

20 MODERN 25 SLAVERY STATEMENT



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ABOUT THIS STATEMENT

Super Retail Group Limited (ACN: 108 676 204) (Super Retail Group) is an Australian public company listed on the Australian Securities Exchange (ASX:SUL). The registered office is at 6 Coulthards Avenue, Strathpine, Queensland, 4500, Australia.

This is Super Retail Group's (**the Group**) Modern Slavery Statement (Statement) pursuant to the *Modern Slavery Act (Commonwealth) 2018* (the Act) for the financial year ended 28 June 2025 (FY25). This is a joint statement covering Super Retail Group and the entities described under Appendix 3 *Reporting Entities*. This Statement describes how Super Retail Group seeks to identify, assess, and address risks and instances of modern slavery across its operations and supply chain. It also sets out how the Group assesses the effectiveness of its approach.

This is our sixth Statement, and it has been internally reviewed and subject to internal assurance.

The CEO and Board of Super Retail Group (as principal governing body of the entities described in Appendix 3 *Reporting Entities*) approved this Statement on 25 November 2025. This statement has been signed by Paul Bradshaw, Group Managing Director and Chief Executive Officer in his role as a responsible member of the Super Retail Group Board. Refer to Appendix 2 for approvals and confirmation of mandatory criteria according to sections 4 and 16 of the Act.

This report contains forward-looking statements. While these forward-looking statements reflect Super Retail Group's expectations at the date of this report, they are not guarantees or predictions of future performance or statements of fact. These statements involve known and unknown risks and uncertainties, which may cause actual results to differ materially from those expressed in the statements contained in this report.

Note: Key capitalised terms used in this Statement are defined in the Glossary in Appendix 1.

Acknowledgement of Country

Super Retail Group acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and communities. We pay our respect to Aboriginal and Torres Strait Islander cultures; and to Elders past and present.

We also operate in Aotearoa New Zealand, and we acknowledge ngā iwi Māori as Tangata Whenua (First People) of Aotearoa.

Super Retail Group is committed to upholding Te Tiriti o Waitangi - Treaty of Waitangi principles, developing relationships with, and supporting local iwi.

Manaaki whenua,
Manaaki tāngata,
Haere whakamua.

If we care for the land,
If we care for the people,
We can move forward into the future.

Māori proverb

Original artwork Seed Dreaming - Watiya-warnu Jukurrpa, was produced by Charmaine Napangardi Dickson, who is a third-generation artist with Warlukurlangu Artists, for our Reflect Reconciliation Action Plan.



SECTION 1



Our CEO's statement

Our commitment to upholding human rights and fair working conditions across our supply chain and operations remains a priority. This Modern Slavery Statement outlines the progress made during the reporting year in enhancing our Responsible Sourcing program and strengthening the management of human rights and modern slavery risks, particularly in areas where we have our highest risks.

Our Values – along with our Human Rights and Responsible Sourcing Policy, Responsible Sourcing Code, and the passion and dedication of our team members – continue to drive our efforts for continuous improvement to protect the rights and wellbeing of workers in our supply chain and operations.

The appointment of the Federal Anti-Slavery Commissioner during the reporting period was a welcome step forward and we will remain engaged with industry groups on the proposed updates to the Modern Slavery Act.

Super Retail Group sources products from several countries. We have complex supply chains with multiple tiers and a diverse product mix. Identifying and addressing risks takes time and sustained focus. Our progress is gradual and deliberate, and we are guided by our risk management framework as we work towards our goals.

We encourage and expect our trade partners and service providers to share our commitment to enhance compliance, and where applicable provide remedy and deliver improved outcomes.

During the year we continued to prioritise compliance verification for higher risk first tier Factories supplying our private brand, direct import and licensed products that the Group is responsible for manufacturing. Through this process we identified various human rights and labour related issues including health and safety concerns, excessive working hours, wages and payroll issues and inconsistent records at some Factories. We continue to work with relevant Factories to improve and if we are unable to reach an acceptable resolution on fundamental issues, we seek alternative sourcing options.

We also achieved further progress following the FY24 Second Party Audit at a Factory in China (April 2024), where we had identified a child worker under the legal age of 16. We engaged LRQA to support and monitor the situation over several months. Based on a report received in December 2024, the child had reached the legal working age and had remained at school. The Factory has addressed the key issues and its status is now Approved.

Also, as reported previously, during the year we identified an existing first tier Factory that had failed to disclose that it had fully outsourced all aspects of manufacturing, assembly and packaging of some of our private brand finished products. We have resolved this issue and have initiated a broader assessment to identify other similar cases.

During FY25, our key improvement initiatives included:

- Introduction of remote LRQA Worker Sentiment Surveys (workers voice) as part of our Second Party Audits to gain anonymous worker insights.
- Improvement in cross functional engagement with our Group Sourcing Office to strengthen onboarding and offboarding processes for trade partners and Factories and help identify potential outsourcing issues.
- Review of Responsible Sourcing risk treatment plans, processes, contract terms and questionnaires to improve future practices.

We recognise that addressing modern slavery risks is a continuous journey. We remain committed to improving supply chain transparency through Second and Third Party Audits, Worker Sentiment Surveys and enhanced sourcing processes that will help uphold the rights of workers.

Paul Bradshaw
Group Managing Director and Chief Executive Officer
25 November 2025



Super Retail Group is a signatory to the United Nations Global Compact (UNGC), a participant of the Global Compact Network Australia (GCNA), and strongly supports the Ten Principles of the UNGC in the areas of Human Rights, Labour, Environment and Anti-Corruption. The Group aims to contribute to the UN Sustainable Development Goals (SDGs) through our operations and supply chain.

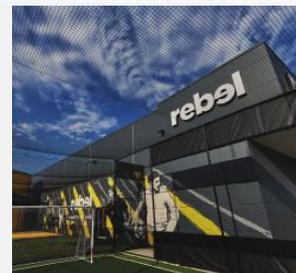
Our structure, operations and supply chain

OUR STRUCTURE

Super Retail Group (ASX: SUL) is the proud owner of four iconic brands: Supercheap Auto, rebel, BCF and Macpac, and is one of Australia and New Zealand’s largest retailers.

Our powerful Brands have leading positions in growing high-involvement lifestyle categories of auto, sports, and outdoor leisure. For our customers and highly engaged 12.5 million active club members, we source, distribute and provide a mix of national and international consumer branded products, as well as private brand products, through online and in-store channels.

The Group provides centralised support services for the procurement and distribution of goods, including, e-commerce activities, customer service and logistics management.



Supercheap Auto is Australia and New Zealand’s favourite specialty automotive parts and accessories retail business. With 352 stores, we provide a wide range of service parts, tools and accessories, as well as products for the garage, travel, touring and outdoor.

rebel is Australia’s leading sporting goods retailer with 162 stores across Australia. Through rich digital and in-store experiences, customers from all walks of life can harness the transformative power of sport. With a broad range of quality product and expert knowledge, we transform lives through the power of sport.

BCF is a leading outdoor retailer with 165 stores across Australia. With expert knowledge and service, we provide everything you need for your next boating, camping, or fishing adventure, all under the one roof.

Macpac is New Zealand’s original, technical outdoor brand, delivering quality gear, made responsibly, and trusted to last in any environment. Tested and proven in the ultimate outdoor test lab – New Zealand – our gear is designed to equip outdoor enthusiasts to adventure better. Launched in 1973, Macpac has 103 stores across Australia and New Zealand and is committed to delivering a great customer experience with expert advice.

OPERATIONS

OUR OPERATIONS

782	TOTAL RETAIL STORES ¹	8	ONLINE RETAIL CHANNELS
352	SUPERCHEAP AUTO <i>Australia and New Zealand</i>	4	SUPPORT OFFICES
162	REBEL <i>Australia</i>	7	DISTRIBUTION CENTRES
165	BCF <i>Australia</i>	3	COUNTRIES OF OPERATION <i>Australia, New Zealand and China</i>
103	MACPAC <i>Australia and New Zealand</i>		

¹ During FY25, we closed 8 stores and opened 31 new stores.

OUR TEAM

15,981	DIRECTLY EMPLOYED TEAM MEMBERS
83 to 321	LABOUR HIRE FTE ² (RANGE) IN OUR DISTRIBUTION CENTRES
~4.6%³	UNION MEMBERS
75%⁴	COVERED BY AN ENTERPRISE AGREEMENT

Note: FY25 data unless otherwise noted.

- ² We utilise labour hire services to support our Distribution Centre (DC) team members. During FY25, the level of support in Full Time Equivalent (FTE) basis varied between 21% (June 2025) and 48% (December 2024) of total DC team members, in line with retail seasonal fluctuations.
- ³ Proportion of the total number of team members engaged by SRG in Australia and New Zealand in FY25 who have payroll deductions for union membership. Excludes team members based in China.
- ⁴ As at FY25, 2,959 Australian team members not covered by an Enterprise Agreement were either Award covered or Award/Agreement-free. As at FY25, our 999 New Zealand team members and 74 China team members are engaged on individual employment agreements underpinned by national and local government legislation.

SUPPLY CHAIN

OUR SUPPLY CHAIN - RETAIL PRODUCTS⁵

Our retail products (including private brand, licensed or national brands) are purchased via the following supply chain arrangements:

- A. Products sourced from Factories directly contracted by our group including Direct Imports;
- B. Products sourced from manufacturing partners or Factories - mainly private brand goods; and
- C. Products sourced from trade partners who manage their own supply chains such as national brands. (This category of products is not managed through our responsible sourcing compliance verification program. These suppliers are responsible for their own compliance obligations).

Suppliers need to meet our Human Rights and Responsible Sourcing Policy and Responsible Sourcing Code expectations.

~\$2.35b

ANNUAL SPEND⁶

920+

TRADE PARTNERS⁷

OUR SUPPLY CHAIN - NON-STOCK PRODUCTS AND SERVICES

Non-Stock products and services include marketing and promotional materials, team member uniforms, capital expenditure, professional services, transport and logistics providers, and cleaning services, amongst others.

~\$680m+

ANNUAL SPEND⁸

1,950+

SUPPLIERS

PRIVATE BRAND PRODUCTS AND FACTORIES⁹ IN SCOPE OF COMPLIANCE VERIFICATION PROGRAM

10,000+ Group private brand products

15 Countries of manufacture

569 Factories⁹, 86 per cent in China

25.4% Group revenue from private brand products¹⁰

SUPERCHEAP
AUTO

30.5%

270+

rebel

9.4%

Group private brand trade partners

BCF

25.0%

macpac

86.0%

Note: Data for FY25 unless otherwise noted.

⁵ Super Retail Group has retail operations in Australia and New Zealand.

