



2025

# Modern Slavery Statement.

Winc’s Modern Slavery Statement.

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

This Statement has been prepared in accordance with the Modern Slavery Act 2018 (Cth) (‘Modern Slavery Act’) and provides details of the measures Winc has taken to identify and mitigate the risks of modern slavery in our operations and supply chains during the reporting period 1 January 2025 to 31 December 2025.



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Acknowledgement of Country.

In the spirit of reconciliation, at Winc, we acknowledge Australia’s First Nations Peoples as the Traditional Custodians of the land on which we conduct our business.

We pay our respects to Elders past, present and emerging. We are committed to honouring the unique cultural and spiritual relationships our First Nations Peoples have to the land, waters and seas, and their cultural contribution to society as the oldest continuing cultures in the world.

A message from Peter Kelly

Taking action to promote ethical trade practices and protect human rights in the supply chain on behalf of our customers is a responsibility we take very seriously at Winc.

As a trusted supplier to more than 100,000 workplaces around the country, we are committed to ensuring that our sourcing practices help support fair, safe and responsible working conditions and protect worker rights.

Winc and its related bodies corporate are committed to building on the progress set out in this Statement as we manage the risks of modern slavery in our operations and supply chain.

During the reporting period we have continued to build on the foundations laid in previous years including:

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

Our company values are fundamental in all our business operations, one of which is to be Always Improving. Supporting suppliers with targeted education and capability building to reduce the risk of modern slavery in all its forms is an integral part of this value. This also remains a key focus moving forward.

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



Peter Kelly  
Chief Executive Officer  
Winc Australia Pty Limited

Troy Swan  
Director, General Counsel and  
Company Secretary  
Winc Australia Pty Limited



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



# Winc’s Approach to Modern Slavery.

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

## Human Right’s Position

Winc is committed to respecting and promoting human rights across all areas of our business, supply chain and stakeholder relationships, in alignment with the UN Guiding Principles on Business and Human Rights. We uphold the principles of dignity, fairness and safe working conditions, and take active steps to identify, prevent and address any risks of harm, exploitation or discrimination.

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

## Our Committees & Corporate Governance

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

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

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

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

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

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

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

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

## Our Policies.

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

### Code of Conduct

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

### Working Together Respectfully

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

### Anti-Corruption Policy

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

### HSEQ Policy

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

### Whistleblower Policy

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

### Winc Ethical Sourcing Policy

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

### Winc Ethical Sourcing Risk Management Procedure

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



# Our Workforce.

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



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

**1.8%** of team members identify as First Nations

**57%** of internal promotions between 1 January 2025 and 31 December 2025 were female.

Our team members are:

|                     |                     |
|---------------------|---------------------|
| Permanent full-time | Permanent part-time |
| 93.6%               | 5.5%                |
| Fixed term          | Casual              |
| 0.3%                | 0.6%                |



## Direct workforce processes.

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

In 2025, we conducted over 7,300 Proactive Safety Interactions, encompassing leader-led safety walks, safe act observations, safety committee meetings, workplace inspections and Chain of Responsibility (CoR) checks. These initiatives ensure that safety remains a constant focus throughout our operations.



We are committed to keeping our people safe having achieved an **55%** reduction in injuries requiring medical treatment since April 2020.

## Employee Safety, Wellbeing and Social Benefits.

Winc is committed to providing a safe, fair and supportive workplace for all employees, recognising that strong internal labour practices are a critical component of mitigating modern slavery risks. In 2025, Winc continued to strengthen its safety culture through both preventative measures and capability building across the organisation.

A disciplined approach to workplace safety is reinforced through regular monitoring and training. Key safety initiatives and outcomes for 2025 include:

- **308 random and for-cause Drug and Alcohol tests conducted across sites**, in addition to mandatory pre-employment testing for warehouse operations team members and casuals
  - **2,162 hours of Manual Handling Equipment (MHE) training** delivered by 14 authorised trainers
  - **4,946 hours of safety training** completed across the organisation
- Winc also prioritises employee health and wellbeing through proactive and preventative measures:
- **254 free flu vaccinations facilitated** across five onsite locations, with vouchers provided to all other employees
  - **222 leaders are now trained through the Mental Health Mastery program** to support team members experiencing mental health challenges
  - **Access to confidential counselling services** through the Converge International Employee Assistance Program

These initiatives are reflected in Winc’s employee engagement outcomes:

- **85% employee participation rate** in the latest engagement survey

- **76% overall engagement score**, placing Winc in the top 25% of similar sized organisations in Australia
- **91%** of employees report their manager demonstrates genuine care for their safety and wellbeing
- **94%** of employees feel they have the skills and resources to perform their work safely

Winc also supports employees through a range of social and financial benefits. All employees have access to Flare HR, Australia’s largest workplace benefits platform, providing pre- and post-tax benefits designed to support financial wellbeing and everyday cost management.

