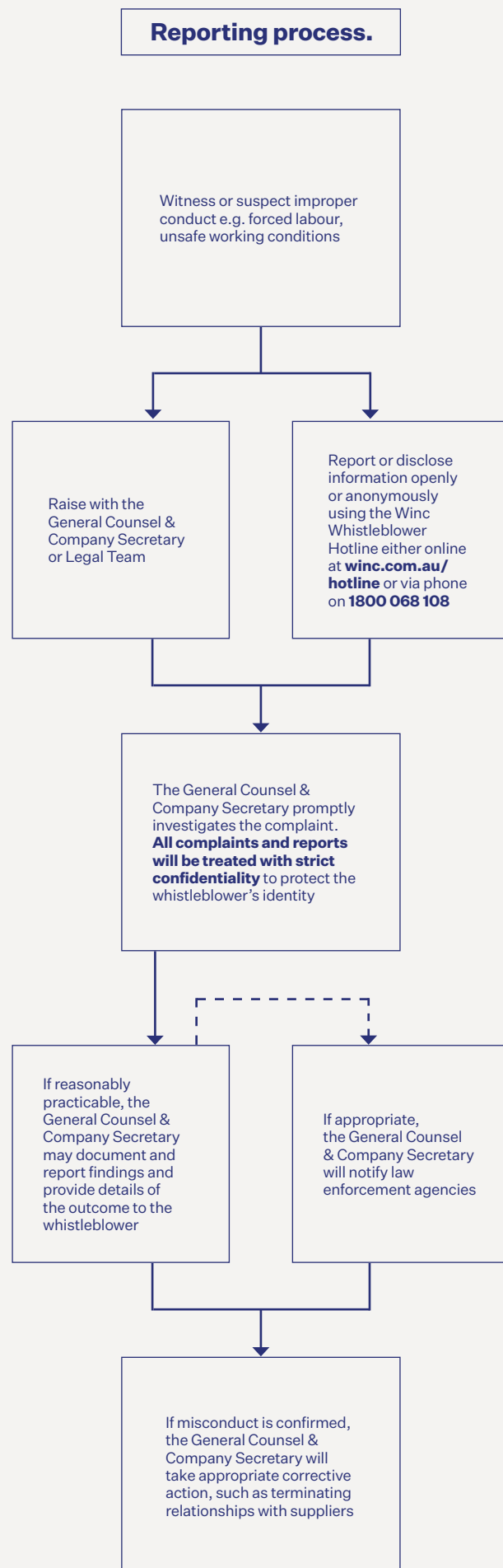
The Whistleblower Policy, compliant with the Corporations Act 2001 (Cth), undergoes annual review by Winc's Legal team to ensure its currency and compliance. Non-retaliation measures are clearly outlined to protect whistleblowers, encouraging all employees and suppliers to report concerns about unethical, illegal or improper behaviour.

Winc strongly encourages suppliers to maintain grievance mechanisms to enable workers to openly communicate and share grievances with management without fear of reprisal, intimidation or harassment, as outlined in Winc's Ethical Sourcing Policy. Winc encourages its suppliers to adopt Winc's grievance mechanisms within their organisations in the absence of their mature grievance procedure, enabling workers to raise concerns and submit grievances directly to Winc.

By implementing these mechanisms, suppliers can foster open communication, allowing workers to express any issues they encounter safely and confidentially. This proactive approach helps ensure that ethical standards are upheld throughout the supply chain and that concerns are addressed promptly and effectively.

**Please refer to our Whistleblower Policy at [winc.com.au/csr](http://winc.com.au/csr).**

Further details about Winc's policies can be found at [winc.com.au/csr](http://winc.com.au/csr). All disclosures made through the grievance mechanism process are treated confidentially. If the grievance mechanism report is investigated, it may be necessary to reveal its substance (on a confidential basis) to people such as other staff, external consultants involved in the investigation process, or if appropriate, law enforcement agencies. In many cases, the person the report relates to will need to be told what the grievance is about. All investigations will be objective, fair and independent.





