



Modern Slavery Statement financial year 2023-2024

This statement is made pursuant to the *Australian Modern Slavery Act 2018* (Cth) (**the Act**) in respect to the period 1 July 2023 to 30 June 2024 (**Current Reporting Period**).

1. Reporting entity

This statement is made by Retail Zoo Holdings Pty Ltd ACN 169 039 721 (**Retail Zoo**).

2. Structure, operations and supply chains of the reporting entity

Structure



Operations

Retail Zoo is headquartered at its Support Centre in Clayton, Victoria. During the Current Reporting Period, Retail Zoo directly employed approximately 150 employees at its Support Centre and approximately 3500 employees within its company-owned stores.

Retail Zoo's franchisees and master franchisees are estimated to directly employ approximately 8000 people globally. Each franchisee and master franchisee are contractually responsible for the employment of those persons in their own operations.

Supply chains

Retail Zoo engages suppliers throughout its business, particularly to support Retail Zoo's company-owned stores and franchised network. Retail Zoo's largest spend categories are:

- fresh and frozen produce (primarily: fruits, meats, poultry and frozen yoghurts);
- coffee beans;
- beverages;

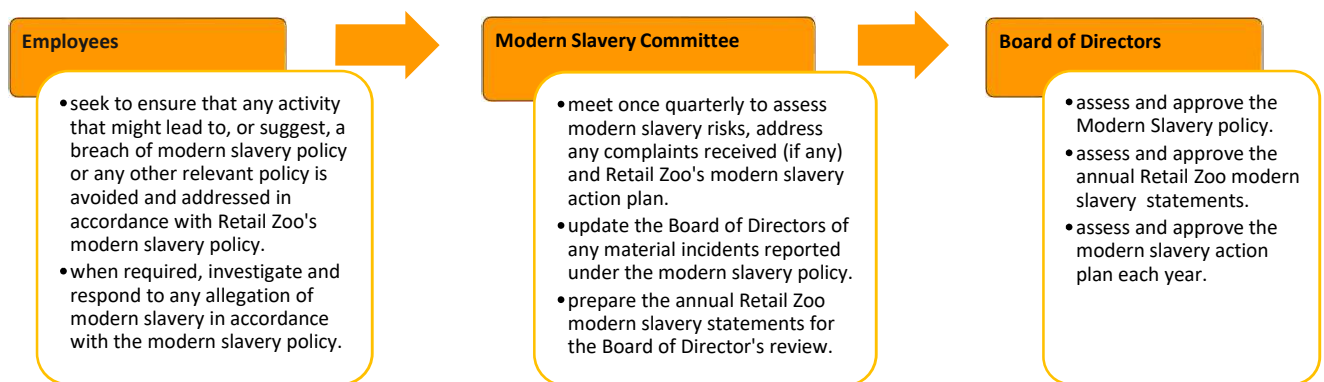
- equipment;
- packaging; and
- services to construct new stores or refurbish existing stores.

Retail Zoo has over 170 suppliers who provide goods and services to support each of Retail Zoo's brands and its headquarters.

Retail Zoo's franchisees and master franchisees are contractually required to use suppliers approved by Retail Zoo, and for some goods and services are required to use suppliers nominated by Retail Zoo.

Modern Slavery Committee

Retail Zoo formed a Modern Slavery Committee (**MSC**) during FY22. The diagram below sets out the role of the MSC within Retail Zoo's organisation.



3. Risks of modern slavery in Retail Zoo's operations and supply chains, and the actions taken to assess and address these risks

In the Current Reporting Period, Retail Zoo continued to assess and consider the risk that Retail Zoo is causing, contributing, or linked to modern slavery practices.

Operations

a. Risks of modern slavery in Retail Zoo's operations

For the same reasons outlined in Retail Zoo's previous modern slavery statements (**Previous Statements**), it remains Retail Zoo's assessment for the Current Reporting Period that it is a low risk that Retail Zoo's operations are causing, contributing, and/or directly linked to modern slavery practices.

As set out in the Previous Statements, in some areas of Retail Zoo's business, Retail Zoo uses contractors or service providers (for example, in respect to cleaning offices, equipment maintenance and off-shore processing). It remains Retail Zoo's assessment that it does not have the same level of visibility or control over these persons, as compared to its own employees.

