



Modern Slavery Statement

For the financial year ending 29 June 2025

R. M. WILLIAMS

EST. 1932, AUSTRALIA



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Summary of our response to the Modern Slavery Act 2018 (Cth)

The following table summarises how, and where, each of the mandatory reporting requirements under *Modern Slavery Act 2018* (Cth) are addressed in this statement.

Table 1: Summary of our response

Mandatory reporting requirement under Modern Slavery Act 2018 (Cth)	Description	Relevant page numbers
16 (1) (a) Identifying the reporting entity	R.M. Williams Group: Jackaroo Capital Pty Ltd, R.M. Williams Holdings Pty Ltd, R.M. Williams Australia Holdings Pty Ltd and R.M. Williams Proprietary Limited (together referred to, along with owned and controlled entities, as “R.M.Williams” in this statement).	Introduction & Approvals - Page 9
16 (1) (b) Describe the structure, operations, and supply chain of the reporting entity	R.M.Williams is an Australian footwear and clothing company. It is best known for producing Chelsea boots for men and women. The company was founded by Reginald Murray “RM” Williams and is currently owned by Tattarang Pty Ltd (“Tattarang”).	Our Structure, Operations and Supply Chain - Page 13
16 (1) (c) Describe the risks of modern slavery in the reporting entity or any entity it owns or controls	R.M.Williams has identified the following modern slavery risks in its operations and supply chain: <ul style="list-style-type: none">• Garment manufacture in China• Garment manufacture in Vietnam• Textiles & apparel manufacture in Turkey• Garment & textiles manufacture in Pakistan• Garment manufacture in Madagascar• Leather manufacture in Bangladesh• Garment manufacture in Turkey• Textiles & apparel manufacture and leather tanneries in Mexico.	Risks screening - Page 20

Mandatory reporting requirement under Modern Slavery Act 2018 (Cth)	Description	Relevant page numbers
16 (1) (d) Describe the actions taken by the reporting entity to assess and address those risks including any due diligence or remediation processes	<p>We actively monitor the risk of modern slavery occurring in our operations and supply chains. Our overall modern slavery risk management process includes policies, contractual arrangements, risk screening and assessments, supplier engagement and training, a supply chain grievance mechanism, and extensive onsite auditing of our High Materiality suppliers (being significant raw materiality & finished goods suppliers). Major actions include:</p> <ul style="list-style-type: none">Increasing supply chain traceability by improving transparency of our suppliers and their supply chains via secure platforms¹ to gather and share information with upstream suppliers. Information shared includes risk assessments, audit reports and evidence of remediation.Conducting due diligence on suppliers by conducting inherent risk pre-screening prior to onboarding.Ongoing supplier engagement activities which include audits, in-person visits, supplier webinars, supplier self-assessment questionnaires, engagement and investigation of supplier-specific issues as they arise, and investigating non-compliances.Supporting remediation of non-compliances through engagement with senior management at our respective suppliers and corrective action plans.Training our team members on human rights and modern slavery risks within our business operations.Collaborating with other organisations and subject matter experts to conduct living wage assessments and audits of both internal operations and significant (or High Materiality) suppliers.Implementation of a third-party Grievance Mechanism across all direct suppliers.	<p>Risk Screening - Page 20</p> <p>Supplier engagement - Page 24</p>
16 (1) (e) Describe how the reporting entity assesses the effectiveness of such actions	Implemented a 3-year plan with KPIs to report against each financial year.	Monitoring & Reporting - Page 30
16 (1) (f) Describe the process of consultation with any entity that the reporting entity owns or controls	Engagement across all entities for consistent modern slavery approach, including oversight by the Board and engagement with Walk Free.	Consultation with owned & controlled entities - Page 34
16 (1) (g) Describe any other relevant information	Not applicable.	Not applicable.

¹ Platforms primarily used include Supplier Ethical Data Exchange (SEDEX), Worldly (Higg Index, Social & Labour Convergence, Fair Factories Clearinghouse), Navex, and QIMA. We utilise TrusTrace as our central platform for Supplier engagement and managing documentation and data capture.

Acknowledgement of Country

R.M.Williams acknowledges the Traditional Custodians of the lands on which we work and live throughout Australia. We pay our respects to their Elders past and present and to the continuation of the custodial, cultural, and educational practices of Australia’s First People. We recognise their continuing connection to land, waters, and culture.

We value your feedback

R.M.Williams remains committed to a continuous improvement approach and continues to treat our modern slavery response as an integral feature of our broader business strategy. Please forward any comments to sustainabilityrm@rmwilliams.com.au

Introduction & approvals

A letter from our Chairman

This joint statement is published on behalf of the following entities in the R.M. Williams Group: Jackaroo Capital Pty Ltd, R.M. Williams Holdings Pty Ltd, R.M. Williams Australia Holdings Pty Ltd and R.M. Williams Proprietary Limited (together referred to, along with owned and controlled entities, as “R.M.Williams” in this statement) for the year ended 29 June 2025.

R.M.Williams has been a mandatory reporting entity since the commencement of the *Modern Slavery Act* 2018 (Cth), and this is our sixth statement.

We are dedicated to proactively identifying and addressing the risks of modern slavery across our global supply chains. Acknowledging the longstanding challenges of traceability within the apparel industry, we are committed to continuously enhancing our approach in alignment with international best practices and informed by our ongoing learning as a business.

Our modern slavery program continues to evolve, with a focus on increasing transparency, strengthening documentation, and deepening supplier engagement. We are committed to sharing our progress openly to support and promote best practices across the industry.

We consulted with all owned and controlled entities as part of the preparation of this statement, and in relation to our modern slavery response in general.

This statement has been prepared by R.M.Williams’ centralised corporate function in consultation with senior leaders, staff, and directors of R.M.Williams and the entities

owned and controlled by R.M.Williams. The centralised corporate function has ensured that R.M.Williams’ operational controlled entities have been involved in the activities undertaken by R.M.Williams to identify, address and mitigate modern slavery risk within their operations and supply chains.