## Methods to report grievance.

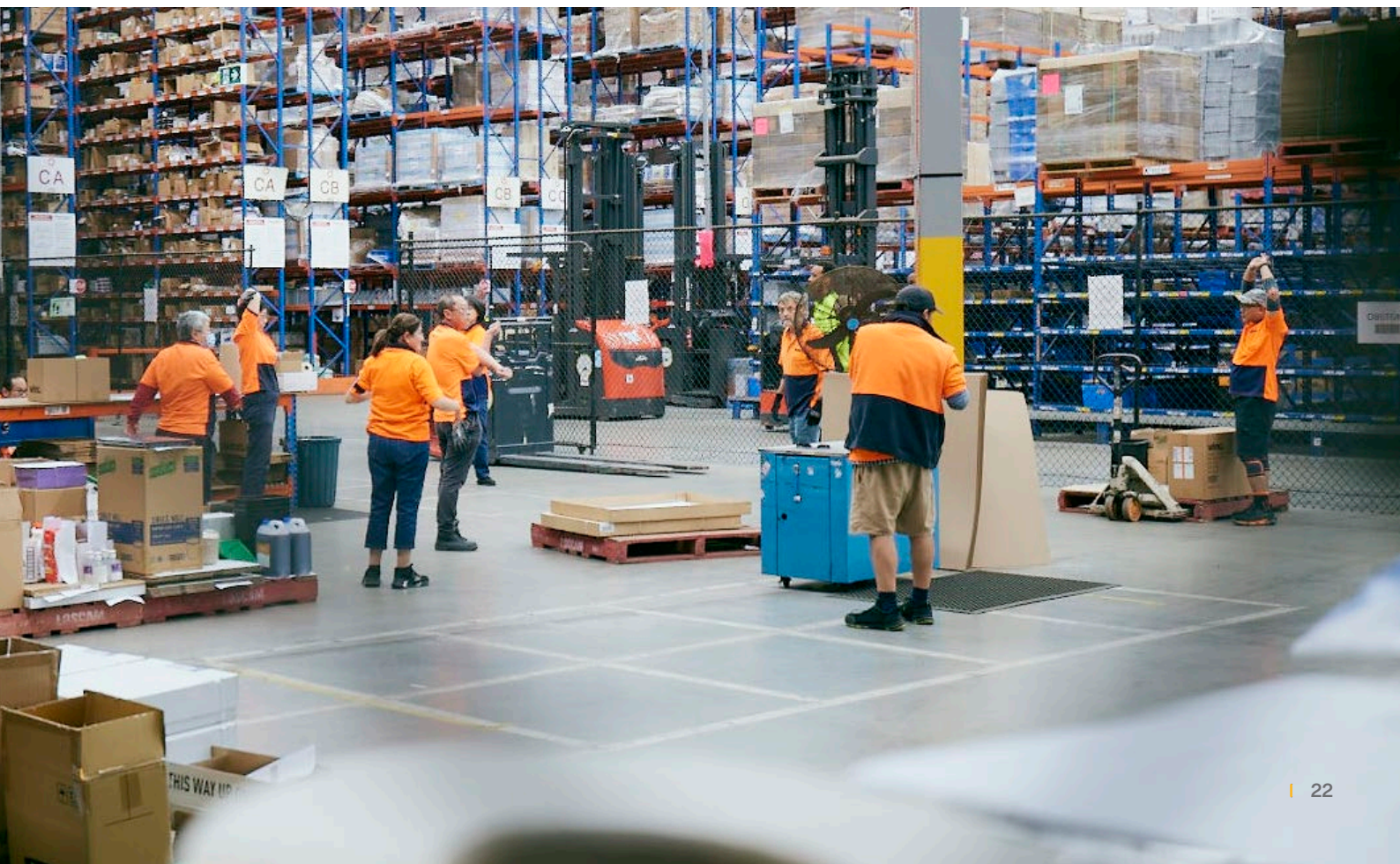
Grievances can be reported through several methods, including:

- **Direct:** Troy Swan,  
General Counsel & Company Secretary
  - **Email:** troy.swan@winc.com.au
  - **Phone:** +61 409 100 364
- **Phone:** 1800 068 108
- **Online:** [www.winc.com.au/hotline](http://www.winc.com.au/hotline)
- **Email:** [legal@winc.com.au](mailto:legal@winc.com.au)
- **Post:**  
Attention: Troy Swan,  
General Counsel & Company Secretary  
Winc Australia Pty Limited  
Level 8, 163 O'Riordan Street  
Mascot NSW 2020 Australia

## Training & awareness.

Throughout 2024, Winc conducted internal training sessions focused on modern slavery, addressing various aspects including legislation and activism, remediation processes, Self-Assessment Questionnaires (SAQs), industry risk factors and third-party auditing. These training sessions, approved by the Group General Counsel and Company Secretary, were conducted across key departments such as Category, Supply & Demand Planning, Sales and HR. The aim was to equip our teams with a comprehensive understanding, covering topics such as the legal framework surrounding modern slavery and the significance of activism in advocating for change. Additional topics included the remediation process for addressing slavery in our supply chains, the role of SAQs in evaluating current practices and identifying areas for improvement, industry-specific risk factors, and the importance of third-party auditing in verifying compliance and ensuring continuous progress.

In addition to the broader training, more focused sessions were provided to the Category Team to ensure they fully understood the real-time implications of their actions on labour conditions within the supply chain. These tailored sessions emphasised how their decisions directly impact working conditions, enabling them to make more informed and ethical sourcing choices. The training also deepened their understanding of remediation processes, equipping them with the tools to address and resolve labour violations effectively. This proactive approach ensured that the Category Team played a crucial role in driving improvements in both labour standards and compliance within the supply chain.



