



Adairs Limited (ABN 50 147 375 451) is proud to submit our fourth Modern Slavery Statement, which includes Adairs, Focus on Furniture and Mocka.

The Adairs Limited Modern Slavery Statement 2024 outlines the actions taken to identify, address and remediate potential risks of modern slavery in our business operations and supply chain from financial year 1 July 2023 until 30 June 2024 (FY24) under the Australian Modern Slavery Act 2018 (Cth) (MSA).

CONTENTS

A NOTE FROM OUR CHAIRMAN	4
ABOUT US	5
OUR STRUCTURE	6
UNDERSTANDING THE RISKS	11
OUR ACTIONS	14
ASSESSING OUR ACTIONS	20
CONSULTATION	21
FUTURE ACTION	22

OUR PURPOSE

"To provide inspiration and expertise, enabling everyone to weave their own story of home."

At Adairs, we are committed to respecting human rights across our operations. Our business and supply chain are extensive, which makes the challenges associated with safeguarding human rights significant and complex.

Our 2024 statement highlights the steps we've taken this year and will continue to take to help protect human rights in Adairs' operations and supply chains. It reflects not only our successes but also the challenges we continue to face as we work to help ensure a fair working environment for those who support our business.

We define modern slavery as situations where individuals are exploited through coercion, deception, or abuse of power for the purpose of economic gain. It encompasses various forms of exploitations, such as forced labour, human trafficking, debt bondage, forced marriage, and exploitation of children.

In FY24, we continued to demonstrate business-wide risk assessments, managed by our Group Risk and Compliance team including our dedicated Group Ethical Sourcing Manager.

Key milestones outlined below:

- We introduced a Homeworker Policy in which we acknowledge that homeworkers can be involved in a diverse array of hand-crafted products and deserve the same treatment as other workers.
- We ensure complete traceability of our raw materials and cotton sourcing for our Australian Cotton range.
- To improve supply chain transparency, we have mapped our Tier 2 suppliers, as we already have full visibility of our Tier 1 factories. The mapping of Tier 3 and 4 suppliers is an ongoing, long-term effort.

In preparing this statement in accordance with the specific reporting requirements under the Modern Slavery Act 2018 (Cth), we have consulted with our Executive Leadership team, and more broadly across our business, to report on our collectively agreed actions to address moder slavery risk.



A NOTE FROM TRENT PETERSON

ADAIRS Chairman

Our FY24 Modern Slavery Statement has been approved by the Board of Adairs Limited on 28 November 2024.



ABOUT US

1. The Reporting Entity

Adairs Limited (ABN 50 147 375 451) is an Australian publicly listed company. This Modern Slavery Statement is a joint statement, made on behalf of all reporting entities into Adairs Limited, being the following:

Adairs Retail Group Pty Ltd – Trading as 'Adairs' Focus on Furniture Pty Ltd – Trading as 'Focus on Furniture' Mocka Products Pty Ltd – Trading as 'Mocka'

Adairs Limited

Adairs Limited is Australia's largest omnichannel specialty retailer of home furnishings and home decoration products. We own and operate three vertically integrated brands in the home category - Adairs, Mocka and Focus on Furniture. All brands are design-led, customer focused, and sells quality in-house designed product direct to customers through our own channels in Australia and New Zealand. Adairs Limited's head office is in Melbourne, Australia.

Adairs

Adairs is a leading specialty retailer of home furnishings in Australia and New Zealand with over 170 stores across a number of formats and a large and growing online channel. Our strategy is to present customers with a differentiated proposition, which combines on-trend fashion products, quality staples, strong value and superior customer service.

Mocka

Mocka, a wholly owned subsidiary of Adairs, is a vertically integrated pure-play online home and living products designer and retailer operating in Australia and New Zealand. Mocka sells its own exclusive, well designed, functional and stylish products in the Home Furniture & Décor, Kids and Baby categories. Delivering great product and compelling everyday value-for-money is core to the Mocka customer proposition.