This statement was approved by the boards of the four reporting entities covered by this statement, being R.M. Williams Proprietary Limited (which approved this statement on 5 November 2025), and Jackaroo Capital Pty Ltd, R.M. Williams Holdings Pty Ltd and R.M. Williams Australia Holdings Pty Ltd (which each approved this statement on 10 November 2025).

This statement is signed by John Hartman, in his capacity as a director of R.M. Williams Property Limited, in accordance with section 14(2)(e)(i) of the Act on 12 November 2025. Paul Grosmann has also signed this statement (see his separate letter below), in his capacity as a director of the other 3 reporting entities, in accordance with section 14(2)(e)(i) of the Act.

Signed by



John Hartman
Chairman, R.M.Williams
Date: 12 November 2025

Our Values

Humility
 Courage & Determination
 Empowerment
 Enthusiasm
 Family
 Frugality
 Generating Ideas
 Integrity
 Safety
 Stretch Targets

A letter from our CEO

Maintaining an ethical supply chain and upholding fair labour conditions remain core priorities for R.M. Williams as we stay committed to lasting, responsible impact. We continue to deepen our knowledge and foster a shared vision with our suppliers, driving meaningful progress across our operations.

In FY25, we scaled and embedded a third-party grievance mechanism, working closely with our supplier base to operationalise this mechanism across their workforces. We also expanded our product tracing program to cover both seasonal and core collections. We significantly enhanced traceability in our core material supply chain (being leather) and increased overall product traceability from 86% in FY24 to 90% visibility to Tier-2 in FY25.

Our strong supplier relationships and clearly defined expectations have led to greater efficiencies and enhanced transparency throughout our supply chain. We remain committed to ongoing education and learning, both internally and in collaboration with our partners.

Looking ahead to FY26, our focus areas include:

- 1. Worker voice:** We aim to elevate our programs to expand genuine channels for worker voice, ensuring feedback is heard and acted upon.
- 2. Upstream engagement:** We continue to deepen relationships with mills and tanneries to improve transparency and drive stronger environmental and social outcomes across the supply chain.
- 3. Embedding relationships:** We continue to embed ethical sourcing practices into our daily operations cross-functionally. By building trust-based, long-term relationships, we're setting the standard for the future.

We acknowledge the progress made and understand that meaningful change requires ongoing, consistent effort. It is through the commitment, perseverance, and insight of our teams that we continue to advance, applying what we learn and staying focused on our goal of fostering an ethical, accountable, and sustainable supply chain.

Learn more about our sustainability journey and approach to positive change in our Sustainability Playbook [here](#).

This statement is signed by Paul Grossmann, in his capacity as a director of Jackaroo Capital Pty Ltd, R.M. Williams Holdings Pty Ltd and R.M. Williams Australia Holdings Pty Ltd, in accordance with section 14(2)(e)(i) of the Act.

Signed by



Paul Grossmann
 CEO, R.M. Williams
 Date: 10 November 2025

Our structure, operations and supply chains

Our structure

Established in 1932, R.M. Williams is an Australian company specialising in the manufacturing and retailing of leather footwear, clothing, and craft products that are sold to Australian and international consumers. Through a dedicated publishing business, we also celebrate and share stories from the Australian outback via published magazines, connecting people along the way.

R.M. Williams is 100% owned by Tattarang, which was established by Andrew and Nicola Forrest and is one of Australia's largest private investment groups.

R.M. Williams Pty Ltd is the main operating entity within the R.M. Williams Group.

R.M. Williams Pty Ltd also wholly owns R.M. Williams Publishing Pty Ltd, which publishes OUTBACK Magazine and other publications sold across Australia.

R.M. Williams Pty Ltd also has wholly owned trading subsidiaries in New Zealand, United Kingdom, United States and the Netherlands. These trading subsidiaries are listed below:

- R.M. Williams (New Zealand) Proprietary Limited
- R.M. Williams (UK) Limited
- R.M. Williams US Trade LLC
- R.M. Williams B.V

Other entities exist within the R.M. Williams Group which are non-trading and are either dormant or holding entities. These include the following Australian entities: Jackaroo

Capital Pty Ltd, R.M. Williams Holdings Pty Ltd and R.M. Williams Australia Holdings Pty Ltd. Non-trading international entities include R.M. Williams US Inc, R.M. Williams US CA LLC, R.M. Williams US NY LLC, and R.M. Williams US TX LLC.

This statement does not include Percy Street Pty Ltd (**Percy Street**) as a reporting entity. Percy Street is the non-operational head company within both the R.M. Williams corporate group (by way of its ownership of the shares in Jackaroo Capital Pty Ltd) and the Akubra corporate group (by way of its ownership of the shares in Dunkerley Hats Pty Ltd). Commencing FY24, Percy Street has prepared a separate modern slavery statement to the other entities within the R.M. Williams Group. It does this so it can more accurately report on the separate modern slavery programs of both R.M. Williams and Akubra, noting that Percy Street only acquired Akubra in November 2023 and that none of the Akubra entities are currently reporting entities in their own right.

Our Operations

Born in the Australian outback, R.M.Williams has become one of the best-known heritage footwear brands in the world. In addition to boots, we also make apparel, accessories, leather goods (e.g. bags, belts, wallets), and other footwear.

The R.M.Williams business comprises product research, design and development, sourcing, manufacturing, distribution, sales, and marketing. Our head offices are located in Sydney, New South Wales, and in Salisbury, South Australia, which is also home to our manufacturing facility.

We operate 55 stores in Australia and New Zealand, and four stores in London.