⁶ The annual amount used for purchasing our products in Australian Dollars and excluding GST.

⁷ Refers to retail trade partners supplying inventory to the Group. Purchase arrangements vary between ad-hoc orders (short-term) and regular orders (longer-term).

⁸ Our Annual Spend on Non-Stock Procurement is calculated including GST or sales tax equivalent. Costs related to taxation, rent and other finance related expenditure have been removed.

⁹ Factories which supply or manufacture Super Retail Group's private brand products; Factories directly contracted by the Group to manufacture products; Factories which supply or manufacture private brand Non-Stock products to/for the Group. These Factories are in the scope of our Responsible Sourcing compliance verification program as outlined in our Responsible Sourcing Code.

¹⁰ Based on approximate percentage of private brand products' sales revenue for FY25, in Australian dollars and excluding GST.

Our governance

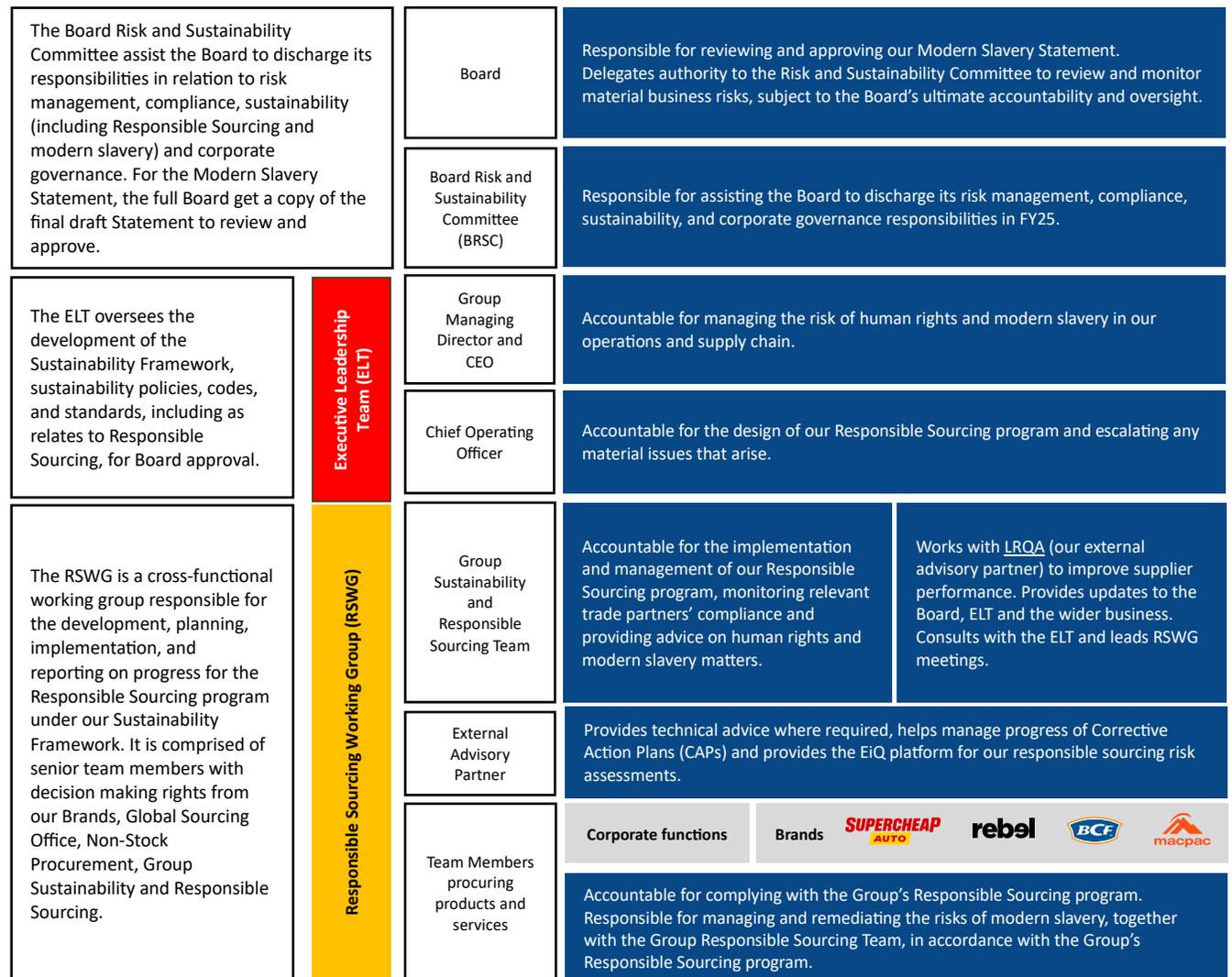
HUMAN RIGHTS AND WAYS OF WORKING

Super Retail Group is committed to upholding human rights and fair working conditions for our team members, trade partners, service providers, and people in our supply chain.

Our responsible sourcing expectations are aligned with several recognised international standards and conventions, including:

- International Bill of Human Rights including the Universal Declaration of Human Rights (UDHR);
- International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work and ILO Conventions;
- United Nations Guiding Principles on Business and Human Rights;
- United Nations Global Compact (UNGC) core values of human rights, labour standards, the environment and anti-corruption; and
- United Nations Sustainable Development Goals (SDGs) and targets relevant to our operations and supply chain.

Our governance approach promotes ongoing consultation with the Brands and corporate functions on responsible sourcing issues, including human rights and modern slavery risk management. Key issues are reported to the Board as part of the Managing Director's Report. Overall program outcomes are reported annually in our [Responsible Business Report](#) (previously named Sustainability Report) and this Statement. Our FY25 internal governance framework related to Responsible Sourcing and modern slavery is outlined on the right.



OUR SUSTAINABILITY FRAMEWORK 2030 (FY25 PROGRESS)



ESG FOCUS AREA	ESG GOAL	2030 TARGETS	FY25 PROGRESS	COMMENTARY
TEAM	1 Invest in the health, safety and wellbeing of our team	<ul style="list-style-type: none"> Implementing a holistic wellbeing program – participation rates Health and Safety TRIFR; first quarter performer in retail 	<p>→</p> <p>→</p>	<p>Good progress achieved, with an improvement from 14.5 to 12.1 (17 per cent) in our Total Recordable Injury Frequency Rate (TRIFR), over the past year. We also continued to implement our 'Reflect' Reconciliation Action Plan and Diversity, Accessibility, and Inclusion Plan to support a more inclusive and equitable workplace. Senior leadership gender diversity improved from 37% in FY24 to 41% in FY25, while Board and executive leadership remained steady at 50% and 33%, respectively. We continue to invest in programs that strengthen leadership capabilities and foster inclusive growth, to support the development of a strong leadership and talent pipeline.</p>
	2 Create an inclusive and diverse team	<ul style="list-style-type: none"> Develop Reconciliation Action Plan 40:40:20¹¹ Develop Access and Inclusion Plan Program development for greater diversity and inclusion inc LGTBIQ+ 	<p>→</p> <p>→</p> <p>→</p>	
	3 Support our team with purpose-led career development	<ul style="list-style-type: none"> Deliver programs for purpose led career development 	<p>→</p>	
COMMUNITY	4 Invest in community programs that support our customers' and team's passions	<ul style="list-style-type: none"> Identify key purpose-aligned community partnerships and agree a strategy for each Brand Contribute to conservation and regeneration programs 	<p>→</p> <p>→</p>	<p>All Brands have established partnerships and community programs that reflect their unique purpose and resonate with the passions of our customers and team members. This year, we contributed over \$3.1 million¹³ to community organisations across Australia and New Zealand.</p>
RESPONSIBLE SOURCING	5 Improve transparency and disclosure of high-risk supply chains	<ul style="list-style-type: none"> Collaborate with and support strategic trade partners to improve their supply chains 	<p>→</p>	<p>We remain committed to improving supply chain transparency through Second and Third Party Audits, Worker Sentiment Surveys (workers voice), enhanced sourcing processes, and ongoing review of factory outsourcing gaps to strengthen visibility and manufacturing insights. Recognising the complexity of our global, multi-tiered supply base, we also engage with industry bodies such as the Australian Retailers Association Sustainability Committee and the UN Global Compact Network Australia – Modern Slavery Community of Practice to remain informed of evolving expectations, emerging risks, and leading practices in responsible sourcing and supply chain governance.</p>
	6 Invest in sustainable supply chains through strategic partnering	<ul style="list-style-type: none"> Contribute to industry level change 	<p>→</p>	
	7 Source materials and products more responsibly	<ul style="list-style-type: none"> Embed responsible purchasing practices in decision making across our business 	<p>→</p>	
CIRCULAR ECONOMY	8 Design and procure durable products, with a circular mindset	<ul style="list-style-type: none"> Develop a standard for design and procurement of products 	<p>→</p>	<p>Our circularity program this year focused on team member training and education, alongside targeted product ranges. We prioritised the use of more sustainable and durable materials, incorporating customer feedback into design reviews to enhance product longevity. This year, we exceeded our waste diversion target of 64 per cent, achieving 65.9 per cent (up from 62.3 per cent in FY24). Our sustainable packaging program has also reduced the use of non-recyclable materials, though further improvement is needed, particularly in addressing hard-to-recycle materials and increasing recycled content.</p>
	9 Reduce waste and unnecessary packaging	<ul style="list-style-type: none"> Increase waste diverted from landfills to 90 per cent 100 per cent of private brand packaging is reusable or recyclable¹² Adopt the Australasian Recycling Label for private brand packaging¹² 50 per cent average recycled content must be included in private brand packaging⁷ Problematic and single-use private brand plastic packaging must be phased out¹² 	<p>→</p> <p>→</p> <p>→</p> <p>→</p>	
	10 Repair, reuse or recycle our products		<p>→</p>	
CLIMATE	11 Develop a decarbonisation roadmap for our operations and customer offering	<ul style="list-style-type: none"> Net Zero Emissions for Scopes 1 and 2 Measure, manage and report Scope 3 emissions to avoid and reduce emissions in our supply chain. 	<p>→</p> <p>→</p>	<p>We are progressing well on our decarbonisation and climate programs. Our decarbonisation roadmap this year included the ongoing rollout of energy efficiency measures in our stores, the development of an energy efficient store fit out specification, onsite solar PV installations, moving from LPG to electric forklifts and the implementation of market-based emissions reporting. Key achievements in the climate program include the establishment of an ASRS Climate Reporting Working Group, commencing a supply chain climate risk assessment and improved Scope 3 data measurement.</p>
	12 Enhance climate-related disclosures	<ul style="list-style-type: none"> Align climate-related reporting to the Task Force on Climate-related Disclosures and adoption of the Australian Sustainability Reporting Standards (ASRS) Understand our priority climate-related risks and opportunities and financial impacts. 	<p>→</p> <p>→</p>	



More work to do Progress slower than anticipated and may be affected by external factors.



