



Good Goods Modern Slavery Statement

It is an awful reality that modern slavery exists and a business in the 21st century needs a statement about it. Below you'll find ours. We should warn you that it includes a lot of troubling language and difficult subject matter. The main takeaway is we forge deep relationships with all of our partners to ensure that no one who works on our product at any stage of development is doing so by force, manipulation or coercion. We hope that eventually there will be a future where statements like this are unnecessary – that all people have equal access to fair work and employment opportunities. Until that day, we proudly stand in the fight against modern slavery and only work with businesses and individuals who join us in that fight.

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1. Introduction

- 1.1. Good Goods Holdings Pty Ltd is opposed to all forms of modern slavery. This Modern Slavery Statement has been prepared in accordance with the Australian Modern Slavery Act 2018 and United Kingdom's Modern Slavery Act 2015. This statement describes our actions during the financial year ending 30 June 2023 to identify and minimise the risk of modern slavery occurring within our operations or supply chains.
- 1.2. The Modern Slavery Act 2018 (Aust) defines modern slavery to include eight types of serious exploitation. Modern Slavery includes slavery or slavery like practices, servitude, forced labour, forced marriage, debt bondage, deceptive recruiting for labour or services, human trafficking. The worst forms of child labour means situations where children are subjected to slavery or similar practices, or engaged in hazardous work.
- 1.3. The Modern Slavery Act 2015 (UK) consolidates offences of human trafficking and slavery.
- 1.4. We have examined the requirements of both Acts and our supply chains as a whole across Good Goods Holdings Pty Ltd group of companies and for this purpose we are pleased to report on our progress.
- 1.5. This statement has been prepared with guidance from the Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities, published by Australian Border Force and the statutory guidance Slavery and human trafficking in supply chains: guidance for business, published by the UK's home office.



- 1.6. This statement was approved in full by the principal governing body for Good Goods Holdings Pty Ltd on 15 December 2023.

2. Our Structure, Governance, Operations & Supply Chain

Structure:

- 2.1. Good Goods Holdings Pty Ltd is a privately-owned company, founded and incorporated in Australia. We sell tissue products direct to consumers and via retail and personal care products direct to consumers. We donate 50% of our profits to charitable organisations who help build toilets and improve sanitation standards to those that need it. Good Goods Holdings Pty Ltd with its Registered Office and principal place of business located at Suite 816, 585 Little Collins St, Melbourne VIC 3000, ACN 630 422 409, is the parent company for our trading entities.
- 2.2. We sell our products in four global markets: Australia (AU), United States (US), United Kingdom (UK) & Europe (EU).
- 2.3. Our Australian wholly owned subsidiary trading entity is Good Goods Pty Ltd, Suite 816, 585 Little Collins St, Melbourne VIC 3000; ACN: 154 870 452.
- 2.4. Our US wholly owned subsidiary trading entity is Who Gives A Crap Inc, 8605 Santa Monica Blvd, PMB 62559, West Hollywood, California 90069-4109, USA, Business Registration: 331219586.
- 2.5. Our UK wholly owned subsidiary trading entity is Who Gives A Crap Limited, c/o MHA, 6th Floor, 2 London Wall Place, London, EC2Y 5AU, UK; Company Number 10334484.
- 2.6. Our global trading name is Who Gives A Crap for tissue products, Our global trading name is Good Time for personal care products.
- 2.7. The consultation process between Good Goods Holdings Pty Ltd and the subsidiaries above in creating this statement was:
 - The statement was produced with the assistance of the supply chain teams in each respective region;
 - A draft was sent to each subsidiary for their amendment and feedback prior to final approval;
 - Good Goods Holdings Pty Ltd reviewed feedback, incorporated and discussed before approving the final statement.

Governance:

- 2.8. The principle governing body for Good Goods Holdings Pty Ltd is 'the Board' which is comprised of Simon Griffiths, Executive Director & CEO, and Raphael Thiolon, non-Executive Director.