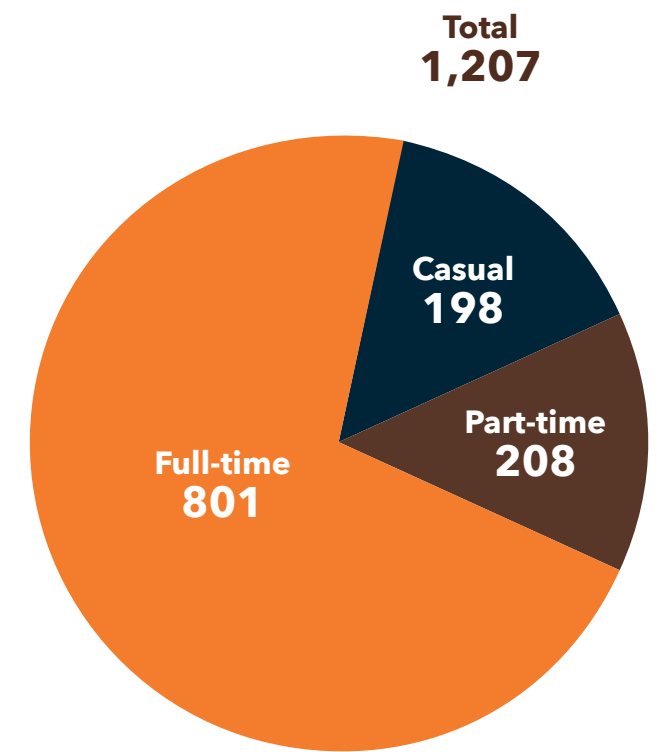
In addition, R.M.Williams products are available via more than 500 stockists around the globe and are exported to 15 countries, including Canada, Switzerland, Germany, France, United Kingdom, Ireland, Italy, New Zealand, Papa New Guinea, Scandinavia, United States and South Africa.

R.M.Williams Publishing is responsible for the creation and distribution of the R.M.Williams bi-monthly magazine, R.M.Williams OUTBACK, along with other occasional titles.

Our People

Our people are the foundation of R.M.Williams. We aim to create an environment where our people are supported and fulfilled within their roles. The global R.M.Williams team works in a diverse range of roles across our workshop, head office, distribution centres and retail stores. Employee numbers are set out in the table below.

Table 2: R.M.Williams Employees as at 29 June 2025



Our Supply Chains

R.M.Williams' supply chains comprise: (1) procurement of materials and components for manufacturing in the R.M.Williams workshop in South Australia; (2) procurement of finished goods from both domestic Australian and international supply chain partners; and (3) indirect procurement, i.e., goods and services for operational needs, such as maintenance, logistics, marketing, financial and data services.

The details of our significant direct suppliers for materials, other inputs, and finished products, remain publicly available on our website. This includes the supplier's names and addresses. For a list of our suppliers please [visit this link](#).

1. Raw material & components supply chains

Supply chains for products manufactured in the R.M.Williams workshop include:

- Leather
- Woven and knitted fabrics
- Footwear and craft components
- Clothing sundries
- Chemicals, such as adhesives and polishes
- Packaging items

In addition to our strong network of local product sources, material inputs are sourced from 25 overseas countries, being Bangladesh, Brazil, China, Czech Republic, France, Germany, Hong Kong SAR, India, Italy, Japan, Madagascar, Mexico, Morocco, Netherlands, New Zealand, Pakistan, Portugal, South Africa, Spain, Sri Lanka, Taiwan, Turkey, United Kingdom, United States, Vietnam. Our average supplier tenure exceeds 7 years, decreasing from 9 years in FY24. The change in supplier tenure this year included the retirement of a long-standing leather agent, which prompted

us to establish direct relationships with the tanneries we were already sourcing from. This transition, along with a broader review of our supply chain and product offering, has allowed us to simplify operations, enhance quality, and benefit from near-shoring opportunities, strengthening our overall sourcing strategy.

2. Finished goods supply chains

Finished items are procured across the following categories:

- Clothing, e.g. shirts, bottoms, knits, outerwear
- Accessories, e.g. headwear, socks
- Footwear, e.g. casual footwear
- Craft items, e.g. bags, wallets
- Packaging items

3. Indirects procurement

We also procure goods and services that support our operations such as maintenance, logistics, marketing and advertising, financial and data services, and other professional services. For clarity, these indirect procurement goods and services do not directly contribute to the production of our final products.

Our approach

We have a multi-step process for modern slavery risk management:

At R.M.Williams, we are committed to environmental sustainability and favourable labour conditions both in our own operations and our supply chain. We have zero tolerance of slavery, and we expect the same commitments from all organisations that we partner with.

No actual or suspected instances of modern slavery were identified in our operations or supply chains over the reporting period. We did identify several non-compliances in third-party audits that could increase the risk of modern slavery and have worked with suppliers to address these (as detailed later in this statement).

We recognise the need to stay diligent, increase the level of transparency and engagement we have with our upstream supply chains, and continuously improve our modern slavery risk management program. To this end, we have a robust framework and roadmap that builds on the progress we have made to date. Our framework is structured in five themes: Governance; Supply Chain Screening; Direct Supplier Engagement; Training and Collaboration; and Monitoring and Reporting. Further detail is outlined in table below.

Table 3: R.M.Williams Modern Slavery Framework

Theme	Activity	Objective	How & when we do it	Who it applies to
A. Governance	Suite of modern slavery policies, guidelines, and contracts	Set clear expectations for all stakeholders, employees, customers	Modern Slavery Policy approved by Board and published on website Other supporting policies and guidelines reviewed annually	All R.M.Williams stakeholders
	Modern slavery committee	Cross-functional collaboration to ensure modern slavery diligence and mitigation is known across the business and efforts are holistic	Quarterly meeting with monthly updates by email	CEO Supply chain Sustainability Product Development
	RMW Board updates	Inform RMW Board on risks assessments and mitigation actions	Reporting template and board meeting; conducted quarterly	RMW Board
	Industry-geography inherent risk screening	Guide focus areas for high levels of diligence by identifying suppliers that have amplified risk due to their industry and geography	Screening via proprietary risk database (SEDEX); run quarterly to identify suppliers with elevated risk. Also issued in pre-screening, prior to onboarding for potential new suppliers	All suppliers
B. Risk Screening	Supplier materiality screening	Segment suppliers by the type of diligence needed based on each supplier's industry, geography, level of RMW spend, and number of employees	RMW supplier archetype framework	All suppliers: resulting segments are High Materiality (A), Mid Materiality (B), and Low Materiality (C)
	Living wage screening	Identify suppliers who are already paying all employees above the local living family wage and those who may have some living wage gap (based on reported minimums) and therefore we need to engage with further on living wage	Desktop assessment based on audits and questionnaires; conducted annually	High Materiality (A) Suppliers and as of FY25, Mid Materiality (B)

