

A black and white photograph of a hand holding a dark, textured shoe. The shoe has a small logo on the side and a label on the heel. The background is a textured surface.

Modern Slavery Statement

For the financial year ending 30 June 2024

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 • Garment manufacture in Hong Kong • Textiles & apparel manufacture in Turkey • Garment manufacture in Pakistan • Garment manufacture in Madagascar • Leather manufacture in Bangladesh • Leather tanneries in Turkey • Leather tanneries in South Africa • Textiles & apparel manufacture in Mexico • Rubber product manufacture in Morocco 	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, and extensive onsite auditing of our High Materiality (significant raw materials & finished goods suppliers). Major actions include:</p> <ul style="list-style-type: none"> Increasing supply chain transparency by engaging with our suppliers on secure platforms¹. Information gathered includes risk assessments, audit reports and evidence of remediation and upstream supply chain mapping. Conducting due diligence on suppliers through 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. 	<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 32
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, including a review of this statement against their Beyond Compliance criteria.	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) and QIMA. In FY24 we have also launched 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 30 June 2024.

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

We are committed to proactively addressing the risks of modern slavery in our global supply chains with vigilance. Recognising the complexity and historical challenges of traceability in the apparel industry, we place a strong emphasis on continuously improving our approach in line with international best practice and as we learn as a business.

We continue to build on our modern slavery program, including by introducing greater transparency, more robust documentation, and improved supplier engagement. We enthusiastically share our progress to support and encourage industry best practice.

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 19 November 2024), and Jackaroo Capital Pty Ltd, R.M. Williams Holdings Pty Ltd and R.M. Williams Australia Holdings Pty Ltd (each of which approved this statement on 20 November 2024).

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 25 November 2024. 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: 25 November 2024

Our Values

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

A letter from our CEO

The integrity of our supply chain, and ensuring good labour conditions throughout it, continues to be a key focus for R.M. Williams. As we transition from looking back at FY24 to looking ahead to FY25 and beyond, we recognise an inflection point in how we approach our supply chain engagement.

The FY24 reporting period was one of scaling our investments in teams and technologies. We added roles dedicated to vendor management and sustainable supply chain management. We launched and scaled our cloud-based vendor engagement software to streamline and improve our vendor engagement. We expanded our product tracing program from a small scale-pilot to full collections.

In 2024, we also became certified as a B Corporation, joining a global movement of people using business as a force for good. Our B Corp certification reinforces the commitments established in our long-term strategy, 'Crafting a Better Future', for which our modern slavery program is a key pillar. Learn about our sustainability journey and approach to positive change in our Sustainability Playbook [here](#).

To date, we have focused on addressing the 'big rocks' in our Modern Slavery diligence efforts. We have established core pillars under Governance, Risk Screening, Supplier Engagement, Training & Collaboration and Monitoring & Reporting. In FY25 we are shifting from implementing new pillars and programs, to continuous improvement in the pillars and program we have established over the past 4 years.

In FY25 our focus areas are:

- 1. Leveling up** to ensure we are not merely engaging in transactional interactions with our suppliers, but embedding processes within our daily work to build

meaningful, trust-based relationships for the long term. Our efforts to strengthen relationships through information sharing and regular webinars have already shown positive results.

- 2. Scaling and embedding** the third-party grievance mechanism we have recently launched. This involves working with and training our supplier base to ensure its efficacy.
- 3. As with FY24, living wages** continue to be a priority. We have started our supplier engagement, but it is a complex area that requires continued focus.
- 4. Continued improvement** in our supply chain traceability through both traceable fibre selection and supply chain engagement.

While we are proud of the progress we have made, there is always more work to be done. The journey, dedication and vigilance of every member of our teams lets us continue to push forward, learn from our experiences, and remain steadfast in our mission to create a fair, transparent and sustainable supply chain.

This statement is signed by Paul Grosmann, 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 on 25 November 2024.

Signed by



Paul Grosmann
 CEO, R.M. Williams
 Date: 25 November 2024

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. Two of R.M. Williams Pty Ltd's non-operational Australian subsidiaries (being R.M. Williams Bushmen's Outfitters Pty Ltd and R.M. Williams The Original Bushmen's Outfitters Pty Ltd) have been voluntarily wound up since the end of the reporting period. As at 30 June 2024, the 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.

R.M. Williams previous modern slavery statements included Percy Street Pty Ltd ("Percy Street") as a reporting entity. Percy Street is the non-operational head company of 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). For this reporting period, Percy Street is preparing a separate modern slavery statement to the other entities within the R.M. Williams Group. It is doing this to more accurately report on the separate modern slavery programs of both R.M. Williams and Akubra, noting that Percy Street acquired Akubra in November 2023 (midway through the reporting period) 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, marketing and supporting corporate functions. We have joint head offices in Sydney, New South Wales and Salisbury, South Australia. Our manufacturing facility (the Workshop) is in Salisbury, South Australia.

