



Good Goods Modern Slavery Policy Statement

Last Updated December 2025

TL;DR

It is an awful reality that modern slavery exists and a business in the 21st century needs a statement about it. Below you'll find ours. We should warn you that it includes a lot of troubling language and difficult subject matter. The main takeaway is we forge deep relationships with all of our partners to ensure that no one who works on our products at any stage of development is doing so by force, manipulation or coercion. We hope that eventually there will be a future where statements like this are unnecessary – that all people have equal access to fair work and employment opportunities. Until that day, we proudly stand against oppression and only work with likeminded businesses and individuals who are also committed to preventing modern slavery.



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1. We Give A Crap



Who Gives A Crap was founded with the idea that business can be an agent for change and have meaningful impact in the world. We are opposed to all forms of modern slavery.

This Modern Slavery Statement has been prepared in accordance with the Australian Modern Slavery Act 2018, United Kingdom's Modern Slavery Act 2015 and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023. This statement describes our actions during the financial year ending 30 June 2025 to identify and minimise the risk of modern slavery occurring within our operations or supply chains.

The Modern Slavery Act 2018 (AU) defines modern slavery to include eight types of serious exploitation. Modern Slavery includes slavery or slavery-like practices, servitude, forced labour, forced marriage, debt bondage, deceptive recruiting for labour or services, human trafficking. The worst forms of child labour means situations where children are subjected to slavery or similar practices, or engaged in hazardous work.

The Modern Slavery Act 2015 (UK) consolidates offences of human trafficking and slavery.

The Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 (CA) requires companies to report on steps they are taking to prevent and reduce the risk of forced and child labour in their supply chains. This includes disclosing information about due diligence processes, risk assessments, and efforts to remediate any instances of forced or child labour.

We generally do business as Who Gives A Crap but our parent company is Good Goods Holdings Pty Ltd. We have examined the requirements of all three Acts and our supply chains as a whole across Good Goods Holdings Pty Ltd group of companies and for this purpose we are pleased to report on our progress.

This statement has been prepared with guidance from the Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities, published by Australian Border Force, the statutory guidance Slavery and human trafficking in supply chains: guidance for business, published by the UK's home office and Forced Labour in Canadian Supply Chains: Guidance for entities, published by Public Safety Canada.

This statement was approved in full by the principal governing body for Good Goods Holdings Pty Ltd in December 2025.



2. How We Roll



2.1. Structure

Good Goods Holdings Pty Ltd is a privately-owned company, founded and incorporated in Australia. We sell household paper, cleaning and waste management products direct to consumers and via retail and sold personal care products direct to consumers. We donate 50% of our profits to charitable organisations who help build toilets and improve sanitation standards to those that need it. Good Goods Holdings Pty Ltd with its Registered Office and principal place of business located at Suite 816, 585 Little Collins St, Melbourne VIC 3000, ACN 630 422 409, is the parent company for our trading entities.

We sell our products in five global markets:

- in Australia (AU) by Good Goods Pty Ltd, DBA Who Gives A Crap (ACN: 154 870 452)
- in the United Kingdom (UK) & Europe (EU) by Who Gives A Crap Limited (Company Number 10334484)
- in the United States (US) by Who Gives A Crap Inc (State File Number: 4904789)
- in Canada (CAN) by Who Gives A Crap Products Inc (Business number: 787615004)

Our global trading name is Who Gives A Crap for household paper, cleaning and waste management products. Our global trading name for personal care products was Good Time; we closed this brand in March 2025.

The consultation process between Good Goods Holdings Pty Ltd and the subsidiaries above in creating this statement was:

- The statement was produced with the assistance of the supply chain teams in each respective region.
- A draft was sent to each subsidiary for their amendment and feedback prior to final approval.
- Good Goods Holdings Pty Ltd reviewed feedback, incorporated and discussed before approving the final statement.

2.2. Governance

The principle governing body for Good Goods Holdings Pty Ltd is “the Board” which is composed of Simon Griffiths, Executive Director & CEO, and Raphael Tholon, non-Executive Director.

The members of our Executive Team are responsible for overseeing our global operations across all subsidiaries and are jointly responsible for all policy authorisation including this Modern Slavery Statement. Our executive team is:

- Danny Alexander: Chief of Product & Purpose
- Ellie Smith: Vice President of People & Culture
- Emily Kraftman: Chief Commercial Officer
- Jehan Ratnatunga: Vice President of Strategy & Growth
- Karen Dwyer: Interim Brand & Creative Executive
- Phil King: Vice President of Supply Chain
- Simon Griffiths: Chief Executive Officer



- Trish Mikhael: Chief Financial Officer

We've been a certified B Corporation (B Corp) since 2016 – a designation that proves we're meeting high standards of verified performance, accountability, and transparency across everything from how we treat our team to how we run our supply chain and source our materials.

