

Modern Slavery Statement Australia

1. Introduction

- 1.1. Good Goods Pty Ltd is opposed to all forms of modern slavery. This Modern Slavery Statement has been prepared in accordance with the *Australian Modern Slavery Act 2018* and describes our actions during the financial year ending 30 June 2020 to identify and minimise the risk of modern slavery occurring within our operations or supply chains.
- 1.2. For the purposes of this statement, we have defined the acts of modern slavery to include slavery or slavery like practices, servitude, forced labour, debt bondage, deceptive recruiting for labour or services, human trafficking and child labour
- 1.3. This statement has been prepared with guidance from the *Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities*, published by Australian Border Force.
- 1.4. This statement was approved in full by the principle governing body for Good Goods Pty Ltd on the 25th of March 2021

2. Our Structure, Governance, Operations and Supply Chain:

Structure:

- 2.1. Good Goods Pty Ltd is a privately-owned company, founded and incorporated in Australia. We sell toilet paper, paper towels, facial tissues and sponges direct to consumers, and we donate 50% of our profits to charitable organisations who help build toilets and improve sanitation standards in the developing world.
- 2.2. Our registered company name, address and ABN are:
 - **Good Goods Pty Ltd, Suite 816, 585 Little Collins St, Melbourne VIC 3000; ABN: 67 154 870 452**
- 2.3. Our trading name is **Who Gives A Crap**
- 2.4. We own subsidiaries in the United States of America (USA) and the United Kingdom (UK)
 - **USA: Who Gives A Crap Inc, 5042 Wilshire Boulevard #43291, Los Angeles, California, 90036, USA, Business Registration: 331219586**
 - **UK: Who Gives A Crap Limited, c/o MHA MacIntyre Hudson, 6th Floor, 2 London Wall Place, London, EC2Y 5AU, UK; VAT 268 3946 55**

- 2.5. We are a Certified B Corporation (BCorp). B Corps use profits and growth as a means to a greater end: positive impact for their employees, communities, and the environment. More information regarding B Corp certification can be found on the B Corp website: <https://bcorporation.net/>

Governance:

- 2.6. The principle governing body for Good Goods Pty Ltd is 'the Board' which was comprised of Simon Griffiths, Sole Director, at the time of initial submission of this statement

Operations:

- 2.7. The members of our Management Team are responsible for overseeing our global operations across all subsidiaries and are jointly responsible for all policy authorisation including this Modern Slavery Statement. Our subsidiary entities fulfil our financial and legal obligations in the markets in which we trade; our total operations are managed centrally by global function.
- 2.8. In the year ending 30 June 2020, we employed 37 permanent staff and 76 casual, freelance and contracted workers
- 2.9. Our operations occur across four global working hubs:
- **Australia:** Finance, B2B Sales, Logistics, Inventory Management, Legal, People & Culture, Procurement
 - **USA:** Creative, Marketing, New Product Development, Digital, Recruitment
 - **Philippines:** Customer Services, Training & Development
 - **China:** Production, Sourcing, Quality Assurance, Quality Control

People

- 2.10. We wouldn't be Who Gives A Crap without our uber-devoted and talented people. We value each of our employees, both full-time and freelance friends, and ensure that we provide structured and holistic opportunities for career development and growth within the business. We stand by a transparent and fair recruitment and interview process in order to reduce bias and provide equal opportunity to all candidates
- 2.11. In each of our office "hubs" we work closely with legal counsel to ensure we are consistently up to date on all employment laws and standards, and we take pride in the fact that we then go beyond the baseline expectation for employee satisfaction.
- 2.12. We approach employee wellness with the nuances of each of our hub cultures in mind and work our hardest to create work conditions that allow flexibility and balance for personal and family life. From our recruitment process to our employee performance assessments, to our choice of impact partners we embody our company values and keep them as the driving "north star" in all our business decision-making.