In line with its commitment to fair labour practices, Winc ensures that employment conditions are structured to protect worker rights and promote equitable outcomes:

- Annual remuneration reviews aligned with market benchmarks and minimum wage requirements
- Freedom for employees and independent contractors to join unions
- Freedom to enter Enterprise Agreements where applicable to govern pay rates and working conditions
- Rostered hours for shift workers to minimise excessive overtime
- No permanent employees under the age of 18

Where casual labour is engaged through third party labour hire providers, particularly within our Distribution Centres to manage demand fluctuations, Winc ensures that service agreements include robust contractual obligations relating to compliance with modern slavery legislation and mandatory reporting requirements. This reinforces Winc’s commitment to ethical labour practices across both its direct workforce and extended labour arrangements.

Indirect workforce processes.

Labour hire.

Throughout the reporting period, Winc maintained its due diligence processes concerning the hiring of labour through agencies. In 2025, workers hired via five agencies, were engaged across all sites. These workers, employed through Labour Hire Providers (LHPs), operate under the stipulations outlined in relevant Industrial Enterprise Agreements with their health and safety managed in line with work health and safety regulations.

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

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

Contracted workforce.

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

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



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

Background.

During the vetting stages for a potential new supplier, Winc identified potential labour and safety concerns that required immediate escalation and further due diligence. Although Winc had never sourced from this site, its visibility on Sedex prompted Winc to review the factory’s most recent social compliance audit.

Challenges Identified.

1. Labour and Working Hour Practices

The audit identified areas for improvement in relation to working hours, rest days and wage practices. These findings indicate potential gaps in alignment with labour standards and the need for strengthened oversight and management controls.

2. Health, Safety and Building Considerations

The audit also identified a number of health and safety considerations, including fire safety measures, building protections and broader worker safeguards. These findings suggest opportunities to enhance site-level systems and ensure a consistently safe working environment.

Actions Taken.

To ensure appropriate escalation and transparency across the supply chain, Winc took the following steps:

Immediate Engagement with the Supplier

Winc contacted the supplier to clarify their relationship with the site and required that the issues be escalated directly with the factory as a matter of urgency.

Internal Risk Communication and Controls

Internal stakeholders were informed of the elevated labour risks. Winc formally confirmed that the facility would not be approved for sourcing unless all issues were fully remediated and independently verified.

Corrective Action Expectations

The Supplier was instructed to develop a corrective action plan with the factory and to provide Winc with ongoing updates to ensure transparency and accountability throughout the remediation process.

Outcomes and Impact.

Risk Prevention Before Sourcing Begins

Sedex visibility enabled Winc to identify elevated labour risks before establishing any commercial relationship, allowing risk prevention rather than reactive remediation.

Strengthened Supplier Accountability

Winc ensured that concerns were escalated and addressed appropriately, and the appropriate safeguards were in place before any further actions were undertaken.

Clear Ethical Boundaries in Decision-Making

Following initial assessment, Winc applied its ethical sourcing framework to guide next steps. Sourcing from the facility was delayed pending verified remediation and confirmation that working conditions meet required standards.

Winc continues to engage with the relevant Supplier and monitor progress, supporting ongoing investigation, and providing appropriate advice and assistance to help with framework compliance.

Conclusion.

This case demonstrates the value of supply chain visibility and proactive due diligence. Sedex enabled Winc to detect risks early, ensuring that overarching obligations were prioritised. Winc seeks to promote responsible practices by engaging with relevant partners to ensure risks are appropriately understood and addressed. This reflects Winc’s commitment to responsible global business practices and continuous improvement across the supply chain.

# Our Supply Chain.

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

## Our categories.



Office Products



Kitchen



Cleaning & Hygiene



Technology



Health & Safety



Furniture



Education Supplies



Packaging Supplies

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

### National Brand.

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

In 2025, the Ethical Sourcing Team continued to expand on the 2024 questionnaire to collect qualitative insights regarding ethical sourcing practices. This includes supplier policies, documentation, supply chain management, traceability efforts and risk assessment processes. Monitoring requirements are then customised based on the identified level of risk.

### Services/Goods Not For Resale.

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



### Winc Own Brand.

Winc’s Own Brand portfolio encompasses a diverse range of brands including Winc, Winc Earth, Business Interiors, Cleera, Codafile, Corporate Express, Office Elements, OfficeMax, Xpress, Simply and Victoria Gardens. Throughout the current reporting period, we collaborated with multiple Own Brand suppliers operating across 17 countries manufacturing goods across nine distinct categories. To uphold ethical standards, information on these suppliers is updated in our Ethical Sourcing Database every month.







# Evaluating Risk.

Winc uses a structured, multi-factor risk assessment approach to identify, understand and address modern slavery risks across our operations and diverse global supply chain.