Theme	Activity	Objective	How & when we do it	Who it applies to
C. Supplier Engagement	Supply chain tracing	Understanding of and engagement with upstream supply chains by product, to continue to reduce the risk of Modern Slavery	Third-party data collection partner; Ongoing as new products come to market	All Direct Raw Material & Finished Goods suppliers include High Materiality (A), Mid Materiality (B) and Low Materiality (C)
	Supplier onboarding	Establish baseline expectations with vendors on R.M.Williams' Code of Conduct and practices to identify and mitigate modern slavery risks, and gather baseline information from new suppliers including modern slavery policies and processes	Supplier Code of Conduct and Supplier Onboarding questionnaire; issued as new raw material and finished goods suppliers are onboarded	All Direct Raw Material & Finished Goods suppliers including High Materiality (A), Mid Materiality (B) and Low Materiality (C), once beyond initial sampling
	Third-party Audits	Verification of legal compliance, labour conditions, and environmental impacts via third-party on-the-ground assessment of supplier facilities	Third-party Audit methodologies & audit partners; conducted every 12 months. Where audits identify non-compliances, we monitor minor, major, and critical non-compliances	High Materiality (A) Supplier facilities
	Corrective Action Plans	Rectification of non-compliances identified through third-party audits, mitigating any real or perceived modern slavery risks	Outcome of Third-Party Audits; deadlines for rectification vary by non-compliance Develop Corrective Action Plans where non-compliance is identified and monitor improvements (depending on the severity and type of non-compliance, R.M.Williams may decide to commission a follow-up audit to validate that the findings are remediated, or "closed")	High Materiality (A) Supplier facilities
	Comprehensive Self-Assessment Questionnaire	Comprehensive understanding of policies and practices regarding environmental and social practices for suppliers that have very few employees; verification through in-person visits by R.M.Williams employees	Annually	Mid Materiality (B) Supplier Facilities
	Modern Slavery specific Self-Assessment Questionnaires	Frequent monitoring and signalling of the importance of Modern Slavery diligence to suppliers in high-risk industry-geographies	Bespoke supplier questionnaires are developed to complement the onsite activities undertaken as part of the audits Questionnaires are issued via supplier engagement platform Also issued in pre-screening, prior to onboarding for potential new suppliers in high-risk geographies & industries	High Materiality (A) and Mid Materiality (B) supplier facilities Potential new suppliers in high-risk regions/industries
	Supplier Living wage roadmap	Understand actual living wage gap for those suppliers with a potential gap identified (based on Living Wage Screening), and engage with supplier on opportunities to reduce any actual gap	Supplier engagement and third-party audits on a case-by-case basis when gaps are identified	High Materiality (A) supplier facilities with potential living wage gap identified
D. Training & Collaboration	Grievance mechanism	Channel for workers to raise concerns confidentially, anonymously, and/ or directly, without fear of reprisal or retaliation	Year-round mechanism	All employees & contractors, all suppliers, as well as their suppliers
	Employee training	Educate all R.M.Williams' employees on the existence, causes, and ways to reduce modern slavery	Employee training via training portal at onboarding and refresher training	All employees (corporate, workshop, retail)
	Supplier training	Share resources with suppliers to support on their individual Modern Slavery mitigation journeys	Proprietary resources; shared annually	Inherent high-risk prospective suppliers (identified in pre-screening) and existing inherent high-risk suppliers
E. Monitoring & reporting	Industry collaboration	External collaboration to ensure we are contributing to and benefiting from best practices to assess and address modern slavery	Frequent engagement with Tattarang modern slavery working group	Sustainability Team
	Modern Slavery Statement	Comply with Australia's <i>Modern Slavery Act 2018</i> and share our approach and lessons learned in a transparent, structured way to help other companies setting up their own programs	Modern Slavery Statement (this document); submitted & published annually	Not applicable
	Modern Slavery Key Performance Indicators (KPIs)	Track operational metrics within Modern Slavery program	Monthly for Modern Slavery Committee Quarterly for RMW Board Meetings Annually for Modern Slavery Statement	Compliance Sustainability Modern Slavery Committee RMW Board

A. Governance

Our overarching governance model for modern slavery issues has not changed significantly since the last reporting period. The Modern Slavery Committee and Sustainability Team remains responsible for ensuring our modern slavery related policies, contracts and statements reflect our commitments to combating modern slavery and are compliant with our legal obligations. Our Legal advisors provide advice on policies and reviews documents where necessary.

Policies, guidelines and contracts

The below key policies and legal frameworks are operational across all aspects of our business. All policies are available to employees via the internal R.M.Williams' employee communications platform or communicated directly with suppliers when onboarded:

- **Employee Code of Conduct.**
Our Employee Code provides advice and guidance on how our employees, contractors, consultants, and board members should conduct business, ethically, and in accordance with all applicable laws, regulations and policies.
- **Modern Slavery Policy.**
Our commitment to reducing the risks of modern slavery in our business operations and supply chains, and to managing incidents where they might occur, is outlined within our Modern Slavery Policy. This policy was updated in FY24.
- **Supply Agreements.**
Our Supply Agreement imposes obligations on our suppliers in relation to modern slavery. This agreement was updated during FY25, including to enhance the provisions relating to modern slavery.
- **Supplier Code of Conduct.**
Our Supplier Code of Conduct is contained in our Supply Agreement, and sets out our performance and behavioral expectations for our suppliers. The Supplier Code of Conduct includes modern slavery considerations such as restricting subcontracting and outsourcing for Chinese suppliers, given the well- established linkages between cotton harvested in China and alleged forced Uyghur labour schemess.
- **Sustainable Procurement Guidelines.**
These guidelines were developed to assist employees, contractors, or those responsible for purchasing goods or services on behalf of R.M.Williams to choose the most environmentally and socially responsible options that contribute to our sustainability goals and values. At R.M.Williams, we prioritise purchasing practices that support long-term partnerships with manufacturers and decrease modern slavery risks.
- **Preferred Fibres & Materials Guidelines.**
These guidelines assist our Strategic Sourcing, Design & Product teams in selecting the most ethical, sustainable, and environmentally friendly third-party certified fibres & materials that align with our company values. This includes training and development of various teams to understand what modern slavery is and how to find it, as well as what constitutes a preferred fibre or material.

