

MODERN SLAVERY STATEMENT

2024

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INTRODUCTION

ACKNOWLEDGEMENT OF COUNTRY

Metcash acknowledges the Traditional Custodians of the lands upon which we live and operate, and we pay our respects to their Elders past and present.

YOUR VOICE MATTERS

Metcash appreciates our stakeholders partnering with us to uphold our commitment to high standards of conduct. If you have concerns about modern slavery or potential human rights issues or unethical behaviour in our operations or supply chains, we encourage you to contact us. Your feedback is valued, and you can choose to remain anonymous.

Metcash Team members and Direct Suppliers

www.talkintegrity.com/metcash

Phone: 1800 835 587 (Australia)
0080 5100 5200 (New Zealand)

Address: 1 Thomas Holt Drive,
Macquarie Park NSW 2113 (Australia)

Metcash Supply Chain Workers

Worker Voice Platform

<http://metcash.ethicspoint.com/>

CONSULTATION PROCESS AND BOARD APPROVAL

This Statement is made pursuant to section 13(1) of the *Modern Slavery Act 2018 (Cth)* (**Modern Slavery Act**). It constitutes the joint statement of the Metcash Group Limited and the reporting entities named in Section 1 of this Statement for the reporting period 1 May 2023 to 30 April 2024. The Statement was prepared in consultation with our controlled entities (including the reporting entities). As an integrated group of entities, where Metcash has operational control, common policies, systems and governance processes, the consultation process occurs at a Metcash Group level, both in respect of our reporting entities and their controlled entities. Key functional support staff responsible for Metcash operations and supply chains were consulted and these teams contributed to the preparation of this Statement, prior to its review by the Metcash Executive Leadership Team, which is collectively responsible for the management of our operations and supply chains. Following review by our ESG Council, including representatives of our Group Leadership Team, the Statement was considered by our Board and Board Safety and Sustainability Committee for approval. Our retail partners are largely independently owned and operated; however, we do have minority interests in some operations. While we seek to assist and consult with our retailers on issues of modern slavery, including through training, knowledge sharing and retailer forums, they are ultimately responsible for compliance with the Modern Slavery Act as it applies to them and, where required, prepare and submit their own Modern Slavery Statements.

The Statement has been reviewed and approved by the Metcash Board on behalf of itself and each of the reporting entities on 31 October 2024.



Doug Jones
Group CEO and Executive Director

1. ABOUT THIS STATEMENT

This modern slavery statement (the **Statement) is made by Metcash Limited (ABN 32 112 073 480) on behalf of itself and the following reporting entities for the reporting period 1 May 2023 to 30 April 2024:**

- Metcash Trading Limited (ABN 61 000 031 569)
- Metcash Food & Grocery Pty Ltd (ABN 67 004 391 422)
- IGA Distribution (WA) Pty Limited (ABN 13 008 667 650)
- Metcash Food and Grocery Convenience Division Pty Ltd (ABN 57 000 226 399)
- Australian Liquor Marketers Pty Ltd (ABN 52 002 885 645)
- Tasman Liquor Co Limited (New Zealand) (ABN IRD 67 672 643)
- Australian Liquor Marketers (Qld) Pty Ltd (ABN 80 010 756 519)
- Australian Liquor Marketers (WA) Pty Ltd (ABN 23 009 196 614)
- Independent Hardware Group Pty Limited (ABN 76 141 010 906)
- Mitre 10 Australia Pty Ltd (ABN 98 009 713 704)
- Danks Holdings Pty Limited (ABN 81 004 295 532)
- South Coast Operations Pty Ltd (ABN 42 122 864 868)
- Faggs Geelong Pty Ltd (ABN 13 130 782 802)
- G Gay Hardware Pty Ltd (ABN 74 167 759 220)
- Tasmania Hardware Pty Ltd (ABN 46 159 847 462)
- Sunshine Hardware Pty Ltd (ABN 95 129 140 085)
- Bianco Hardware Pty Limited (ABN 76 152 645 406)
- Bianco Construction Supplies Pty Limited (ABN 70 152 933 750)
- Total Tools Holdings Pty Limited (ABN 57 138 595 525)
- Total Tools Stores Pty Limited (ABN 94 617 752 806)

All entities are incorporated in Australia unless specifically identified.

References to 'our' and 'we' in this Statement refer to Metcash Limited and its majority owned and controlled subsidiaries (including reporting entities) and managed joint venture operations (Metcash or Metcash Group).

2. GROUP CEO STATEMENT



At Metcash, we believe championing successful independents is at the heart of thriving communities.

I am pleased to present our Modern Slavery Statement for 2024, which underscores our commitment to continue protecting those most vulnerable and addressing modern slavery across our operations and supply chains.

By closely engaging with our suppliers, retail partners and communities, we strive to safeguard human rights and uphold ethical conduct in all that we do.

As we reflect on the past year, I am proud to see our programs of work continue to drive progress in this critical area. We have taken steps to enhance our policy framework, including the creation of our Responsible Sourcing Principles, aimed at promoting transparency and resilience in our supply chains. By incorporating our new Supplier Code of Conduct into these Principles, this enables us to reinforce this as a shared responsibility alongside our suppliers.

We have also refined our approach to risk management by shifting our focus to the areas that matter most. By implementing a new way of identifying our priority risk areas and tapping into deeper insights, we have improved our approach towards supply chain due diligence. We are optimistic that these steps will help drive more positive impact in the years ahead.

At Metcash, we care about our people and take pride in fostering a culture that values diversity, inclusion and equity – something we see as important when it comes to supporting change across our extended supply chains. During the reporting year, the newly established Modern Slavery Working Group enhanced our [Human Rights & Anti-Slavery Policy](#), demonstrating our commitment to respect the rights of individuals belonging to vulnerable groups or populations.

While we have made progress in many key areas, we recognise that there are always opportunities for improvement and further collaboration. Our efforts wouldn't be possible without support from our stakeholders, so I would like to thank you for your dedication and engagement as we work towards a future that is free of modern slavery.

A handwritten signature in black ink, appearing to read 'Doug Jones'.

Doug Jones
Group CEO and Executive Director

3. FY24 HIGHLIGHTS

KEY ENHANCEMENTS IN FY24

During the reporting year, we have made progress across the three areas underpinned by our Modern Slavery Framework. This framework continues to guide our efforts in making measurable outcomes towards cultivating a culture of transparency, embedding due diligence in everything we do and developing capabilities to mitigate modern slavery risks.

Prevention

EXPANDED ON OUR CAPACITY BUILDING AND TRAINING

- We continued to invest in education for procurement team members across the three pillars. In the hardware sector of our business, we rolled out the mandatory Modern Slavery Awareness training on our eLearning platform. (Section 7.5).

DEVELOPED NEW POLICIES AND STANDARDS

- We expanded our procurement program through the creation of Responsible Sourcing Principles for both team members and suppliers, aligning our approach to recognised frameworks that protect human rights. (Section 7.4).
- We issued our new Supplier Code of Conduct within these Principles to communicate our standards and expectations to our suppliers and reinforce that our mitigation efforts are a shared responsibility. (Section 7.4).
- We enhanced our Human Rights and Anti-Slavery Policy as a first step to demonstrate our commitment to safeguarding human rights as part of our approach to addressing modern slavery. (Section 7.4).

Detection

STRENGTHENED OUR SUPPLY CHAIN DUE DILIGENCE

- We leveraged the Lloyd's Register Quality Assurance (LRQA) EiQ platform to identify the most significant risk areas in our extended supply chains; this includes access the five priority risk areas identified in our last risk assessment, work uniforms, garden care categories, canned seafood, domestic agriculture (Australia), and freight. (Section 6.1.2).
- We conducted a thorough due diligence check on our supplier of solar panels to ensure they passed our criteria as we continue to install photo-voltaic solar cells across selected distribution centres in Australia. (Section 7.3.2).

ENHANCED CERTIFICATION COMPLIANCE FOR OUR TIMBER PRODUCTS

- We executed a comprehensive supply chain review for timber products used in our hardware sector to monitor certification compliance and responsible forestry practices. (Section 7.7.1).

Remediation

STREAMLINED OUR GRIEVANCE AND REMEDIATION SYSTEMS

- We initiated surveys to gather insights and validate the value of our grievance mechanisms to better understand the effectiveness, capabilities and performance of our suppliers' existing whistleblower systems. (Section 7.6.2).
- We actively promoted the use of the new NAVEX EthicsPoint solution through a social compliance memo and a supplier survey to centralise incident management and foster an ethical workplace. (Section 7.6).