Winc recognises that modern slavery risks can arise across both our operations and supply chain. The level of inherent risk is influenced by multiple factors, including product category, raw materials used, manufacturing processes, geographical location, supplier capability and the value of our procurement. These elements shape the way Winc may be involved in, or exposed to, modern slavery risks and inform the risk management measures we implement.

### Our Role as an Employer

Winc puts in place appropriate controls, work practices and governance to mitigate the risks of adverse human rights impacts to employees when employment practices do not meet legal and ethical standards. We maintain strong HR and WHS systems, clear workplace policies and accessible grievance channels to protect our people.

We mitigate this risk through compliant employment conditions, regular training, transparent reporting pathways and continuous monitoring of workplace standards.

### Our Role as a Procurer of Goods and Services

Through our procurement activities, Winc recognises that modern slavery risks are present throughout our suppliers operations and extended supply chains. To mitigate this,

Winc enforces its Ethical Sourcing Policy and Supplier Terms and Conditions, conducts due-diligence assessments and works closely with suppliers to address identified issues through corrective actions, capability-building and ongoing monitoring.

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

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

### Risk management plan for Ethical Sourcing.

International human rights reports underscore the prevalence of modern slavery in certain countries, often due to factors like weak rule of law, inadequate governance practices, conflicts, migration patterns and socio-economic disparities such as poverty. Utilising data from The Global Slavery Index, we assess the risk associated with countries from which we source goods, categorising those with an estimated prevalence rate exceeding 2.5 per 1,000 population as high risk.

Additionally, certain industries, irrespective of location, are inherently more susceptible to modern slavery risks, characterised by informality, lack of regulation, dependence on low-skilled labour and low wages. Leveraging insights from the Global Slavery Index, the Ethical Sourcing Team categorises the risks of product categories and solutions, enabling targeted mitigation strategies to ensure ethical practices across our supply chain.



**99.5%** of Winc suppliers acknowledge and accept Winc’s Ethical Sourcing Policy Questionnaire.

### National Brands. Key findings.

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

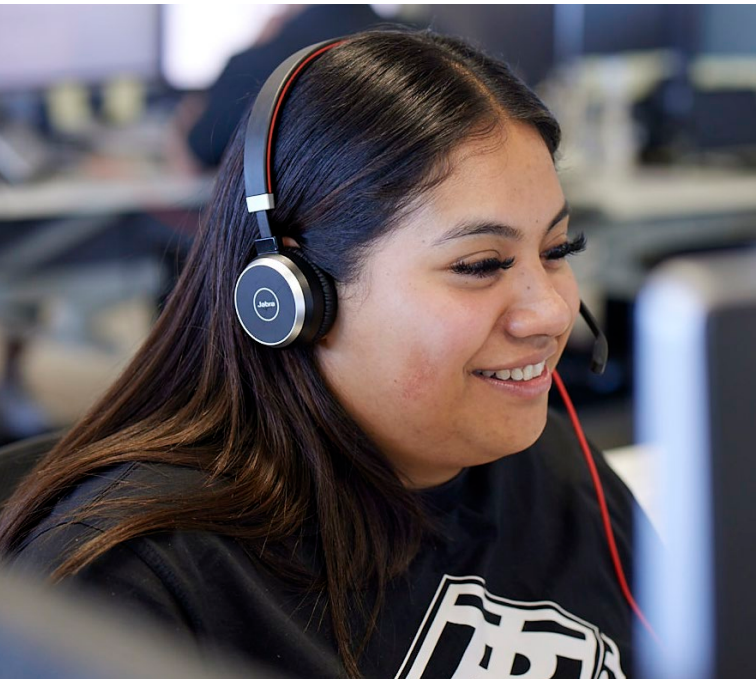
In 2025, Winc utilised SAQ responses to gain deeper insights into suppliers’ risk profiles. Based on the information provided, the Winc team took a proactive approach to ensuring the completion of the SAQ by engaging directly with National Brand suppliers through one-on-one meetings. These meetings served as a platform to address any challenges suppliers faced in completing the questionnaire, to clarify expectations, and reinforce the importance of ethical sourcing. By maintaining open communication and providing guidance, the Winc team was able to drive higher participation rates, ensure accurate data collection and support suppliers in identifying areas for improvement. This hands-on approach not only facilitated SAQ completion but also strengthened supplier relationships and reinforced Winc’s commitment to mitigating modern slavery risks through collaborative engagement.

Beyond assessing supplier risk, the Self-Assessment Questionnaires (SAQs) continued to facilitate meaningful discussions focused on strengthening anti-modern slavery efforts during the reporting period. Through these one-on-one meetings, Winc engaged with National Brand suppliers to gain deeper insights into their initiatives, exploring the measures they have implemented to prevent exploitation and uphold ethical standards.