2.9. The members of our Executive Team are responsible for overseeing our global operations across all subsidiaries and are jointly responsible for all policy authorisation including this Modern Slavery Statement. Our executive team is:

- Danny Alexander: Chief of Product & Purpose
- Ellie Smith: Vice President of People & Culture
- Emily Kraftman: Managing Director, UK & Europe
- Jehan Ratnatunga: Vice President of Strategy & Growth
- Phil Halbish: Chief Financial Officer
- Phil King: Vice President of Supply Chain
- Ronalee Zarate-Bayani: Chief Brand Officer
- Simon Griffiths: Chief Executive Officer

2.10. We have been a Certified B Corporation (B Corp) since 2016. As stated on the B Corp website, B Corp Certification is a designation that a business is meeting high standards of verified performance, accountability, and transparency on factors from employee benefits and charitable giving to supply chain practices and input materials. In order to achieve certification, a company must:

- Demonstrate high social and environmental performance by achieving a B Impact Assessment score of 80 or above and passing the risk review. Multinational corporations must also meet baseline requirement standards.
- Make a legal commitment by changing their corporate governance structure to be accountable to all stakeholders, not just shareholders, and achieve benefit corporation status if available in their jurisdiction.
- Exhibit transparency by allowing information about their performance measured against B Lab's standards to be publicly available on their B Corp profile on B Lab's website. You can see more information about our B Corp Score and Certification here:

<https://www.bcorporation.net/en-us/find-a-b-corp/company/who-gives-a-crap>

2.11. As at 30 June 2023, we employed or contracted 236 full-time and part-time workers and 33 casual or freelance workers. These comprised of:

- 69 employed by Good Goods Pty Ltd in AU
- 48 employed by Who Gives a Crap Inc in the US
- 13 employed by Who Gives a Crap Limited in the UK
- 134 contracted to Good Goods Pty Ltd in the Philippines
- 5 employed through a FESCO in China contracted to Good Goods Pty Ltd

Our operations occur across five global working 'hubs':

2.12. Australia:

- Global Functions: Customer Experience, Finance, Legal, Integrated Business Planning, Marketing and Innovation, Strategy, People & Culture, Digital Product, Insights
- Regional Functions: APAC Supply Chain



- 2.13. United States:
- Global Functions: Customer Experience, Finance, Legal, Integrated Business Planning, Marketing and Innovation, Strategy, People & Culture, Digital Product, Insights and Impact
 - Regional Functions: North America Supply Chain
- 2.14. United Kingdom & European Union:
- Regional Functions: UK & EU Supply Chain, UK Consumer, UK Commercial and UK Strategy & Insights
- 2.15. Philippines:
- Global Functions: Customer Experience, Finance, Legal, Integrated Business Planning, Marketing and Innovation, Strategy, People & Culture, Digital Product, Insights and Impact
 - We engage full time, part time and freelance contractors based in the Philippines who are self employed and work from home providing their own devices and workspaces. Each contractor works a schedule that is aligned to their personal needs and those of their global function and they invoice and are paid monthly based on hours worked. They receive access to our global leave entitlements including 20 days of Annual Leave and 10 days of Sick/Carers leave and discretionary Life Leave and are protected by the same policies as our global team.
- 2.16. China
- Regional Function: APAC Supply Chain (Production, Quality Assurance, Compliance)
 - We sourced and recruited our China team directly via global recruitment channels such as LinkedIn, using the same recruitment process and standards that are applied by us globally. We have contractually engaged our China team via a FESCO (Foreign Enterprise Service Company) which ensures that contract terms, taxation and social insurance meet all legislated standards within People's Republic of China (PRC). They receive access to our global leave entitlements including 20 days of Annual Leave and 10 days of Sick/Carers leave and discretionary Life Leave and are protected by the same policies as our global team.

People:

- 2.17. Who Gives A Crap was founded with the idea that business can be an agent for change and have meaningful impact in the world. We believe in fostering a culture of honesty and vulnerability, in which employees at every level feel empowered to do their best work, speak up and share different perspectives, and are met with a strong sense of belonging. We strive to have our teams represent the richness of the communities in which we work, and to be a good influence on other organisations working in the social impact space.
- 2.18. We wouldn't be Who Gives A Crap without our talented people. We value each of our employees, both permanent and casual, and ensure that we provide structured and holistic opportunities for career development and growth within the business.