# Future Activities.

## 1. Strengthening Own Brand compliance.

As we move forward, Winc will work to reinforce compliance requirements for our Own Brand products. Some of the future activities to ensure Own Brand compliance include:

- Enhancing efforts to identify and mitigate forced labour risks by conducting thorough analyses of audit findings and prioritising non-compliances based on severity. This will allow Winc to take a targeted approach to addressing key risks such as excessive working hours, unethical recruitment practices and inadequate housing conditions for workers. Rather than relying solely on compliance checks, we will work closely with suppliers to develop and implement corrective action plans that drive meaningful and lasting improvements.
- Targeted training and guidance to suppliers, ensuring they understand and meet ethical labour standards, setting clear timelines for issue resolution. Our monitoring systems will be strengthened to track progress and verify that corrective measures are effectively implemented. Where necessary, Winc will support suppliers in transitioning to responsible labour management strategies, such as eliminating worker-paid recruitment fees and improving workforce planning to prevent excessive overtime.

By integrating lessons learned from previous assessments and continuously refining our ethical sourcing strategies, Winc will ensure a proactive and long-term approach to improving labour conditions. Our commitment is not just to meet compliance requirements but to fostering a supply chain that upholds the highest ethical standards and prioritises the wellbeing of workers.

## 2. One-on-one engagement with top 10 by risk.

Winc will prioritise direct engagement with the top 10 High-risk sites through one-on-one consultations. These discussions will focus on understanding site-specific challenges, addressing key non-compliances, and supporting suppliers in implementing corrective action plans. By working closely with these High-risk sites, Winc can pinpoint areas where suppliers may need additional support and intervention, ensuring that all partners uphold the company's standards for ethical sourcing and risk mitigation.

## 3. Working closely with suppliers who are early in their modern slavery journey.

We identified an opportunity to collaborate with suppliers who have yet to establish an ethical sourcing policy and those who have not yet conducted a risk assessment. To support them, the Winc team will provide guidance and resources to strengthen their risk management strategies, helping them identify and mitigate modern slavery risks. This hands-on approach will not only assist suppliers in meeting compliance requirements, but also empower them to build long-term, sustainable ethical sourcing practices.

## 4. Create actions plans for suppliers using Informed 365.

Winc will work to develop comprehensive action plans for all suppliers using the Informed 365 platform, ensuring that each supplier's unique risks are identified and addressed effectively. These action plans will be customised based on the results of supplier assessments, focusing on critical areas such as the establishment of ethical sourcing policies, completion of risk assessments and the identification and mitigation of modern slavery risks recognised through our SAQs.

- For each supplier, the action plan will outline specific, measurable steps that must be taken to resolve any identified non-compliances, along with clear timelines for implementation and periodic follow-up assessments to monitor progress.
- The action plans will not only focus on immediate corrective actions but will also include long-term strategies to build supplier capabilities in risk management.
- Winc will provide guidance and resources. This helps suppliers enhance their understanding of ethical sourcing practices, ensuring they are equipped to handle potential risks in their operations.

By using Informed 365, Winc can track each supplier's progress in real time, ensuring transparency and accountability throughout the process.

In addition:

- These action plans will be aligned with Winc's broader ethical sourcing strategy, reinforcing the company's commitment to driving continuous improvement across its supply chain.
- Suppliers will be supported through training sessions, resources and regular check-ins to ensure they are fully equipped to implement the required changes and become more competent in managing risks.

Ultimately, Winc aims to empower all suppliers to meet and exceed ethical sourcing standards, reducing risks and contributing to a more responsible, sustainable supply chain.



# Appendix.

Mandatory Criteria for Reporting Statements	Location of Information
Identify the reporting entity	<ul style="list-style-type: none"> <li>• Introduction</li> </ul>
Describe the structure, operations, and supply chains of the reporting entity	<ul style="list-style-type: none"> <li>• Introduction</li> <li>• Our Committees &amp; Corporate Governance</li> <li>• Modern Slavery Overview</li> </ul>
Describe the risks of Modern Slavery practices in the operations and supply chains of the reporting entity and any entities that the reporting entity owns or controls	<ul style="list-style-type: none"> <li>• Modern Slavery Overview</li> <li>• Our Operations</li> <li>• Our Supply chain</li> </ul>
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls to assess and address those risks, including due diligence and remediation processes	<ul style="list-style-type: none"> <li>• Modern Slavery Overview</li> <li>• Our Operations</li> <li>• Our Supply chain</li> <li>• Pro-Active Risk Mitigation</li> <li>• Training and Awareness</li> </ul>
Describe how the reporting entity assesses the effectiveness of such actions	<ul style="list-style-type: none"> <li>• Effectiveness &amp; Performance Indicators</li> </ul>
Describe the process of consultations with any entities that the reporting entity owns or controls	<ul style="list-style-type: none"> <li>• Introduction</li> </ul>
Provide any other information that the reporting entity, or the entity giving the Statement considers relevant	<ul style="list-style-type: none"> <li>• Our Policies</li> <li>• Future Activities</li> </ul>





**For any questions, email us at  
[socialimpact@winc.com.au](mailto:socialimpact@winc.com.au)**

**[winc.com.au](http://winc.com.au)**