Focus on Furniture

Focus on Furniture ('Focus') is a vertically integrated omni-channel furniture and bedding retailer offering well-designed, functional and on-trend products at great value for money through its network of 25 stores in Australia and its online channel. Focus is characterised by its attention to customer service, support, product quality and range.

The Adairs Limited Modern Slavery Statement 2024 outlines the actions taken to identify, address and remediate potential risks of modern slavery in our business operations and supply chain from financial year 1 July 2023 until 30 June 2024 (FY24).

OUR STRUCTURE

2. Our Structure, Operations and Supply Chain

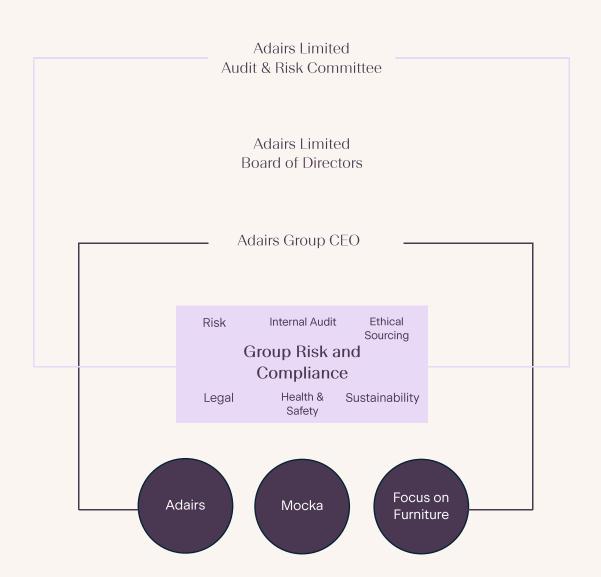
All three business are vertically integrated, design-led, customer-focused, and sell quality in-house designed products direct to customers.

We operate out of a number of distribution centres (DCs) in Australia and New Zealand and contract with third-party logistic providers (3PLs). Adairs Limited's headquarters is in Melbourne, Victoria.

Unless stated otherwise, references to 'Adairs', 'we', 'our', 'the Group' or 'the Company' in the following sections of this statement are a reference to Adairs Limited.

Governance Structure

Human rights responsibilities (including in relation to modern slavery) are managed at the highest level across our companies and are integrated into our governance framework. The Audit and Risk Committee are directly responsible for the activities taken by all owned and controlled Australian entities to assess and address modern slavery risks, including our reporting obligations.



OUR OPERATIONS

Adairs

At Adairs, we operate across retail, support office, and distribution centres.

Our support office operations are based in Melbourne, Victoria Australia.

We operate retails stores in both Australia and New Zealand and warehouse operations are based in Melbourne, Australia and with a 3PL managed facility in New Zealand.

Focus on Furniture

At Focus on Furniture, we operate across retail, support office, and distribution centres.

Our support office operations are based in Melbourne, Victoria Australia.

All retail stores and distribution centres operate in Australia.

Mocka

At Mocka we operate online. Our support offices and distribution centres operate out of Brisbane, Australia and Christchurch, New Zealand.



OUR SUPPLY CHAIN

"Partnering with suppliers that share our values for a safe and happy team, as well as quality product, is our priority."

At Adairs, we are committed to conducting business lawfully and ethically and will only seek to partner with suppliers who share our belief in abiding by the global laws, regulations, codes, and frameworks that we work within.

Whilst the majority of our product is currently manufactured in China (including Hong Kong), we also have manufacturing suppliers located in the following countries: India, Vietnam, Bangladesh, Pakistan, Malaysia, Turkey and Indonesia.

We are committed to gaining visibility across all tiers of production, however, recognise that this is a complex undertaking, given the diverse inputs such as fabric, dyes, printing, buttons, zips and the raw materials that can be sourced from multiple suppliers and countries.