We operate more than 50 stores in Australia and New Zealand, and three stores in London.

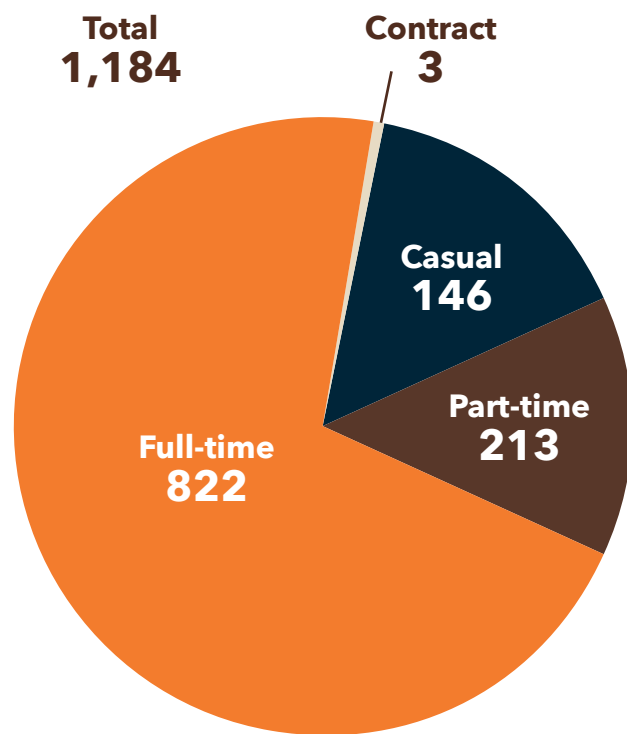
In addition, R.M.Williams is available at more than 600 stockists around the globe and exports to 15 countries, including Canada, Switzerland, Germany, France, United Kingdom, Ireland, Italy, New Zealand, Papa New Guinea, Scandinavia, United States and South Africa.

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 offices, distribution centre and retail stores. Employee numbers are set out in the table below.

Table 2: R.M.Williams Employees as at 30 June 2024



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) indirects procurement of goods and services for operational needs, such as maintenance, logistics, marketing, financial and data services.

The details of our significant direct suppliers for materials, components, 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](#).

Our average supplier tenure exceeds 9 years, and we believe our long-term supplier relationships help facilitate transparent onsite independent auditing activities.

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 component inputs are sourced from 24 overseas countries, being Bangladesh, Brazil, China, Czech Republic, France, Germany, Hong Kong, India, Italy, Japan, Madagascar, Mexico, Morocco, New Zealand, Pakistan, Portugal, South Africa, Spain, Sri Lanka, Taiwan, Turkey, United Kingdom, United States and Vietnam.

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
- Lifestyle items, e.g. scents, drinkwear
- Packaging items

3. Indirects procurement

We also engage a range of suppliers that support our operations such as maintenance, logistics, marketing and advertising, financial and data services, and other professional services.

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	Monthly meeting	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
B. Risk Screening	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	All suppliers
	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

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 including 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 compliment the onsite activities undertaken as part of the audits Questionnaires are issued via supplier engagement platform; sent every quarter (individual supplier receives max 1 per annum) 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
D. Training & Collaboration	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
	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)
E. Monitoring & reporting	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
	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 & Compliance 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	Sustainability & Compliance team 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 and Compliance Teams remain 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. The legal team provides 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 Agreements impose obligations on our suppliers in relation to modern slavery. These agreements were updated during the reporting period, 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 schemes.
- **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.
- **Workplace Behaviour Policy.** The Workplace Behaviour Policy ensures all staff are treated and treat others 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.
- **Workplace Grievance Policy.** Our Workplace Grievance Policy is to ensure consistent and thorough handling of personal grievances that are raised in the workplace.
- **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.
- **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 program oversight, 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 embed 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. The board receives a quarterly update on Modern Slavery risk management.

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 below 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	Inherent risk type/s	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	Forced Uyghur labour in cotton supply chains remains a high-risk.	✓	✓	✓	<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.
	Freedom of Association					
	Working Hours					
Garment manufacturing in Vietnam	Working Hours	Forced labour and child labour in Vietnamese garment manufacturing remains a high-risk.	✓	✓	✓	
	Forced labour					
	Child labour					
Garment manufacturing in Hong Kong	Freedom of association	Hong Kong has over 21,000 people in some form of modern slavery.	✓	✓		
	Working Hours					
	Poor wages					
Textiles & apparel from Turkey	Forced 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.	✓	✓	✓	
	Child labour					
Garment manufacturing in Pakistan	Forced labour	A high level of refugees in Pakistan makes the population vulnerable to modern slavery.	✓	✓	✓	
	Child labour					
	Freedom of movement	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.				