- **Whistleblower Policy.**
Our Whistleblower policy encourages employees, contractors, suppliers, and customers to raise concerns of suspected unethical, illegal, or fraudulent conduct. The policy provides protection for whistleblowers, so they feel safe to disclose any malpractice or misconduct. This policy was reviewed in FY25.
- **Workplace Behaviour Policy.**
The Workplace Behaviour Policy ensures all staff are treated and treat other with dignity and respect, free from harassment and bullying. It helps foster an environment in which our staff are comfortable to say something if they see something. This policy was reviewed in FY25.
- **Workplace Grievance Policy.**
Our Workplace Grievance Policy is to ensure consistent and thorough handling of personal grievances that are raised in the workplace. This policy was reviewed in FY25.
- **Work Health Safety & Wellbeing Policy.**
Given a substantial portion of our business comes from our own manufactured goods, the labour conditions in our workshop are critical in our modern slavery risk management. This reporting period we have continued to shine a light on safety in the workplace with upgraded programs, commitments and policy focused on high labour conditions for all team members through the Work Health Safety & Wellbeing Policy. This policy is currently under review and will be updated in FY26.

- **Risk-based, internally prioritised due diligence processes and audit framework.**
Clear thresholds (based on factors such as operating country, industry category, supplier history and spend amount) for-triggering auditing and other prescribed due diligence measures.

Modern Slavery Committee

The committee is responsible for discussing modern slavery risks, incidents, and responses, as well as establishing and implementing our Modern Slavery Framework and monitoring our progress across reporting periods. Committee members work with various teams across the organisation to implement modern slavery risk management into existing business processes and systems, ensuring that all relevant policies and procedures are followed. The committee is also responsible for the creation and deployment of modern slavery training for employees and continues to engage external subject matter experts to provide advice and assistance with our modern slavery response.

Board

The Board provides ultimate oversight of R.M.Williams' risk management, including our modern slavery risks and response. It receives updates from the Modern Slavery Committee and modern slavery progress reporting quarterly.

B. Risk screening

Industry-geography inherent risk screening

We screen all suppliers through proprietary databases on a quarterly basis to identify high risk supply chains. As we have advanced our modern slavery processes, we have expanded this screening in two ways; first, through screening more of our upstream Tier 2 and Tier 3 suppliers, and second, through pre-screening new suppliers or facilities prior to onboarding.

The risks identified opposite are all inherent risks based on geography and industry, not risks identified as specific to our suppliers. We use inherent risk screening to identify suppliers with whom we need to engage more frequently on modern slavery risk mitigation.

Table 4: Risks identified via inherent screening & mitigation actions

Industry	Risk themes	Description of inherent risk	RMW Code of Conduct signed	Third-party Social Audits	Engaged on Living Wage	Additional actions taken
Garment manufacturing in China	Forced labour Freedom of Association Working Hours	Forced Uyghur labour in cotton supply chains remains a high-risk, verified by our FY25 SEDEX inherent risk assessment.	✓	✓	✓	<ul style="list-style-type: none">Continue training of design, product development, and strategic sourcing team members on our Preferred Fibres Materials Matrix to ensure we are sourcing cotton with reduced risk of Modern Slavery. We prioritise sourcing more cotton from lower risk countries, such as Australia.Expanded transparency and traceability programs to increase visibility into our cotton supply chains; piloted with China-based garment suppliers.Restricted subcontracting and outsourcing for all suppliers.
Garment manufacturing in Vietnam	Working Hours Forced labour Child labour	Forced labour and child labour in Vietnamese garment manufacturing remains a high-risk, verified by our FY25 SEDEX inherent risk assessment.	✓	✓	✓	<ul style="list-style-type: none">Site visits by RMW Team.
Textiles & apparel from Turkey	Forced labour Child labour	These industries are recognised as being some of the most hazardous and unregulated industries, where forced labour, debt bondage and child labour are commonplace.	✓	✓		<ul style="list-style-type: none">Site visits by RMW Team.
Garment manufacturing in Pakistan	Forced labour Child labour Freedom of movement	<p>A high level of refugees in Pakistan makes the population vulnerable to modern slavery.</p> <p>Many garment sector workers are forced to operate in poor and/or dangerous conditions and face threats if they try to unionise. Female workers are particularly at risk of intimidation, harassment, and sexual violence at work.</p>	✓	✓	✓	
Garment manufacturing in Madagascar	Forced labour Child labour	Forced and child labour is common in the apparel and textile industries in Madagascar.	✓	✓		
Leather manufacturing in Bangladesh	Poor wages	Low wages are commonly associated with leather manufacturing and apparel industries in Bangladesh.	✓	✓	✓	<ul style="list-style-type: none">Continue training of design, product development, and strategic sourcing team members on our Preferred Fibres Materials Matrix to ensure we are sourcing leather with reduced risk of Modern Slavery. We prioritise sourcing more leather from gold rated Leather Working Group tanneries.
Leather tanneries in Turkey	Forced labour Working hours Freedom of association	Tanneries are heavily reliant upon migrants who may be more vulnerable to exploitative practices than local employees due to deceptive recruitment practices which can lead to debt bondage; their immigration status; a lack of familiarity with the language, their rights, and local laws; discrimination; and families that rely on them to send wages home, increasing pressure to stay.	✓	✓	✓	
Textiles & apparel manufacture and Leather tanneries in Mexico	Working hours Forced labour	Mass migration, high crime rates and weak judicial systems fuel forced labour in Mexico with estimated 850,000 victims of modern slavery. Migrants flee countries such as Venezuela and others and congregate on the border between the US and Mexico.	✓	✓		

Supplier materiality screening

Following inherent risk screening, we assign a level of material risk based on inherent risk, number of employees, and size of our spend with suppliers. The level of materiality dictates the level of due diligence activities, and ensures we are focusing our resources on the highest risk parts of our supply chains.

Suppliers are segmented into five risk categories with corresponding due diligence requirements (see Table 5 below). The greater the risk, the more controls we have in place.