4. ABOUT METCASH



has evolved to become Australia's leading wholesale distribution and marketing company with a significant retail presence in Hardware

YEAR ESTABLISHED

1927

TEAM MEMBERS (ACROSS 100% OWNED ENTITIES)

~10,000

OVERVIEW

Founded in 1927 as a small corner store in Woolloomooloo, New South Wales, Metcash has evolved to become Australia's leading wholesale distribution and marketing company, providing independent retailer services and creating much-loved brands across our Food, Hardware and Liquor pillars. Metcash also has a significant retail presence in Hardware.

We believe it is vital to empower family-owned businesses to become the 'Best Store in Their Town' for everyday Australians and for generations to come. Today, Metcash supports over 6,500 bannered retail stores across the country through distribution centres located in major cities and smaller regional centres.

As an ASX-listed company, Metcash is accountable for meeting the expectations of a wide range of stakeholders, including our shareholders, team members, suppliers and customers. Our extensive reach across the country drives us to thoughtfully consider how our approach to modern slavery can support industries that prioritise integrity and responsibility.

~6,500

BANNERED INDEPENDENT RETAILERS ACROSS FOOD, HARDWARE AND LIQUOR

38

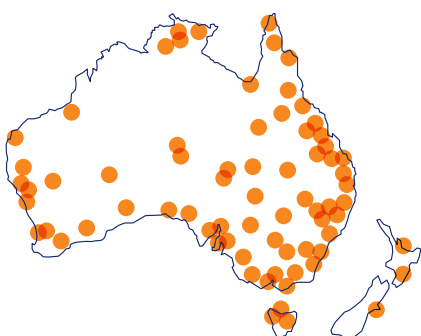
DISTRIBUTION CENTRES

~95,000

NON-BANNERED STORES AND CUSTOMERS

20+

BRANDS



WE REACH

~95%

OF AUSTRALIANS

OUR PURPOSE

CHAMPIONING SUCCESSFUL INDEPENDENTS

in support of

THRIVING LOCAL COMMUNITIES

to create

SUSTAINABLE SHAREHOLDER VALUE

OUR VALUES

Independence is worth fighting for; treating our people, retailers and suppliers the way we like to be treated; giving back to the communities where we live and work.

5. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

5.1. OUR ORGANISATIONAL STRUCTURE

METCASH LIMITED (CORPORATE)

Metcash Limited is the parent company of Metcash. Metcash provides strategic guidance, operational support and centralised services across our three internal pillars.

METCASH PILLARS

Our pillars supply and support a network of independent retailers that form part of our bannered network and several other non-bannered businesses.

FOOD

OUR BANNERED STORES



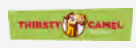
HARDWARE

OUR BANNERED STORES



LIQUOR





OUR BANNERED STORES



5. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS CONTINUED

5.2. OUR OPERATIONS

Metcash operates across Australia and New Zealand, supporting over 6,500 bannered independent retailers and serving tens of thousands of wholesale customers through our vast distribution networks located in major cities and smaller regional centres.

SERVICE	DESCRIPTION	KEY DATA POINTS	
CORPORATE	<p>Metcash Limited is headquartered in Macquarie Park, New South Wales.</p> <p>We provide essential functions that underpin our business operations, including strategic guidance, operational support and centralised services such as procurement, logistics and marketing. This approach fosters efficiency and collaboration throughout the organisation and ensures compliance and governance.</p> <p>We also have major distribution centres located in different States and Territories.</p>	<p>1 CORPORATE HEAD OFFICE in Macquarie Park, New South Wales</p> <p>16 DISTRIBUTION CENTRES in metro and regional Australia</p>	<p>5 MAJOR DISTRIBUTION CENTRES in Queensland, New South Wales, South Australia, Victoria and Western Australia</p> 
FOOD	<p>The Metcash Food pillar supports a network of independently owned supermarkets across Australia as well as the Campbells Convenience Network.</p> <p>Our diverse range of stores are tailored to meet the unique needs of their local communities by providing fresh food, groceries and general merchandise, such as household essentials. By offering the convenience of a local store while tapping into the advantages of a national network, our retailers can provide quality products at competitive prices.</p> <p>In our Food pillar, Metcash serves several large customers known as Multiple Store Owners (MSOs). These customers own and/or operate more than one independent retail store, and in some cases can own and/or operate many stores. Examples include Ritchies Stores Pty Ltd (Ritchies), and Romeo Retail Group.</p> <p>Additionally, our Food pillar is a supplier to several contract customers, one of which is Australian United Retailers (AURs), who operate the Foodworks bannered network.</p>	<p>5 MAJOR DISTRIBUTION CENTRES in Queensland, New South Wales, South Australia, Victoria and Western Australia</p> <p>16 CAMPBELLS AND CONVENIENCE BANNERED STORES</p>	<p>16 REGIONAL DISTRIBUTION CENTRES in metro and regional Australia</p> <p>-1,280 BANNERED IGA STORES</p> 
HARDWARE	<p>The Metcash Hardware pillar includes Independent Hardware Group (IHG), the largest independent hardware wholesaler in Australia. With flagship brands such as Mitre 10 and Home Hardware, IHG caters to Trade and DIY customers.</p> <p>The Hardware pillar also includes Total Tools Holdings, the largest professional tools retailer in Australia. Metcash increased its ownership of Total Tools Holdings from 85% to 100% in FY24.</p>	<p>610+ BANNERED STORES</p> <p>3 DISTRIBUTION CENTRES in Queensland, Victoria and Western Australia</p>	<p>-950 NON-BANNERED STORES</p> <p>118 TOTAL TOOLS STORES</p> <p>1 SOURCING OFFICE IN CHINA</p> 
LIQUOR	<p>Independent Brands Australia (IBA) is the largest network of bannered independent liquor stores in Australia. The Metcash Liquor pillar is the second-largest supplier in the Australian liquor market, serving approximately 85% of independent liquor stores, including Cellarbrations and The Bottle-O.</p> <p>Our Australian Liquor Marketers (ALM) division goes beyond retail, supplying over 14,000 liquor customers. This includes large and small contract banner groups, non-bannered liquor stores, on-premise establishments and online retailers.</p>	<p>11 DISTRIBUTION CENTRES in Australia (shared with our Food pillar distribution network)</p>	<p>3 DISTRIBUTION CENTRES in New Zealand</p> <p>>1,750 BANNERED STORES</p> 

5. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS CONTINUED

5.3. OUR SUPPLY CHAINS

By closely examining our operations and supply chains, we can understand how and where modern slavery risks may occur. Many of our suppliers are headquartered in Australia, and we source finished goods and raw materials for trade and non-trade purposes both domestically and globally.

Our extensive reach across industries and complex network of suppliers means that we play a role in driving ethical practices and creating resilient supply chains built on transparency and integrity.

Fig. 1 depicts how products move through our supply chain.

FIGURE 1 – EXAMPLE SUPPLY CHAIN VISUALISATION

FOOD

Example Supply Chain:
Canned Foods



Raw ingredient cultivation, farming



Harvesting and primary processing



Food manufacturing and packing



Shipping to Metcash DCs and collation for stores



Delivery to retail stores and other customers

LIQUOR

Example Supply Chain:
Wines



Grape cultivation



Picking



Crushing, fermentation and bottling



Shipping to Metcash DCs



Delivery to retail stores

HARDWARE

Example Supply Chain:
Power Tools



Sourcing of raw materials



Production



Assembling and packaging



Shipping to Metcash DCs



Delivery to retail stores

5. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS CONTINUED

5.3. OUR SUPPLY CHAINS CONTINUED

5.3.1. For-trade sourcing

This involves the procurement of goods and services that are directly related to our core operations and revenue generation as a business. At Metcash, we procure through over 13,000 supplier arrangements in over 40 countries across our three pillars for both private labels (products that are specifically manufactured for and branded by the retailer) and proprietary products (those that are owned and developed by a specific company).