As a result, it is possible that these persons may engage individuals who are less aware of their rights and/or vulnerable to exploitation, such as in respect to working conditions and wage compliance. While practices such as substandard working conditions and underpayments are not “modern slavery” as defined by the Act, these practices can be harmful and may escalate to modern slavery if not addressed. During the Current Reporting Period, Retail Zoo has taken steps, including expanding its use of SEDEX, to improve visibility and control over its contractors and service providers.

b. Actions taken by Retail Zoo to assess and address these risks

Despite the relatively low risk of modern slavery (as defined by the Act) in its operations, in the Current Reporting Period, Retail Zoo:

- requested any new key personnel or employees employed by Retail Zoo complete Retail Zoo’s internal training on modern slavery;
- made available training on modern slavery to its Australian franchisees, to assist them in understanding the concept of modern slavery, recognising modern slavery risks within their own operations and supply chains and the process of handling a modern slavery complaint or escalating a concern if one does arise;
- enabled its MSC to meet at least quarterly to discuss modern slavery risks;
- provided SEDEX platform training to its MSC members;
- improved its ability to map its supply chain and operations to gain further visibility over its contractors or service providers by continuing to invite its suppliers to join SEDEX, and encouraging those that did join to complete their SAQ questions;
- ensured new contracts considered relevant by key management contained Retail Zoo’s anti-slavery clause, which specifically addresses and sets out Retail Zoo’s expectations in respect to adhering to anti-slavery laws and refers to Retail Zoo’s Modern Slavery Policy; and
- completed a risk register of key suppliers which considered modern slavery risk.

Supply chain

c. Risks of modern slavery in Retail Zoo’s supply chain

As assessed in Previous Statements, it remains Retail Zoo’s assessment for the Current Reporting Period that the areas within Retail Zoo’s supply chain that have an increased modern slavery risks are:

- apparel (such as uniforms), electronics (such as computers and mobile telephones), coffee beans and produce from fruit farms. These goods are either located in, or sourced from, countries or regions that are estimated to have a higher prevalence for modern slavery or have in the past been criticised for modern slavery practices;
- in the second and third tier of Retail Zoo’s supply chain such as in respect to the production, processing,

packaging and transport of goods;

- suppliers used by master franchisees (or their sub-franchisees); and
- unapproved suppliers engaged by franchisees.

d. Actions taken by Retail Zoo to assess and address these risks

In this Current Reporting Period, Retail Zoo:

- reviewed suppliers' information made available on SEDEX. As more of Retail Zoo's suppliers join and connect with Retail Zoo on SEDEX, Retail Zoo is provided further visibility and access to independent SMETA audits, which continues to assist Retail Zoo to assess its supply chains and the modern slavery risks. In the Current Reporting Period, Retail Zoo received independent audits in respect to three of its major suppliers;
- continued to update contracts (such as supply agreements provided by new suppliers) with a clause which specifically addresses and sets out Retail Zoo's expectations in respect to adhering to anti-slavery laws;
- continued to share Retail Zoo's Modern Slavery Policy with its suppliers and operation chains;
- enabled MSC to meet at least quarterly to discuss modern slavery risks;
- provided SEDEX platform training to its MSC members;
- ensured its procurement and supply team personnel understood the importance of assessing modern slavery risks in the context of their role;
- completed a risk register of key suppliers which considered modern slavery risk including by geographical location, commodity risk profile and relationship history; and
- updated Retail Zoo's Supplier Code of Conduct, which includes requirements to assess and mitigate modern slavery risks within their operations and supply chains, join SEDEX and comply with legal obligations including in respect to human trafficking, forced labour, and employment.

4. Effectiveness of Retail Zoo's actions

While Retail Zoo did not discover or become aware of any specific modern slavery issues within its supply chain or operations during the Current Reporting Period (including under its Whistleblower Policy), Retail Zoo endeavours to continually assess its effectiveness in identifying and managing modern slavery risks by tracking its actions and outcomes.

The actions taken by Retail Zoo so far have:

- provided management with improved insight of Retail Zoo's supply chain and operations;

- provided an opportunity for Retail Zoo to communicate its expectations to its suppliers and master franchisees in respect to assessing and reducing modern slavery risks within their supply chains;
- sought to educate and train Retail Zoo's Australian franchisees, managers, key personnel and Support Centre employees on recognising and addressing modern slavery risks;
- improved a number of internal processes, in an effort to gain further visibility across Retail Zoo's supply chains, including 2nd and 3rd tier supply chains.

Retail Zoo's action plan for the Current Reporting Period

In the Previous Statements, Retail Zoo identified the following specific actions that it aimed to take in the Current Reporting Period:

a. SEDEX

In Previous Statements, Retail Zoo focused on onboarding and connecting with its major suppliers on SEDEX.

For this reporting period, the MSC reviewed Retail Zoo's list of suppliers and established that for this reporting period the MSC would focus its efforts on inviting suppliers that comprise the top 80% of Retail Zoo's spend (**FY24 Supplier List**). Following this review, Retail Zoo invited those suppliers on its FY24 Supplier List to join SEDEX and informed them of Retail Zoo's expectations in respect to modern slavery.