Living wage screening

As our modern slavery program matures, we continue to build on our knowledge of and engagement in living wage. We strongly believe in creating conditions in our supply chain that do more than meet legal requirements, by creating jobs that enable individuals and families to enjoy a decent standard of living.

Living wage: direct operations (our own R.M.Williams employees)

In FY25, we completed a living wage review for all R.M.Williams employees in Australia, United Kingdom and New Zealand. We used the Anker Family Living Wage methodology and confirmed that, at all locations, our remuneration packages remain more than sufficient to meet the calculated living wage for that locality. We continue to monitor and maintain employees’ packages to this standard.

Living wage: raw materials & finished goods suppliers

We have established a living wage analysis process for High Materiality (A) and Mid Materiality (B) suppliers to evaluate minimum pay levels against the relevant local Living Wage benchmark (using the Anker Family Living Wage methodology and the Global Living Wage Coalition resources).

We have prioritised closer collaboration with suppliers on living wages based on our assessment of where the largest potential gaps exist, and R.M.Williams is a large customer. In FY24, we launched our Living Wage Engagement Program, partnering with three major suppliers to explore the broader value provided to workers beyond base wages. While we’ve made progress in FY25, this remains a complex area influenced by factors such as geography, industry, and organisational context. We continue to build our understanding of best practices and actively seek collaborative guidance to support workers in a meaningful and sustainable way.

Supply chain tracing

During the reporting period, we continued to expand our supply chain tracing program to better understand the processes and people behind our products (see Table 6 below).

We also scaled our certified material evidence collection program, which has led to a step change in our supply chain traceability. For all materials we make claims upon, such as Organic Cotton, we are collecting documentation to establish provenance. This has led to increased engagement with our vendors on supply origins.

Table 5: Due diligence requirements according to supplier archetype

Supplier category	Materiality	Archetype	Inherent risk	Number of employees	R.M.Williams spend	Resulting level of diligence
Raw Material & Finished Goods suppliers	High Materiality (A)	High spend, large company	Low-High	Mid-High	High	High (policies, third-party audits, annual SAQs, CAPs)
		Mid spend, High risk	High	Low	High	High (policies, third-party audits, annual SAQs, CAPs)
	Mid Materiality (B)	High spend, small company, low risk	Low	Low	High	Mid (policies, annual SAQs, in person visits)
		Mid spend, low-mid risk	Low-Mid	Low-Mid	Mid	Mid (policies, annual SAQs, in person visits)
Indirect suppliers	Low materiality (C)	Small spend	Low-High	Low-High	Low	Low (policies, annual SAQs) case-by-case assessment if further diligence is required
		Indirect	Low	Low-High	Low-High	Case-by-case assessment if further diligence is required

Table 6: Supply chain tracing status

Tier	Definition	Examples	Relationship	Mapping Status
1	Factory & Production Workshops	Our own factory in Salisbury, South Australia or another factory that cuts, makes and processes R.M.Williams product that is shipped to us for sale.	Direct & Upstream	100% styles & materials mapped to Tier 1 facilities
2	Fabric Mills & Accessories Suppliers, Dying & Printing Mills	Where fabric or material is produced. Trim supplier such as buttons or zips. Includes processing mills that fabric mills use to dye or print fabrics and accessories. Also includes tanneries.	Direct & Upstream	90% styles mapped to Tier 2 or beyond (i.e., to Tier 3 and 4 for some styles)
3	Yarn & Spinning Mills	Textile mills and spinners of yarns and abattoirs.	Upstream	35% (up by 6pp compared to last year) of Core styles mapped to Tier 3 (including only apparel & soft accessories). Expanding mapping of Seasonal styles through Made2Flow
4	Raw Material Sources	Cotton farms, livestock farms, man-made chemical processing.	Upstream	Increased sourcing of traced-to-farm cotton by 36% (FY25 vs FY24 by weight) via Good Earth Cotton. Invested in physical scanners for verification in our distribution centre

C. Supplier engagement

R.M.Williams is committed to engaging with our suppliers and building deeper relationships to maximise positive impact on the most vulnerable individuals in our supply chains.

We believe direct engagement with our suppliers is the most effective way to reduce the risk of modern slavery. Formal methods include Self-Assessment Questionnaires, On-Site Auditing, and Corrective Action Plans. This engagement is to supplement informal relationship building to understand the unique ways each supplier approaches their modern slavery initiatives.

Supplier onboarding

R.M.Williams has a comprehensive onboarding process for engaging new vendors at both a corporate and factory level. This onboarding process has also been made mandatory for all existing raw material and finished goods suppliers and is now supported by the platform, TrusTrace.

As part of our onboarding process, new suppliers are required to disclose the following information to help us determine their appetite and awareness of engaging with modern slavery issues:

- If the vendor has policies prohibiting forced labour
- If the vendor has policies expressly disavowing child labour
- Whether the vendor has a remediation policy

- If the vendor is compliant with other human rights related concerns, such as providing freedom of association with unions, maintaining safe work sites, providing minimum wage standard, ensuring that working hours are in accordance with local laws, and implementing a recruitment policy commitment for migrant workers
- Determining whether the vendor agrees to comply with R.M.Williams’ Ethical Code of Conduct, and commits to publish the Code on their factory floors
- Details of any social initiatives that the vendor participates in.

We also request that our individual supplier factories provide us with a registration and capability assessment, which provides us with the following additional information:

- The workforce composition, including the number of migrant workers, non-local workers, and non-English-speaking employees.
- The formal accreditations or certifications of the factory.

As this program has matured, we continue to focus on cultivating strong relationships with our direct suppliers, along with expanding our engagement with indirect suppliers. This reporting period, we have established direct communications with two-thirds of our fabric suppliers (upstream suppliers). This practice has enhanced the quality of product and the visibility of any possible modern slavery risk in the wider supply chain.

Supply Chain Engagement Workshops

We follow a regular cadence of engagement workshops via videolink. This is an opportunity for R.M.Williams to present an update on our business, discuss supply chain engagement activities, provide training and/or further information on modern slavery related topics, and answer suppliers’ questions. It also provides a forum to share updates to regulation, standards, best practice and follow up general information flow, such as audits.