Figure 1. Adairs Group's manufacturing supply chain Tiers.

FY24 MERCHANDISE SUPPLY CHAIN FOOTPRINT

COUNTRY OF ORIGIN	Adairs	Focus	Mocka	Group
China (ex HK)	63%	87%	82%	71%
India	10%		7%	8%
Australia	7%			5%
Hong Kong	4%		7%	5%
Malaysia				>~
Vietnam	2%	1%		1%
Turkey	2%			1%
Bangladesh	6%			4%
Indonesia	1%			0%
Other various	5%			3%
Total	100%	100%	100%	100%
Suppliers				
Number of Supplier	273	26	28	327
Concentration				T
Largest Supplier	16%	24%	30%	-
Top 10	50%	92%	87%	-
Top 20	65%	99%	99%	-



SOURCING

The Adairs sourcing strategy involves diversifying our manufacturing of products across multiple countries to strengthen our global supply network and mitigate risk.

In FY24, our merchandise sourcing footprint spanned 13 countries, working with over 300 finished goods factories. Our product range includes bedlinen, bedding, bathroom, beach, furniture, lighting, home accessories and décor, fragrance and pet. Materials used in our products include many natural textile fibres (such as cotton, wool and linen), man made textiles fibres (such as polyester, polypropylene and acrylic) and non-textile materials (such as leather, wood and glass)

Our contractual trading agreements are primarily with our direct merchandise suppliers that own or engage factories to produce merchandise. However, we do not have direct relationships with every entity involved in the complex supply chains of our products.

Across the range of products that we design, each of the steps involved in manufacturing are often different and nuanced depending on the product type, design and style, or the materials used. The range of activities involved in our supply chain may include:

- cultivation of raw materials (such as cotton or linen)
- processing of raw materials into fibres or yarn
- weaving, knitting, or bonding of the fibres into fabrics
- wet processing including dying, washing and tanning
- cutting, making, trimming and assembly (including sewing, knitting and molding)
- other value-add processes (such as embroidery, trims, hardware and screen printing)
- packaging, labelling, packing and shipping

Adairs conducts supplier profiling exercises to assess risks across our network. This allows us to identify the number of Tier 1 suppliers and factories in specific regions enabling us to optimise our existing supplier base.

Our Group Risk and Compliance Team continued to complete in person factory visits across our network. This provides assurance in relation to social compliance and adherence to our contractual and ethical expectations. Over the course of the financial year the team conducted factory visits China, India and Bangladesh.





Picture 1: Visiting one of our factories and observing a worker threading loom.

Picture 2: Group Quality, Sourcing and Compliance Manager, Angie Kent on a factory tour with our Suppliers



UNDERSTANDING THE RISKS

3. Describe the risks of modern slavery practices in the operations and supply chains.

At Adairs Limited, we understand we have the potential to cause, contribute to, or be directly linked to modern slavery practices throughout our everyday business. When selecting new suppliers, we actively seek suppliers that meet our high standards and allow us to continue to provide our customers with high-quality products that both inspire and delight.

CAUSE

A business may cause modern slavery or other human rights harm where it's actions directly result in modern slavery occurring.

For example, a logistics company could cause modern slavery by exploiting its workers used to crew shipping vessels.

CONTRIBUTE

A business may contribute to modern slavery or other human rights harm where its actions or omissions facilitate or incentivise modern slavery.

For example, a fabric wholesaler could contribute to modern slavery where it requires its suppliers to reduce costs to a level that could only be achieved by using exploited workers.

DIRECTLY LINKED TO

A business may be directly linked to an adverse human rights impact where it is connected to the impact through the actions of another entity with which it has a business relationship, such as a supplier.

For example, a bedlinen company could be directly linked to modern slavery where its supplier manufactures sheets made using raw materials produced by a third supplier who exploits its workers.