Retail Zoo's use of SEDEX has provided Retail Zoo with increased visibility over its supply chains. For the Current Reporting Period, Retail Zoo gained access to approximately 18 audits that were sought by other SEDEX members.

b. Training

In the Previous Statements, Retail Zoo endeavoured to extend its modern slavery training to all of Retail Zoo's employees and franchisees.

During the Current Reporting Period, Retail Zoo continued to share its internal modern slavery training module to existing and new employees on each brand's E-Network platform. The internal training module is a video explaining what modern slavery is and Retail Zoo's expectations from its employees in assessing and addressing modern slavery risks they may come across in their day-to-day role working at Retail Zoo.

As at 30 June 2024, approximately 65% of Retail Zoo's Support Centre employees had completed the training. While this completion rate is likely to shift throughout the years as result of Retail Zoo operating a retail business where frequent change in casual employees occur over a reporting period, the completion rate is below Retail Zoo's expectation and has been identified as an opportunity for improvement in FY25.

In the last reporting period, Retail Zoo extended its internal training to its Australian franchisees. As at 30 June 2024, collectively across Retail Zoo's brands, 88% of Australian franchisees had completed the training.

c. Setting Retail Zoo's expectations

Retail Zoo has a Modern Slavery Policy which it seeks to share with suppliers and employees.

The modern slavery policy is available on each Brand's E-Network platform. The policy explains modern slavery; the roles and responsibilities of employees, franchisees, suppliers and contractors; and, how a modern slavery risk can be reported,

d. MSC

Retail Zoo's MSC continued to meet during the Current Reporting Period to:

- review Retail Zoo's list of suppliers and established a course of action;
- assess Retail Zoo's progress on achieving its desired targets;
- assess and address any modern slavery risks or concerns in Retail Zoo's supply chains and operations; and
- prepare Retail Zoo's modern slavery action plan for the next reporting period.

e. Audits

During the Current Reporting Period, Retail Zoo proceeded to invite or connect with a number of its suppliers on SEDEX, whereby Retail Zoo was able to gain further visibility over its suppliers, including obtaining copies of audits which were conducted on some of its suppliers by other SEDEX members. For the Current Reporting Period, Retail Zoo has gained access to approximately 18 audits in relation to its suppliers connected on SEDEX. Retail Zoo has reviewed the contents of the audits made available to Retail Zoo, which did not raise any modern slavery concerns.

f. Region visits

In the Current Reporting Period, Retail Zoo representatives physically attended Boost Juice stores in several regions including Chile, Singapore, Thailand, UAE and Vietnam. During these visits, the representatives discuss employee payment obligations with master franchisee owners and some of their team members, as well as making general observations on working conditions.

g. Appoint a consultant

In its previous report, Retail Zoo outlined an intention to engage an external consultant to review modern slavery risk in the context of Retail Zoo's operations and supply chain, analyse Retail Zoo's risk controls, and assist to develop a modern slavery action plan for the business to implement in FY24 and FY25. In the reporting period, Retail Zoo has conducted its own internal assessment of key risks, using a tool developed with the input of external consultants, and will use the output of this assessment to continue to develop an action plan to establish best practice modern slavery risk management commensurate with the level of identified risk. .



Retail Zoo's modern slavery action plan for FY25

Retail Zoo understands that the process of assessing and addressing modern slavery risks in its operations and supply chains is an ongoing and evolving process. In the FY25 period, Retail Zoo:

- is aiming to encourage at least 90% of its key suppliers to join SEDEX;
- intends to arrange for independent audits to be completed on at least 5 additional key suppliers;
- will seek acceptance of Retail Zoo's Supplier Code of Conduct by all key suppliers;
- will work to further develop its approach to risk assessment and risk management specifically for modern slavery risk;
- will require its Support Centre employees to prioritise completion of Retail Zoo's modern slavery training module; and
- has budgeted to send representatives to physically attend Boost Juice stores outside of Australia, as well as the offices and/or factories of Nominated Region Suppliers and/or Nominated Goods Suppliers, as part of which will be to observe any modern slavery risks.

5. Process of consultation

Retail Zoo's entities, including its ultimate parent company Safari HoldCo Pty Ltd (**HoldCo**), have common directors, and each of Retail Zoo's brands are supported by the same teams at its headquarters. This statement has been prepared from information provided by Retail Zoo's Group Procurement and Supply Manager, Head of Learning and Development and Chief Transformation Officer, and considered by the Board of Directors of Retail Zoo and HoldCo, and Retail Zoo's Senior Executives.

This statement was approved by the Retail Zoo Board of Directors in their capacity as principal governing body of Retail Zoo Holdings Pty Ltd on 4 December 2024.

Georgina Varley

Georgina Varley (Dec 5, 2024 16:00 GMT+11)

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Director
Retail Zoo Holdings Pty Ltd