The B Corp standards have evolved, moving beyond a “points score” to a non-negotiable set of baseline requirements. We are already transitioning to this higher standard ahead of our 2026 recertification, proving we are committed to continuous improvement.

In order to remain a certified B Corp, we are committed to:

- **Meet the bar, not a score:** We must meet every single mandatory, non-negotiable requirement across all seven core Impact Areas (e.g., Human Rights and Climate Action) in Years 0, 3, and 5. This means no more scoring, only 100% compliance.
- **Legal commitment:** We legally commit to giving a crap about everyone by ensuring our corporate governance structure is accountable to all stakeholders (people, planet, and community).
- **Full disclosure:** We keep putting our performance information out in the open on our public B Corp profile for everyone to see.

You can see more information about our current B Corp certification [here](#).

2.3. Operations

Our operations occur across five global working “hubs”:

- AU
 - **Global Functions:** Customer Experience, Finance, Legal, Integrated Business Planning, Marketing, Commercial, Strategy, Sustainability, People & Culture, Digital Product and Insights and Impact.
 - **Regional Functions:** APAC Supply Chain
- US
 - **Regional Functions:** North America Supply Chain, People & Culture
- UK & EU
 - **Global Functions:** Commercial and Strategy & Insight
 - **Regional Functions:** UK & EU Supply Chain and UK Commercial
- PH
 - **Global Functions:** Customer Experience, Finance, Legal, Supply Chain, Commercial, Marketing
 - We engage full time, part time and freelance contractors based in the Philippines who are self employed and work from home providing their own devices and workspaces.
 - Each contractor works a schedule that is aligned to their personal needs and those of their global function, and they invoice and are paid monthly based on hours worked. They receive access to our global leave entitlements including 20 days of Annual Leave, 10 days of Sick/Carers leave, discretionary Life Leave and are protected by the same policies as our global team.



- CH
 - **Regional Functions:** APAC Supply Chain (Production, Quality Assurance, Compliance)
 - We sourced and recruited our China team directly via global recruitment channels such as LinkedIn, using the same recruitment process and standards that are applied by us globally.
 - We have contractually engaged our China team via a FESCO (Foreign Enterprise Service Company) which ensures that contract terms, taxation and social insurance meet all legislated standards within People's Republic of China (PRC). They receive access to our global leave entitlements including 20 days of Annual Leave ,10 days of Sick/Carers leave, discretionary Life Leave and are protected by the same policies as our global team.

2.4. People

At Who Gives A Crap we believe in fostering a culture of honesty and vulnerability where all our people are empowered to do their best work, speak up, share different perspectives, and know they genuinely belong. We strive to have our teams represent the richness of the communities in which we work and to be a good influence on other organisations working in the social impact space.

We wouldn't be Who Gives A Crap without our talented people. We value each of our employees, both permanent and casual, and ensure that we provide structured and holistic opportunities for career development and growth within the business. This year, we rolled out a more equitable and consistent performance and pay review system to ensure clearer feedback, fairer assessments and bigger opportunities for everyone. We stand by a transparent and fair recruitment and interview process in order to reduce bias and provide equal opportunity to all candidates.

In each of our office "hubs" we work closely with legal counsel to ensure we are consistently up to date on all employment laws and standards, and we take pride in the fact that we then go beyond the baseline expectation for employee satisfaction as measured by Engagement Survey results twice a year.

We approach employee wellness with the nuances of each of our hub cultures in mind and work our hardest to create work conditions that allow flexibility and balance for personal and family life. From our recruitment process to our employee performance assessments, to our choice of impact partners we embody our company values and keep them as the driving "north star" in all our business decision-making.

We have a Diversity Equity & Inclusion (DEI) council to leverage and stay responsive to our team's unique lived experiences and continue to diversify and broaden these as we grow. The council is made up of employees across our organisation who work on strategic projects and spotlight integrative approaches to DEI for our purpose-first business – creating an inclusive workplace and fostering a deep sense of belonging so we can be our true selves and do our best work.

Our commitment to this work is not just internal. Our DEI Council is actively developing our Reconciliation Action Plan (RAP), driving forward a significant commitment to systemic change and deeper community integration.