RISK CATEGORY

EXPLANATION

INDUSTRY RISK

The textile and homewares industries are considered high-risk for modern slavery due to the complex and often opaque nature of its supply chains.

Key risk factors include the reliance on migrant workers, the use of unskilled or temporary labour, and short-term contracts that impact how we engage with different stages of production. Additionally, tight deadlines can lead suppliers to enforce excessive working hours or outsource work to meet demands, where poor labor practices may result in the exploitation of workers.

PRODUCT RISK

Certain products in our industry may carry a higher risk of modern slavery based on how they are produced, sourced, or utilised. Cotton, in particular, presents a heightened risk due to the potential involvement of forced labor in its production.

GEOGRAPHIC RISK

Certain countries or regions are more prone to modern slavery due to factors like weak governance, conflict, migration, and socio-economic challenges such as poverty. Cotton production in regions such as Xinjiang in China, Uzbekistan, and Turkmenistan has been identified as particularly high-risk for modern slavery.

ENTITY RISK

Certain entities or suppliers may lack the adequate governance structures and ethical standards to ensure worker rights and protections. This can lead to the use of forced labour or other human rights violations.

POLITICAL RISK

The potential exists for political events or conditions to negatively impact the operations, profitability, or safety of businesses and investments. These risks can arise from a variety of factors, including:

- Government Actions
- Political Instability
- Corruption
- Geopolitical Tensions
- Policy Shifts



ASSESSING OUR MODERN SLAVERY RISKS

By developing a deep understanding of our modern slavery risks and how they evolve over time, we can focus our risk management efforts on the areas that pose the greatest risk to people.

Additionally, we take further steps to assess and monitor modern slavery risks throughout our supply chains.

We take a risk-based approach to managing our suppliers within our Ethical Sourcing Program. Suppliers undergo a risk assessment which informs how we manage and monitor their compliance with our Program. It allows us to focus our resources where there is a greater risk of labour or human rights violations, and where we have leverage to facilitate change in our supply chain.

While compliance with our Policy is mandatory for all direct suppliers, our requirements will vary based on each supplier's risk profile. Recognising that modern slavery risks increase further down the supply chain, we hold our upstream suppliers accountable for managing these risks through our Code of Conduct.

These suppliers maintain a direct relationship with the relevant subcontractors and are expected to frequently visit their factories to monitor compliance with the Code of Conduct and consistently meet our standards.

As a condition of our relationship with suppliers, we require that all subcontractors and suppliers be identified and approved by our Ethical Sourcing Team before any work begins.

By establishing a robust transparency and governance framework, Adairs can protect workers at all levels of its supply chain from modern slavery. In collaboration with industry experts, we have continued to enhance our internal ethical sourcing program. This includes the ongoing use and development of a custom supplier traceability database and the continuation of our social compliance auditing program, as well as annual factory visits.

We require all Tier 1 factories to provide a current Social Compliance Audit report, conducted by an independent and qualified third party. In FY24, we extended this requirement to lower-tier manufacturers as part of our expanding supply chain traceability efforts.

This year, our team successfully conducted on-site visits to factories across the supply chain, including trips to China, India, and Bangladesh. Alongside factory audits and visits, we also use tools such as formal grievance processes and confidential whistleblower mechanisms, both internal and external, to support compliance and accountability.



Pictured: Group Risk and Compliance Team and GM of Supply Chain visiting one our Testing Labs

OUR ACTIONS

4. Describe the actions taken to assess and address these risks, including due diligence and remediation processes.

Adairs' actions to address actual and potential modern slavery risks begin with our ongoing due diligence management process. Our policy framework establishes the governance structure that guides us in identifying, preventing, mitigating, and managing modern slavery risks and human rights impacts our business activities.





POLICY FRAMEWORK

Our comprehensive policy framework supports the application of our Code of Conduct and provides our governance structure and operational guidance for how we identify, manage, and remediate modern slavery risk.