We stand by a transparent and fair recruitment and interview process in order to reduce bias and provide equal opportunity to all candidates.

- 2.19. In each of our office “hubs” we work closely with legal counsel to ensure we are consistently up to date on all employment laws and standards, and we take pride in the fact that we then go beyond the baseline expectation for employee satisfaction as measured by Culture Amp survey results twice a year.
- 2.20. We approach employee wellness with the nuances of each of our hub cultures in mind and work our hardest to create work conditions that allow flexibility and balance for personal and family life. From our recruitment process to our employee performance assessments, to our choice of impact partners we embody our company values and keep them as the driving “north star” in all our business decision-making.
- 2.21. We have built a Diversity Equity & Inclusion (DEI) council to leverage and stay responsive to our team’s unique lived experiences and continue to diversify and broaden these as we grow. The council is made up of employees across our organisation who work on strategic projects and spotlight integrative approaches to DEI for our purpose-first business - creating an inclusive workplace and fostering a deep sense of belonging so we can be our true selves and do our best work.

Supply Chain:

- 2.22. Our supply chain includes the direct manufacture of our products, shipping to end-market, warehousing in-market and final distribution to customers.
- 2.23. In the year ending 30 June 2023:
- We produced our finished goods in four countries:
 - 89% in China
 - 5% in the US
 - 3% in the UK
 - 3% in Sweden
 - Raw materials used within the manufacture of our products are grown/produced, processed and procured in each country of manufacture.
 - We do not own the factories where our products are made, we work closely and directly with a group of carefully selected manufacturing partners.
 - We used global freight forwarding partners to ship our finished goods into our global sales entities.

Within each sales entity:

- We used our third-party 3PL warehousing partners to receive and store our products.
- We use local third-party national fulfilment partners and internal capabilities to deliver our products from warehouse to end consumer
- Our distribution spend occurred:
 - 42% in the US
 - 38% in AU
 - 20% in the UK



3. Risks of Modern Slavery Practices in our Operations & Supply Chain

Our Employment & Remuneration Standards:

- 3.1. In the year ending 30 June 2023, our Employment & Remuneration Standards did not change and continue to ensure that we maintain transparent, open and equitable processes to safeguard the fair employment and remuneration of our people:
- All employees, both permanent and casual, are engaged directly with clear contracts and agreements in place outlining their conditions of work, job expectations, minimum entitlements and compensation.
 - Our recruitment processes ensure we have full visibility over the attraction, selection and engagement of all employees across our global hubs. Our global People & Culture function includes regional-specific support specialists who are responsible for executing our global benefits and remuneration frameworks in line with local obligations.
 - Our remuneration methodology ensures that each individual's compensation is benchmarked against internal and external relativity to drive equitable outcomes.

Our Supply Chain:

- 3.2. In the year ending 30 June 2023, we assessed our risks and prioritised our activities using our human rights risk register. This allowed us to review our business activities and identify the presence of associated contextual risk against four pillars:
- **High Risk Geographies:** we understand that some countries have a higher prevalence of modern slavery, frequently associated with low government response to address modern slavery and its root causes, state-imposed forced labour programs and/or the presence of formal conflict.
 - **High Risk Products, Services & Importation:** we understand that certain products represent greater risk of vulnerable populations being exposed to exploitation. These risks extend to direct raw materials extraction and production up the chain to importation by end sales market.
 - **Vulnerable Populations:** we understand that discrimination on the basis of gender, race, caste, and ethnicity drives vulnerability to modern slavery, in addition to societal disenfranchisement and poverty. These groups are more likely to be exploited.
 - **High Risk Business Models and Supply Chain Complexity:** we understand that indirect, third-party or complex employment and supply structures remove transparency from the value chain and expose workers to greater risk of exploitation.
- 3.3. In the year ending 30 June 2023, we identified the risk of exposure to modern slavery within our supply chain to be low. We identified risk in the following areas and worked throughout the year to mitigate and understand the root causes:
- 3.4. **Geographic Risk**
- Importing risk in the US & UK: In FY23, we expanded our manufacturing supply base to include the US & UK. While improved, we acknowledge that these new manufacturing markets are still exposed to the risks of modern slavery despite their strong government oversight, high levels of action to respond to modern slavery within their regions and relative affluence to