2.5. Supply Chain

Our supply chain includes the direct manufacture of our products, shipping to end-market, warehousing in-market and final distribution to customers.

We produced our finished goods in six countries:

- 85% in China
- 2.5% in the US
- 5% in the UK
- 1% in Sweden
- 4% in Malaysia
- 2.5% in Portugal

We do not own the factories where our products are made, but we work closely and directly with a group of carefully selected manufacturing partners.

We used global freight forwarding partners to ship our finished goods into our global sales entities.

Within each sales entity:

- We used our third-party 3PL warehousing partners to receive and store our products.
- We use local third-party national fulfilment partners and internal capabilities to deliver our products from warehouse to end consumer.

Our distribution spend occurred:

- 43% in the US
- 32% in AU
- 22% in the UK
- 2% in EU

3. Risks of Modern Slavery¹



In the year ending 30 June 2025:

3.1. Employment & Remuneration Standards

Our Employment & Remuneration Standards did not change materially and continue to evolve to ensure that we maintain transparent, open and equitable processes to safeguard the fair employment and remuneration of our people:

- All employees, both permanent and casual, are engaged with clear contracts and agreements in place outlining their conditions of work, job expectations, minimum entitlements and compensation.
- Our recruitment processes ensure we have full visibility over the attraction, selection and engagement of all employees across our global hubs. Our global People & Culture function includes regional-specific support specialists who are responsible for executing our global benefits and remuneration frameworks in line with local obligations.

¹ Icon represents risks as a hole in a process (apple)



- Our remuneration methodology ensures that each individual's compensation is driven by validated external benchmarks and calibrated against internal relativity to drive equitable outcomes.

3.2. Supply Chain

We assessed our risks and prioritised our activities using our human rights risk register. This allowed us to review our business activities and identify the presence of associated contextual risk against three pillars:

- **Geographies (geos):** Some countries have a higher prevalence of modern slavery, frequently associated with low government response to address modern slavery and its root causes, state-imposed forced labour programs and/or the presence of formal conflict.
- **Products, services & importation:** Certain products represent greater risk of vulnerable populations being exposed to exploitation. These risks extend to direct raw materials extraction and production up the chain to importation by end sales market.
- **Vulnerable populations:** Discrimination on the basis of gender, race, caste, and ethnicity drives vulnerability to modern slavery, in addition to societal disenfranchisement and poverty. These groups are more likely to be exploited.

3.3. Risk Assessment

We identified the risk of exposure to modern slavery within our supply chain to be low. We identified risk in the following areas and worked throughout the year to mitigate and understand the root causes. Our assessment relies on internal audit data (BSCI/FSC®) and external sources, including the Global Slavery Index to understand geographic and sector risks.

3.3.1. Geos

Our highest risk geos are China, Malaysia and United Arab Emirates (UAE); these geos continue to be our primary focus.

China – Domestic Risk	Risk Rating: High
Widespread internal migrant labour vulnerability, dispatch-labour overuse, excessive overtime, regional enforcement gaps, documented cases in multiple manufacturing sectors.	
Drivers of Risk	Modern Slavery Risk
Heavy internal migrant labour with excessive overtime, wage withholding, restricted movement	Forced labour, debt bondage (via recruitment fees or withheld wages), servitude / coercive conditions
Labour intermediaries and dispatch labour	Forced labour, deceptive recruitment, bonded labour / debt bondage, employer control over labour conditions
Overtime culture / peak-season overwork	Forced labour, exploitative labour conditions, likelihood of labour law breaches escalating to forced labour
Regional regulatory variability (weak oversight)	Increased likelihood of unremediated forced labour, supply chain opacity, heightened vulnerability in inland provinces