Making progress Good progress made towards delivering, ahead of or in line with 2030 targets.



Achieved Initiative delivered ahead of time and now part of business-as-usual operations.

¹¹ The Group has a goal of 40:40:20 representation in Board, executive and senior leadership positions.

¹² Our packaging targets are aligned to those set by the Australian Government, with delivery due by 31 December 2025.

¹³ Figure includes both direct donations (cash or product donations from the Brands) and indirect donations (cash donations from team members and customers which have been facilitated by a Brand, such as customer donations to a charity at point of sale).

Our overarching *Sustainability Framework 2030* sets our path forward for our five focus areas: *Team, Community, Responsible Sourcing, Circular Economy, and Climate.*

These focus areas have 12 goals. **Goals 5, 6 and 7** relate to **responsible sourcing and are linked to relevant targets**. Our 2030 Sustainability Framework continues to guide our sustainable business practices. A double materiality exercise currently underway will support a refreshed sustainability framework, coupled with the development of strategic roadmaps to 2030.

POLICY FRAMEWORK

Super Retail Group has several policies and codes that articulate our Values and the expectations of our team members, trade partners and service providers.

The policies and codes listed here relate specifically to human rights, modern slavery risk and ethical behaviour generally, with the [Human Rights and Responsible Sourcing Policy](#) and [Responsible Sourcing Code](#) embodying the Group's approach to human rights and modern slavery risk management (explained further in *Section 3 Identifying and assessing our modern slavery risks*) and are underpinned by several recognised international standards and conventions as explained on page 8.

Each Policy or Code is subject to approval or oversight from the Board and its Committees, the CEO, or the ELT, as detailed in the table.

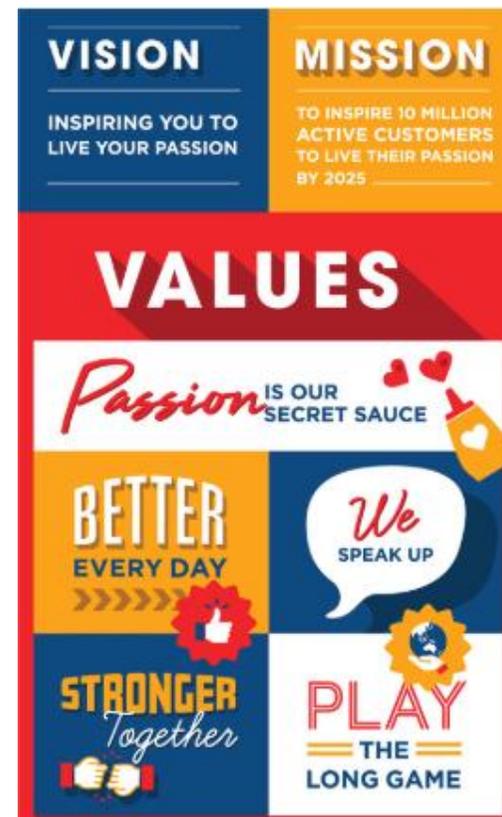
POLICY OR CODE	CONTENTS AND PURPOSE	APPLIES TO SUPER RETAIL GROUP	APPLIES TO TRADE PARTNERS AND SERVICE PROVIDERS
<u>Code of Conduct</u> ¹⁴	Sets out the expected standards of behaviour for business activities and outlines legal and ethical obligations for team members, officers, volunteers, work experience students, contractors, and labour-hire workers of Super Retail Group and wholly owned subsidiaries.	✓	N/A ¹⁶
<u>Compliance Policy</u> ¹⁴	Outlines the Group's expectation and commitment to compliance with all applicable laws and Group values.	✓	✓
<u>Human Rights and Responsible Sourcing Policy</u> ¹⁴	Approved by the Board in February 2024. Provides a set of high-level expectations of team members, trade partners, and service providers in relation to human rights, modern slavery, business integrity and the environment drawing on international standards. This Policy is also available in Chinese . The policy also references the Speak Up (Whistleblower) Policy and relevant contact points.	✓	✓
<u>Responsible Sourcing Code</u> ¹⁴	Approved by the Board in February 2024. This Code supports the implementation of our Human Rights and Responsible Sourcing Policy and promotes business integrity; human rights and fair working conditions; environmental management; and sustainable sourcing throughout our supply chain. It outlines our monitoring programs and verification expectations of trade partners and service providers. This Code is also available in Chinese .	✓	✓
<u>Responsible Sourcing Procedures</u> ¹⁵	These detail the Group's internal procedures to assess risk and verify compliance against our Responsible Sourcing Policy and Code, and outline our expectations related to trade partner and service provider compliance. There are separate internal procedures for Factories (trade partners) and Non-Stock/services (service providers).	✓	✓

¹⁴ These policies and codes are publicly available on our website at www.superretailgroup.com.au.

¹⁵ These are internal policies and documents that are available to team members on our intranet.

¹⁶ Similar requirements for trade partners and service providers are documented in our [Responsible Sourcing Code](#).

POLICY OR CODE	CONTENTS AND PURPOSE	APPLIES TO SUPER RETAIL GROUP	APPLIES TO TRADE PARTNERS AND SERVICE PROVIDERS
<u>Speak Up (Whistleblower) Policy</u> ¹⁷	<p>Updated July 2024 and approved by the Board, this policy outlines for team members, trade partners, service providers and others, the mechanisms for reporting and investigating concerns about conduct suspected to be unethical, illegal, or contrary to our values. Concerns may be raised to the Integrity Officer in writing, by phone through the Integrity Line (for our China-based team members and suppliers) or anonymously via ‘Whispli’. This Policy is also available in Chinese.</p> <p>The Board Risk and Sustainability Committee will periodically receive a summary of reports made under the whistleblower program and has oversight of the maintenance of the whistleblower program. Where appropriate, the Committee may escalate issues to the Board.</p>	✓	✓
<u>Anti-corrupt Practices Policy</u> ¹⁷	<p>Outlines our commitment to recognising, reporting, and upholding laws and regulations relating to bribery and corruption.</p>	✓	✓
<u>Workplace Resolution Policy</u> ¹⁸	<p>Sets out our commitment for resolution of workplace issues. This Policy may be used in conjunction with the processes outlined in the Whistleblower Policy.</p>	✓	N/A ¹⁹
<u>Supporting Young Team Members Policy</u> ¹⁸	<p>Outlines minimum requirements and expectations to safeguard workers under 18 years of age directly employed by Super Retail Group.</p>	✓	N/A ¹⁹
<u>Harassment-Free Workplace Policy</u> ¹⁸	<p>Outlines our commitment to maintain a professional work environment that is free from workplace harassment (bullying), sexual harassment and discrimination.</p>	✓	N/A ¹⁹



¹⁷ These policies and codes are publicly available on our website at www.superretailgroup.com.au.

¹⁸ These are internal policies and documents that are available to team members on our intranet.

¹⁹ Similar requirements for trade partners and service providers are documented in our Responsible Sourcing Code.

SECTION 3

Identifying and assessing our modern slavery risks

We review our risk profile for human rights and modern slavery on a regular basis to inform the actions in our Responsible Sourcing program and mitigate adverse human rights risks and impacts. The potential types of modern slavery risks identified as most relevant to our operations and supply chain are the risk to people of Forced Labour, Debt Bondage, Deceptive Recruitment practices and Child Labour.²⁰ These practices are prohibited under our Human Rights and Responsible Sourcing Policy and Responsible Sourcing Code. We also identify other human rights related risks including those related to remuneration, working hours, health and safety and other working conditions.

We consider inherent exposures across our operations and supply chains to identify where the risks of modern slavery may be heightened by known factors. Those factors include the geographic location of a factory or service, the type of industry or commodity, or presence of specific workforce vulnerabilities.²¹

To better understand our supply chain and enhance our approach to risk and factory profiles, including the impact of high-risk products, we utilise the LRQA EiQ supply chain intelligence platform. This has allowed us to gain better insight into potential risk at Factories that are part of our compliance verification process including risk of

certain products, and it forms part of our overall Responsible Sourcing program review process. The EiQ methodology covers multiple sub-indices across 5 key sustainability dimensions and incorporates risks from various audits conducted by LRQA for their clients as well as public domain data from multilateral organisations and NGOs.

We also consider our potential relationship to modern slavery risks in line with the **United Nations Guiding Principles on Business and Human Rights** “Protect, Respect, and Remedy Framework”. This acknowledges that businesses can *cause, contribute to, or be directly linked to* human rights risks and impacts and aim to address or encourage remediation as appropriate.

Practices such as Forced Labour are found to be more prevalent in certain industries and sectors, notably manufacturing and its supply chains. Although not a direct operation of our business, manufacturing is a core component of our supply chain. Manufacturing therefore constitutes our largest exposure to modern slavery risk.

The Group’s assessment of risks to date has focused primarily on direct business relationships and the first tier of our supply chains. While risks exist beyond these relationships and the first tier, management and oversight are complicated by layers of supply and reduced leverage. Consistent with our principle to focus our efforts where we believe we have the greatest risk and can have the greatest impact, we will be focusing our efforts beyond the first tier of our supply chain on identifying the highest risk inputs and components of our products (e.g. cotton) that may have links to Child and Forced Labour across Asia. We still have a long journey ahead but as an example by Macpac choosing Fairtrade organic cotton for Macpac’s 100

per cent cotton T-shirts, we contribute to a system that supports more resilient livelihoods, fairer trade relationships, and more transparent sourcing practices.

As defined in the Modern Slavery Act 2018 Guidance for Reporting Entities²¹, an important aspect of identifying modern slavery is acknowledging the connection to other potential practices of workplace and labour exploitation. The ILO has outlined the following indicators of Forced Labour, recognising that some of these are enough to constitute Forced Labour, while others are significant warning signs:

1. Abuse of vulnerability;
2. Deception;
3. Restriction of movement;
4. Isolation;
5. Physical and sexual violence;
6. Intimidation and threats;
7. Retention of identity documents;
8. Withholding of wages;
9. Debt bondage;
10. Abusive working and living conditions; and
11. Excessive overtime.

In line with the Modern Slavery Act guidance, our Responsible Sourcing program considers modern slavery on a spectrum with other forms of labour and human rights exploitation and recognises that these other forms of exploitation could be signs that severe practices like Forced Labour may be occurring.

Our commitment to identifying and addressing these and other human rights abuses is reflected in our Due Diligence Process (i.e. the process by which we evaluate and address risks) and our supplier management practices. We outline our efforts to promote compliance with the Responsible Sourcing Code in the following sections.