Category	Food	Hardware	Liquor
Goods provided by suppliers	<ul style="list-style-type: none"> – Fresh produce, including meat, baked goods, fruits and vegetables. – General merchandise and personal care items. – Non-perishable food items including canned goods. – Perishable food items including dairy and frozen meals. – Tobacco and smoking accessories. 	Building, DIY and home supplies such as timber, cladding, cement, paint, insulation, power tools, outdoor furniture and gardening equipment.	Liquor including beer, wine and spirits.
Nature of supplier engagement	<p>Stores in our bannered network of retailers purchase products in three primary ways:</p> <ul style="list-style-type: none"> – Direct purchases from Metcash; – Through ‘charge-through’ purchases, where Metcash suppliers deliver goods directly to retailers; or – Direct from third-party suppliers. <p>The majority of our suppliers are based in Australia, and we have long-established relationships with them. In our Food pillar, we procure goods locally as well as globally (such as Thailand, India, Vietnam, Malaysia, Egypt, Turkey, the Philippines, Indonesia and the United States).</p> <p>Our supplier base includes a mixture of distributors, major international as well as local food manufacturers, and primary producers.</p>	<p>Independent Hardware Group:</p> <ul style="list-style-type: none"> – The majority of products are sourced from Australian-based vendors, who source from factories that are primarily based in China and Australia. We have some direct relationships with product manufacturers. <p>Total Tools:</p> <ul style="list-style-type: none"> – More than 85% of stocked products are procured from branded suppliers based in Australia. The majority of these products are manufactured overseas. – 13% of stocked products are directly sourced from overseas suppliers and imported under our own brands. Approximately 95% of these directly sourced products are manufactured in China and Taiwan. Our sourcing office based in China is responsible for these supplier relationships, including orders, quality inspections and social audits conducted by accredited third-party providers. 	<p>Many of our suppliers of proprietary products are based in Australia. These suppliers enter ongoing multi-year relationships. They either manufacture locally or import products from global manufacturers, including from the United Kingdom, Europe and the United States.</p>

5.3.2. Non-trade sourcing

This includes the procurement of goods and services that support our business operations, commonly referred to as ‘goods not for resale’ (GNFR). Across Corporate and our three pillars, we work with over 4,000 suppliers to purchase items such as personal protective equipment, information technology (IT) equipment, and marketing materials. Workwear uniforms are sourced by site and State logistic teams.

We also engage directly with domestic suppliers for services, such as security, facilities management, team member assistance and office cleaning. Functions such as accounting and IT are outsourced to international providers. Major freight contracts exceeding \$5 million are managed by Corporate Non-Trade Procurement, while smaller providers are handled at the site or State level.

6. UNDERSTANDING OUR RISKS

We recognise that modern slavery takes many forms and is an issue that affects millions of people in every corner of the world. Here in Australia, an estimated 41,000 individuals are impacted by modern slavery (Global Slavery Index, 2023). Ensuring that our business operates in ways that actively prevent and address modern slavery is of critical importance to us.

At Metcash, while we evaluate and address modern slavery risks within our operations, our primary focus lies in our supply chains. The following guiding principles have been established to create a culture of accountability and transparency around addressing potential modern slavery risks:

- We ensure our internal operations comply with relevant laws and regulations, which involves comprehensive human resources procedures and controls.
- We engage in ongoing dialogues and maintain strong relationships with suppliers to minimise modern slavery risks in our supply chains.
- We identify and assess actions to address high-risk procurement categories and geographies in our extended supply chains.

We have adopted the principles outlined in the [United Nations Guiding Principles on Business and Human Rights](#) (UNGPR) to assess our modern slavery risks. This enables us to thoroughly understand our potential involvement in modern slavery and other human rights violations through three perspectives: **cause**, **contribute** and **directly linked**. By analysing these various dimensions of our association with modern slavery and human rights risks, we can define targeted strategies and actions to address these.

To mitigate modern slavery risks in the most impactful way, we have adopted a systematic approach towards risk management that is underpinned by three critical steps:

1. Risk assessment
2. Prioritisation
3. Determine and understand drivers

6.1. RISK ASSESSMENT

This first step refers to how we identify potential modern slavery risks in our supply chains and operations. The tools and methodologies used in our risk assessment are:

6.1.1. Tools and methodologies for our risk assessment

Tool and methodology	How it supports identifying risks
Social Lifecycle Assessment (S-LCA)	By screening our procurement data against internationally recognised risk, media and literature databases (including the Global Slavery Index and Social Hotspot Database), we can identify category and geographic risk hotspots and their drivers. Metcash previously engaged with Edge Impact in FY20 to conduct this assessment and the methodology has enabled us to continue taking targeted actions to mitigate modern slavery risks.

Tool and methodology	How it supports identifying risks
Supplier Ethical Data Exchange (Sedex)	Sedex is a member-based organisation and provides an online platform to manage supply chain information and social audits. This platform enables Metcash’s Food pillar to maintain strong oversight to ensure suppliers take appropriate actions to mitigate modern slavery risks. Additionally, suppliers’ corrective action status can be reviewed, and any unresolved critical non-conformances are monitored. Through Sedex, our own brand food suppliers can access the Self-Assessment Questionnaire (SAQ) and Sedex third-party audit data is available to monitor supplier performance.
LRQA EiQ (new in FY24)	EiQ improves how we evaluate our risks by assessing our operational sites against inherent risks and independently verified outcomes. Our sites are measured and ranked based on risk so that we can promptly identify high-risk suppliers, respond accordingly and monitor their performance.

6.1.2. Case study

EVOLVING OUR APPROACH TO RISK ASSESSMENT

In FY24, we began utilising the LRQA EiQ solution to focus our efforts on the most salient risk areas. We screened more than 11,000 vendors and manufacturing data across our three pillars, as well as non-trade products and services in the Food and Liquor pillars. This enabled us to develop a comprehensive risk profile by evaluating our risks across a wide range of dimensions and social indices, including child labour, freedom of association, migrant workers, wages and working hours. This improved approach sets a strong foundation for continued improvement in the coming years by enabling us to be tailored and targeted in our programs of work.

Due to data limitations, some non-trade suppliers were excluded from the risk mapping in FY24. We recognise the need for quality data to support the continued analysis of the actual and potential risks in our supply chains. Next year we will continue to expand our granularity and coverage of data that are material to our non-trade procurement operations.

In addition to the LRQA EiQ screening, the Sedex analysis identified 54 active private label suppliers in our Food pillar that are in high-risk geographies, including China, Malaysia, Egypt, Turkey, India, the Philippines, Thailand and Indonesia. These suppliers have been flagged for further assessment, which will involve evaluating their SAQ responses, workers’ voice survey feedback and social audit status, to identify intervention opportunities.

It is a priority for us to continue evaluating SAQ responses and social audit outcomes, as well as use the ‘Sentinel’ screening feature in the LRQA EiQ solution to identify other intervention opportunities. This solution leverages machine learning to monitor thousands of public news websites and media sources to send alerts for cases of supplier and vendor misconduct relating to labour conditions, health and safety, and business practices.