One of the key challenges identified during our assessments was the lack of understanding of modern slavery risks within businesses. Some suppliers demonstrated limited awareness of how modern slavery can manifest in their

operations and supply chains, as well as the necessary steps to identify and mitigate these risks. This knowledge gap underscores the need for targeted education and capacity-building initiatives to ensure that businesses not only comply with ethical sourcing requirements but also actively contribute to the prevention of modern slavery. Winc works to address this challenge by providing tailored training, guidance and resources to develop a deeper understanding of modern slavery risks and implement effective risk management strategies.

- **99.5% of Winc suppliers acknowledge and accept Winc’s Ethical Sourcing Policy**, demonstrating strong alignment with our expectations and commitment to responsible business practices.
- **62.3% confirmed they have an Ethical Sourcing Policy in place**, reflecting the continued maturity in managing ethical sourcing risks across our supply chain.
- Of the remainder who do not yet have a formal Ethical Sourcing Policy in place, **94% are Australian-registered entities**, highlighting a key opportunity to further strengthen domestic supply chain governance. While the absence of a formal policy may indicate varying levels of maturity, it also presents a clear pathway for engagement and capability building.
- Winc is actively supporting these suppliers to develop and implement robust Ethical Sourcing Policies, providing guidance and tools to help embed consistent approaches to managing modern slavery, labour rights, and environmental risks.
- Strengthening policy adoption across all suppliers remains a key focus area with a clear objective to drive full alignment over time. This reflects Winc’s commitment to continuous improvement and to building a supply chain that is not only compliant, but resilient, transparent and accountable.



Winc Own Brand.

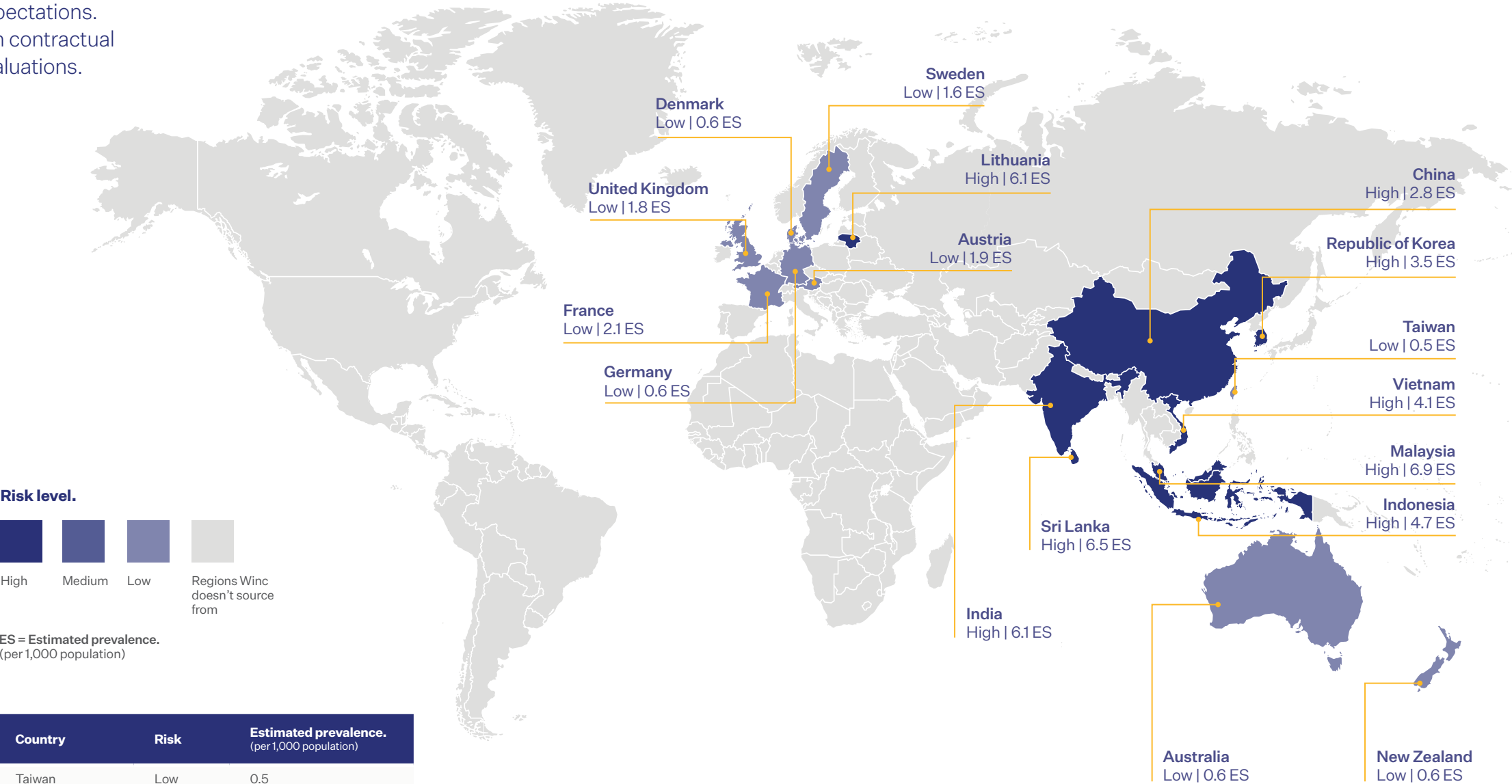
Winc’s Ethical Sourcing Program ensures that Own Brand suppliers fully understand the company’s standards and expectations. This initiative includes an onboarding process with contractual agreements and mandatory social compliance evaluations.