²⁰ Definitions for these types of modern slavery can be found in the glossary.

²¹ Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities (May 2023 update)

Our Commitment - Responsible Sourcing

We are committed to building a more transparent and responsible supply chain, supported by strong environmental, social and governance practices that benefit our team members, customers, trade partners, service providers, and the communities in which we operate.

We source our products from various countries. As a business with complex supply chains with multiple tiers and a diverse product mix, identifying and addressing risks will take time and requires ongoing focus.

Progress is gradual and deliberate, and we are guided by our risk management processes and our organisational values as we work towards our goals.



United Nations Sustainable Development Goals

Operations' Risks

We consider modern slavery risks in our operations in relation to our team members and the use of contracted services and labour. Super Retail Group does not own any manufacturing operations. In FY25 our operations included 782 retail stores, seven distribution centres, four support offices and two sourcing offices across Australia, New Zealand and China which were leased from property landlords.

Most of our team members are employed by the employing entity of a Brand subsidiary company, or by Super Retail Group Services Limited. In FY25, we employed 15,981 team members, of which 75 per cent were covered by enterprise agreements. The remaining team members were engaged on individual employment agreements, in accordance with relevant workplace laws. The standards, obligations and worker protections required by Australian and New Zealand labour laws result in a relatively lower risk of modern slavery within our team.

During FY25, between 83 to 321 Full Time Equivalent (FTE) workers at our distribution centres were contracted through labour hire firms. These firms are assessed under our Responsible Sourcing program as part of their onboarding and contract renewal processes for service providers.

Supply Chain Risks

SUPPLY CHAIN RISKS- SERVICE PROVIDERS

Our [Human Rights and Responsible Sourcing Policy](#) and [Responsible Sourcing Code](#) apply across our supply chain and include service providers. In line with our Non-Stock Group Procurement onboarding process, we aim to screen service providers, who enter into new contracts with the Group, against responsible sourcing requirements through contract conditions, self-declarations or other assessments. Some exemptions may be provided as part of our procedures. Further information for assessment may be requested, depending on the residual risk.

We continue to consider that the following characteristics may present heightened risks for service providers in Australia and New Zealand and this is the basis upon which we assess the risk of service types we could receive in our operations:

- Use of labour brokers and third-party labour providers;
- Higher prevalence of migrant, overseas, other vulnerable or young workers (e.g. office cleaning and catalogue distribution); and
- Multi-layer subcontracting models (e.g. where multiple subcontractors can be involved in completing the work or contractors can in turn subcontract further e.g. construction and fit out works at our stores and DC's).

The risk rating of the service types used in our operations remained mostly unchanged from FY24. General examples of service types and risk ratings are provided in the attached table. Risk ratings for a service type may be adjusted following additional review of information from a supplier. Therefore, service providers under similar service types may be allocated different risk ratings.

In FY25, the Responsible Sourcing Team continued its engagement with our Non-Stock Group Procurement team and Legal team to help assess and support the management of responsible

sourcing issues relating to onboarding of relevant service providers.

Assessment of our service providers is limited to our Non-Stock Group Procurement onboarding process and proportionate to the level of risk. During the year our Non-Stock responsible sourcing verification process, Supplier self-declaration and questionnaire as well as the sustainability related questions in our Group Procurement tender documentation were updated to reflect better practices and reinforce our commitment to partnering with key service providers who share our sustainability goals.

During FY25, we onboarded 31 service providers across various service types through the Non-Stock Group Procurement process. Of these, six were exempt and 25 were screened for Responsible Sourcing requirements through contract conditions, self-declarations or other assessments. An additional four suppliers were identified that should have been onboarded through the Non-Stock Group Procurement process but were not. These were therefore not screen for responsible sourcing requirements. Data related to the risk rating of the 35 service providers can be found on page 13 of our [FY25 Responsible Business Report Data Pack](#).

SERVICE TYPE EXAMPLES THAT COULD BE ONBOARDED - POTENTIAL RISK RATING

Office cleaning (includes distribution centers)
Direct mail marketing – catalogues
Labour hire
Logistics (transport/ freight)
Physical security
IT services (if overseas workers are used)
Fitness equipment installation
Offshore services (i.e. warehousing)
Facilities maintenance
Construction
Energy supply ²²
Insurance
Professional services
Travel
Waste disposal

HIGH

LOW

²² Our decarbonisation plan for 2030 incorporates on-site solar panels installed by our landlords or us. We acknowledge the potential risks involved in the procurement of energy infrastructure in this way. We will review these risks as part of our assessments from an operational perspective as well as a supply chain perspective.

SUPPLY CHAIN RISKS- OUR PRODUCTS

For our **products**, our FY25 assessment of risks for the first tier Factories of our supply chain included consideration for the following three main factors:

- Our proximity to, and business relationship with, the factory;
- Insights gained through our compliance verification program and work with external partners such as LRQA, the EiQ platform and the media scanning tool Sentinel; and
- Other information from external or internal sources that may indicate heightened risk for certain trade partners or Factories.

Proximity to supply

We continued to focus our due diligence efforts where they will have the most impact. We do this by focusing on those business relationships where we have more influence on, and proximity to, the manufacture of the goods. We believe this provides us with the greatest potential to both understand how we might cause or contribute to modern slavery practices in our supply chains, as outlined by *United Nations Guiding Principles on Business and Human Rights*²³, and work with trade partners

and Factories to implement positive change in the areas of human rights and modern slavery.

We have assessed Super Retail Group's ability to influence its supply chain as highest in relation to:

- Private brand products, Direct Imports, licensed products that the Group is responsible for manufacturing; and
- Non-Stock products with corporate branding.

For these types of products, Super Retail Group has greater transparency on pricing inputs, demand planning and greater leverage to influence trade partners to improve performance.

Country risk

We utilise the LRQA EiQ supply chain intelligence platform and media scanning tool Sentinel for our first tier Factories to assess risk. With this tool, we have greater visibility into risk factors such as regional differences, inherent product and industry risks, Factory performance, leverage and other Environmental, Social, and Governance (ESG) risk ratings. These allow us to have better insight into potential risk at existing Factories as well as help with screening of new Factories during onboarding.

The EiQ platform geography risk ratings form part of LRQA's supply chain ESG risk ratings portfolio that includes ratings for over 100 geographies, over 600 products, as well as controversy intelligence and risk scores for more than 500,000 suppliers.

Our compliance verification audit cycle for relevant Factories is generally once every two years unless exemptions, extensions or other circumstances require a different approach.

We utilise the geography risk ratings obtained through the EiQ platform to determine the high level scope of compliance verification for the relevant Factories. This is further supplemented by checking other requirements such as those for specific licensed brands products that we are responsible for manufacturing and international or internal information that potentially identify heightened risks of human rights or modern slavery.

²³ As guided by *United Nations Guiding Principles on Business and Human Rights* the "Protect, Respect and Remedy" Framework.

The following table identifies for each manufacturing country the FY25 risk rating, compliance verification program inclusion and the number of Factories from which our private brand products, Direct Imports and licensed brands that we are responsible for manufacturing were sourced.

Given the concentration of our Factories in higher risk counties as well as other factors, most of our relevant Factories (93 per cent) were considered to be inherently higher risk and in scope of our compliance verification process requirements. Refer to *Section 4 (Our actions to address key modern slavery risks)* for further details on how we manage these risks.



FY25 First Tier Factories by Country and Risk Rating

Country	Number of Factories ²⁴	Country of Factories in Scope of Compliance Verification FY25	EIQ Country Risk Rating ²⁵
Australia	31	Exempt	Medium
Bangladesh	5	Yes	High
China	487	Yes	High
England	1	Exempt	Low
India	8	Yes	High
Indonesia	2	Yes	High
Italy	2	Yes	Medium
New Zealand	6	Exempt	Low
Philippines	2	Yes	High
Slovenia	1	Yes	Low
South Africa	1	Yes	High
South Korea	3	Yes	Medium
Taiwan	5	Yes	Medium
Thailand	5	Yes	High
Vietnam	10	Yes	High
	569		
	Total		

²⁴ Number of Factories relate to our private brand products, Direct Imports and licensed brands that Super Retail Group is responsible for manufacturing. These are first tier Factories.

²⁵ Country risk based on EIQ ratings. Compliance verification scopes were based on assessment of EIQ ratings, audit performance, additional sample checks.

SECTION 4

Actions to address key modern slavery risks

APPROACH TO RISK MANAGEMENT AND ACTIONS

Our Responsible Sourcing program and relevant policies and codes, in conjunction with our processes for compliance verification, remediation, grievance reporting mechanisms, and capability building activities, together form our approach to managing and mitigating human rights and modern slavery risks.

Our [Human Rights and Responsible Sourcing Policy](#) and our [Responsible Sourcing Code](#) require team members, trade partners and service providers to:

- Conduct business with integrity, honesty, transparency, in compliance with laws and our Group policies;
- Respect human rights, labour standards and fair working conditions to protect the people across our operations and supply chains; and
- Implement environmental protection and management measures to reduce our impact on the people and planet.

New contracts and contract renewals utilising our General Business Agreement generally require inclusion of a responsible sourcing clause which requires trade partners and service providers to comply with our Human Rights and

Responsible Sourcing Policy and Responsible Sourcing Code.²⁶ Compliance and monitoring of this requirement across the Group is ongoing and we will continue to explore how we can best communicate our Responsible Sourcing requirements to existing suppliers who are not under written contractual arrangements regarding the requirements.

We continued to work with relevant team members across the Group to improve their understanding of our expectations and compliance when negotiating new contracts and contract renewals.

Trade partners that we consider to be higher risk in the context of Responsible Sourcing including human rights and modern slavery are asked to:

- Disclose to us the Factories being used to manufacture the relevant products, including name, address, and Factory contact details;
- Complete a third-party social audit according to our accepted requirements²⁷; and
- Complete Corrective Action Plans for identified non-conformances, particularly for zero tolerance and critical non-conformances.

SUPPLIER FACTORY AUDITS

For those Factories that require audits as part of our Responsible Sourcing program compliance verification process, we have incorporated

several allowances to reduce duplication and audit fatigue, ensuring we are not placing undue burden or unnecessary costs on suppliers. We accept third-party audit reports and certification conducted by accredited auditors, in accordance with the following internationally recognised programs:²⁷

- Sedex SMETA 2 or 4-Pillar audits;
- Social Accountability International (SA8000) audit or Certification;
- Worldwide Responsible Apparel Production (WRAP) Certification;
- amfori Business Social Compliance Initiative (BSCI) audits;
- International Council of Toy Industries (ICTI) Ethical Toy Program Certification;
- Responsible Business Alliance (RBA) audits;
- Fair Labour Association (FLA) monitoring reports;
- ILO Better Work Programme;
- Social & Labor Convergence Program (SLCP) assessments that are verified by approved third-party auditors; and
- Other audit reports issued by SAAS accredited or amfori-BSCI approved audit companies that meet the requirements of our Responsible Sourcing Code.