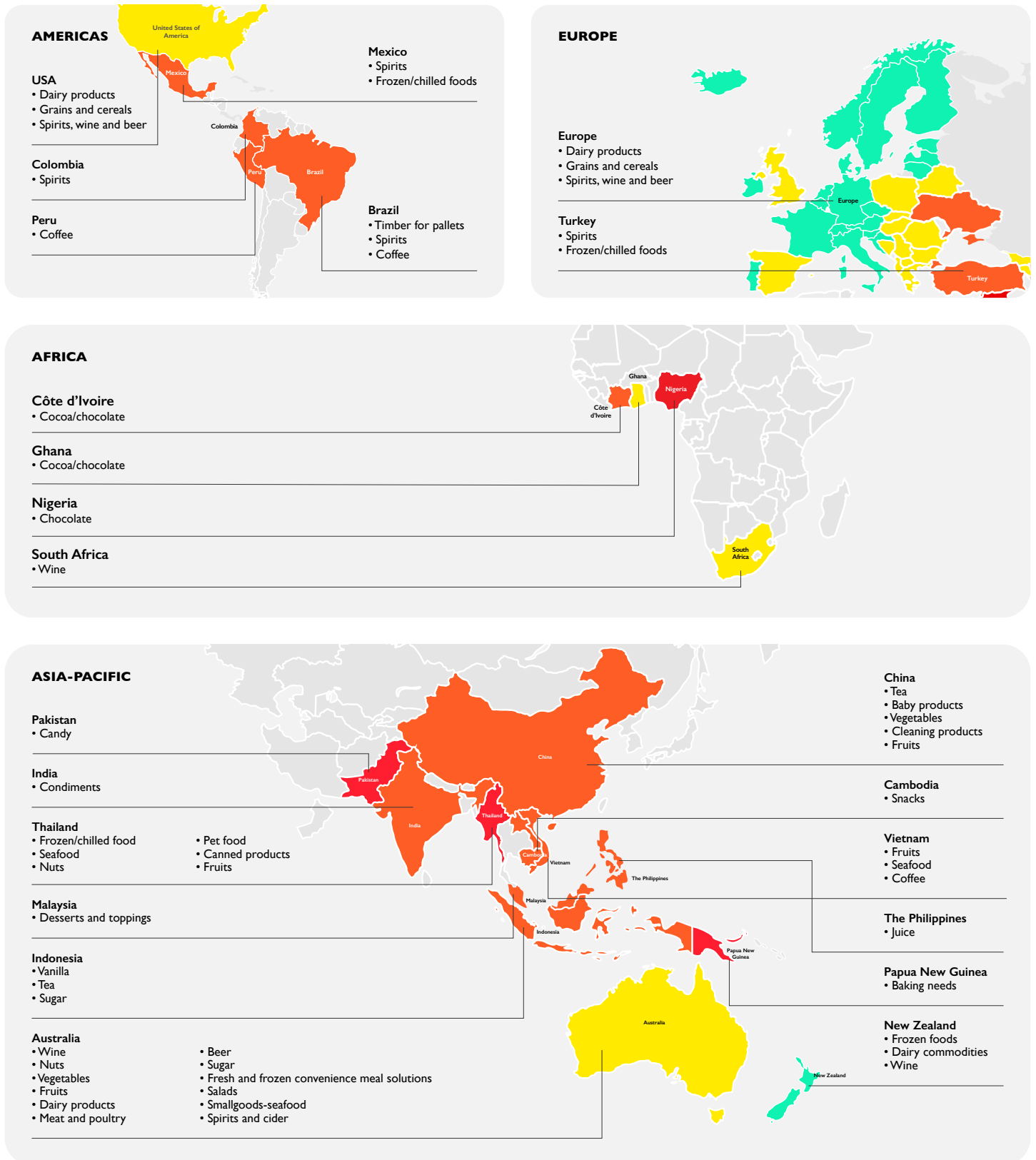
6. UNDERSTANDING OUR RISKS CONTINUED

6.1.3. Metcash risk landscape

Fig. 2 shows our commodity risk map by sourcing country/region.
 Source: LRQA, EiQ Country Risk Supply Chain Risk: Labour Index, 2024.

- Extreme (0–2.49)
- High (2.50–4.99)
- Medium (5–7.49)
- Low (7.50–10)


FIGURE 2 – COMMODITY RISK MAP BY SOURCING COUNTRY/REGION



6. UNDERSTANDING OUR RISKS CONTINUED

6.1.4. Product risk

The following products and raw materials used in the manufacture of products across our pillars were identified as high-risk categories based on the LRQA report:

FOOD 	HARDWARE 	LIQUOR 	GENERAL
Coffee	Hand tools	Crops	Cleaning services
Seafood	Electronic hardware	Vineyards	Freight and Transportation
Tobacco	Construction and maintenance support equipment		
Domestic agriculture (Australia)			
Fresh products			

6.2. PRIORITISATION

The second step of our risk management process involves evaluating where we focus our efforts to have the greatest impact. This includes assessing three areas of consideration:

- **Human rights impact:** the severity of potential human rights violations across our operations and supply chains.
- **Risk prevalence:** geographies, product categories and industries that have the highest prevalence of modern slavery risks.
- **Opportunity for stakeholder engagement:** where we can engage with stakeholders in a meaningful way to understand their perspectives on modern slavery risks. Based on our experience, the most impactful interventions are with our private label suppliers since we have more direct influence on their practices due to the bespoke products we purchase from them. Our influence is more limited for our proprietary product suppliers and in our extended supply chains.

● **With these considerations in mind, we identified five priority risk categories in FY24:**

- Work uniforms
- Canned seafood
- Freight, including maritime freight
- Garden care categories
- Domestic agriculture (Australia)

We have taken a number of actions to directly address modern slavery risks across these categories. Across all categories, we request suppliers to share independent audit reports; and we focus on zero tolerance and critical non-conformances from the report outcomes. Additionally, for the canned seafood category, suppliers must be certified for environmental and social compliance.

6. UNDERSTANDING OUR RISKS CONTINUED

6.3. DETERMINE AND UNDERSTAND DRIVERS

The third step takes the priority risk areas we identified and maps out how our business activities and practices could be connected to human rights violations, including modern slavery. Based on guidance from [The United Nations Guiding Principles on Business and Human Rights \(UNGPR\)](#), we evaluate our risks based on three perspectives:

- **Cause:** a business may cause modern slavery or other human rights harm where its actions directly result in modern slavery.
- **Contributor:** a business may contribute to modern slavery or other human rights harm where its actions or omissions facilitate or incentivise modern slavery.
- **Directly linked:** a business may be directly linked to modern slavery through its products, services or operations. This includes situations where modern slavery may occur in the extended supply chain of a business.

Below are some examples of how we apply the UNGP to our supply chain:

Risk category	Our relationship to risk	Our relationship to risk
WORK UNIFORMS 	Contributor Metcash could contribute to modern slavery risks by procuring from countries with limited labour controls or from suppliers lacking traceability in how they source raw materials. A lack of traceability raises concerns about sourcing from production regions that may involve forced labour.	Directly linked If a uniform supplier subcontracts part of their production to facilities or manufacturers that engage in forced labour or fail to uphold fair labour standards, Metcash becomes associated with modern slavery through our connection with these suppliers.
GARDEN CARE 	Contributor The cultivation of materials in this category, including natural rubber and timber, is connected to high-risk areas associated with modern slavery. This includes forced labour and labour exploitation.	Directly linked If there is evidence of forced labour or labour exploitation within the supply chain of natural rubber and timber products, the direct association with suppliers involved in these practices poses a risk to Metcash.
CANNED SEAFOOD 	Contributor Engaging with suppliers that may employ forced labour or subject workers to poor conditions on fishing vessels or in processing plants could incentivise or facilitate the use of forced labour. Putting significant cost pressures on suppliers could also lead them to cut corners on labour rights and employ workers under exploitative conditions to meet the demand for low-cost seafood products.	Directly linked If our seafood supply chain involves intermediaries or suppliers who source from regions or countries with known instances of forced labour, then Metcash could be directly linked to modern slavery. For instance, if a wholesaler's suppliers purchase seafood from regions where forced labour is prevalent, and those suppliers do not have robust due diligence processes in place.
AUSTRALIAN AGRICULTURE 	Contributor Metcash may unintentionally contribute to modern slavery by placing significant pressure on suppliers to meet unrealistic demands regarding cost and time. This can lead to subcontractors resorting to unethical labour practices and contribute to the exploitation of vulnerable individuals, rather than communicating to Metcash that our requests are unrealistic.	Directly linked If Metcash engages with suppliers that source raw materials, such as fruits and vegetables, from farms flagged with forced labour indicators, then we become directly associated with these risks.
FREIGHT, INCLUDING MARITIME FREIGHT 	Contributor Certain actions or practices can result in Metcash inadvertently contributing to modern slavery in this category. For instance, subcontracting transportation services to providers that exploit drivers or fail to uphold fair labour practices, such as through long working hours, low wages and even human trafficking. Another example is putting excessive pressure on suppliers to reduce costs, which can incentivise labour exploitation to meet these demands.	Directly linked Metcash requires the indirect use of freight services across our global operations. Wholesalers may be directly linked to modern slavery deep within their supply chain, including the exploitation of drivers in regions with an absence of labour regulations and enforcement.

7. ADDRESSING AND MITIGATING RISKS

At Metcash, we recognise the severity of the impact that modern slavery can have on individuals and communities. We have formulated our modern slavery risk management strategy to be robust and adaptable to our daily operations, while aligning with our core values and ethical responsibilities to safeguard the wellbeing of individuals throughout our operations and supply chains.

Our systematic approach brings together overarching frameworks that are integrated across the organisation to guide our collective efforts, as well as targeted programs of work to drive ongoing engagement and action.

7.1. METCASH MODERN SLAVERY FRAMEWORK

This framework informs our strategy and guides our efforts to make measurable outcomes towards addressing modern slavery risks. It is designed to be flexible and dynamic, while keeping us on course towards three core objectives:

- 1**

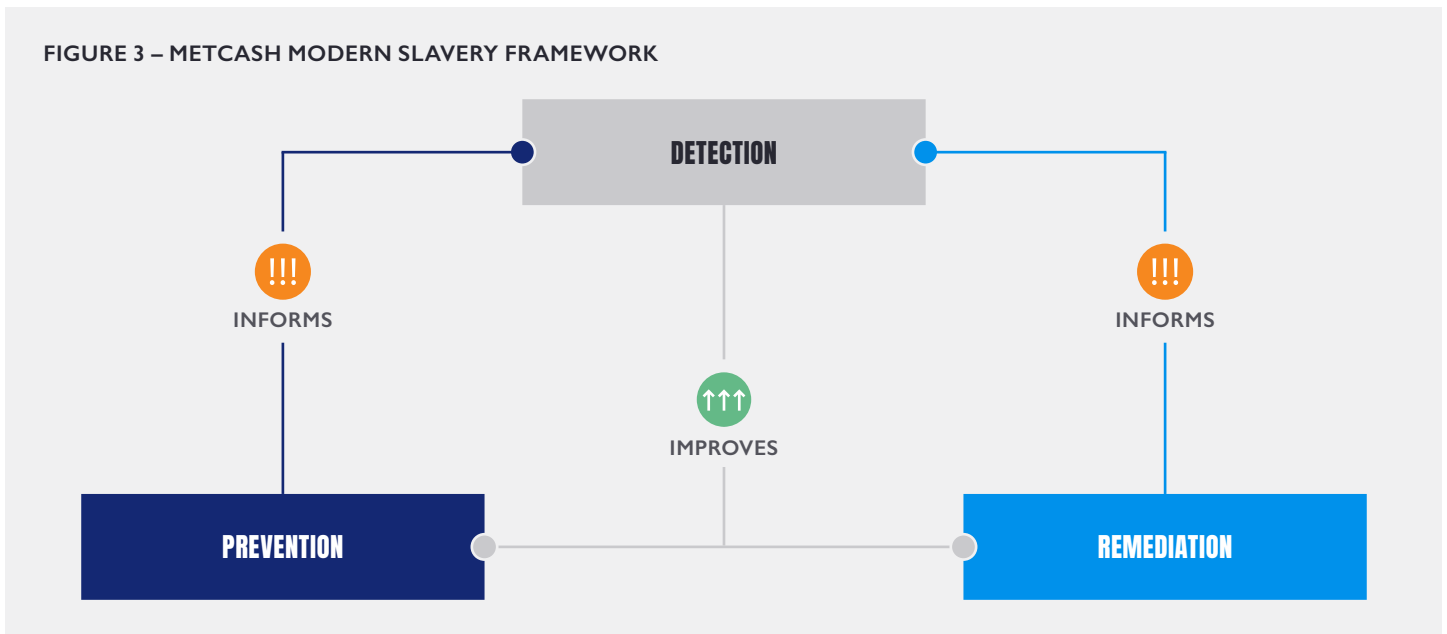
Promoting a culture that prioritises transparency and the protection of individuals by raising awareness among team members and suppliers.
- 2**

Embedding due diligence in the work we do and empowering our people to speak up when reporting incidents related to modern slavery.
- 3**

Developing internal capabilities to effectively respond to and remediate the harm experienced by individuals impacted by modern slavery.

Our framework is underpinned by three areas: **prevention, detection** and **remediation**.

Fig. 3 shows how each of these areas are interconnected, and how insights and learnings in one area can drive improvements in another.



7. ADDRESSING AND MITIGATING RISKS CONTINUED

7.2. METCASH GROUP ESG STRUCTURE AND GOVERNANCE FRAMEWORK

Governance plays a crucial role in providing the framework that ensures accountability at all levels of the organisation towards addressing and mitigating risks associated with modern slavery.

Our ESG governance structure begins with the Metcash Board, which is responsible for overseeing the Company’s strategy, including our response to potential modern slavery risks, and is supported by committees.

The Board Audit, Risk and Compliance Committee (ARCC) supports the Board in overseeing the effective management of material risks to Metcash, including modern slavery. In FY24, the Safety and Sustainability Committee was established to be responsible for maintaining Board oversight of ESG at Metcash.

The Group Leadership Team is accountable for the implementation of the strategy and programs of work, while the ESG Council incorporates specific measures and actions across the business.

Fig. 4 shows the Metcash Group ESG Structure.

FIGURE 4 – METCASH GROUP ESG STRUCTURE



The effective implementation of our modern slavery risk management strategy requires input and engagement from a diverse range of stakeholders across the business and beyond. Empowering everyone to contribute towards addressing modern slavery is critical, even if our responsibilities vary.

7.2.1. Case study

MITIGATING AND ADDRESSING NON-CONFORMANCES IN THE FOOD PILLAR

Private label products in the Metcash Food pillar follow a stringent review protocol by Metcash Food quality teams.

In FY24, we achieved our objective for Sedex compliance in the Food pillar, with more than 90% of our registered private label suppliers being 100% SAQ compliant. To drive continuous improvement, we enhanced our technical sign-off procedures for all projects, using a project management stage-gate approach. Additionally, we hold monthly compliance meetings with our private label managers to effectively address issues and escalations. Through these improvements, we have increased our capacity to effectively oversee compliance and manage Sedex data.

Our Sedex tracking identified 35 private label food sites with outstanding critical non-conformances. This prompted us to follow up and monitor their progress with their respective certification bodies. This resulted in 26 sites successfully closing their non-conformances. Looking ahead, we will continue to closely monitor the progress of the remaining sites to ensure compliance.

7.2.2. Case study

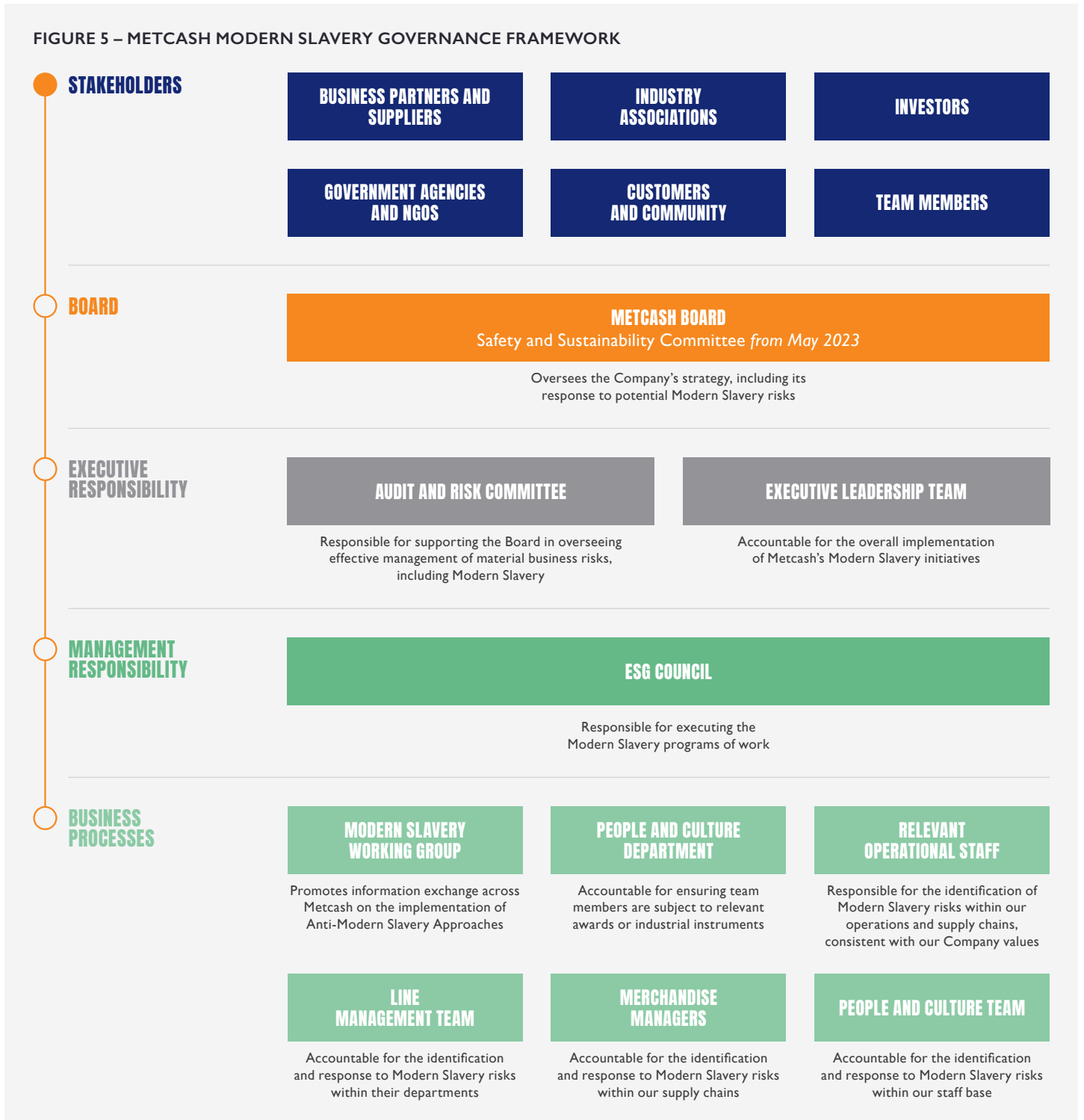
IMPROVEMENTS TO MODERN SLAVERY COVERAGE, ALIGNMENT AND PARTICIPATION

FY24 marks a transformative year for Metcash as we invested significantly in integrating our modern slavery program into our operations and aligning approaches between our business pillars. This led to the formation of a cross-pillar anti-slavery working group, led by corporate. Regular meetings of this group have been instrumental in addressing challenges, sharing best practices and embedding due diligence.

As our understanding of modern slavery risks deepens, each pillar is developing tailored strategies that are relevant and impactful to the respective pillar and Metcash as a whole. We are committed to continuous evolution and improvement of our modern slavery program.