Our Ethical Sourcing Policy provides the structure for how we fundamentally manage our approach to social impact and human rights as a business.

In addition to these foundational documents, we have detailed policies that have been implemented to assist us in minimising the risk of modern slavery while improving our sourcing practices. (See fig 3 – Adairs Policy Framework)

Our supplier manual is how we engage with our suppliers and communicate our expectations and requirements.

Adairs suppliers must agree to all terms and sign our Supplier Agreement. This agreement covers our operational business relationship and all trading terms, including governance of the supply chain. These expectations are tested through our supplier onboarding and due diligence policies and procedures.

Suppliers cannot be used for an activity until a signed Supplier Agreement and Code of Conduct has been received and approved by Adairs.



ADAIRS POLICY FRAMEWORK	PURPOSE
Anti-Bribery and Corruption Policy	The provide guidance on our zero-tolerance approach towards any form of Bribery and Corruption including extortion.
Child Labour Policy	To provide guidance related to our zero tolerance of child labour in accordance with international standards
Code of Conduct	To provide confirmation that suppliers agree to meeting our standards for conduct.
Ethical Sourcing Policy	To provide overarching principles and key values related to ethical sourcing and social impact, making clear our expectations.
Gender Equality in Supply Chain Policy	To promote gender equality throughout the entire business and in the partnerships, we form through the supply chain. Ensuring our commitment to awareness, education and ongoing development of gender equality initiatives are embedded across all aspects of the supply chain.
Modern Slavery and Forced Labour Policy	To provide guidance outlining expectations of our suppliers related to worker rights and conditions
Sanctioned Country Sourcing Policy	To set clear expectations regarding sourcing of raw materials from banned locations.
Supplier Manual	To provide a holistic overview of our expectations and requirements for suppliers including the relevant policies that must be followed.
Unauthorised Subcontracting Policy	To set clear expectations regarding our zero-tolerance approach to the use of undisclosed suppliers that may present a higher risk.

Ongoing Due Diligence

ONBOARDING SUPPLIERS

Our onboarding process aims to ensure our social and environmental requirements are clearly communicated, understood and achievable.

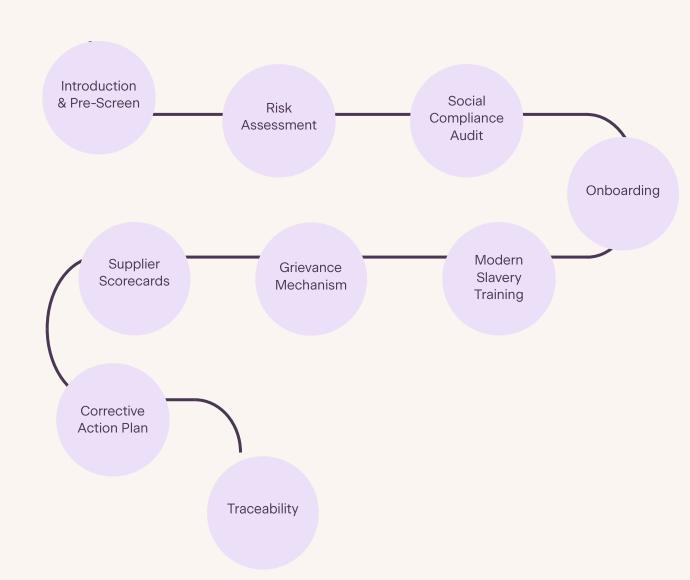
Suppliers must meet Adairs' Code of Conduct requirements, have robust environmental and sustainable practices in place and give full transparency of their factories from Tiers 1-4 and agree to sign our Supplier Agreement.

FACTORY AUDITS

To ensure workers are protected from the risk of modern slavery Adairs accept independent factory audit reports from organisations such as SEDEX, BSCI and WRAP.

Within these audits are confidential individual and group worker interviews where concerns can be raised. From this, we conduct annual follow-up audits to address concerns and ensure corrective actions are taken.