²⁶ Discretionary exemptions can be provided in some circumstances. Exemptions can also be given from audit protocol on a discretionary basis for orders with a value below \$10K USD and must be approved by the Responsible Sourcing Team based on risk (this exemption cannot be made more than once biennially).

²⁷ Audit reports must include details of non-conformances and must not be older than nine months. Certifications must have a minimum of three months validity when provided unless exemption is provided.

Relevant first tier Factories are currently required to renew their audit reports biennially based on the date of their last approved audit unless otherwise instructed. Factories that do not complete the audit on time, without an acceptable explanation, may have their Factory Status rating downgraded. Extensions to due dates or exemptions based on consideration of circumstances can be provided at the discretion of the Responsible Sourcing Team.

Our Responsible Sourcing process requires our Responsible Sourcing Team to review valid audit reports and certifications received from the Factories prior to brands placing orders for the products. After review of relevant reports or certificates, our team assigns a rating of 'Approved', 'Conditionally Approved', 'On Probation' or 'Not Approved'. Rating definitions can be found in *Appendix 1 - Glossary*.

To strengthen our compliance verification, we also conduct a limited number of Second Party and Group commissioned and funded Third Party Audits to sample compliance independently.

Trade partners that fall outside the risk criteria set out in our Responsible Sourcing Code (as outlined in *Section 3 (Identifying and assessing our modern slavery risks)*) are not required to disclose their factory details and are not subject to our Responsible Sourcing Audits. However, they are required to comply with our Responsible Sourcing Policy and Responsible Sourcing Code.

SUPPLIER AUDIT CORRECTIVE ACTION PLANS (CAPS) AND REMEDIATION

'Approved' and 'Conditionally Approved' Factories can continue to supply products to Super Retail Group. Factories can only receive an 'Approved' status once audit zero tolerance and critical non-conformances have been addressed. Exceptions may apply when the Factory can provide a genuine reason and demonstrate continuous improvement depending on the non-conformance. Zero tolerance and critical non-conformances are those that present significant risk to the workers' health, safety and rights, or which can often be legal breaches or significant risks to the environment. Examples include potential Forced Labour or Child Labour related non-conformances, failure to provide minimum wage or adequate overtime pay, failure to maintain a safe workplace, illegal or hazardous waste management issues, lack of required permits etc.

Where audits identify non-conformances with our Responsible Sourcing Code, we require our trade partners and Factories to take appropriate action to address our requirements, particularly for zero tolerance and critical non-conformances. Where relevant, we communicate the actions required to address the non-conformances by preparing and issuing a Corrective Action Plan (CAP); support capability requirements by delivering selected e-learning modules to some suppliers, through our

advisory partner LRQA; and engage directly with trade partners and Factories if our expectations are unclear.

We require our trade partners and Factories to remediate key issues identified in CAPs within an appropriate timeframe, depending on the nature and severity of the non-conformance. Most non-conformances can be closed with photographic evidence or provision of electronic copies of documents, records and plans. However, an on-site re-audit may be required to verify some corrective actions. We work with our suppliers to address significant non-conformances and if we are unable to reach an acceptable resolution, we seek alternative sourcing options.

For Macpac, the relevant trade partners are managed by the Macpac team. The [Group Human Rights and Responsible Sourcing Policy](#) and [Responsible Sourcing Code](#) apply equally to all brands' suppliers and our additional independent Third Party and Second Party Audits include sampling of some Macpac related Factories.

FY25 SUPPLIER FACTORY PERFORMANCE, BASED ON AUDITS

At the end of FY25, we had 569 registered active Factories in 15 countries:

- 88 of these Factories were onboarded during the year. These Factories were

screened against our Responsible Sourcing Code requirements as part of our mandatory review process.

- 531 Factories were subject to our compliance verification audit program requirements based on risk with 93 per cent of these having had audits done in the past two years. The outstanding 7 per cent are in the process of being progressed through our responsible sourcing program.

To complement and strengthen our general compliance verification process, where we accept and assess audit reports supplied by Factories, in FY25 our Responsible Sourcing Team conducted 24 Second Party Audits:

- An existing Factory was placed On Probation with critical non-conformances related to worker contracts and urgent fire safety issues.
- A new Factory was Not Approved for onboarding due to the significant number of critical non-conformances including business licence coverage, no fire alarm, other fire and safety related non-conformance. The Factory, subsequent to the reporting period, addressed the majority of its non-conformances, was reassessed and is now Conditionally Approved.

We commissioned and funded 14 independent audits of Factories through LRQA and based on these:

- An existing Factory was placed On Probation due to the nature of non-conformances including excessive working hours, not meeting legal requirements to obtain consent for overtime, incorrect overtime payment rates, insufficient daily break period, fire licence renewal, and various other safety concerns. The Factory addressed some of the non-conformances but

was unwilling to address others. The Factory has since been offboarded.

- A new Factory was Not Approved for onboarding. The audit identified various non-conformances including trade licence being expired, excessive working hours, construction approval not covering all facilities, and several health and safety issues.

At the end of FY25, of the 569 active Factories, 465 Factories were Approved, 100 were Conditionally Approved and four were either On Probation or Not Approved.

FY25 AREAS OF IMPROVEMENT

LRQA Worker Sentiment Surveys (workers voice)

During FY25, we began piloting remote LRQA Worker Sentiment Surveys (workers voice), deployed as part of our Second Party Audits conducted by our internal Responsible Sourcing Team at Factories. These confidential surveys provide opportunity for relevant Factory workers to give additional feedback on issues such as workplace wellbeing, labour conditions, wages, safety standards and general working environment. The insights will further help us identify key areas for improvement and enhance compliance.

We trialled this as part of ten Second Party Audits in FY25 and will continue the process in FY26. These surveys are also deployed as part of any standard LRQA ERSAs Third Party audit that we commission and fund independently. A summary of the results for FY25 completed surveys is presented on the following page.

FACTORY STATUS (end of FY25)

465

FACTORIES APPROVED

100

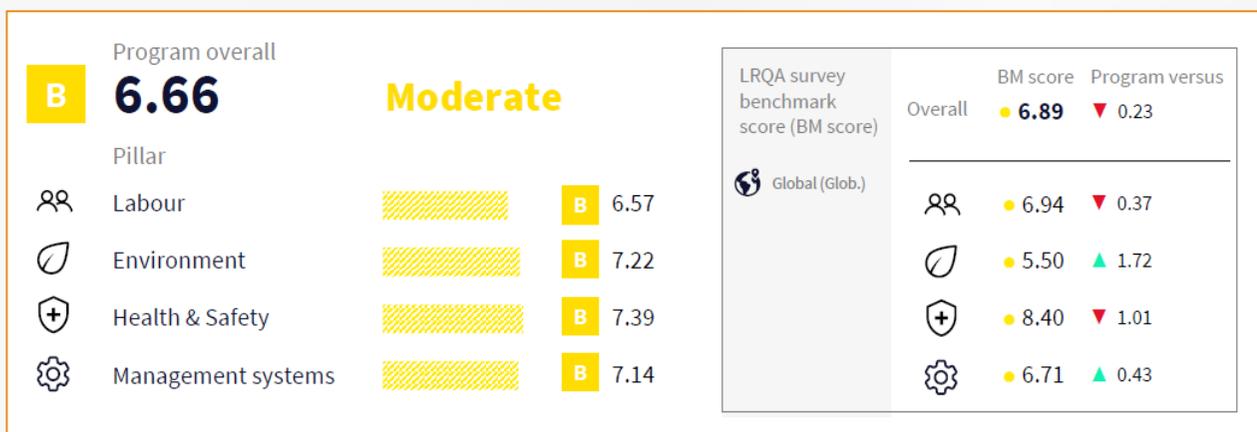
FACTORIES CONDITIONALLY APPROVED

4

FACTORIES ON PROBATION / NOT APPROVED

General key areas requiring improvement identified in the various audit reports include those relating to health and safety, working hours, wages, payroll, and social insurance. We require Corrective Action Plans in each case and work with our relevant trade partners and Factories to resolve or improve critical issues overtime.

Summary: LRQA Factory Worker Sentiment Surveys (workers voice) completed in FY25:



- The overall summary score from the Worker Sentiment Surveys completed at 20 Factories by the end of FY25 was B grade (score of 6.66 out of 10), indicating a moderate level of satisfaction. The score was 0.23 points below the LRQA survey benchmark score.
- We had encouraging responses for the three pillars of Environment, Health & Safety and Management Systems. Based on the distribution of site counts, all three pillar's questions at every level demonstrated a positive level of satisfaction, with no sites receiving C or D grade at question level.
- Areas of improvement that need further focus are in the Labour pillar. Three sites received an overall score of C for the Labour pillar. Issues included potential harassment or abusive behaviour. One Factory has since been offboarded subsequent to the LRQA audit that was commissioned and funded by Super Retail Group as the Factory was unwilling to address some of the non-conformances identified during the audit.
- We are developing actions to address the identified issues including provision of additional training and monitoring during FY26 to help improve performance at relevant factories. Where necessary we may engage additional support from our advisory partners.
- Any longer-term improvements identified will be considered as part of our overall Responsible Sourcing program risk treatment plans and continuous improvement processes.

Suggestions for responding to the survey results

Scoring range	Grade	Suggested actions
7.50-10.00	A	Satisfactory Keep the current worker engagement strategies as they are effective. Regularly check to ensure they remain functional.
5.00-7.49	B	Moderate Continue worker engagement efforts but make improvements based on workers' feedback and management awareness.
2.50-4.99	C	Low / Unsatisfactory Implement significant improvements by using the Improvement Action Plan (IAP) monitoring. Typically, establishing IAP monitoring takes 3 to 6 months, followed by a follow-up survey to monitor performance.
0.00-2.49	D	

FY25 AREAS OF IMPROVEMENT (Continued)

Progress update on child worker in China Factory

As reported in our FY24 Sustainability Report and Modern Slavery Statement, during a Second Party Audit at a Factory in China (April 2024), we identified a child worker under the legal age of 16. In addition, we found several other non-conformances at the Factory.

The Factory was placed On Probation, provided with a CAP, and the child worker returned to school. We engaged LRQA to support and monitor the situation over several months. Based on a report received from LRQA in December 2024, the child had reached legal age and remained at school. The Factory has addressed the majority of non-conformances and its status is now Approved.