7. ADDRESSING AND MITIGATING RISKS CONTINUED

Fig. 5 shows how each stakeholder group, department and team support putting our strategy into action.



7. ADDRESSING AND MITIGATING RISKS CONTINUED

7.3. METCASH DUE DILIGENCE FRAMEWORK

By conducting thorough assessments at each step of procurement across all our Metcash pillars, our framework enables us to promptly identify areas where modern slavery is likely to occur and implement strategies to minimise these risks.

Fig. 6 outlines the steps we take to embed due diligence at each stage of procurement with our suppliers.



Stage	Examples						
1 Identify category risk	<p>Clear understanding of inherent risk profile</p> <p>We have training programs that assist team members to recognise the inherent risks within their category before approaching suppliers. This enables team members to consider high-risk geographies, industries and entities. Additionally, each pillar has identified specific categories that require increased due diligence procedures.</p>						
2 Align expectations	<p>Promote supplier understanding</p> <p>Depending on the type of procurement being undertaken, Metcash team members can utilise available tools to establish the minimum standards of conduct required of suppliers. This can include a combination of: Contract Terms, Supplier Code of Conduct, Ethical Sourcing Policy, Human Rights and Anti-Slavery Policy, Supplier Communication Pack and Modern Slavery Awareness Training.</p>						
3 Evaluate supplier controls	<p>Evaluate evidence of supplier controls</p> <p>To ensure alignment in our business practices, including the treatment of team members, we require suppliers identified as high-risk through our Sedex audits to complete a SAQ. This captures details about their policies, practices and performance in various areas of business conduct. It serves as a valuable tool for assessing supplier alignment with our Metcash values and principles. By doing so, we make informed decisions during the contract award process and establish partnerships with suppliers who share our commitment to responsible and ethical practices.</p> <p>For certain categories, we require suppliers to provide verified certifications. For our private label food suppliers, Metcash encourages them to adhere to Fair Farms, Sedex, BSCI, or an equivalent industry-recognised scheme. For the sourcing of timber, Metcash encourage suppliers to adhere to Programme for the Endorsement of Forest Certification (PEFC) and/or Forest Stewardship Council (FSC) certification schemes.</p> <table border="1"> <thead> <tr> <th>Certification</th> <th>Relevant category (within Private Label scope)</th> </tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> – Aquaculture Stewardship Council (ASC) – Marine Stewardship Council (MSC) – GLOBALG.A.P. (Good Agricultural Practice) – Best Agricultural Practice (BAP) </td> <td>Seafood</td> </tr> <tr> <td> <ul style="list-style-type: none"> – Rainforest Alliance/UTZ – Fairtrade – Cocoa Horizons – The Round Table for Sustainable Palm Oil (RSPO) </td> <td>Private label single ingredient tea, coffee, cocoa, and cocoa used in private label solid chocolate blocks</td> </tr> </tbody> </table>	Certification	Relevant category (within Private Label scope)	<ul style="list-style-type: none"> – Aquaculture Stewardship Council (ASC) – Marine Stewardship Council (MSC) – GLOBALG.A.P. (Good Agricultural Practice) – Best Agricultural Practice (BAP) 	Seafood	<ul style="list-style-type: none"> – Rainforest Alliance/UTZ – Fairtrade – Cocoa Horizons – The Round Table for Sustainable Palm Oil (RSPO) 	Private label single ingredient tea, coffee, cocoa, and cocoa used in private label solid chocolate blocks
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7. ADDRESSING AND MITIGATING RISKS CONTINUED

Stage	Examples
4 Monitor performance	<p>Ensure suppliers are taking steps to mitigate risks</p> <p>We proactively monitor supplier performance through ongoing and regular communications to foster transparency and collaboration towards addressing modern slavery. Beyond social audits and compliance measures, we adopt a partnership approach with suppliers and industry bodies; which includes discussing modern slavery risks and strategies during review meetings, where relevant.</p> <p>While we continue to mature and standardise our approach, we use findings from SAQ responses and audit outcomes to develop tailored action plans where appropriate. By adopting this approach, we can support our suppliers to continue to meet cost and quality expectations while working towards mitigating modern slavery risks.</p>
	<p>Use of Supplier Ethical Data Exchange (Sedex)</p> <p>The Metcash Food pillar utilises the Sedex system to monitor performance by maintaining oversight of existing social audits and measures suppliers are taking to address modern slavery risks. This enables us to follow up on outstanding critical non-conformances and devise corrective action plans.</p>
	<p>Scheduled audits for our Total Tools business</p> <p>Total Tools utilises a scheduled audit system for monitoring supplier performance regarding modern slavery and human rights.</p> <p>Social audit process: qualified, independent third-party providers conduct inspections of the factories. New suppliers must pass an independent social audit before the first purchase order is placed. Existing suppliers are audited regularly based on the schedule.</p> <p>Social audit outcomes: factories that meet all requirements are audited every two years. Factories with non-critical non-conformances undergo annual audits with corrective action plans, while factories with critical non-conformances require a successful re-audit before supply is resumed.</p>
5 Address issues	<p>Escalate and assign corrective actions to address specific risks</p> <p>Metcash proactively addresses specific risks by escalating and assigning corrective actions when necessary. If a supplier falls below an agreed threshold in their actions or audit results, corrective action is taken. This response is based on clear internal understanding or red flags to identify the need for escalation. The protection of vulnerable people is the central focus, including remediation of any harm to workers. Key internal team members are notified to collectively manage the issues. Collaborative actions, such as providing training, resources and support, are employed to build capacity, where appropriate. Lessons learned from this process are embedded to strengthen future contracts and interactions.</p>
6 Review progress	<p>Review supplier risk profile before contract renewal</p> <p>During contract renewal for our private label Food suppliers, our team members assess if we have sufficient information to confirm their efforts to mitigate risks, such as their completion of a SAQ or satisfactory audit results, if applicable. We identify key actions required from the supplier for us to continue the business relationship, such as completing a SAQ or providing audit results. This evaluation helps us to maintain supplier relationships with a focus on mitigating modern slavery risks.</p>

7.3.1. Our progress in numbers

Initiative	FY24	FY23	FY22
Number of owned brand Food suppliers that completed the Sedex SAQ	300	228	168
Number of third-party external audits completed	~124	Data not captured in previous years	

7. ADDRESSING AND MITIGATING RISKS CONTINUED

7.3.2. Case study

PERFORMING DUE DILIGENCE TO REDUCE RISKS

Metcash continues to focus on rolling out solar panels at selected distribution centres and warehouse sites across Australia. From The Global Slavery Index 2023 issued by Walk Free, we know that the manufacturing of solar panels faces a high risk of modern slavery. Upon identifying a potential supplier based in China, we conducted a thorough due diligence process given solar panels manufactured in this region are at high risk of forced labour conditions. We requested a third-party verified social audit report, as well as assessed its Tier 2 manufacturers that supplied materials, including the inverter and framing. The assessment confirmed that the supplier and its key Tier 2 manufacturers passed our due diligence criteria. We have now engaged the supplier.

7.3.3. Case study

ADDRESSING CRITICAL CONCERNS WITH TOTAL TOOLS SUPPLIERS

Another example of a critical concern we became aware of was with one of our Total Tools suppliers in China, which was fined approximately AUD45,000 by the Chinese government for operating without a construction project planning permit. In response, Total Tools required the factory to take corrective actions and provide supporting documentation. The factory promptly collaborated with a construction company to secure the necessary building safety permit. A follow-up Sedex audit, conducted in June 2023, confirmed that the safety concerns had been addressed and the appropriate permits were in place.



7. ADDRESSING AND MITIGATING RISKS CONTINUED

7.4. METCASH POLICY FRAMEWORK

At Metcash, we help champion our core values through a comprehensive set of policies that govern our operations and guide our team members and suppliers. We aim to engage suppliers with our policies in a transparent, collaborative way by ensuring they can access those most relevant to them, including the Speak Up Policy and Human Rights and Anti-Slavery Policy. Our policies are reviewed annually, and they inform our strategy towards addressing modern slavery risks.