Third-party audits & corrective action plans

This reporting period we have continued our third-party audit program. By concentrating on core industry standards for social and environmental audits, we aim to minimise audit fatigue and foster a more streamlined approach to compliance across the industry.

We utilise the industry platforms SEDEX (Supplier Ethical Data Exchange) and Worldly to gather and share industry audit information with suppliers.

We continue to track and report upon our audit program key performance indicators (KPIs) as below and have designed a formal process for monitoring the rate of third-party social audits and engaging on those with critical & major non-compliances related to modern slavery risks.

Table 7: Summary of current audit results for High Materiality (A) suppliers

Audit program KPIs	
Number of High Materiality (A) Facilities	66
% with third-party social audits	74% facilities / 91% of spend
• At end of reporting period (End FY25)	
Of third-party social audits complete:	
% with non-compliances related to Forced Labour	0.0%
% with non-compliances related to Child/Young Labour	0.0%
% with non-compliances related to Freedom of Association	3.0%^

^ Under Chinese labour law, freedom of association is significantly restricted, which presents challenges when evaluating this criterion during social audits.

The following table sets out a summary of critical & major non-compliances with our modern slavery policies that may increase modern slavery risk, and the actions we’ve taken with suppliers to mitigate those risks.

Table 8: Summary of critical & major non-compliances related to modern slavery and actions taken to remediate (at facility level).

Industry of Facility	Description of critical or major non-compliances	Corrective action plan (CAP) issued	Corrective action plan (CAP) status	Engaged on Living Wage
Textile, Apparel, Footwear & Accessories	<ul style="list-style-type: none">Hiring management systems not sufficient, leading to potential risk of discriminationCompulsory insurances not paid	✓	CAP in place; Third-party follow-up audit requested	✓
Garment	<ul style="list-style-type: none">Workers unable to form union of their choosingOvertime management system not implemented effectively, leading to excessive overtimeCompulsory insurances not paid	✓	CAP in place; Desktop confirmation received for rectification of all non- compliances;	
Garment	<ul style="list-style-type: none">Overtime management system not implemented effectively, leading to excessive overtime	✓	CAP in place; Desktop confirmation received for rectification of all non- compliances;	
Garment	<ul style="list-style-type: none">Workers unable to form union of their choosing	✓	CAP in place; Desktop confirmation received for rectification of all non- compliances;	
Textile, Apparel, Footwear & Accessories	<ul style="list-style-type: none">Collaborative action required on Living wage gap analysis	✓	CAP in place; Desktop confirmation received for rectification of all non- compliances;	
Textile, Apparel, Footwear & Accessories	<ul style="list-style-type: none">Compulsory insurances not paid	✓	CAP in place; Pending desktop confirmation received for rectification of all non-compliances;	
Garment	<ul style="list-style-type: none">Risk management system not sufficient to include assessment for pregnant workers	✓	CAP in place; Desktop confirmation received for rectification of all non- compliances;	

Impact of COVID-19 and Health & Safety

Since the onset of the COVID-19 pandemic, R.M.Williams’ has continued to engage fairly with suppliers, maintaining orders to ensure business continuity. Our third-party audits have a strict checklist regarding the correct use of Personal Protective Equipment (PPE) which in turn helps prevent the spread of disease and infection such as COVID-19. In addition, we have provided all employees with training and shared best practices to provide COVID-safe workplaces.

Exited supplier who refused to collaborate

Transparency is at the core of our Modern Slavery program, because if we cannot get visibility into our supply chain we cannot ensure we are mitigating risk. In FY25 we had a supplier who had declined to participate in our transparency efforts. After multiple discussions to find a path forward with the supplier we reached an impasse, and unfortunately had to make the decision to end the relationship. We do not believe that supplier relationships should be exited lightly, and all efforts should be made to remediate issues identified rather than terminate relationships. However, without a commitment to transparency this was not possible in this situation.

Grievance mechanism

At R.M.Williams we define a grievance as any type of complaint, concern or problem which is related to an employee’s work or working environment, job or working relationships, that may cause undue concern or distress, or a feeling of injustice or resentment at having been treated unfairly. All reported grievances and complaints are treated seriously and there is a commitment to ensure that these matters are fully investigated and dealt with in a consistent, fair, timely and confidential manner.

We communicate a grievance mechanism in our Supplier Code of Conduct and require that suppliers implement their own mechanism.

After reviewing our external grievance mechanism against best practices outlined in the United Nations Global Compact’s *Implementing Effective Modern Slavery Grievance Mechanisms* guidelines, we identified an opportunity to enhance engagement by partnering with an expert third-party provider. To strengthen our supply chain and uphold high ethical and labour standards, we fully implemented a new third-party grievance mechanism for our suppliers in FY25 to ensure all workers have access to a confidential and complimentary channel to raise concerns.

D. Training & collaboration

Employee training

All employees, contractors and suppliers working for, or on behalf of, R.M.Williams are responsible for identifying, preventing and addressing modern slavery risks.

During the reporting period, the modern slavery training continued to be assigned to all new and existing employees as part of their training pathway. As at 29 June 2025, 81% of employees have completed our bespoke modern slavery training.

We utilise R.M.Williams' internal employee engagement platform, Axonify, to deploy knowledge reinforcement activities on modern slavery topics, such as the Modern Slavery Policy, in addition to our traditional training.

Supplier training

When considering a new partnership with a supplier, we include modern slavery information within our standard pre-screening process (prior to onboarding).

As part of the onboarding, we provide training materials and resources to support our supplier organisations in understanding the level of transparency required to effectively address (and, where necessary, remediate) modern slavery issues. Ongoing updates and best practice are shared during our Supply Chain Engagement Workshops.

Industry collaboration

We recognise collaborating with on-the-ground experts globally helps us formulate better processes and remediation methodology.

R.M.Williams is a candidate member of Cascale (formerly known as the Sustainable Apparel Coalition), Leather Working Group and Seamless.