Sector-level documented high-risk sectors (light manufacturing, packaging, plastics recycling, electronics, garments, paper converting and tissue production, warehousing and e-commerce)	Sector-specific forced labour and labour exploitation risks, including dispatch labour, withheld wages, and excessive overtime
China – Imported Risk	Risk Rating: High
High-risk upstream sources (recycled fibre, plastics scrap, pulp, bamboo) coming from South Asia, Africa, and rural Asia with forced-labour, bonded-labour and trafficking indicators.	
Drivers of Risk	Modern Slavery Risk
Informal global recycling networks imported into China (plastics scrap, recycled fibre)	Forced labour, slavery-like practices, debt bondage, human trafficking in informal waste-picking networks
Imported pulp and virgin fibre from high-risk countries (Indonesia, Brazil, Thailand, etc.)	Forced labour, deceptive recruitment, servitude, labour exploitation in forest harvesting
Imported bamboo and natural fibre from rural Asia	Forced labour, child labour (in rural harvesting), debt bondage, deceptive recruitment
Imported chemicals, additives and intermediate goods (from South Asia, Africa, Middle East North Asia (MENA))	Forced labour risks in upstream manufacturing, trafficking in low-skilled industrial labour
Low Tier 3-4 traceability of upstream inputs	Exposure to hidden forced labour, slavery-like practices in informal supply chains
Malaysia – Domestic Risk	Risk Rating: Medium-High
Heavy migrant-labour dependence, recruitment debt, contract substitution, passport retention risks, coercive accommodation practices, uneven enforcement.	
Drivers of Risk	Modern Slavery Risk
Migrant labour dependence (Bangladesh, Nepal, Indonesia, Myanmar)	Forced labour, servitude, debt bondage (via recruitment fees), restricted movement (passport retention)
Labour brokers and contract substitution	Deceptive recruitment, forced labour, debt bondage, trafficking indicators
Excessive overtime, low wages, coercive shift patterns	Forced labour, exploitative labour conditions
Employer-controlled housing and document retention	Servitude, coercive dependency, slavery-like practices
Subcontracted tasks with weak oversight (cleaning, packing, sorting)	Forced labour, deceptive recruitment, trafficking (via undocumented migrant routes)
Malaysia – Imported Risk	Risk Rating: High
Recycled fibre, bamboo, plastics scrap, and pulp imported from high-risk regions (South Asia, Indonesia, Africa) with informal, unsafe, and untraceable supply chains.	
Drivers of Risk	Modern Slavery Risk
Imported recycled fibre / waste paper from high-risk regions (South Asia, South East (SE) Asia, MENA,	Forced labour, slavery-like practices, debt bondage in informal recycling systems



Africa)	
Imported bamboo and agricultural fibre	Forced labour, deceptive recruitment, child labour and bonded labour risks in rural harvesting
Imported pulp from Indonesia, Brazil and other high-risk regions	Forced labour, servitude in forestry crews, deceptive recruitment
Imported plastic scrap from informal global recycling economies	Slavery-like practices, debt bondage, forced labour, trafficking of undocumented workers
Upstream opacity and lack of Tier 3-4 traceability	Exposure to hidden forced labour, servitude, systemic exploitation in informal sectors
UAE – Domestic Risk	Risk Rating: High
Heavy reliance on migrant labour under kafala-like systems, recruitment fees, deceptive recruitment, employer control of housing, document retention, limited worker mobility.	
Drivers of Risk	Modern Slavery Risk
Heavy dependence on migrant labour (South Asia, East Africa, SE Asia) with risks of wage withholding and tied employment contracts	Forced labour, servitude, debt bondage (due to recruitment fees), slavery-like practices (employer control over movement)
Kafala-like conditions (employer sponsorship tying worker to employer)	Forced labour, servitude, slavery-like practices, human trafficking elements (restriction on job changes/movement)
Recruitment fees, contract substitution and deceptive job offers via labour brokers	Deceptive recruiting for labour or services, debt bondage, forced labour, trafficking for labour exploitation
Employer-controlled accommodation and passport retention	Servitude, forced labour, coercive control, slavery-like practices
Excessive overtime and low wage transparency in labour-intensive sectors	Forced labour, exploitative labour conditions
Sector-level documented high-risk industries (construction, logistics, cleaning, security, waste management, F&B, warehousing)	Sector-specific forced labour risks due to subcontracting chains, labour brokers, and migrant worker vulnerability
UAE – Imported Risk	Risk Rating: Medium-High
Upstream inputs (plastics scrap, fibre, paper, chemicals) come from high-risk global supply chains, but UAE plays a less central role as a processing hub than China or Malaysia.	
Drivers of Risk	Modern Slavery Risk
Imported recycled plastics, fibre, paper, and packaging materials from South Asia, SE Asia and Africa	Forced labour, slavery-like practices, debt bondage, trafficking in informal recycling economies
Imported bamboo, pulp and agricultural fibre from rural Asia	Forced labour, deceptive recruitment bonded labour child labour risk in harvesting
Imported chemicals and industrial inputs from high-risk manufacturing hubs	Forced labour, deceptive recruitment, trafficking indicators (movement of undocumented workers)
Dependence on global supply chains with limited Tier 3-4 transparency	Hidden forced labour risk, servitude, slavery-like practices in upstream processing