Relevant policies are described below:

Policy	Relevance to modern slavery
Recruitment Policy	Designed to promote fairness, equity and non-discrimination in our recruitment practices. This policy ensures eligibility to work in Australia and compliance with labour laws.
Code of Conduct	Defines the values, commitments, ethical standards and policies of the Company, and outlines the standards of conduct expected of our business and people. Specifically, this policy empowers our people to uphold the Metcash commitment to being a good corporate citizen when engaging in business activities, and to speak up about any behaviour or conduct that is inconsistent with this commitment.
Speak Up Policy	Covers a wide range of issues, including unethical behaviour, illegal activities and violations of our Code of Conduct. It also addresses concerns related to modern slavery, abuse of authority, harassment, discrimination, victimisation and bullying by providing procedures for reporting and addressing such conduct.
Supplier Engagement Terms	These communicate our expectation that workers within our supply chain are employed fairly, treated with dignity and their human rights are respected.
Supplier Onboarding Procedures	Includes for private label Food suppliers, the completion of a SAQ, which enables our suppliers to respond to the expectations outlined by our Supplier Engagement Terms and, where necessary, provide information that helps us to verify responses.
Responsible Sourcing Principles (Developed in FY24)	Provide practical guidance for all procurement activities conducted by our internal team and external suppliers. They align our sourcing approach to national and internally recognised frameworks and institutions that uphold the protection of human rights.
Supplier Code of Conduct (Developed in FY24)	Outlines our expectations of suppliers in adhering to labour standards and ethical practices, reinforcing the mitigation of modern slavery as a shared responsibility. Covers child labour, living wages, workplace safety, freedom of association and collective bargaining.
Human Rights and Anti-Slavery Policy (Enhanced in FY24)	Outlines our expectations of the behaviour and actions of both our team and suppliers as part of our commitment to minimise modern slavery risks and uphold human rights. This policy extends to the protection of individuals and vulnerable groups or populations, including women, migrant workers, people with disabilities and those who are part of the LGBTQ+ community.

7.4.1. Case study

STRENGTHENING OUR COMMITMENT TO RESPONSIBLE PRACTICES ACROSS OUR PRIVATE LABEL FOOD PRODUCTS

During the reporting year, we made various improvements to the procurement process of our private label Food products. This included enhancing the tender documentation to incorporate comprehensive guidelines on ethical and responsible sourcing practices, ensuring alignment with sustainability goals from project inception. We also refined our project 'kick-off' process to systematically capture ethical and responsible sourcing considerations from the outset. This ensures that critical factors are integrated into the project planning and execution phases. We have also introduced social compliance checkpoints throughout the project lifecycle, such as Sedex, to allow us to monitor progress effectively.

7. ADDRESSING AND MITIGATING RISKS CONTINUED

7.5. BUILDING OUR CAPABILITY AND AWARENESS

We are committed to equipping our people and suppliers with knowledge and providing access to practical resources, empowering them to effectively identify and respond to instances of modern slavery. As part of this commitment, one of our core programs is Modern Slavery Awareness Training. The purpose of this training is to educate internal team members about modern slavery, its different forms and the indicators to identify potential risks within our operations and supply chains.

These online sessions serve as a platform for fostering collaboration and knowledge sharing across our pillars. We encourage exchange of information and ideas across teams so that we can learn from our respective approaches and experiences, enabling us to further align our strategies and practices in addressing modern slavery.

7.5.1. Case study

EMPOWERING OUR PEOPLE THROUGH EDUCATION

This year we conducted both new tailored training sessions and also focused on driving completion of our online training module for suppliers, retailers and Metcash team members.

Specifically, we developed capacity-building modules for merchandise, procurement and non-trade logistics as well as bespoke training for the Total Tools sourcing team based in China, conducted in Chinese.

In February 2024, we partnered with Edge Impact to deliver training to our Board of Directors on the Metcash approach to modern slavery and potential changes to the Modern Slavery Act. This involved sharing insights to improve the Board’s oversight of the strategy and risk management framework.

Additionally, we extended the baseline awareness of our staff through externally facilitated seminars. The Anti-slavery Commissioner for New South Wales delivered a tailored training event for 30 team members from our merchandise and procurement teams. Members of our newly established Modern Slavery Working Group also received training conducted by an independent third-party social compliance auditor.

Providing external and independent views on modern slavery to our internal teams has proven to be effective in driving engagement and awareness.

7.5.2. Our progress in numbers

Initiative	FY24	FY23	FY22
Number of internal team members who have completed the Modern Slavery Awareness Training	516	537	111
Number of external suppliers who have completed the Modern Slavery Awareness Training to date	135 (additional 38 from FY23)	97	69

7.6. OUR GRIEVANCE AND REMEDIATION APPROACH

At Metcash, our grievance and remediation processes are designed to maintain high standards of conduct and drive consistency towards addressing concerns or incidents of modern slavery. Our approach is centred around protecting vulnerable individuals and preventing future harm and prioritises transparency and accountability so that we can effectively respond to the unique circumstances of each incident.

7.6.1. Grievance mechanisms

Our ‘Speak Up’ whistleblower hotline enables team members, suppliers and associates to address their grievances and remain anonymous. For individuals who face challenges in terms of accessibility and would like to reach out to us, our platform offers interpreter support in over 150 languages. This allows anyone, regardless of their preferred language, to have a safe and confidential means to report concerns or incidents of modern slavery. The service is offered via NAVEX, a leading global platform for anonymous grievance reporting.

This year we continued to reach out to a range of suppliers to determine which grievance mechanisms they have in place. Where there is no existing mechanism, suppliers are encouraged to utilise Metcash’s NAVEX platform, at no cost to the supplier.

7.6.2. Case study

PROACTIVE MEASURES TO GATHER INSIGHTS AND ENHANCE OUR GRIEVANCE APPROACH

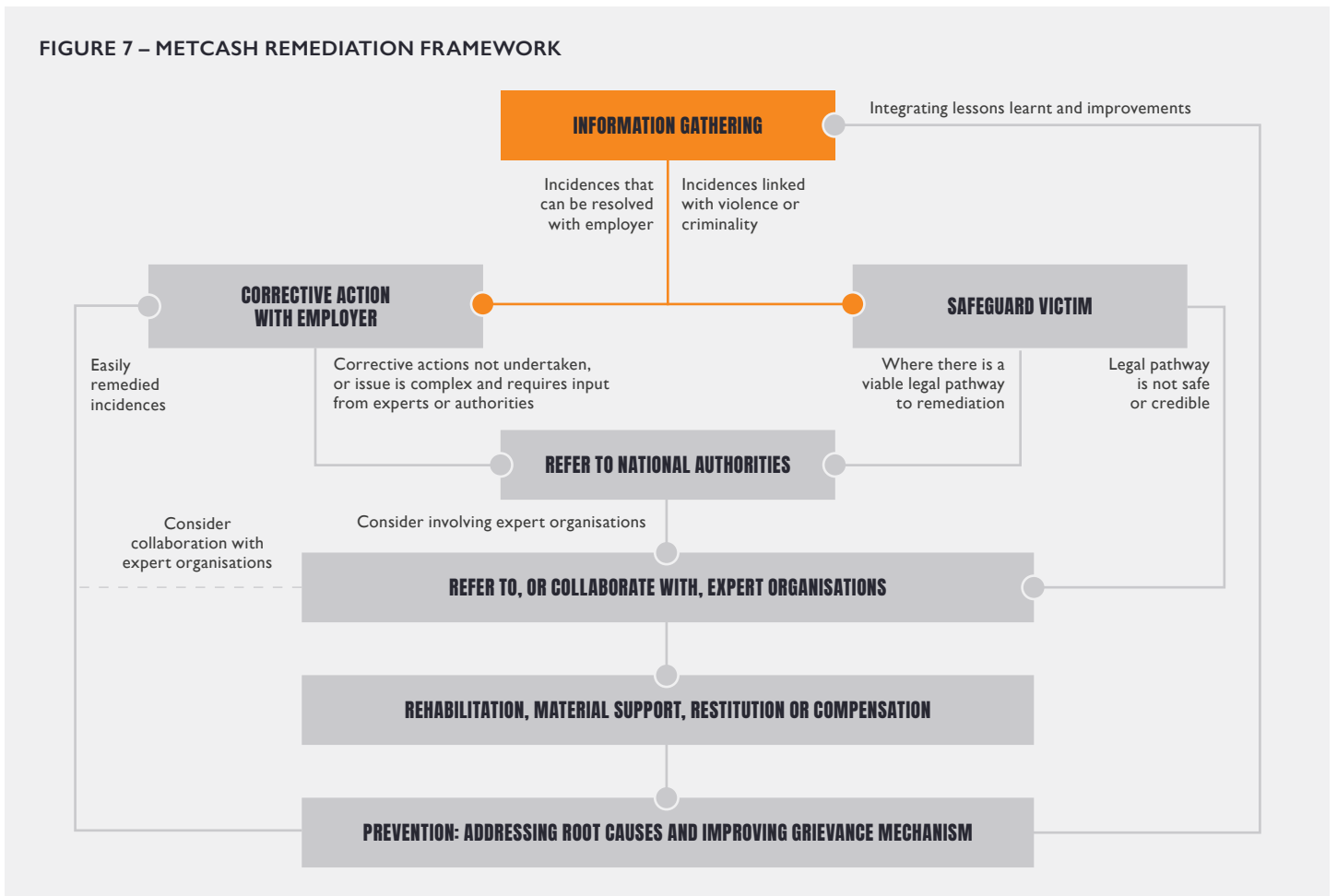
During the year we undertook a survey to gather insights into the effectiveness of our grievance mechanisms for our suppliers in Food and Total Tools. Over 130 responses were received and from that information we became better informed about the effectiveness and capability of existing supplier grievance mechanisms and were able to assess the effectiveness of those suppliers using the NAVEX solution.