In 2025, Winc enhanced its onboarding procedures and plans to offer additional supplier training sessions to further clarify its ethical standards and assessment criteria, while providing suppliers with opportunities to improve their social and environmental compliance. As part of the 2025 Modern Slavery Statement, Winc has implemented several measures to mitigate the risk of modern slavery:

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

This table shows the countries where Winc sources its Own Brand products, along with their respective risk ratings based on the current Global Slavery Index data.

These risk ratings are an important part of Winc’s ongoing efforts to mitigate modern slavery risks within its supply chain. One of the key ways Winc evaluates risk is by identifying suppliers operating high-risk countries. This enables the company to prioritise due diligence, supplier engagement and targeted mitigation strategies that help prevent harm and promote ethical practices.



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

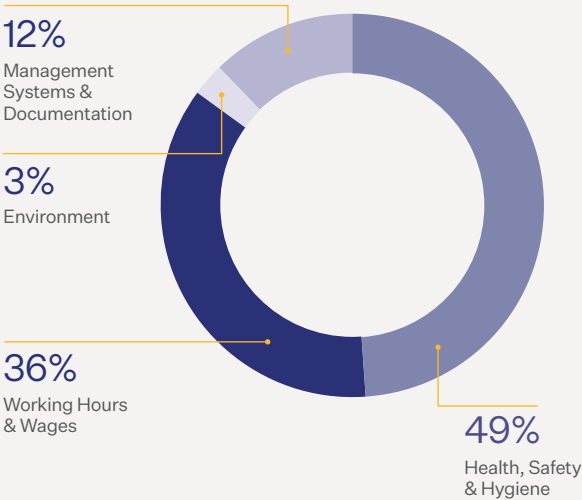
| Countries Audited in 2025 |    |
|---------------------------|----|
| China                     | 62 |
| India                     | 2  |
| Indonesia                 | 4  |
| Lithuania                 | 1  |
| Malaysia                  | 6  |
| Sri Lanka                 | 1  |
| Taiwan                    | 1  |
| Vietnam                   | 1  |

Key findings.

As part of our ongoing commitment to ethical sourcing and responsible supply chain management, Winc regularly evaluates its suppliers based on risk assessments and third-party audits. The breakdown on the following page provides a snapshot of our supplier risk categories for 2025, reflecting our continued efforts to identify and mitigate potential risks such as modern slavery and unsafe working conditions. This data highlights our proactive approach in auditing suppliers, addressing non-compliances, and ensuring that all suppliers adhere to the highest ethical standards.

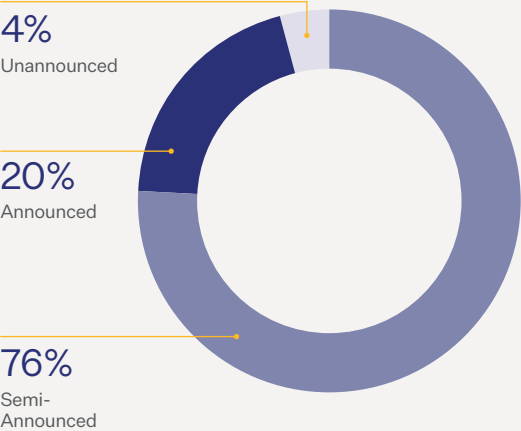
Trends of common findings by category.

Audit Finding Types



Audit Type

Majority of audits conducted were semi-announced to support audit integrity and transparency.



Closure of non-compliances.

Winc has successfully closed 101 major non-compliances (NCs), as part of its ongoing efforts to enhance ethical sourcing and supplier accountability. Winc remains committed to addressing critical non-compliances and ensuring that suppliers take meaningful steps toward ethical sourcing. As part of this commitment, we have identified 17 critical non-compliances in 2025, of which 15 have already been successfully resolved. We are working with the two factories to ensure their corrective actions can be closed and follow up audits have been booked.