Upstream informal waste-picking, sorting and material collection	Forced labour, debt bondage, trafficking, deceptive recruiting for sorting/collection work
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Geo risk assessment:

- Although some of our sourcing countries, such as China, Malaysia and the UAE are recognised as having higher inherent risks of modern slavery, our assessment concludes that the residual risk to our business is low. This is due to the strength of our controls, including 100% Forest Stewardship Council® (FSC) certification across all tissue products and the maintenance of FSC Chain of Custody (COC) certification for every supplier involved in our fibre and tissue supply chain.
- FSC standards require independent third-party auditing against the core labour conventions of the International Labour Organisation (ILO), and these audits provide verified assurance that the supply chain meets labour conditions closely aligned with the requirements of modern slavery legislation in Australia, the United Kingdom and Canada.
- In addition, we have undertaken detailed mapping of our supply chain, implemented enhanced supplier sourcing standards, and established robust onboarding, training and compliance processes.
- These measures materially reduce the risks associated with geographical, sectoral and migrant-labour vulnerabilities, resulting in a low overall residual modern slavery risk for our tissue products.

3.3.2. Sectors, products & services

Our highest risks are as follows:

Tissue products (FSC certified)	Risk Rating: Low residual (High inherent)
Drivers of Risk	Modern Slavery Risk
Inherent risk in forestry, pulp and converting, migrant labour in China/Malaysia, high-risk Tier 2-4 if uncertified, but fully mitigated by FSC COC audits and transparency	Forced labour, servitude, debt bondage (if recruitment fees apply), deceptive recruiting (in upstream uncertified mills), human trafficking risks in non-certified supply chains
Timber / forest products	Risk Rating: Low residual (Medium–High inherent)
Drivers of Risk	Modern Slavery Risk
Elevated global risk in forestry and harvesting, subcontracting, seasonal rural labour, mitigated by FSC certification	Forced labour, slavery-like practices in forest harvesting, deceptive recruiting, debt bondage in rural labour, human trafficking in global timber flows
Palm oil & palm-derived chemical inputs	Risk Rating: Medium–High residual (High inherent)
Drivers of Risk	Modern Slavery Risk



Palm oil supply chains have well-documented risks, including land clearing by migrant or informal labour, recruitment through labour brokers, excessive working hours, passport retention, and exposure to forced labour in harvesting and mill operations. High-risk geographies include Indonesia and Malaysia. Long, opaque chains of smallholders and mills increase upstream vulnerability.	Forced labour, servitude, debt bondage (due to recruitment fees), deceptive recruiting, slavery-like practices, human trafficking in migrant worker recruitment
Recycled plastics (Portugal)	Risk Rating: Medium residual (Medium inherent)
Drivers of Risk	Modern Slavery Risk
Upstream informal waste-picking risk, migrant labour in sorting facilities, dependency on recycled feedstock, EU regulatory mitigations	Forced labour, slavery-like practices, debt bondage (informal recycling networks), deceptive recruiting, human trafficking in waste-picking chains
Packaging (cartons, wrappers)	Risk Rating: Medium residual (Medium inherent)
Drivers of Risk	Modern Slavery Risk
Paper converting often in Asia, migrant labour, long shifts, printing sector overtime patterns, upstream fibre risk	Forced labour, servitude through excessive overtime, deceptive recruiting, debt bondage in migrant labour supply
International freight, shipping & ports	Risk Rating: Medium residual (Medium inherent)
Drivers of Risk	Modern Slavery Risk
Documented modern slavery risk among seafarers, subcontracted port labour, opaque labour for vessel crews	Forced labour, servitude, slavery-like practices, human trafficking in maritime labour
Domestic warehousing & 3PL	Risk Rating: Medium residual (Medium inherent)
Drivers of Risk	Modern Slavery Risk
Labour hire, migrant workers, underpayment risks, multiple subcontracting layers	Forced labour, deceptive recruiting, debt bondage, human trafficking (undocumented labour routes)
Last-mile couriers	Risk Rating: Medium residual (Medium-High inherent)
Drivers of Risk	Modern Slavery Risk
Gig-based delivery, unrealistic KPIs, underpayment, weak protections for subcontractors	Forced labour (due to coercive KPIs), deceptive recruiting, servitude (dependence on unpaid hours)

Sectors, products & services risk assessment:

- We mitigate modern slavery risks across our products, sectors and services through a combination of rigorous certification, targeted due diligence, and supplier governance.
- Our tissue products are fully certified under the FSC system, supported by independent COC audits that verify compliance with core labour conventions of the ILO.
- For palm oil and palm-derived chemical input – an inherently high-risk category due to migrant labour, recruitment brokers, and complex smallholder supply chains – we sourced certified palm oil for use within 100% of relevant products. We partnered with a US



production specialist who helped us source 100% of our palm oil from two validated Roundtable on Sustainable Palm Oil (RSPO) certified sources, and we traced those sources back to the plantations.