Members of R.M.Williams executive and governance team continue to work with Tattarang's Modern Slavery Working Group, including peers responsible for modern slavery across industries within Tattarang's portfolio companies and the Minderoo Foundation, including Walk Free



E. Monitoring & reporting

To maintain a strong due diligence system and ensure that modern slavery risks are being identified, managed, and remedied, we regularly assess the effectiveness of our systems and processes.

We have assessed effectiveness in two ways, through Key Performance Indicators (KPIs) and tracking progress against our annual objectives in our modern slavery roadmap.

We recognise that our internal business practices also affect our supply chain. We have commenced tracking root causes of delivery delays and rush orders, particularly to identify and avoid rush orders caused by internal changes and processes.

Effectiveness key performance indicators

We have set KPIs that align to our program framework, set out in the table below. In the theme of continuous improvement, we will continue to review and enhance these KPIs in future reporting periods.

Effectiveness roadmap tracking

An important measure for transparency in our overall modern slavery response is ensuring continuity between reporting periods. This involves providing detailed information on those areas where we have been able to effectively implement key performance indicators, and those where this has not yet been achieved.

Table 9: Key performance indicators (KPIs)

Theme	Metric	Current Performance
Governance	% High Materiality (A) and Mid Materiality (B) Supplier contracts with Modern Slavery clauses (via Supplier Code of Conduct)	89%.
Risk Screening	% Suppliers screened via inherent risk screening	100%
	% High Materiality (A) with living wage screening	54% facilities / 85% of spend
	% High Materiality (A) and Mid Materiality (B) with living wage screening	55% facilities / 85% of spend
Supplier Engagement	% High Materiality (A) facilities with third-party social audits	74% facilities / 91% of spend
	• At end of reporting period (End FY25)	
Training & Collaboration	% employees allocated modern slavery training in learning pathway	100%
	% employees who have completed modern slavery training	81%
Monitoring & Reporting	Establishment of KPIs and annual Modern Slavery statement	This table & statement



Table 10: Roadmap progress report:
measuring the effectiveness of our goals & actions in our 3-year plan

Theme	Activity	FY25 progress	FY26 objectives
A. Governance	Suite of modern slavery policies, guidelines, and contracts	Continued monthly Supplier Management meeting to track progress of Responsible Sourcing Program	Review full suite of policies and guidelines to ensure reflective of best practice
	Modern Slavery Committee	Monthly MS Committee meetings adapted to ensure consistent engagement cross-functionally to quarterly meeting with email update in between	Continue monthly monitoring of KPIs and adapt as learnings continue
	RMW Board updates	Quarterly reporting dashboard continued and improvements made incrementally for transparency	Continue quarterly reporting dashboard and engagement within the Tattarang steering committee
B. Risk Screening	Industry-geography inherent risk screening	Continued expansion upstream (building on increasing traceability), using third- party expert platform SEDEX	Continue expansion upstream (building traceability)
	Supplier materiality screening	Embedded residual risk KPI in onboarding & ongoing management processes	Update screening tiers to include any supplier that we publicly co-brand with, regardless of spend
	Living Wage screening	Expanded living wage screen for all High (A) & Mid (B) materiality suppliers	Continue to expand living wage screening through 3rd party audit program and with meaningful supplier engagement
C. Supplier Engagement	Supply chain tracing	Mapped 35% of Core products to Tier 3 Supplier for FY25 production. Expanding Seasonal product category.	Continue to scale upstream traceability program for Tiers 3 & 4
		Expanded tracing program to all categories, core and seasonal products.	
		Scaled supply chain mapping module in Trustrace	
	Supplier onboarding	Launched TrusTrace (software platform) to Supplier cohort for more comprehensive onboarding & data gathering	Review and update onboarding documentation and consistent standards of ethical practice across all suppliers
	Third-party Audits	Engaged more comprehensively with third party experts and Suppliers to understand challenges and support transparency while acknowledging and reducing compliance burden where possible	Internal review and commitment to an alternate method for confirming audit results, such as incorporating direct and anonymous worker feedback
	Corrective Action Plans	Scaled and improved CAP tracking and follow ups with Suppliers to receive meaningful insights	Continuous improvement in timeliness and verification of remediation actions
	Comprehensive Self-Assessment Questionnaire	Scaled TrusTrace engagement TrusTrace (software platform) for comprehensive data gathering & engagement through SAQ	Formalise a structured program of data gathering, review and action based on SAQ through TrusTrace
	Modern Slavery specific Self-Assessment Questionnaires	Scaled TrusTrace engagement for comprehensive data gathering & engagement	
	Supplier Living Wage roadmap	Built workforce insights with key suppliers having potential living wage gap in screening	Expand program of work (as appropriate) and embed lessons from supplier engagement in roadmap
	Grievance mechanism	Designed and deployed a Third-Party Supply Chain Grievance Mechanism for all Suppliers in FY25	Engaging with suppliers for successful and consistent application of Grievance Mechanism, especially with High (A) & Mid (B) materiality suppliers

Theme	Activity	FY25 progress	FY26 objectives
D. Training & Collaboration	Employee training	Increased participation with Modern Slavery training	Review training materials and continuously adapt for the evolving employee experience
		Refresher training implemented to all team members through employee engagement platform, Axonify	
		Knowledge reinforcement questions deployed through Axonify to enhance and deepen awareness	
	Supplier training	Hosted supplier webinars educating suppliers on various topics including Modern Slavery. This year we had a focus on Grievances and importance of transparency	Refine Supplier training programs to ensure effectiveness and best practice for supply chain
	Industry collaboration	Quarterly Modern Slavery Working Group meeting to share and update on best Practice across the wider Tattarang businesses	
E. Monitoring & Reporting	Modern Slavery Statement		
	Modern Slavery Key Performance Indicators (KPIs)	Continually improved KPI's and data integrity	

Consultation with owned & controlled entities

This statement has been prepared by R.M.Williams' centralised corporate function in consultation with senior leaders, staff, and directors of R.M.Williams, and all our owned and controlled entities (entities outlined in the Introduction & Approvals section of this statement).

Our owned and controlled entities have been involved in all the activities undertaken by R.M.Williams to identify, address, and mitigate modern slavery risk within their operations and supply chains.



R. M. WILLIAMS
EST. 1932, AUSTRALIA