7. ADDRESSING AND MITIGATING RISKS CONTINUED

7.6.3. Metcash Remediation Framework

We recognise the importance of effective and prompt remediation in correcting the harm experienced by victims of human rights violations, including modern slavery. Our framework encompasses a diverse range of actions in partnership with national authorities and independent experts, including providing access to health, legal or psychosocial services, facilitating repatriation, offering financial compensation and issuing an apology or recognition of harm caused.

Fig. 7 outlines our Metcash Remediation Framework, designed to effectively respond to incidents, ensure the wellbeing of those impacted, remediate harm; and actions to prevent similar incidents in the future.



7. ADDRESSING AND MITIGATING RISKS CONTINUED

7.7. COLLABORATION

We continue to actively collaborate with various industry organisations and initiatives to drive collective progress towards eliminating modern slavery across our operations and supply chains.

7.7.1. Case study

DRIVING RESPONSIBLE FORESTRY PRACTICES FOR OUR TIMBER PRODUCTS

In a comprehensive review of the supply chain for our timber products, we assessed its adherence to responsible sourcing practices and the extent of third-party certification. Independent Hardware Group (IHG) recognises certifications from both the Forest Stewardship Council (FSC) and the Program for the Endorsement of Forest Certification (PEFC), which independently verifies that timber products are sourced from suppliers committed to sustainable forestry practices.

The assessment revealed that approximately 90% of IHG wholesale sales came from FSC/PEFC certified products, and 5% came through wholesalers of FSC/PEFC certified products. The remaining 5% are currently under review. Moving forward, Metcash will continue to work with timber suppliers to enhance certification compliance and responsible practices.

7.7.3. Case study

INTERNATIONAL SUPPLIER AND SOURCING OFFICE VISITS

In May 2024, at the invitation of the Total Tools Sourcing team, our corporate subject matter expert visited China and provided grievance mechanism training to the Total Tools China operations team. We also visited three of their local suppliers in China. The aim was to gain first-hand insights into the challenges faced within the supply chain and to foster a culture of transparency and individual protection. During the visit we identified some discrepancies in record-keeping and brought these to the attention of the supplier. We used this as an opportunity to encourage transparency and to collaborate on social and commercial aspects of our supplier's operations. In FY25 we will review how our audit process is conducted and what alternatives there may be to the existing third-party audit program for Total Tools China.

7.7.2. Case study

ADVANCING OUR COLLECTIVE INDUSTRY PROGRESS

In FY24, we connected with our top proprietary business partners as part of our joint business planning process. By doing so, we aim to understand the maturity of their modern slavery programs of work and identify opportunities for collaboration.

We also continued our partnership with the National Retail Council Modern Slavery Committee. This involves engaging with leading Australian companies in the FMCG and consumer durables sectors to identify emerging issues, address legislative changes and alleviate barriers for shared suppliers by adopting consistent standards and requirements.

Additional partnership opportunities with various industry groups, NGOs, trade unions and academic research institutions are currently being explored. We connected with several of these in FY24, including consulting with Monash University as part of their research project focusing on the disclosure quality of modern slavery statements submitted by 100 listed companies on the Australian Stock Exchange (ASX). This has helped us to identify areas of improvement in our reporting practices in line with industry benchmarks and best practices.

8. MEASURING OUR EFFECTIVENESS

At Metcash, we are committed to making tangible progress and consistently improving our strategic roadmap towards addressing and mitigating modern slavery. We continue to actively review our programs of work to ensure we focus our efforts on driving the most impact across our operations and supply chain.

Area	FY23 commitment	FY24 progress	Status
Capacity building and awareness	Develop more extensive training on modern slavery for Metcash Board members.	We delivered targeted training for Board members on the Metcash approach to modern slavery, and shared insights for improving our overall risk management framework.	Complete
Embed due diligence processes	Continue to strengthen our procurement program by enhancing our policy framework.	We expanded our procurement program through the new Responsible Sourcing Principles, our Supplier Code of Conduct; and we developed our Human Rights and Anti-Slavery Policy.	Ongoing
		All suppliers are now obliged under the General Terms and Conditions Agreement to adhere to relevant laws and uphold the Modern Slavery Act (2018). This also includes Divisions 270 and 271 of the <i>Criminal Code Act 1995</i> (Cth) and relevant international regulations. This commitment explicitly prohibits involvement in any form of modern slavery, and we require suppliers to demonstrate their adherence to these standards and disclose any awareness of modern slavery within their supply chains.	Ongoing
	Define our role in addressing modern slavery in the freight category, which includes maritime freight.	We engaged external subject matter experts to draft a position statement. We plan to release the statement in FY25.	Ongoing
	Expand Sedex audits across all pillars to provide more comprehensive oversight.	We broadened the scope of our accepted third-party audits to gain further visibility into our extended supply chains, including Fair Farms and BSCI (Business Social Compliance Initiative).	Complete
	Extend the scope of our Modern Slavery Awareness Training across the organisation.	We introduced and held webinars for our teams and updated our training modules onto our new eLearning platforms.	Ongoing
Collaborations and partnerships	Develop organisational tools and resources to support suppliers in remediation procedures.	We have progressed from initial commitment to assessments with our selected remediation partners.	Ongoing
	Design training and capacity-building initiatives for our team members and suppliers.	We delivered Modern Slavery Awareness Training to our non-trade logistic team members, as well as grievance mechanism training for the Total Tools sourcing team based in China.	Ongoing
	Expand on our industry partnerships to build our knowledge and maximise our collective influence.	We are actively exploring partnership opportunities with various industry groups, NGOs, trade unions and academic research institutions. Again in FY24 we connected with Monash University as part of their research project focusing on the disclosure quality of modern slavery statements. This has helped us identify areas of improvement in our reporting practices in line with industry benchmarks and best practices.	Ongoing
	Collaborate with external experts to address risks associated with modern slavery.	We continued our engagement with subject matter experts from Edge Impact, a global impact consultancy firm.	Ongoing
Grievance mechanisms	Launch a worker voice program among suppliers to improve our grievance mechanisms.	We communicated to all private label suppliers in our Food pillar, promoting the use of the new NAVEX EthicsPoint solution to centralise incident management and foster an ethical workplace. Based on supplier feedback, we issued a survey to evaluate the quality and types of grievance mechanisms they have in place across our private label sites to streamline our grievance procedures. We received over 130 responses from suppliers. In FY25, we will focus on defining strategies and actions based on these insights.	Ongoing

9. LOOKING AHEAD

At Metcash, we recognise that while we have made progress in many areas, we have a long road ahead to achieve a future that is free from modern slavery. We remain committed to mitigating modern slavery in both our own operations and our supply chain through the following activities that will be prioritised this coming year.

Focus area	Objective	Future actions
Identifying modern slavery risks	<p>Improve the data granularity of our products to better reflect high-risk categories across our supply chains.</p> <p>Enhance how we prioritise our programs of work to address the most salient risk areas.</p>	<p>Continue risk analysis and utilise the risk assessment results to prioritise categories and subcategories, identifying targeted categories and suppliers.</p> <p>Consult with stakeholders across our pillars on the FY24 risk assessment outcomes to identify and align on our priorities.</p>
Responsible and Ethical Sourcing	Integrate Responsible and Ethical Sourcing Principles into our operations.	<p>Pillars to apply the Responsible Sourcing Principles continuing to strengthen our sourcing practices.</p> <p>Review modern slavery risks into the new supplier tendering process, screen the high-risk suppliers and strengthen responsible sourcing practice.</p>
Enhancing due diligence	Extend the external third-party social compliance audit within our operations for transparency.	<p>Increase the use of third-party audit reports to identify high-risk private label suppliers and take corrective actions as necessary.</p> <p>Completing a social compliance audit of our own operations due to increasing customer requests.</p>
Measuring our progress	Establish clear goals and methods to track our progress.	Continue to embed initiatives; focus on key annual KPIs across our pillars to ensure progress towards addressing and mitigating modern slavery.
Grievance Mechanisms	Gain more insights and enhance our grievance approach.	Review the effectiveness and capability of existing supplier grievance mechanisms from the 130 survey responses we received; where there is no existing mechanism, suppliers are encouraged to utilise Metcash's NAVEX platform.
Collaborations and partnerships	Continue to collaborate with external experts to eliminate risks associated with modern slavery.	Explore working with an NGO to provide support to victims as part of our remediation response.