- **Note:** We closed the Good Time brand in March 2025 and palm oil is no longer a product risk, however, for most of the year ending 30 June 2025, it remained a risk.
- For recycled plastics sourced in Portugal, we leverage EU regulatory protections, supplier onboarding and traceability checks to minimise upstream risks commonly associated with informal recycling networks.
- Packaging materials such as cartons and wrappers are procured from suppliers who are regularly audited alongside Tier 4, and meet our sourcing standards, including requirements for ethical production and labour transparency.
- Across all categories, our processes – comprising supplier screening, training, declarations, risk assessment and ongoing monitoring – operate collectively to reduce inherent geographic and sectoral risks and ensure responsible production and delivery of our products.

3.3.3. Vulnerable populations

Our highest risks are as follows:

Migrant workers	Low–Medium residual (High inherent)
Drivers of Risk	Modern Slavery Risk
Reliance on migrant labour in manufacturing, logistics and services, exposure to recruitment fees, contract substitution, document retention, language barriers and limited bargaining power.	Forced labour, servitude, debt bondage, deceptive recruiting, human trafficking
Women workers	Low–Medium residual (Medium–High inherent)
Drivers of Risk	Modern Slavery Risk
Concentration in lower-paid and lower-skilled roles, exposure to discrimination, unequal pay, harassment, limited access to grievance mechanisms and reduced job mobility.	Servitude, forced labour, deceptive recruiting, slavery-like practices
Young workers and students	Low residual (Medium inherent)
Drivers of Risk	Modern Slavery Risk
Risk of coercive internships or trainee placements, lack of informed consent, excessive overtime and weak protections in some manufacturing and packaging operations.	Forced labour, deceptive recruiting, servitude
Low-skilled and informal workers	Medium residual (High inherent)
Drivers of Risk	Modern Slavery Risk
Employment in informal or low-visibility operations such as recycling, forestry, palm oil harvesting and small workshops, weak legal protections and oversight.	Forced labour, slavery-like practices, debt bondage, human trafficking
Gig economy and subcontracted workers	Medium residual (Medium–High inherent)



Drivers of Risk	Modern Slavery Risk
Subcontracting and gig models in warehousing and last-mile delivery, economic coercion via KPIs, underpayment, unpaid waiting time and unstable income.	Forced labour, servitude, deceptive recruiting
Seafarers and maritime labour	Medium residual (Medium–High inherent)
Drivers of Risk	Modern Slavery Risk
Opaque recruitment, flag-of-convenience vessels, long periods at sea, limited worker voice and weak enforcement in international shipping.	Forced labour, servitude, slavery-like practices, human trafficking

Vulnerable populations risk assessment:

- We take active steps to mitigate the risks faced by vulnerable populations within our supply chain, including migrant workers, women, young workers, and low-skilled or informal labourers.
- Our strongest safeguard is the use of recognised third-party certification and independent auditing across our tissue products, including 100% FSC certification and COC audits that verify compliance with core labour conventions of the ILO. These requirements, together with our enhanced supplier onboarding, training and ethical sourcing standards, help ensure that workers – particularly those vulnerable to coercion, discrimination or economic pressure – are protected through verified labour practices, transparent recruitment pathways and clear worker rights.
- We conduct supply-chain mapping to identify where vulnerable groups may be present and apply heightened scrutiny in higher-risk categories such as palm oil, recycled plastics, packaging, logistics, warehousing and last-mile delivery.
- These measures collectively reduce the likelihood of forced labour, deceptive recruitment, debt bondage and gender-based exploitation, and ensure that vulnerable populations are afforded stronger protections throughout the lifecycle of our products and services.
- We have assessed our risk associated with vulnerable populations involved in the production of our raw materials as low in response to audit findings and the added oversight of FSC COC certification. We continue to prioritise this risk within our actions.

4. Our Actions Against Modern Slavery ²



4.1. Ongoing Compliance

4.1.1. Global mapping & auditing

- We continue to maintain a comprehensive vendor matrix at all tiers:

² Icon represents empowered* labour force

*Fair pay, decent work, strong voice.