Industry	Inherent risk type/s	Description of inherent risk	RMW Code of Conduct signed	Third-party Social Audits	Engaged on Living Wage	Additional actions taken
Garment manufacturing in Madagascar	Forced labour	Forced and child labour is common in the apparel and textile industries in Madagascar.	✓	✓		
	Child labour					
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	Working hours	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.	✓	✓	✓	
	Freedom of movement					
Leather tanneries in South Africa	Working hours Wages	Although labour conditions have improved on large commercial manufacturing facilities in South Africa, labour conditions on small farms remain harsh. Underpayment of wages and poor living conditions for workers, were common.	✓	✓		
Manufacturing of textiles in Mexico	Working hours	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.	✓	✓		
	Forced labour					
Manufacturing of rubber products in Morocco	Working hours	85,000 people live in modern slavery in Morocco with higher prevalence in rubber and plastic factories.	✓	✓		

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)

We have completed a living wage audit 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 exceed the local living wage. 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).

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 risk	Low	Low-High	Low-High	

We have prioritised suppliers to work with more closely on living wages based on our screening of suppliers where there is the largest potential gap, and R.M.Williams is a large customer. In 2024 we have launched our living wage engagement program, working with three major suppliers.

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 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, Dyeing & 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	87% 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. Abattoirs.	Upstream	29% of Core apparel & soft accessory styles mapped to Tier 3. Expanding mapping of Seasonal styles through Made2Flow.
4	Raw Material Sources	Cotton farms, livestock farms, man-made chemical processing.	Upstream	Scaling of mapping in FY24 Increased sourcing of traced-to-farm cotton by 245% (by volume) 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 supplements 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 is supported by our cloud-based vendor management 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' Supplier 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 matures, we continue to focus on cultivating strong relationships with our direct suppliers, along with expanding our engagement with 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

In FY24 we have established a quarterly 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 minimize supplier audit fatigue and foster a more streamlined approach to compliance across the industry.

We onboarded 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	67
% with third-party social audits	69% facilities / 89% of spend*
• At end of reporting period (End FY24)	
Of third-party social audits complete:	
% with non-compliances related to Forced Labour	0%
% with non-compliances related to Child/Young Labour	2.9%^
% with non-compliances related to Freedom of Association	0%

* Audits received as a percentage of total facilities is lower than our previous reporting period, largely due to increasing the depth of auditing in our supply chain and therefore the number of facilities.

^ Non-compliance related to best practice of labour clause in employment contract or internal verification processes; no instance or suspicion of child labour identified.

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	Description of critical or major non-compliances	Corrective action plan issued	Corrective action plan status	Engaged on Living Wage
Garment	<ul style="list-style-type: none"> Overtime exceeded local limits Non-compliances related to compulsory insurance 	✓	Confirmation received for rectification of all non-compliances; New audit scheduled	✓
Garment	<ul style="list-style-type: none"> Overtime management system not implemented effectively, leading to excessive overtime Insufficient social insurance Lack of living wage awareness or implementation 	✓	Third-party follow-up audit requested	✓
Garment	<ul style="list-style-type: none"> Overtime management system not implemented effectively, leading to excessive overtime Compulsory insurances not paid 	✓	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 	✓	Confirmation received for rectification of all non-compliances	✓
Textile, Apparel, Footwear & Accessories	<ul style="list-style-type: none"> Labour contract had insufficient detail relating to young workers Compulsory insurances not paid Non-compliances related to rest days, leave requirements, work stoppages, and other types of leave (e.g., public holidays, sick leave) 	✓	Confirmation received for rectification of all non-compliances; third-party follow-up requested	
Textile, Apparel, Footwear & Accessories	<ul style="list-style-type: none"> Overtime exceeded local limits Non-compliances related to rest days, leave requirements, work stoppages, and other types of leave (e.g., public holidays, sick leave) 	✓	Confirmation received for rectification of all non-compliances; third-party follow-up booked in	

Industry	Description of critical or major non-compliances	Corrective action plan issued	Corrective action plan status	Engaged on Living Wage
Garment	<ul style="list-style-type: none"> Workers unable to form union of their choosing Non-compliances relating to wages & benefits provisions (e.g. medical, illness) 	✓	Third-party follow-up audit requested	
Garment	<ul style="list-style-type: none"> Overtime management system not implemented effectively, leading to excessive overtime Workers unable to form union of their choosing 	✓	Confirmation received for rectification of all non-compliances; third-party follow-up booked in	
Garment	<ul style="list-style-type: none"> Overtime premium & deductions could not be adequately verified Some business contracts were missing wage information 	✓	Third-party follow-up audit requested	
Garment	<ul style="list-style-type: none"> Labour contract had insufficient detail relating to young workers 	✓	Confirmation received for rectification of all non-compliances; Third-party follow-up audit requested	
Garment	<ul style="list-style-type: none"> Overtime management system not implemented effectively, leading to excessive overtime 	✓	Third-party follow-up audit requested	
Textile, Apparel, Footwear & Accessories	<ul style="list-style-type: none"> Overtime exceeds local limits 	✓	Confirmation received for rectification of all non-compliances	
Textile, Apparel, Footwear & Accessories	<ul style="list-style-type: none"> Workers unable to form union of their choosing Too restrictive in hiring policies 	✓	DConfirmation 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.