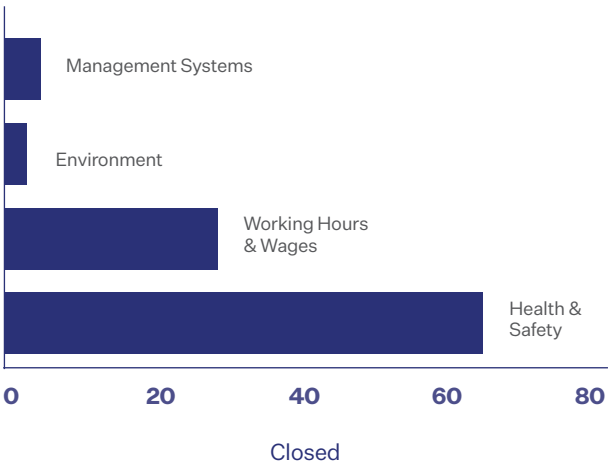
ethical sourcing standards. The remediation program provides structured support, including guidance on policy improvements, worker welfare enhancements and operational changes needed to eliminate risks. By maintaining an active role in remediation efforts, Winc reinforces its commitment to improving labour conditions and strengthening supply chain accountability.

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

Through continuous monitoring and targeted interventions, Winc works closely with these factories to implement corrective actions, ensuring compliance with

For some of the major non-compliances, Winc is in the process of creating long term action plans – please see the case studies on page 9 and 20.

Major Findings Closed



Corrective actions implemented during the period focused on strengthening chemical safety management, workplace health and safety controls, fire safety preparedness and worker welfare and compliance systems.



| Category                                                                | Percentages for non-compliances already addressed. |
|-------------------------------------------------------------------------|----------------------------------------------------|
| Universal Rights covering UNGP                                          | 0%                                                 |
| Business ethics                                                         | 4.2%                                               |
| Environment                                                             | 4.9%                                               |
| Freedom of association and right to collective bargaining are respected | 2.1%                                               |
| Legal wages are paid                                                    | 7.0%                                               |
| No discrimination is practiced                                          | 0%                                                 |
| No harsh or inhumane treatment is allowed                               | 2.1%                                               |
| Responsible recruitment and entitlement to work                         | 12.0%                                              |
| Working conditions are safe and hygienic                                | 59.9%                                              |
| Working hours are not excessive                                         | 7.8%                                               |

# Effectiveness & Performance Indicators.

Winc uses key metrics to measure the effectiveness of our approach in managing the risk of modern slavery in our supply chain.

## Self-Assessment Questionnaire Results.

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

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

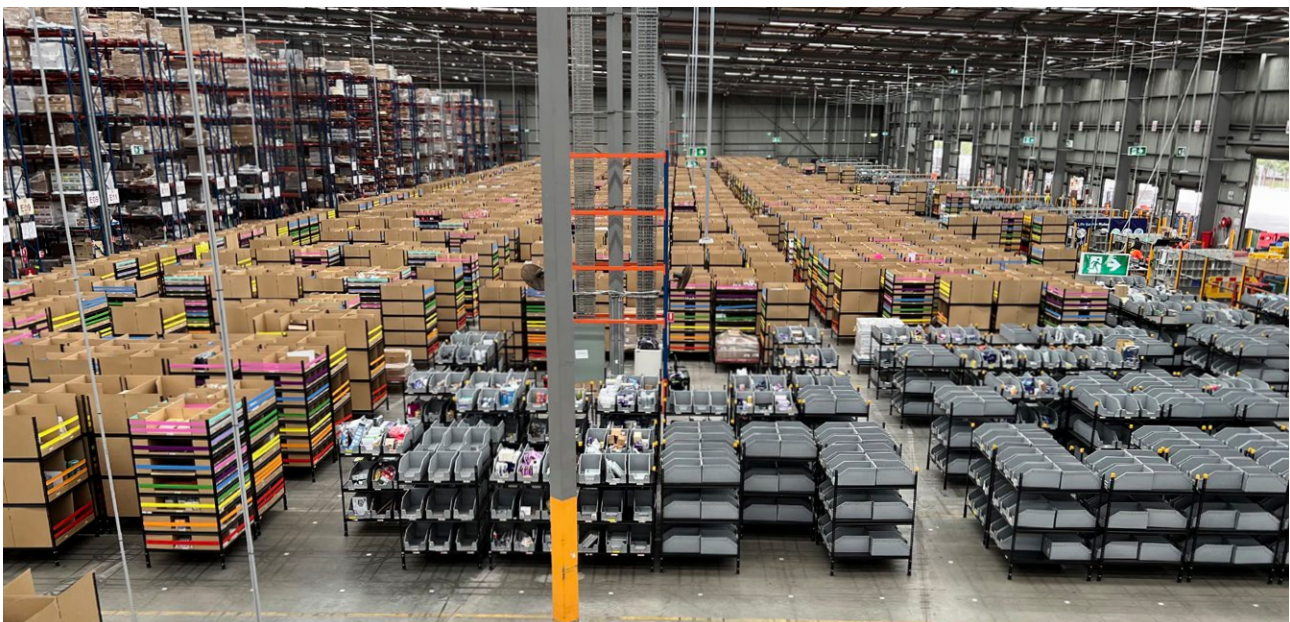
An increasing number of suppliers since 2024 have demonstrated strong engagement in ethical compliance. 79% suppliers have conducted a modern slavery risk

assessment within their operations and supply chains, showcasing their commitment to responsible sourcing. Similarly, 80% of suppliers have established a grievance mechanism for employees, reinforcing their dedication to ethical business practices.