Fair pay: Wages and benefits.

Decent work: Reasonable hours, safe conditions, and respectful treatment.

Strong voice: Ability to advocate for themselves and have a say in their working conditions.



- Tier 1: Finished goods, last mile delivery, warehouse and third party logistics (3PL)
- Tier 2: Packaging
- Tier 3: Raw material production
- Tier 4: Raw inputs, bamboo plantations and paper collectors
- We continue to audit all active suppliers within the production supply chain
- All suppliers are risk assessed against our key pillars
- A strategy for each supplier is determined at initial stages of engagement and refined throughout the life of the relationship. We require active social audits as a minimum standard to engagement and continue to adopt [BSCI](#) criteria as our standard for social audits in complement to FSC Core Labour Requirements independent audit program.
- Mapping and auditing of our supply chain enables us to a) Accurately assess the risk that we may be contributing to modern slavery practices through lack of transparency, and b) Identify specific risk factors and create action plans to reduce and mitigate those risks.

Traceability matrix

CATEGORY	TIER	COUNTRY OF ORIGIN	RISK	MAPPED 2025	AUDITED 2025
FINISHED GOODS	T1	CHINA	High	100%	100%
FINISHED GOODS	T1	PORTUGAL	Medium	100%	100%
FINISHED GOODS	T1	UK	Medium	100%	100%
FINISHED GOODS	T1	US	Medium	100%	100%
FINISHED GOODS	T1	SWEDEN	Low	100%	0%
LAST MILE	T1	AU	Medium	100%	0%
LAST MILE	T1	UK	Medium	100%	0%
LAST MILE	T1	US	Medium	100%	0%
WAREHOUSE 3PL	T1	AU	Medium	100%	0%
WAREHOUSE 3PL	T1	UK	Medium	100%	0%
WAREHOUSE 3PL	T1	US	Medium	100%	0%
PACKAGING	T2	CHINA	High	100%	100%
PACKAGING	T2	PORTUGAL	Medium	100%	100%
PACKAGING	T2	UK	Medium	100%	100%
PACKAGING	T2	US	Medium	100%	100%
PACKAGING	T2	SWEDEN	Low	100%	0%
RAW MAT PROD	T3	CHINA	High	100%	100%
RAW MAT PROD	T3	UAE	High	100%	100%
RAW MAT PROD	T3	PORTUGAL	Medium	100%	0%
RAW MAT PROD	T3	UK	Medium	100%	0%
RAW MAT PROD	T3	US	Medium	100%	0%



RAW MAT PROD	T3	SWEDEN	Low	100%	0%
RAW INPUTS	T4	CHINA	High	100%	100%
RAW INPUTS	T4	MALAYSIA -PALM OIL	High	100%	100%
RAW INPUTS	T4	GERMANY	Medium	100%	0%
RAW INPUTS	T4	PORTUGAL	Medium	100%	0%
RAW INPUTS	T4	UK	Medium	100%	100%
RAW INPUTS	T4	US	Medium	100%	100%
RAW INPUTS	T4	UAE	High	100%	100%

4.1.2. Contractual controls & supplier training

We continue to embed FSC Core Labour Requirements and updated [Social & Ethical Policy Suite](#) into all manufacturing vendor contracts, making adherence and compliance with our policies fully binding. The updated Social & Ethical Policy Suite now includes Grievance and Whistleblower policies, this change was communicated to all our existing suppliers.

We conduct training as required depending on the lifecycle of each supplier, in conjunction with monthly and quarterly scorecarding against performance indicators that include ethical performance and compliance. We award business in response to high performance.

Policy suite now includes:

- Modern Slavery Policy
- Migrant, Contract & Temporary Workers Policy
- Child Labour & Young Workers Policy
- Gender Equality Policy
- Safeguarding Vulnerable Persons Policy*
- Anti-Bribery & Corruption Policy
- Grievance Policy*
- Whistleblower Policy*
- Responsible Purchasing Policy

**new policies included in the Social & Ethical Policy Suite*

4.1.3. Improved results for 3rd party factory audits

We achieved improved BSCI audit scores from our China converters and a mother roll manufacturer. This improvement was an ongoing focus area for our China team and involved training, support, and leverage to help our factories raise their standards.

We are proud to share the progress in our key facilities:

- Conversion Factories: Achieved a Score B (up from C)
- Mother Roll Factory: Achieved a Score B (up from C)

Our specific focus areas were in improving management systems and increasing compliance with Decent Working Hours. We recognise their exceptional efforts this year!