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.

Following a review of our external grievance mechanism against best practice as defined by the United Nations Global Compact Implementing Effective Modern Slavery Grievance Mechanisms guidelines, we identified and consulted expert third-party providers and have selected a solution that best fits to support our supply chain and uphold high ethical, labour practices. This will be fully operationalised with our Suppliers in FY25.





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 30 June 2024, 73% of employees have completed our bespoke modern slavery training.

In FY24, R.M.Williams launched a new internal employee engagement platform, Axonify, to centralise and democratise all communications. In addition to our traditional training, through Axonify we have rolled out knowledge reinforcement activities on modern slavery topics, such as the new Modern Slavery Policy.

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).	83%
		New Code of Conduct issued at the end of this reporting period. Updated metric to follow.
Risk Screening	% Suppliers screened via inherent risk screening.	100%
	% High Materiality (A) with living wage screening.	49% facilities / 81% of spend
Supplier Engagement	% High Materiality (A) facilities with third-party social audits. • At end of reporting period (End FY24)	69% facilities / 89% of spend*
Training & Collaboration	% employees allocated modern slavery training in learning pathway.	100%
	% employees who have completed modern slavery training.	73%
Monitoring & Reporting	Establishment of KPIs and annual Modern Slavery statement.	This table & statement

* Audits received as a percentage of total facilities is lower than our previous reporting period, largely due to increasing the depth of auditing in our supply chain and therefore the number of facilities.



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

Theme	Activity	FY24 progress	FY25 objectives
A. Governance	Suite of modern slavery policies, guidelines, and contracts	Updated Modern Slavery Policy, with Board approval Updated and rolled out Supply Agreement, including enhanced Supplier Code of Conduct Continued monthly Supplier Management meeting to track progress of Responsible Sourcing Program	Continue monthly Supplier Management meetings
	Modern Slavery Committee	Monthly MS Committee meeting cadence established and engagement cross-functionally	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
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	Designed residual risk KPI and commenced implementation	Embed residual risk KPI in onboarding & ongoing management processes
	Living Wage screening	Expanded living wage screen for all High (A) & Mid (B) materiality suppliers	Expand to Mid Materiality (B) facilities
C. Supplier Engagement	Supply chain tracing	Mapped 29% of Core apparel & soft accessory products to Tier 3 Supplier for FY24 production. Expanding Seasonal product category. Increased supplier visit program to upstream supply chain	Expand tracing program to all categories, core and seasonal products. Launch supply chain mapping module in Trustrace
	Supplier onboarding	Launched TrusTrace (software platform) to Supplier cohort for more comprehensive onboarding & data gathering	Continue to embed standardised onboarding
	Third-party Audits	Expanded Supplier Visit Program Engage more comprehensively with third party experts and Suppliers to understand challenges	Investigate other methods for confirming audit results, such as incorporating direct and anonymous worker feedback
	Corrective Action Plans	Implemented a process to track and follow up with Suppliers	Continuous improvement in timeliness and verification of remediation actions
	Comprehensive Self-Assessment Questionnaire	Launched 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	Launched TrusTrace for comprehensive data gathering & engagement Designed a questionnaire tailored specifically for Modern Slavery data gathering Commenced Issuing MS SAQ in supplier onboarding process	
	Supplier Living Wage roadmap	Identified and engaged 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	Selected and engaged with third- party Grievance Mechanism provider	Embed Third-Party Supply Chain Grievance Mechanism for all Suppliers in FY25

Theme	Activity	FY24 progress	FY25 objectives
D. Training & Collaboration	Employee training	Mandatory training program rolled out to all team members Refresher training implemented to all team members through employee engagement platform, Axonify All team members trained on Policy updates through Axonify	Continue to increase employee participation in Modern Slavery training and refreshers
	Supplier training	Hosted quarterly supplier webinars encouraging supplier on various topics including on Modern Slavery	Refine Supplier training programs to ensure effectiveness and best practice for ever changing supply chain
	Industry collaboration	Quarterly Modern Slavery Working Group meeting to share and update on best Practice across the wider Tattarang businesses	Continue participation in Modern Slavery Working Group
E. Monitoring & Reporting	Modern Slavery Statement	Submitted	Continually improve KPI's and data integrity
	Modern Slavery Key Performance Indicators (KPIs)	Continually improved KPI's and data integrity	Continually improve 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
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