Outsourcing of products without our knowledge

As reported in our 2024 Modern Slavery Statement, subsequent to the FY24 reporting period closure, we identified an existing Factory that had not disclosed to us they were fully outsourcing all aspects of manufacturing, assembly and packaging of some of our private brand finished products.

An audit of this Factory in September 2024 also identified Non-conformances including a zero tolerance non-conformance related to minimum wage, numerous critical non-conformances including attendance records, annual leave provisions, rest days, worker contracts, and various safety related issues. This Factory was placed On Probation. We have since been working with the Factory and monitoring its progress to close non-conformances. The Factory is now Conditionally Approved. All products from this Factory including those previously outsourced, have been consolidated into 13 Factories. These include the original Factory, two other existing registered Factories, and 10 new Factories that were previously not registered and have been subsequently assessed and onboarded. The outsourcing issue at this Factory has been resolved.

Following the above event, we initiated a broader assessment to identify other potential Factories that may be fully outsourcing all aspects of manufacturing, assembly and packaging of our private brand products and continue to address any findings. We have identified and addressed outsourcing issues at 13 additional Factories that were supplying products to us. Relevant products have since been consolidated into registered Factories. Our assessment is ongoing.

Proactive protection of young workers

We encourage our team members to speak up if they observe potential risks related to Responsible Sourcing. As an example in FY25, a member of our quality team informed our Responsible Sourcing Team that they may have observed a young-looking worker during a Factory visit.

A Second Party Audit of the Factory was conducted by our Responsible Sourcing Team, and 14 interns were identified working in the assembly process area of the Factory, 11 were young workers the youngest being 16 years and 9 months. The type of work was considered non-hazardous. The Factory had obtained consent letters of internship from the parents, had conducted health checks and had internship agreements in place.

Some critical non-conformances were however identified including:

- Excessive working hours and inadequate rest days for the adult workers.
- Total weekly working hours of the interns was 48 hours in a sampled month, and they had worked on one Saturday. It was against the law to arrange internships for students on rest days and statutory holidays.
- Factory had not checked the registration requirements for the 11 young workers at the local labour bureau.
- We continue to monitor the corrective action plans for this Factory. The interns have completed their internship and are no longer at the Factory.

GRIEVANCE REPORTING MECHANISMS

Super Retail Group recognises both the importance of, and challenge in, establishing an effective grievance reporting mechanism.

As outlined in *Section 2 Policy Framework*, our [Speak Up \(Whistleblower\) Policy](#) provides protection and support to enable whistleblowers to raise concerns, including those related to human rights and modern slavery. Anyone with information about Potential Misconduct (as defined in the policy) is encouraged to Speak Up. This Policy applies to the Group and all of the Group's current and past employees, volunteers, officers, contractors, consultants, suppliers (including employees of suppliers), work experience participants, students on placements, and associates, as well as these people's dependants (or their spouse's dependants) and their relatives.

To support this, the Group has established the following mechanisms:

- Integrity Officers who oversee the application of the Policy and the protection of whistleblowers;
- Various reporting channels, including post, and 'Whispli' (an online platform) to facilitate anonymous and confidential reporting; and
- A dedicated telephone line service to facilitate reporting in English or Mandarin for our China-based team members and trade partners.

At Super Retail Group, one of our core values is 'We speak up'. We are committed to creating and maintaining a safe Speak Up culture. Providing an effective and accessible grievance mechanism for such issues is a critical aspect to maintaining a safe and respectful working environment for our team members.

As part of the Respect@Work program, Super Retail Group remains committed to fostering a safe, respectful and inclusive workplace. Building on the core principles of the Respect@Work legislation, we broadened our approach to address all forms of serious misconduct, including bullying, harassment, discrimination, sexual harassment and victimisation.

In FY25, there was a 25 per cent reduction in the number of complaints²⁸ received which related to the serious misconduct categories listed above, marking this the first year-on-year decrease in related complaints since the introduction of Respect@Work.

The number of closed cases, which were substantiated as serious behavioural misconduct²⁸ specifically relating to sexual harassment, bullying, discrimination, victimisation, other forms of harassment, and inappropriate behaviour or conduct, decreased by 27 per cent compared to the previous year. Overall, approximately 0.3 per cent of our workforce were affected by serious behavioural misconduct, based on closed cases that were substantiated.

As part of our Responsible Sourcing Code, we also ask that our suppliers provide and maintain their own effective grievance mechanisms so their workers and stakeholders in their community can access in their native language. The Responsible Sourcing audits we accept from Factories would generally include verification of the existence of grievance reporting mechanisms at Factories, but they do not offer detailed insight into the efficacy of those mechanisms in resolving workers' concerns. To improve our understanding of workers' grievances, where possible we conduct sample LRQA Worker Sentiment Surveys (workers voice) as part of the audits that we commission and fund (refer to page 19).

TEAM MEMBER WELLBEING

In FY25, 6,259 team members participated in the "I Am Here" program, which equips individuals with practical tools to confidently offer support and signpost help to colleagues in need.

We also introduced a new Employee Assistance Program (EAP) provider offering expanded services. Since the launch, 57 per cent of team members have activated the program, using self-help resources and safety notifications. Support services, such as medical triage or mental health support have been utilised by 29 per cent of team members.

²⁸ Subsequent to the closure of FY24 and FY25 reporting periods, data previously reported have been updated due to an identified error.



CAPABILITY BUILDING – PARTNERING WITH OUR FACTORIES AND TRADE PARTNERS

We work collaboratively with our relevant trade partners, service providers and team members to improve conditions in our operations and supply chains. Throughout FY25, our Responsible Sourcing Team and our Global Sourcing Office continued to remain an accessible contact for trade partners, service providers and team members, with a dedicated inbox to assist with concerns or queries.

We delivered online training to some trade partners and Factories through our advisory partner, LRQA. Examples of topics covered include health and safety, working hours, social insurance and chemical management. During FY25, representatives from 151 suppliers completed various online training modules.

To enhance capability, we will be rolling out further training through the LRQA online training platform to selected team members and suppliers.

As part of our ongoing strategic engagement with our trade partners, we provided an update on our Responsible Sourcing program and general sustainability topics at our annual trade partner conference in China. This year, 288 participants attended the conference, including 201 representatives from 93 trade partners and service providers, plus team members including members from our ELT.

CAPABILITY BUILDING – INTERNAL

Our Board, ELT and Responsible Sourcing Working Group team members continued to receive updates on the performance of our Responsible Sourcing program and relevant emerging trends or issues.

In FY25, we delivered Responsible Sourcing training to 110 team members involved in the procurement of products on behalf of the Group.

As part of our risk treatment plans and the end-to-end sourcing process optimisation, including responsible sourcing aspects, we worked with our Global Sourcing Office team in China to improve cross functional engagement and obtain and share additional information in the future to help better manage relevant onboarding and offboarding of trade partners and Factories.



SECTION 5

Assessing the effectiveness of our actions

At Super Retail Group, we monitor our progress against our Sustainability goals and targets for responsible sourcing and assess the effectiveness of our work through various mechanisms summarised below.

GOVERNANCE

The governance framework outlined in *Section 2* aims to support accountability for program delivery, program quality and target execution.

Our Responsible Sourcing Working Group (RSWG) is comprised of senior team members with decision making rights from each of our Brands, Global Sourcing Office, Non-Stock procurement, and Group Sustainability and Responsible Sourcing. This team supports the implementation of the responsible sourcing goals and targets, set out in our Sustainability Framework 2030. The RSWG also provides a forum to discuss risks and issues related to our Responsible Sourcing program, including human rights and modern slavery risks. Risks are escalated to the Executive Leadership Team (ELT) where required and reported monthly, by the

Group Managing Director (the CEO), to the Board.

CONSULTATION WITH EXPERTS AND KEY PROGRAM ENHANCEMENTS

We work with internal and external experts to get advice and help us continuously improve our approach. We engage with relevant trade partners to assess and improve performance in our supply chains.

During FY25 our key improvement projects included:

- Introduction of remote LRQA Worker Sentiment Surveys as part of our Second Party Audits to further gain insight from Factory workers (anonymously).
- Improved cross functional engagement with our Group Sourcing Office to better manage relevant onboarding and offboarding of trade partners and Factories and help identify potential outsourcing issues.
- Review of Responsible Sourcing risk treatment plans, processes, contract terms and questionnaires to help improve future practices.
- Working with relevant trade partners for licensed brand products, that the Group is responsible for manufacturing, to improve our processes.

INDEPENDENT AND SECOND PARTY AUDITS AND TRACKING

Our Responsible Sourcing Team verifies the extent to which Factories maintain or exhibit an improvement of audit results through the completion of re-audit cycles and Corrective Action Plans. We also commission and fund a limited number of independent audits to verify the status of selected Factories and completed actions. The majority of these independent audits commissioned by us include a workers' sentiment survey, giving workers a voice to tell us their concerns and opinions so we can improve processes.

In FY25, we worked closely with some of our trade partners for licensed brands product that we are responsible for manufacturing. We have learnt from these partnerships and continue to improve our processes where relevant.

Through our Second Party Audits we are identifying non-conformances and further areas of improvement and for our Responsible Sourcing Team to have the opportunity to engage with the Factories face to face.

GRIEVANCE REPORTING MECHANISMS

Our [Speak Up \(Whistleblower\) Policy](#) facilitates serious misconduct reporting if relevant issues arise. It is designed to provide opportunity for

transparency and allow workers to report complaints without fear of reprisal.

Through our work with external advisors, we continue to look for opportunities to improve grievance reporting mechanisms in our supply chain, resolve issues that are identified and learn from these.

PARTNERING WITH INDUSTRY

We partner with and learn from industry. We continued to participate in the United Nations Global Compact Network Australia – Modern Slavery Community of Practice, the Australian Retail Association and The Collaborative Advantage in New Zealand. We also continued to partner with external advisors where required, both in Australia and in the countries where our trade partners and Factories mostly operate.

CHALLENGING OURSELVES THROUGH TRANSPARENCY

Macpac actively engages in the Better Buying Purchasing Practices Index (BBPPI), which provides a platform for trade partners to anonymously rate the purchasing practices of the companies that procure their products. The Better Buying Institute utilises data to foster stronger relationships between trade partners and buyers. The aim is to enhance purchasing practices that not only drive profitability but also safeguard workers and the environment.

In FY25, 12 team members including senior decision makers in Macpac completed training on the principles of Responsible Purchasing. Macpac also reviewed their 2024 survey results with their Design and Merchandising teams to determine what improvements could be considered for FY26.