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

- Over 60% of suppliers have an Ethical Sourcing Policy.
- 79% of suppliers have conducted a risk assessment on their suppliers.

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



# Tools to Identify, Assess & Mitigate Risks in the Supply Chain.

The below tools support transparency, accountability and continuous improvement throughout Winc’s supply chain.

## Supplier Risk Profiling

Winc applies a multi-factor risk assessment methodology to evaluate inherent modern slavery risks across its supplier base. This considers factors such as industry and product, geographic location, supplier spend and whether products are Own Brand or National Brand.

## Independent Social Compliance Audits

Higher-risk suppliers and sites are required to maintain independent third-party social compliance audits. These audits assess labour conditions, working hours, wages, health and safety and other human rights risks, with corrective actions required where non-compliances are identified.

## Supplier Self-Assessment Questionnaires (SAQ)

Suppliers are required to complete structured Self-Assessment Questionnaires, including Sedex SAQs and Winc supplier questionnaires, to assess labour standards, working conditions and governance controls within their operations.

## Governance and escalation processes

Modern slavery risks identified through assessments, audits or supplier engagement are escalated through Winc’s internal governance structures, including the Ethical Sourcing Team, Merchandising Team, Winc Legal, the Group General Counsel & Company Secretary, and the Social Agenda Committee.

## Corrective Action and Continuous Improvement Plans

Where risks or non-compliances are identified, Winc requires suppliers to implement corrective action plans. Progress is monitored through follow-up reviews and supplier engagement to support continuous improvement in labour standards.

## Supply-chain visibility platforms (Sedex)

Winc uses supply-chain transparency platforms such as Sedex to review audit reports, monitor corrective actions and identify emerging labour-rights risks across supplier facilities.

# Case Study:

As part of Winc’s Ethical Sourcing Program, ten suppliers operating in higher-risk categories were selected for one-on-one consultations following our annual risk review. These suppliers represented a mix of food, manufacturing and product-processing sites, each demonstrating varying levels of maturity in ethical sourcing governance. While many had strong foundations, such as globally recognised safety certifications, Fair Work audits or quality systems, our assessments consistently identified gaps in formalised ethical sourcing practices, particularly around modern slavery risk identification and governance.



## Engagement Selection Criteria

The suppliers involved in this program were selected because they demonstrated one or more indicators of elevated ethical sourcing or modern slavery risk, as identified through Winc’s annual review process. These indicators included:

- Absence of a formal Ethical Sourcing Policy, limiting visibility over their expectations for labour rights and responsible sourcing.
- Informal or undefined governance structures, where responsibility for ethical sourcing or modern slavery oversight was unclear.

- Limited or ad hoc risk assessment practices, without a structured approach to identifying or managing supply chain risks.
- Ethical sourcing requirements not yet integrated into supplier approval, onboarding or contracting processes.

These risk indicators did not necessarily reflect poor performance, but rather highlighted areas where additional capability building and governance support could significantly strengthen modern slavery due diligence.

## How Winc Supported the Suppliers

Across all 10 consultations, Winc tailored recommendations to the supplier’s industry, risk profile and internal capacity, but the core support pillars remained consistent.

- **Establishing Ethical Sourcing Policies**  
Suppliers were guided to develop formal Ethical Sourcing Policies that clearly articulate expectations around labour rights, human rights and responsible sourcing. For suppliers without an existing framework, the Ethical Sourcing Team provided a customisable template to simplify adoption and ensure alignment with Winc’s standards.
- **Introducing Structured Risk Management Plans**  
Winc encouraged suppliers to adopt practical, tiered risk assessment frameworks to map supply chain risks, document controls and monitor progress.
- **Strengthening Governance and Accountability**  
Suppliers were supported to define ownership of ethical sourcing, ensuring procurement, operations and leadership all had clear roles and reporting responsibilities.
- **Enhancing Supplier Approval Programs**  
Winc recommended the integration of ethical sourcing checks into onboarding, contracts and ongoing supplier performance monitoring.
- **Conducting Independent Supply Chain Risk Assessments**  
Rather than relying solely on third-party certificates, suppliers were encouraged to review their extended supply chains and identify red flags relevant to modern slavery.

## Outcome: Building Capability at Scale

This engagement strengthened governance and transparency across ten higher-risk suppliers, reflecting Winc’s commitment to partnering with suppliers to build capability rather than simply auditing compliance. Through tailored consultations, Winc provided each supplier with practical tools, including a customisable Ethical Sourcing Policy, a structured Risk Management Plan, examples of effective governance models and guidance on integrating modern slavery requirements into contracts to support the development of formalised ethical sourcing frameworks. As a result, many suppliers have now commenced drafting policies, identifying supply chain risks and establishing clearer governance pathways. Winc will continue regular follow-ups to monitor progress, provide guidance and support continuous improvement across the group, contributing to a more responsible and resilient supply chain.