Asia. In both countries, importation of raw materials represents risk of exposure to modern slavery including forced labour, debt bondage, human trafficking and child labour related to a) the importation of illegally harvested timber from Brazil, Russia, Peru, Czech Republic and Estonia and b) the importation of palm oil from Indonesia or Malaysia.

- We have assessed our risk associated with importation of illegally harvested timber as low; we have a natural insulation to these risks by virtue of our non-wood tissue substrates, and have further reduced this risk by enlisting suppliers in the US & UK with full Forestry Stewardship Council (FSC) Chain of Custody (COC) Certification which aligns with illegal logging legislation in the US, the EU and AU to significantly reduce the risk of slavery-like practices associated with illegal timber from entering our supply chain.
- We have assessed our risk associated with importation of palm oil as low; we have sourced Roundtable on Sustainable Palm Oil (RSPO) certified palm oil for use within 100% of our relevant products. RSPO has made significant and substantial progress over the past 10 years in improving conditions and safety for workers through development and implementation of global standards. Currently, RSPO Certification applies to 55% of the total estimated global hectare dedicated to palm oil, and therefore the industry itself remains at a medium risk level.
- Raw materials risk in China: We acknowledge that China carries greater geographic risk than western manufacturing hubs, and that Asia Pacific has the highest global prevalence of modern slavery per capita. In China, our primary risks occur at the raw materials tier and include risks associated with importation of paper and forestry products from Russia in addition to domestic risk associated with the agricultural sector as it relates to bamboo harvesting. Risks include: a) imported: forced labour and debt bondage, b) domestic: forced labour and state-imposed forced labour, specifically as it relates to treatment and trafficking of Uyghurs inside and outside of Xinjiang. We have assessed this risk as low; all tissue products that we procure from China carry FSC COC Standard FSC-STD-40-004 v3-1 which includes independent auditing against the Core Labour Conventions of the International Labour Organisation (ILO). This standard ensures that the entire supply chain is independently audited against criteria that map closely to many of the requirements of the modern slavery Acts in both the UK and AU, providing a further means of verification. To further reduce our geographic risk in relation to raw materials, we have continued to consolidate our raw materials supply base into fewer suppliers with FSC COC Certification and proactive ethical standards.

3.5. Product Risk

- Timber: We acknowledge that paper and forestry products represent risk of exposure to modern slavery as they are commonly made from timber.



- Risks of forced labour are present in both developed and developing countries. The US Department of Labor lists North Korea and Peru and two of the largest timber producing countries globally, Brazil and Russia, as countries in which timber may be produced with forced labour. Further, it has been reported that forestry workers, and in particular migrant workers, in the Czech Republic and Estonia have been subjected to forced labour, often by being compelled to work to pay off debt to their employers. Forced labour can occur in logging, and may include threats, violence, poor living and working conditions, a lack of formal contracts, and non-payment of wages. It also may occur in sawmills, where workers may have to work excessive and unpaid overtime while having their documents retained and movement restricted.
https://knowthechain.org/wp-content/uploads/KTC_forestry_brief.pdf
- As mentioned above, FSC COC Certification reduces our risk associated with timber via alignment with global illegal logging legislation, and independent auditing of Core Labour Conventions of the ILO.
- Palm Oil: In FY23, we launched a new brand, Good Time, in a new product sector; hair & beauty. Within the raw materials used for our bar soaps we identified risks associated with palm oil. Risks include forced labour, debt bondage, human trafficking and child labour. Indonesia and Malaysia produce the majority of the world's palm oil, with workers tending to be from neighbouring countries or from impoverished communities surrounding palm plantations. To reduce our risk, we partnered with a US production specialist who was able to help us to source 100% of the palm oil from two validated RSPO certified sources, and we traced those sources back to the plantations. RSPO (<https://rspo.org>) is a voluntary, global membership organisation that partners with stakeholders from the seven sectors of the palm oil industry to develop and implement global standards for the production and procurement of sustainable palm oil. Certification principles and criteria include modern slavery identification and remediation in accordance with ILO conventions to protect workers with a specific focus on migrant workers.
 - Using RSPO certified palm oil in our Good Time body bars reduces our risks associated with this product and industry, but does not eliminate it entirely. We have, and will continue to explore alternatives to palm oil in our product formulations. Our ingredient exploration takes into consideration several complex social and environmental factors associated with the use of plant oils including what plant and region the oils are sourced from as well as if there is a system in place to ensure responsible sourcing.