Supply Chain

- 2.13. Our supply chain includes the direct manufacture of our products, shipping to end-market, warehousing in-market and final distribution to customers.
- 2.14. In the year ending 30 June 2020, all of our finished goods were produced in China, using raw materials grown, processed and procured in China. We do not own the factories where our products are made, we work closely and directly with a group of carefully selected manufacturing partners.
- 2.15. We use global freight forwarding partners to ship our finished goods to our third-party 3PL warehousing network which is spread across multiple locations in three countries. We use local third-party national fulfillment partners to deliver our products from warehouse to end consumer.

3. Risks of Modern Slavery practices in our IOperations and Supply Chain

Our Operations

- 3.1. All of our team are currently engaged directly with clear contracts and agreements in place outlining their conditions of work, job expectations, minimum entitlements and compensation.
- 3.2. Our recruitment processes ensure we have full visibility over the attraction, selection and engagement of each of our team members across our global hubs. Our global People & Culture function includes regional-specific support specialists who are responsible for executing our global benefits and remuneration frameworks in line with local obligations.
- 3.3. Our remuneration methodology ensures that each individual's compensation is benchmarked against internal and external relativity to drive equitable outcomes.

Our Supply Chain

- 3.4. We review our business activities and identify the presence of associated contextual risk factors by maintaining a human rights risk register. This is split into three categories: country and sector context, workforce demographics, and the characteristics of risk management processes or controls. Where multiple modern slavery risk factors are present, we investigate further in order to establish best response. In the year ending June 2020, this risk register was expanded to include risks associated with COVID 19. We use this risk register to prioritize our activities across regions of manufacture and to inform our audit criteria. Our key identified modern slavery risks are:
- Non-compliance with our code of conduct which includes labour standards governing health and safety, unfair remuneration, excessive working hours, precarious employment, child labour, bonded labour and forced labour.

- Our supply chain demographics: women, children and migrants are most at risk of falling victim to modern slavery
- Our purchasing behaviours: we appreciate that our own actions have the potential to contribute to modern slavery practices

4. Actions taken to assess and address risks, including due diligence and remediation processes

- 4.1. We provide policy guidance to suppliers and exercise contractual controls to ensure full commitment. We expect our partners and stakeholders to adhere to ethical business conduct standards which are consistent with our own and we are committed to working with them to fulfil this common goal.
- 4.2. We use the amfori BSCI Code of Conduct as the standard for behaviours and values published to our manufacturing partners and used as the benchmark for our social audit program.
- 4.3. We have developed and published a suite of policies designed to target the causes and symptoms of modern slavery. These policies are incorporated into our commercial contracts and used to inform, gain commitment, guide training programs and enhance our audit process. Policy suite includes:
 - o Modern Slavery Policy: Overarching
 - o Anti-Bribery and Corruption Policy
 - o Migrant, Contract & Temporary Workers Policy
 - o Gender Equality In the Supply Chain Policy
 - o Forced, Bonded and Child Labour Policy
 - o Responsible Purchasing Policy
- 4.4. We have long relationships in place with our suppliers and invest heavily in our commercial partnerships. This investment takes the form of regular weekly and monthly visits and feedback sessions, full transparency around pricing and supplier cost centres, volume forecasts for pre-procurement of raw materials, financial support towards the costs of auditing and training sessions in response to audit findings. Long term relationships help us to work closely with our suppliers to safeguard human rights. Our core suppliers account for 95%+ of our volume and have been working with us for a number of years.
- 4.5. We have fully mapped our T1 and T2 manufacturing sites and have direct relationships incorporating regular visits by our own employees to all T1 and T2 suppliers. We have active improvement plans and Corrective Action Plans (CAPs) in place in all T1 level manufacturing sites with regular progress updates and capacity building where required.