Whistleblower Policy.

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

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

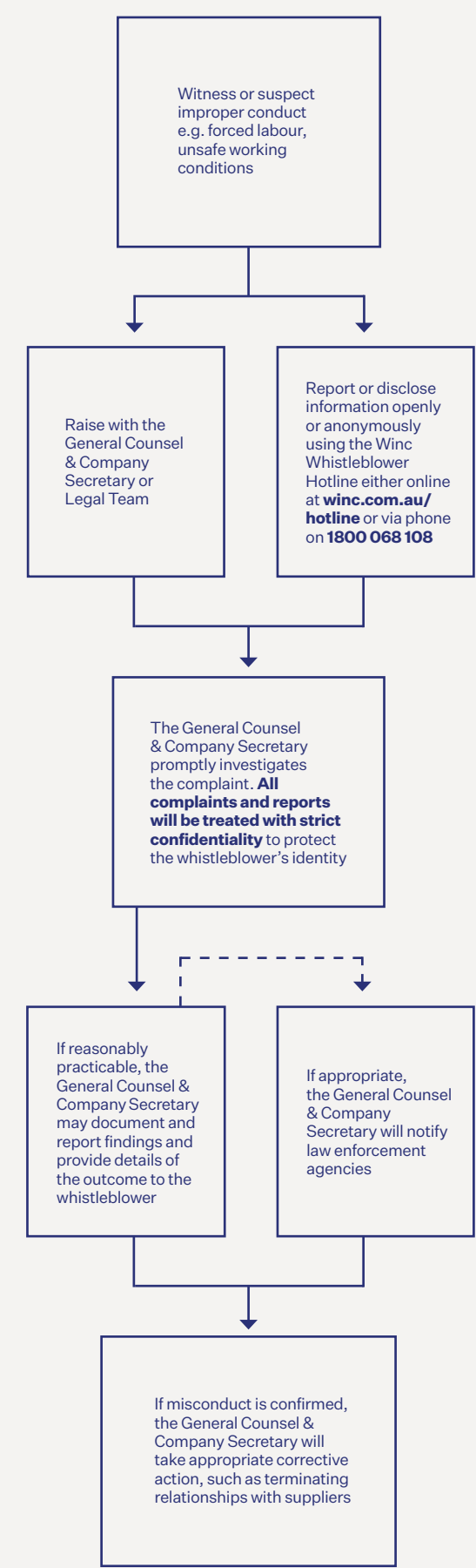
Winc strongly encourages suppliers to maintain grievance mechanisms to enable workers to openly communicate and share grievances with management without fear of reprisal, intimidation or harassment, as outlined in Winc’s Ethical Sourcing Policy. Winc encourages its suppliers to adopt Winc’s grievance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

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

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

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

Reporting process.



Training & awareness.

Throughout 2025, Winc conducted internal training sessions focused on modern slavery, addressing various aspects including legislation and activism, remediation processes, Self-Assessment Questionnaires (SAQs), industry risk factors and third-party auditing. These training sessions, approved by the Group General Counsel and Company Secretary, were conducted across key departments such as Category, Supply & Demand Planning, Sales and HR. The aim was to equip our teams with a comprehensive understanding, covering topics such as the legal framework surrounding modern slavery and the significance of activism in advocating for change. Additional topics included the remediation process for addressing slavery in our supply chains, the role of SAQs in evaluating current practices and identifying areas for improvement, industry-specific risk factors, and the importance of third-party auditing in verifying compliance and ensuring continuous progress.

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



Methods to report grievance.

Grievances can be reported through several methods, including:

**Direct:** Troy Swan, General Counsel & Company Secretary  
**Email:** [troy.swan@winc.com.au](mailto:troy.swan@winc.com.au)  
**Phone:** +61 409 100 364

**Post:** Attention: Troy Swan, General Counsel & Company Secretary  
Winc Australia Pty Limited  
Level 8, 163 O’Riordan Street  
Mascot NSW 2020 Australia

**Phone:** 1800 068 108  
**Online:** [winc.com.au/hotline](http://winc.com.au/hotline)  
**Email:** [legal@winc.com.au](mailto:legal@winc.com.au)

# Future Activities.

## 1. Strengthening Own Brand compliance.

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

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

By integrating lessons learned from previous assessments and continuously refining our ethical sourcing strategies, Winc will ensure a proactive and long-term approach to improving labour conditions. We are committed to meeting compliance requirements and fostering a supply chain that holds the highest ethical standards and prioritises the wellbeing of workers.

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

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

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

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

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

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

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

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

In addition:

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

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

# Appendix.

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





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

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