In addition to third-party audits, our product managers and compliance teams also conduct factory visits with our suppliers annually.



FACTORY AUDITS CONTINUED

Social compliance audits remain an important tool for engaging our suppliers and factories. Through these audits, factories are assessed to identify workplace indicators that may lead to, or be a red flag for, modern slavery. This provides our business and the suppliers' factories with clear corrective action plans to verify, remediate and close non-compliance issues.

These factory audits are administrated and monitored by the Group's Ethical Sourcing Team, and findings from these audits are recorded and reported. The most critical issues, where immediate interventions are required, are escalated to relevant stakeholders, including where necessary our executive team for awareness, consultation, and approval of actions to address. Resolution may include termination of supplier relationships where required, but our aim is always to work with suppliers to resolve issues where possible.

No instances of modern slavery were identified through our Factory Assurance Program audits during this reporting period.

Adairs Factory Assurance Program captures all Tier 1 factories (those involved in the production of finished goods), as they are most directly associated with us.

TRAINING AND AWARENESS

In FY24, we conducted a modern slavery awareness session with key stakeholders from our Product and Buying teams, providing an opportunity for discussion and questions.

We are dedicated to enhancing our training programs in the coming years, collaborating with internal and industry experts to stay current on identification and mitigation strategies related to modern slavery.

GRIEVANCE MECHANISM

Adairs Limited has a public Whistleblower Policy which provides guidance on how improper or criminal conduct (such as instances of modern slavery) can be confidentially disclosed and investigated.

We strive to be an ethical business, with robust policies and procedures to reduce the likelihood of human rights breaches, including modern slavery.

However, instances of ethical misconduct may still arise. It is important that team members, customers, suppliers, factory workers and contractors have an opportunity to report their concerns safely, confidentially and without fear of retribution.

Internal:

whistleblower@adairs.com.au (+61) 3 8888 4506

External:

Speak Up – Operated by Core Integrity

Email: speakup@coreintegrity.com.au

Web: https://coreintegrity.com.au/su/adairs/

These reports enable us to identify where the business may inadvertently cause, contribute or be linked to potential risks of modern slavery across our Group operations.

REMEDIATION

When issues are identified whether through our due diligence processes or from other sources, we first determine whether the issue is classified as Zero Tolerance, Critical, Major or a Minor Non-conformance.

Remediation requirements and timelines will be dependent on the classification of the non-conformance and the risk posed to workers.

ISSUES IDENTIFIED

During FY24, the predominant concerns identified were the use of undisclosed subcontractors, excessive overtime and insufficient social insurances. To a lesser extent, there were also some occupational health and safety risks identified.

In response to these findings, we worked closely with the suppliers concerned to remediate and continued to collaborate with industry peers to ensure a best practice response.

We recognise the importance of supporting our suppliers to meet compliance obligations. We will continue to empower all stakeholders with the knowledge, tools and strategies necessary to address these challenges.

By doing so, our ultimate goal is to effectively confront the non-compliances issue and reduce the risk of modern slavery. We believe these efforts will result in sustainable, long-term, improvements in compliance and ethical sourcing practices throughout our supply chain.



ASSESSING OUR ACTIONS

5. Describe how the reporting entity assesses the effectiveness of these actions.

The Adairs Group continually monitors its actions to assess and address modern slavery risk. We also appreciate that these measures need to be reviewed and adapted as our actions mature and as our understanding of modern slavery continues to develop and evolve.

Below are some indicators we utilise to measure our effectiveness at accessing and addressing modern slavery risks.