In May 2025, for the fourth consecutive year, Macpac engaged in the Better Buying Purchasing Practices Index (BBPPI). It invited 37 of its top apparel and equipment manufacturing trade partners to anonymously rate its purchasing behaviour against best practice, recording an 89 per cent participation rate. Macpac achieved an overall score of 72 out of 100 and will further review relevant areas of improvement in the future.

By participating in the BBPPI, Macpac aims to establish transparent and mutually beneficial sustainable partnerships with strategic suppliers.

We also publish the list²⁹ of first tier Factories for Macpac on Open Supply Hub which can be accessed via this [link](#).

CONSULTATION WITH OWNED AND CONTROLLED ENTITIES

Consultation with the Reporting Entities and the Entities owned and controlled by them on the matters set out in this Statement, occurred

throughout the reporting period as well as for the purpose of preparing this Statement.

Super Retail Group's [Human Rights Responsible Sourcing Policy](#) and [Responsible Sourcing Code](#) apply to all wholly owned entities of the Group and are approved by the Board. These cover the requirements of our Responsible Sourcing program including issues related to human rights and modern slavery. Implementation and oversight of the Group's Responsible Sourcing program are managed by a centralised Responsible Sourcing Team for Supercheap Auto, BCF and rebel, and for Macpac, by Macpac's in-house team in New Zealand with high level oversight from the Group.

Relevant members of the Responsible Sourcing Working Group, and Executive Leadership Team (ELT) were consulted at various stages of the ongoing process to manage human rights and modern slavery risks. Refer to *Section 2 (Our governance)* for further details on governance, accountabilities and responsibilities including those related to this Modern Slavery Statement.

From a management perspective, the Managing Directors of Supercheap Auto, BCF, rebel and Macpac are directors of their respective Brand's trading entity. Under the Responsible Sourcing program, the Managing Directors of these Brands and their teams are kept informed by the

²⁹ We update this list occasionally therefore the list could be outdated compared to internal records.

centralised Responsible Sourcing Team or, in the case of Macpac, by their own in-house team, throughout the reporting period on human rights and potential modern slavery risks and issues in our supply chain and operations, as well as actions taken or proposed to be taken to address any non-conformances. This in turn facilitates an effective and meaningful consultation process for the management of modern slavery risks and the preparation of this Statement.

As reported previously, we conducted a Responsible Sourcing material risk deep dive to identify areas of further improvement and risk treatment plans. This was presented to the Board Risk & Sustainability Committee in July 2024 and relevant actions are being implemented based on Group priorities.

In preparing this Statement, Super Retail Group consulted representatives from the Reporting Entities to confirm that the included information is relevant and accurate. This consultation took place through discussions with the Reporting Entities, the Responsible Sourcing Working Group members, and circulation as appropriate of summaries of program performance throughout the reporting period. We also distributed draft version of this Statement to the Managing Directors of the Reporting Entities, our Responsible Sourcing Working Group and members of the Executive Leadership Team for review.

The Board of Directors were provided opportunity for input and feedback prior to final approval of this Statement.

A declaration of principal governing body approval can be found in *Appendix 2* in accordance with the Act.

FY26 AND BEYOND

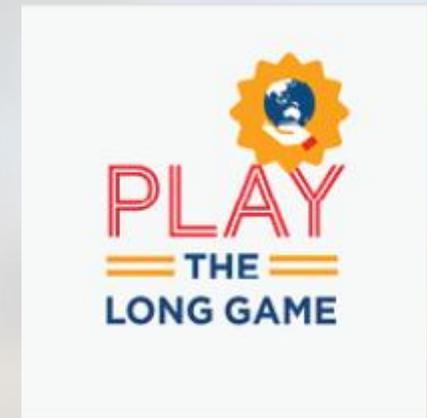
Our Sustainability Framework 2030 sets out our responsible sourcing goals, whereby we aim to:

- **GOAL 5:** Improve transparency and disclosure of high-risk supply chains;
- **GOAL 6:** Invest in sustainable supply chains through strategic partnering; and
- **GOAL 7:** Source material and products more responsibly.

Please refer to page 9 for a high-level summary of progress against our FY25 ESG goals.

We remain committed to driving positive change and enhancing the program's effectiveness by strengthening our supply chain.

We will continue to work towards improving supply chain transparency through Second and Third Party Audits, Worker Sentiment Surveys (workers voice), enhancing sourcing processes, and ongoing review of Factory outsourcing gaps to strengthen visibility and manufacturing insights. Recognising the complexity of our global, multi-tiered supply base, we will continue to engage with industry bodies such as the Australian Retailers Association Sustainability Committee and the UN Global Compact Network Australia – Modern Slavery Community of Practice to remain informed of evolving expectations, emerging risks, and leading practices in responsible sourcing and supply chain governance.



Appendix 1 – Glossary

TERMS AND ABBREVIATIONS

Term	Definition
Act	Modern Slavery Act 2018 (Commonwealth).
Brand(s)	The four retail Brands of Super Retail Group: Supercheap Auto, rebel, BCF, Macpac.
BRSC	Board Risk and Sustainability Committee - responsible for assisting the Board to discharge its risk management, compliance, sustainability, and corporate governance responsibilities.
Child Labour	<p>Child labour refers to work that is mentally, physically, or morally harmful to children; and interferes with their schooling by:</p> <ul style="list-style-type: none"> • depriving them of the opportunity to attend school; • obliging them to leave school prematurely; or • requiring them to attempt to combine school attendance with excessively long and heavy work. <p>Key areas of risk for Super Retail Group are where children are engaged in hazardous work including night work, work with machinery and chemicals.</p>
Controlled Entities	The subsidiaries, controlled entities, and investments of the Reporting Entities.
Corrective Action Plan or CAP	A plan issued by Super Retail Group setting out non-conformances of a Factory with our Responsible Sourcing Policy and Responsible Sourcing Code, the date by which evidence must be provided to the Group demonstrating corrective actions have been completed and non-conformances remediated.
Debt Bondage	Payment of excessive recruitment fees or associated costs, and retention of documents.
Deceptive Recruitment	False promise of a job, benefits, or conditions.
Direct Imports	Products we source or import direct from the Factories which manufacture them.
Due Diligence Process	The process by which we evaluate and address risks.
Executive Leadership Team (ELT)	The Group’s Managing Director and CEO and their direct reports.
Factories	Focus of our Responsible Sourcing program is Factories which supply or manufacture Super Retail Group’s private brand products; Factories directly contracted by Super Retail Group to manufacture products; Factories that supply or manufacture private brand Non-Stock products to/for the Group.
First tier Factories	Factories supplying finished goods directly to the Group or through our relevant trade partners.
Forced Labour	Restrictions of movement, intimidation, threats, including human trafficking. It includes situations in which persons are coerced to work through the use of violence or intimidation, or by more subtle means such as accumulated debt, retention of identity papers or threats of denunciation to immigration authorities.
the Group	Super Retail Group Limited and its Reporting Entities.

ILO	International Labour Organisation.
Inappropriate Behaviour or Conduct	Misconduct that does not meet the criteria to be categorised into a specific category.
Non-Stock	Non-Stock products and services include marketing and promotional materials, team member uniforms, capital expenditure, professional services, transport and logistics providers, and cleaning services, amongst others.
Private Brand	Products manufactured specifically for our Brands, using product brand names owned or licensed by Super Retail Group.
Reporting Entity	Super Retail Group follows the definition of a reporting entity as outlined by the Act: Any entity with a consolidated annual revenue of at least AU\$100 million over the twelve-month reporting period and is at any time in the reporting period either an Australian entity or a foreign entity carrying on business in Australia.
Responsible Sourcing Audit	An audit we may require of a trade partner, Factory or service provider following consideration of our Due Diligence process.
Responsible Sourcing Code	Sets out specific criteria for our trade partners and service providers to comply with the Responsible Sourcing Policy regarding business integrity; human rights and fair working conditions; environmental management; grievance mechanisms; and provision of remedy.
Human Rights and Responsible Sourcing Policy	Provides a set of high-level expectations of team members, trade partners, service providers and associated supply chains in relation to human rights, modern slavery, business integrity and the environment, drawing on international standards.
Responsible Sourcing Procedures	Sets out the processes used by Super Retail Group to verify compliance with its Responsible Sourcing Policy and Code.
Responsible Sourcing Team	Team responsible for managing and supporting the delivery of the Group's Responsible Sourcing program.
Second Party Audit	Second Party Audits are external evaluations conducted by one organisation on another. These audits are usually performed by customers or clients to ensure that their suppliers or service providers meet their requirements.
Service Provider	Providers of services to Super Retail Group, such as information technology, cleaning, security services, etc.
Statement	This Modern Slavery Statement.
Supply Chain	The products and services (including labour) that contribute to our retail and Non-Stock products and services. Includes products and services sourced in Australia or overseas and extending beyond our direct suppliers, including indirect suppliers for raw materials, manufactured componentry and freight.
Team Members	All employees of Super Retail Group.
Trade Partners	<ul style="list-style-type: none"> • Suppliers of retail products, including agents and Factories which supply or manufacture Super Retail Group's private brand products; • Factories directly contracted by Super Retail Group to manufacture products; and • Suppliers of Non-Stock products to/for Super Retail Group.

RESPONSIBLE SOURCING STATUS³⁰ DEFINITIONS:

Rating	Description Examples	Effect of Rating
Approved	The Factory has no critical but some major and minor non-conformances.	An order can be placed with the Factory.
Conditionally approved	The Factory has some critical non-conformances (excluding Child and Forced Labour) as well as major and minor non-conformances.	An order can be placed with the Factory. Group Responsible Sourcing will issue a Corrective Action Plan to the Factory including completion timeframes.
On probation	Renewed audit: repeated critical non-conformances. Conditionally approved Factory: critical non-conformances overdue by 3 months OR audit renewal over 30 days overdue.	Allow existing orders to complete. No new orders until all critical non-conformances are closed out. Re-audit may be required before new orders are placed.
Not approved	New or existing Factory with Zero Tolerance non-conformances (e.g. Child and Forced Labour). 'On Probation' Factory that has critical non-conformances overdue by more than 6 months. New Factory that has not provided an audit report for evaluation. Existing 'Conditionally Approved' Factory overdue for audit renewal (over 60 days).	Orders must not be placed. Audit/Re-audit is required before placing any orders.

³⁰ Extensions to due dates and status (based on considering circumstances) can be provided at the discretion of Group Sustainability (Responsible Sourcing Team).

Appendix 2 – Modern Slavery Act 2018 (Cth) Annexure

MODERN SLAVERY STATEMENT APPROVAL

PRINCIPAL GOVERNING BODY APPROVAL

This Modern Slavery Statement was approved by the Board of Super Retail Group Limited as the principal governing body³¹ of Super Retail Group on behalf of all Reporting Entities specified in the Statement on 25 November 2025.