3.6. Vulnerable Populations:

- Production: We acknowledge that the highest risk sector of our supply chain is production including the extraction of raw materials. We understand that



most occurrences of slavery-like practices occur in the lowest tiers of our supply chain and that within these tiers migrants, immigrants, women, young people and children are the most vulnerable to risks including forced labour, human trafficking and deceptive recruiting. We continue to audit all levels of our production supply chain using both FSC & Business Social Compliance Initiative (BSCI) criteria for monitoring gender, ethnicity, age and employment standards at each site. This transparency enables us to pinpoint areas of specific risk related to vulnerable populations and work to reduce that risk through focussed initiatives including further auditing, training and policy adoption.

3.7. **Business Model Risk:**

- Logistics: We acknowledge that the transportation of our products to our customers carries risks associated with third-party labour arrangement or indirect employment of contractors, frequently involving vulnerable populations such as migrants or immigrants. In some cases, the gig economy presents a lack of transparency around actual employment standards and can leave workers exposed to risk including fragmentation of regulatory oversight, insecure employment, isolating working conditions and outsourcing or subcontracting which can expose workers to further harm including forced labour and debt bondage. We work to reduce this risk by choosing partners with robust Environmental, Social and Governance (ESG) programs and policies in place that protect workers and provide transparency of their own supply chains. We mitigate this risk by choosing partners carefully using risk based selection criteria including ethical and Occupational Safety and Health (OSH) performance. In most cases, we use large national and international partners to ship, store and distribute our products to our customers. Most of our partners are above the reporting thresholds for publishing Modern Slavery Statements of their own and have shared information related to their own risk assessments, actions and ESG programs on their corporate channels.
- Warehousing: In conjunction with our own FSC COC Certification, all global warehousing partners participated in additional risk assessment and commitment to FSC Core Labour Standards. Assessment criteria included core principles and geographic legal requirements in AU, UK & US to ensure global alignment and conformance.
- In the year ending 30 June 2023 we assessed the risks of modern slavery practices within our logistics operations to be low and continue to prioritise our actions on geographic and product risk areas.



4. Actions Taken to Assess & Address Risks, Including Due Diligence & Remediation Processes

4.1. FSC Chain of Custody Certification:

- In March 2021 we joined the FSC (<https://fsc.org/en>) as Trademark License Holders which enabled us to procure FSC certified finished goods from our FSC certified core suppliers for sale into our Direct-to-Consumer (D2C) customer base.
- In the year ending June 30 2022, we conducted end-to-end due diligence within our supply chain for our bamboo products and validated the full chain of custody from farm to end producer.
- In March 2022, we completed the full transition to 100% FSC certified sources for the manufacture of our bamboo tissue products.
- In February 2023, we completed the full transition to 100% FSC certified sources for the manufacture of our recycled tissue products.
- In July 2023, we gained FSC Chain of Custody Certification for all trading entities under our group umbrella, Good Goods Holdings Pty Ltd: (AU) Good Goods Pty Ltd, (UK) Who Gives A Crap Limited, (US) Who Gives A Crap Inc

4.2. FSC's COC Standard FSC-STD-40-004 v3-1 includes independent auditing against the Core Labour Conventions of the ILO. Procuring FSC certified products means that the entire supply chain is independently audited in the following areas which map closely to many of the requirements of the modern slavery Acts in both the UK and AU, providing a further means of verification, being:

- The organisation shall not use child labour,
- The organisation shall not employ workers under the age of 15, or below minimum age in national or local laws or regulations, whichever is higher; and
- Where national law or regulations permit, the employment of workers shall not interfere with schooling or be harmful to health or development.
- Children must only work outside school hours; and
- The organisation shall have policy in place to prohibit the worst forms of child labour
- The organisation shall eliminate all forms of forced and compulsory labour
- Employment relationships are voluntary and based on mutual consent, without threat of penalty; and
- There is no evidence of any practices indicative of forced or compulsory labour, including, but not limited to:
 - Physical and sexual violence
 - Bonded labour
 - Withholding of wages/including payment of employment fees and or payment of deposit to commence employment
 - Restriction of mobility/movement
 - Retention of passport and identity documents
 - Threats of denunciation to the authorities



- 4.3. The FSC COC Standard assists in ensuring that there are no indicators of slavery by further requiring independently audited evidence that:
- There is no discrimination in employment and occupation; and
 - Rights to freedom of association and the effective right to collective bargaining are maintained, in that:
 - Workers are able to establish or join worker organisations of their own choosing; and
 - The organisation respects the full freedom of workers' organisations to draw up their constitutions and rules; and
 - The organisation respects the rights of workers to engage in activities relating to forming, joining or assisting a workers' organisation, or to refrain from doing the same, and will not discriminate or punish workers for exercising these rights;
 - The organisation negotiates with lawfully established workers' organisations and/or duly selected representatives in good faith and with the best efforts to reach a collective bargaining agreement;
 - Collective bargaining agreements are implemented where they exist.
- 4.4. The FSC system requires validation and independent auditing of suppliers annually. As this is conducted over the entire supply chain from source to finished labelled goods, the system provides us with a further means of assurance. FSC's chain of custody provides greater transparency of our supply chain and greater oversight of risks and actions related to modern slavery.
- 4.5. **Domestic Manufacture & New Supplier Sourcing:** In the year ending 30 June 2023, we successfully launched domestic production in two of our sales markets: USA & UK. Our selection criteria for tissue suppliers included FSC COC Certification and therefore our risk has been reduced via further FSC verification against standard FSC-STD-40-004 v3-1. By extending our supply base outside of South East Asia, we have reduced geographical risks inherent to the region; we acknowledge that modern slavery practices exist within USA & UK supply chains and have used audit and site visits to gain clarity and understanding for exposure to geographical and sector risks in both countries. We employ an extensive vetting process for selection of new suppliers that includes equal weighting for ethical and environmental performance as for price, as well as physical presence and on-site auditing before any business is awarded.
- 4.6. **Contractual Controls & Supplier Training:** We continue to embed FSC Core Labour Standards and our Modern Slavery Policy Suite into all manufacturing vendor contracts, making adherence and compliance with our policies fully binding. We conduct training as required depending on the lifecycle of each supplier, in conjunction with monthly and quarterly scorecarding against performance indicators that include ethical performance and compliance. We award business in response to high performance.
- Policy suite includes:
- Modern Slavery Policy
 - Anti-Bribery and Corruption Policy



- Migrant, Contract & Temporary Workers Policy - includes remediation
- Gender Equality In the Supply Chain Policy
- Forced, Bonded and Child Labour Policy - includes remediation
- Responsible Purchasing Policy