AREA	OBJECTIVES	EFFECTIVENESS
Policies and Contractual Controls	 Ensure policies set clear expectations around preventing and addressing all forms of modern slavery across our operations and supply chains 	 Observable compliance to policy requirements Policies reviewed on a regular basis
Risk Assessments	 Understanding and assessing our potential exposure to modern slavery risks 	 High risks identified and mitigated 100% completion rate of risk assessments for new suppliers conducted Suppliers actively prevented from onboarding
Awareness raising and capacity building	 Improve internal and external awareness and transparency relating to modern slavery risks 	 Team members know and understand modern slavery risks and actively consider them as part of the onboarding process Suppliers and factory workers are educated on what constitutes unacceptable business practices that could result in modern slavery.
Audits and Issue Monitoring	 Supply chain monitoring and assurance through our Factory Assurance Program Ensure audit corrective actions undertaken, improved, or closed Ensure quality and effectiveness of audit types 	 100% of tier 1 suppliers have been independently audited prior to onboarding A reduction in the number of critical issues identified Compliance to corrective action plans with associated evidence of remediation.
Remediation and Reporting processes	 Access to effective grievance mechanisms for all workers Required actions taken against any modern slavery violations 	 The presence of reporting mechanisms on supplier and factory worker facing documentation All reports of serious non-conformances or potential modern slavery are appropriately investigated and remediated Any known or suspected instances of modern slavery are reported to the executive team and board

CONSULTATION

6. Describe the process of consultation with any entities the reporting entity owns or controls.

This statement has been prepared in consultation with all owned and controlled entities of Adairs Limited listed on page 5.

All businesses have resources assigned to reviewing and implementing modern slavery risk mitigations and collaborate continually with Group Risk and Compliance.

All businesses operate under one Code of Conduct document and are aligned with suppliers as a result.

Senior management, executives and the directors of the reporting entities, have been consulted and informed of the actions taken throughout this reporting period, and development of this statement.

Consultation has also occurred with industry peers, including having representation on the Australian Retailers Association Sustainability Advisory Committee.



FUTURE ACTION

7. Provide any other relevant information

At Adairs, our ability to measure performance in reducing modern slavery risk across our businesses is key to understanding how we can continually improve.

In FY25, Adairs will create a roadmap to further support our approach to combatting modern slavery and to effectively deliver our continuous improvement actions in future reporting periods. The roadmap highlights the improvement actions we will be focusing on in the next FY25 reporting period.

We know our responsibility does not end here, and we will continue taking steps forward to eradicate the risk of modern slavery from our supply chain.

ACTION ITEM	FY25
MODERN SLAVERY TRAINING	New Starters Refresher training for key stakeholders
POLICY FRAMEWORK REVIEW	Update Supplier Guide Update Supplier Agreement Update Supplier Onboarding Pack
SUPPLY CHAIN TRANSPARENCY	Tier 3 supply chain mapping Explore further opportunities to improve traceability of raw materials
INDEPENDENT FACTORY AUDITS	Continue using 3 rd party independent audits to assess each factories social compliance
SUPPLIER VISITS	Continue to conduct supplier factory visits for all brands Conduct a lower tier visit, including raw material
SUPPLIER CONFERENCE	Hold supplier conference to engage with key suppliers and educate on expectations and modern slavery updates
RESEARCH	Ongoing research to understand new developments and best practice.
PEER ENGAGEMENT	Continue to collaborate with peers as part of ARA Sustainability Advisory Committee

MANDATORY REPORTING CRITERIA

LOCATION OF RESPONSE TO MANDATORY CRITERIA WITHIN THIS STATEMENT

	WITTIIN THIS STATEMENT
1. identify the reporting entity	Page 5
2. Describe the entity's structure, operations and supply chains	Page 6-10
3. Describe the risks of modern slavery, practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Page 11-13
4. Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes.	Page 14-19
5. Describe how the reporting entity assess the effectiveness of those actions.	Page 20
6. Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement).	Page 21
7. Include any other information that the reporting entity, or the entity giving the statement considers relevant.	Page 22

adairs

Mocka.



This Statement and all other publicly available Corporate Governance documents relating to Adairs may be found on the company's investor relations website as follows:

www.investors.adairs.com.au/investors/