SIGNATURE OF RESPONSIBLE MEMBER

This Modern Slavery Statement is signed by a responsible member³² of the Super Retail Group Limited Board of Directors as defined by the Act:



Paul Bradshaw

Group Managing Director and Chief Executive Officer

25 November 2025

³¹ Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

³² Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorized to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the Corporations Act 2001—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.

MANDATORY REPORTING CRITERIA

This statement has been prepared to meet the mandatory reporting criteria set out under the Modern Slavery Act 2018 (Cth). The table below summarises where each criterion is disclosed in this Statement.

Mandatory Reporting Criteria	Reference in this statement
1. Identify the reporting entity.	Reporting Entities Page 2 and Pages 32-35.
2. Describe the reporting entity's structure, operations and supply chains.	Section 2. Our structure, operations and supply chain Page 5-7.
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Section 3. Identifying and assessing our modern slavery risks Pages 12-16.
4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Section 4. Actions to address key modern slavery risks Page 17-23. Grievance reporting mechanisms Page 22. Capability building Page 23.
5. Describe how the reporting entity assesses the effectiveness of these actions.	Section 5. Assessing the effectiveness of our actions Page 24-26.
6. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	Consultation with owned and controlled entities Page 25-26. Governance and Policy Framework Page 8-11. Principal Governing Body Approval Page 2 and Page 30. Signature Of Responsible Member Page 4 and Page 30.
7. Any other information that the reporting entity, or the entity giving the statement, considers relevant.	Team member wellbeing Page 22. FY24 and beyond Page 26. Link to FY25 Responsible Business Report . Link to Macpac list of first tier Factories . Link to FY25 Responsible Business Report Data Pack .

Appendix 3

LIST OF REPORTING ENTITIES

Super Retail Group Limited (ACN: 108 676 204) makes this Statement on its own behalf and on behalf of the following entities for which it is the ultimate holding company (Reporting Entities):



Super Cheap Auto Pty Ltd ACN 085 395 124



Rebel Group Limited ACN 110 006 678 (Rebel Group), Foghorn Holdings Pty Ltd ACN 122 558 874 (Foghorn), and Rebel Sport Limited ACN 003 283 823 (Rebel Sport), noting that Rebel Sport is the trading entity and Rebel Group and Foghorn are Reporting Entities because of their ownership of Rebel Sport



SRG Leisure Retail Pty Ltd ACN 110 667 411



Macpac Holdings Pty Ltd ACN 609 407 436 (Macpac Holdings), MP Finco Pty Ltd ACN 634 448 598 (MP Finco), Macpac Group Holdings Pty Ltd ACN 638 577 625 (Macpac Group Holdings), and Macpac Retail Pty Ltd ACN 129 716 025 (Macpac Retail), noting that Macpac Retail is the trading entity, and Macpac Holdings, MP Finco, and Macpac Group Holdings are Reporting Entities because of their ownership of Macpac Retail

For the reporting period, there were no other Reporting Entities (such as joint ventures, wholly or partially owned entities) required to be named in this joint Statement.

The subsidiaries, controlled entities, and investments of the Reporting Entities (Controlled Entities) can be found on page 142 and 143 of our [FY25 Annual Report](#) and have also been included on the next pages.

INVESTMENTS IN CONTROLLED ENTITIES
(Extract from page 142 of our [FY25 Annual Report](#))

CONSOLIDATED ENTITY DISCLOSURE STATEMENT

For the period ended 28 June 2025

Name of entity	Body corporate, partnership or trust	Principal activities	Country of incorporation	% of share capital held	Tax residency	
					Australian or foreign	Foreign jurisdiction
Super Retail Group Limited	Body corporate	Parent entity	Australia	n/a	Australian ⁽³⁾	n/a
A-Mart All Sports Pty Ltd ⁽¹⁾	Body corporate	Dormant	Australia	100	Australian ⁽³⁾	n/a
Auto Trade Direct (NZ) Limited	Body corporate	Dormant	New Zealand	100	Foreign	New Zealand
Auto Trade Direct Pty Ltd ⁽¹⁾	Body corporate	Dormant	Australia	100	Australian ⁽³⁾	n/a
BCF New Zealand Limited	Body corporate	Dormant	New Zealand	100	Foreign	New Zealand
Coyote Retail Pty Limited ⁽¹⁾	Body corporate – trustee of the Rowe & Jarman Unit Trust	Trustee	Australia	100	Australian ⁽³⁾	n/a
Foghorn Holdings Pty Ltd ⁽¹⁾	Body corporate	Holding company	Australia	100	Australian ⁽³⁾	n/a
Goldcross Cycles Pty Ltd ⁽¹⁾	Body corporate	Dormant	Australia	100	Australian ⁽³⁾	n/a
Infinite Retail Pty Ltd ⁽¹⁾	Body corporate	Dormant	Australia	100	Australian ⁽³⁾	n/a
Macpac Enterprises Limited	Body corporate	Dormant	New Zealand	100	Foreign	New Zealand
Macpac Group Holdings Pty Limited ⁽¹⁾	Body corporate	Holding company	New Zealand ⁽⁴⁾	100	Australian ⁽³⁾	n/a
Macpac Holdings Pty Ltd ⁽¹⁾	Body corporate	Holding company	Australia	100	Australian ⁽³⁾	n/a
Macpac Limited	Body corporate	Dormant	New Zealand	100	Foreign	New Zealand

**INVESTMENTS IN CONTROLLED ENTITIES
(Continued) (Extract from page 142 of
our FY25 Annual Report)**

CONSOLIDATED ENTITY DISCLOSURE STATEMENT (continued)

For the period ended 28 June 2025

Name of entity	Body corporate, partnership or trust	Principal activities	Country of incorporation	% of share capital held	Tax residency	
					Australian or foreign	Foreign jurisdiction
Macpac New Zealand Limited	Body corporate	Outdoor retail	New Zealand	100	Foreign	New Zealand
Macpac Retail Pty Ltd ⁽¹⁾	Body corporate	Outdoor retail	Australia	100	Australian ⁽³⁾	n/a
MP Finco Pty Limited ⁽¹⁾	Body corporate	Holding company	New Zealand ⁽⁴⁾	100	Australian ⁽³⁾	n/a
Mouton Noir IP Limited	Body corporate	Dormant	New Zealand	100	Foreign	New Zealand
Mouton Noir Management Pty Ltd ⁽¹⁾	Body corporate	Dormant	Australia	100	Australian ⁽³⁾	n/a
Oceania Bicycles Pty Ltd ⁽¹⁾	Body corporate	Dormant	Australia	100	Australian ⁽³⁾	n/a
Oceania Bicycles Limited ⁽²⁾	Body corporate	Dormant	New Zealand	100	Foreign	New Zealand
Ray's Outdoors New Zealand Limited	Body corporate	Dormant	New Zealand	100	Foreign	New Zealand
Ray's Outdoors Pty Ltd ⁽¹⁾	Body corporate	Outdoor retail	Australia	100	Australian ⁽³⁾	n/a
Rebelsport.com Pty Limited ⁽¹⁾	Body corporate	Dormant	Australia	100	Australian ⁽³⁾	n/a
Rebel Group Limited ⁽¹⁾	Body corporate	Holding company	Australia	100	Australian ⁽³⁾	n/a
Rebel Management Services Pty Limited ⁽¹⁾	Body corporate	Dormant	Australia	100	Australian ⁽³⁾	n/a
Rebel Pty Ltd ⁽¹⁾	Body corporate	Dormant	Australia	100	Australian ⁽³⁾	n/a

**INVESTMENTS IN CONTROLLED ENTITIES
(Continued) (Extract from page 143 of
our FY25 Annual Report)**

CONSOLIDATED ENTITY DISCLOSURE STATEMENT (continued)

For the period ended 28 June 2025

Name of entity	Body corporate, partnership or trust	Principal activities	Country of incorporation	% of share capital held	Tax residency	
					Australian or foreign	Foreign jurisdiction
Rebel Sport Limited ⁽¹⁾	Body corporate	Sports retail	Australia	100	Australian ⁽³⁾	n/a
Rebel Wholesale Pty Limited ⁽¹⁾	Body corporate	Dormant	Australia	100	Australian ⁽³⁾	n/a
Rowe & Jarman Unit Trust	Trust	Trust	Australia	100	Australian ⁽³⁾	n/a
SRG Equity Plan Pty Ltd ⁽¹⁾	Body corporate	Investments	Australia	100	Australian ⁽³⁾	n/a
SRG Leisure Retail Pty Ltd ⁽¹⁾	Body corporate	Outdoor retail	Australia	100	Australian ⁽³⁾	n/a
SRGS (New Zealand) Limited	Body corporate	Dormant	New Zealand	100	Foreign	New Zealand
SRGS Pty Ltd ⁽¹⁾	Body corporate	Product acquisition and distribution	Australia	100	Australian ⁽³⁾	n/a
Super Cheap Auto (New Zealand) Pty Limited	Body corporate	Auto retail	New Zealand	100	Foreign	New Zealand
Super Cheap Auto Pty Ltd ⁽¹⁾	Body corporate	Auto retail	Australia	100	Australian ⁽³⁾	n/a
Super Retail Commercial Pty Ltd ⁽¹⁾	Body corporate	Auto retail	Australia	100	Australian ⁽³⁾	n/a
Super Retail Group Services (New Zealand) Limited	Body corporate	Dormant	New Zealand	100	Foreign	New Zealand
Super Retail Group Services Pty Ltd ⁽¹⁾	Body corporate	Support services	Australia	100	Australian ⁽³⁾	n/a
SRG Trading (Shanghai) Limited	Body corporate	Product sourcing	China	100	Foreign	China
Workout World Pty Limited ⁽¹⁾	Body corporate	Dormant	Australia	100	Australian ⁽³⁾	n/a

⁽¹⁾ These controlled entities have been granted relief from the requirement to prepare financial reports in accordance with ASIC Corporations (Wholly-owned Companies) Instrument 2016/785 issued by the Australian Securities and Investments Commission.

⁽²⁾ Investment is held directly by Oceania Bicycles Pty Ltd.

⁽³⁾ This entity is part of a tax-consolidated group under Australian taxation law, for which Super Retail Group Limited is the head entity.

⁽⁴⁾ Macpac Group Holdings Pty Limited and MP Finco Pty Limited were incorporated in New Zealand but redomiciled to Australia on 20 January 2020 and 1 July 2019 respectively.

Super Retail
Group 

SUPERCHEAP
AUTO

rebel



Super Retail Group Limited

ABN: 81 108 676 204

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www.superretailgroup.com.au