- 4.7. **Raw Material Consolidation:** In FY23, FSC due diligence allowed us to continue to consolidate the supply of our raw materials into fewer sources in China and to go deeper into the fourth tier of our supply chain. This is important for several reasons:
- Focus: Going deeper with fewer suppliers reduced risk across our broader supply chain and enabled us to focus our own resources on targeted initiatives and outcomes at fewer locations
 - Supplier relationships: More time and resource was made available for building deeper and robust relationships with critical suppliers
 - Leverage: Fewer, deeper supplier relationships enabled us to use our leverage to drive more impactful outcomes and further reduce our risk of contributing to modern slavery practices through oversight.
- 4.8. **Global Mapping and Auditing:** We continue to map and audit all suppliers within the production supply chain. As shared in 3.2, all suppliers are risk assessed against our four key pillars (High Risk Geographies, High Risk Products, Services & Importation, Vulnerable Populations & High Risk Business Models and Supply Chain Complexity) and a strategy for each supplier is determined at initial stages of engagement and refined throughout the life of the relationship. We require active social audits as a minimum standard to engagement and continue to adopt BSCI code of conduct (<https://www.amfori.org/en/solutions/social/about-bsci>) as our standard for social audits in complement to FSC Core Labour Standards independent audit program. Mapping and auditing of our supply chain enables us to:
- Accurately assess the risk that we may be contributing to modern slavery practices through lack of transparency
 - Identify specific risk factors and create action plans to reduce and mitigate those risks.
- 4.9. **Supplier Relationship Management:** In FY23 and across our global supply chain team, we have engaged in comprehensive Supplier Relationship Management training and education to positively transform our engagement with supply partners. We understand that maintaining frequent structured communication centred on targeted improvements and mutually beneficial outcomes delivers sustainable results. Maintaining fully open dialogue on problem solving and building greater trust with our suppliers helps to offset performance and compliance risk by encouraging our supply partners to willingly engage with us in challenging performance and cost conversations.



5. Assessment of the Effectiveness of our Actions to Identify & Address Modern Slavery Risks

Quite simply, how do we rate ourselves and where do we need to improve? How do we know our policies etc. are working?

5.1. In the year ending 30 June 2023, we believe that our actions have been effective in reducing our risk of causing, contributing to or being indirectly linked to modern slavery practices within our own operations or those of our suppliers:

- Gaining FSC Chain of Custody Certification: verifies that forest-based materials produced according to FSC's rigorous standards are credibly used along our tissue product's path from the forest through to manufacture of finished goods and into our third-party warehousing operations. Combined with our existing audit program, this system reduces our risk of oversight and allows us to prioritise actions for greatest impact.
- The inclusion of modern slavery due diligence in our supplier sourcing processes has enabled successful transition into domestic manufacturing markets and reduced our geographic risk in relation to South East Asia.
- Continued raw materials consolidation has reduced some of the risk associated with complexity and provided us with opportunities for deeper relationship building and greater leverage to drive change ongoing.

5.2. We accept that our actions this year have not eliminated all risk and have taken steps to address residual risk in the coming year. Our priorities for FY24 include:

- Extension of Audit Program into Tier 4: Raw materials in China remain a key focus area for us in the coming year. Delays in market accessibility in FY23 created challenges for direct auditing which we are currently addressing; completion of direct auditing of all raw inputs providers, including paper collectors and bamboo farms.
- Courier Review: We are reviewing the employment standards of our courier partners in the UK and will include a deep dive into the modern slavery statements of existing and new suppliers. For our volume within London (20% of UK volume) we are moving to a new courier partner who employs their own drivers and pays the Real Living Wage.
- US Manufacturing: We are continuing our efforts to identify manufacturing opportunities in our market countries to further reduce modern slavery risks, and FY24 plans include continued domestication of US products.
- Supplier Relationships: We are continuing our efforts to establish strong and enduring relationships with suppliers who share a strong commitment to ethical standards of conduct focused on responsibility, reputation, integrity, transparency, diversity, environmental sustainability, and social



responsibility.

- Palm Oil: As mentioned in section 3.5, we will continue to explore alternatives to palm oil in our product formulations. Our ingredient exploration takes into consideration several complex social and environmental factors associated with the use of plant oils including what plant and region the oils are sourced from as well as if there is a system in place to ensure responsible sourcing.

6. Version Control

This statement is reviewed and updated annually and published. It aligns with best practice and legal requirements.

	Last Modified	Last Modified By	Document Changes
0.1	15 Nov 2023	Nila Jayasekera	Document first created
0.2	16 Nov 2023	Nila Jayasekera	Document review (DRAFT)
1.0	12 Dec 2023	Nila Jayasekera	Finalised document after review

Simon Griffiths

Simon Griffiths, CEO, December 2023