Tier	Definition	Example	Status
Tier	Main Production	Factory that manufactures and packs the	Fully

1	Sites	end product	Mapped
Tier 2	Materials and Components	Factory that produces the packaging and the jumbo 'mother' rolls	Fully Mapped
Tier 4	Raw Materials Processing	Factory that pulps the recycled inputs or bamboo	Partly Mapped
Tier 4	Raw Materials	Recycled Paper: schools & offices Bamboo: forest farms	Partly Mapped

- 4.6. We have an active auditing program in place incorporating audit criteria informed by amfori BSCI Code of Conduct and including confidential worker interviews. We understand that women, children and migrants are most at risk of falling victim to modern slavery and our audit criteria highlights these demographics in summary findings. We use this audit data to assess risk and inform the corrective action plans for each site.
- 4.7. We employ a team in China that visits our T1 level manufacturing partners on a weekly basis and provides feedback to our core operations. This feedback informs, supports and guides business levels and CAPs at each site with higher levels of business granted to partners demonstrating the strongest commitment to the standards laid out in our code of conduct.
- 4.8. We practice responsible purchasing, clarifying our expectations with suppliers of a fair and reciprocal working relationship that promotes progress, growth and sustainable outcomes benefitting both sides commercially whilst enabling all parties to optimise our social & environmental impact.
- 4.9. Over the past two years, it has been necessary to engage additional suppliers in order to meet growth and increased demand. We took great care when expanding our supplier network and developed an extensive vetting process to ensure values alignment, adequate management systems in place, local legal compliance and safe working environments. This process includes business license verification, environmental certificate review, assessment of existing audit criteria, and three separate on-site visits before initial orders are placed. We have strict controls in place governing supplier sourcing, vetting, engagement and supervision. Our selection criteria for suppliers are based on sustainable practices, organizational ethics, price, quality, capacity, transparency, and raw materials management.
- 4.10. We have comprehensive remediation policies in place to guide all activities in the event that bonded, forced, trafficked or child labour is discovered within our supply chain. Our policies stress the need for privacy and prioritization of the best long-term interests of the individual victim and outline the required collaborative responses for local government, independent social welfare agencies, the direct employer and Good Goods Pty Ltd. Remediation would include at a minimum: continuation of wage & relevant housing compensation as well as appropriate protective services such as safe accommodation, medical

care, financial assistance, legal assistance, counselling and reintegration into their community or origin as relevant. When the interests of the victim(s) have been best served, a full investigation and action plan would be conducted to further build capacity and prevent reoccurrence.

- 4.11. COVID-19 impact on workers: We acknowledged that the spread of COVID-19 represented a risk to our manufacturing partners as well as our own operations. We remained in daily contact with all sites during the early stages of the contagion until workers were able to safely return. Throughout this period, we fully supported workers' wages by honouring all orders placed with no additional fees or charges for late delivery due to factory closure. Once workers fully returned, we monitored conditions per region and site daily & weekly to ensure the safety and health of the workforce under Stage 3 conditions.

5. Assessment of the effectiveness of our actions to identify and address modern slavery risks

- 5.1. Stakeholder Engagement: as B Corp members, we undergo an annual assessment of our impact on our workers, customers, community and environment. Our 'B Impact' report can be found on bcorporation.net. In accordance with B Corp guidelines, we have also amended our legal governing documents to require our board of directors to balance profit and purpose. This combination of third-party validation, public transparency and legal accountability underpin our ability to drive trust and value for our customers and stakeholders.
- 5.2. Ethical Sourcing Audit Program: we measure the total number of factories in our audit program as well as their audit results and successful completion of CAPs. Favourable ethical performance is rewarded with increased levels of business.
- 5.3. Training and Capacity Building - External: We work closely with our suppliers and invest time and resources in ensuring that they understand our expectations, align with our values and commit to our standards. We conduct training and offer support in relation to audit findings and the root causes of non-compliance.
- 5.4. Training and Capacity Building - Internal: We spend time and resources in training our internal teams in the definition and recognition of the signs of modern slavery as well as the principles of remediation for victims.

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Simon Griffiths

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Signed by Simon Griffiths, Sole Director, 25 March 2021