4.2. FSC Chain of Custody Certification

We have FSC COC certification for all trading entities under our group umbrella, Good Goods Holdings Pty Ltd: (AU) Good Goods Pty Ltd, (UK) Who Gives A Crap Limited, (US) Who Gives A Crap Inc.

Our entire paper supply chain – from fibre source to warehouse – is FSC certified! All our tissue products, across all our markets, come straight from FSC-certified sources.

FSC certification promotes fair labour practices, including the right to freedom of association and collective bargaining, the prohibition of forced labor and child labour, and the provision of safe and healthy working conditions. These standards help to create a work environment where workers are treated with dignity and respect and are less vulnerable to exploitation.

The FSC standard mandates annual validation and independent audits of all members within the chain of custody, spanning from plantations and paper collectors to retailers. This comprehensive oversight enhances supply chain transparency and strengthens our vigilance against modern slavery risks. Our annual surveillance audits reinforce this commitment, requiring our supply chain team to refresh their training on ILO core labor conventions and collaborate with suppliers to complete and review annual FSC Core Labor Requirements Self-Assessments. This ongoing process underscores our dedication to due diligence and actively addressing modern slavery risks within our supply chain.

4.3. Carbon Reduction

We acknowledge that climate change causes inherent risk within our supply chains as a result of forced migration which exposes vulnerable populations to risk of forced labour and human trafficking. We took steps to reduce our carbon footprint in focused areas, thereby mitigating risk of climate change overall.

- Distribution
 - Zero emissions final mile delivery ~ 30t CO2e annually.
 - Increased use of renewable energy at existing warehouses ~ 350t CO2e annually.
 - Offsetting logistics emissions ~ 20,346t CO2e FY25.
- Manufacture
 - Local manufacture UK ~ 1,400t CO2e annually.
 - Increased use of renewable energy at existing manufacturers ~ 3,100t CO2e annually.
 - Improved sourcing guidelines to ensure carbon emissions are a consideration when choosing new suppliers.

4.4. UK Logistics Partners

Our primary carrier, handling 72% of our deliveries, partners with the [Slave-Free Alliance](#); they actively engage in combating modern slavery throughout their operations, including robust risk assessments, due diligence processes, and remediation strategies. demonstrating their commitment to ethical labour practices.



5. How We Did & What We'll Do

In the year ending 30 June 2025:

5.1. Assessment of the Effectiveness of our Actions

Good News: Zero Incidents Detected of modern slavery, forced labour, or child labour incidents within our operations or audited supply chains during the FY25 reporting period.

We measure the effectiveness of our actions against the following key performance indicators (KPIs):

1. Full supply chain mapping to Tier 4 for all tissue products
2. 100% completion of social compliance audits for high-risk manufacturing sites
3. Zero confirmed findings of modern slavery incidents

Our actions met or exceeded these KPIs in FY25, leading to the following assessment:

Overall, we consider our actions to be effective in materially reducing modern slavery risk, particularly within our core manufacturing and raw material supply chains, while recognising that continued improvement is required in service-based and downstream activities.

Our **contractual controls and supplier training framework** provide a strong foundation for risk mitigation. By embedding FSC Core Labour Requirements and our updated Social & Ethical Policy Suite into all manufacturing vendor contracts, compliance with modern slavery expectations is both explicit and enforceable. The expansion of the Policy Suite to include Grievance and Whistleblower policies significantly strengthens our ability to detect and respond to risks, particularly for vulnerable workers who may otherwise lack safe reporting channels. Communicating these updates to all existing suppliers ensures consistency of expectations across the supply base. The effectiveness of these controls is further reinforced through lifecycle-based supplier training, monthly and quarterly ethical performance scorecarding, and commercial incentives that reward strong ethical compliance. This integration of ethical performance into sourcing decisions has proven effective in driving supplier engagement and accountability.

Our **FSC COC certification** remains one of the most effective controls within our program. Maintaining FSC COC certification across all trading entities and ensuring that 100% of our paper supply chain – from fibre source to warehouse – is FSC certified provides independent, third-party assurance against forced labour, child labour and unsafe working conditions. The requirement for annual validation, surveillance audits and Core Labor Requirements Self-Assessments strengthens transparency across multiple tiers of the supply chain. These audits, combined with mandatory refresher training for our supply chain team on FSC certification requirements, create a robust, repeatable mechanism for identifying and addressing risks and have significantly reduced the likelihood of undetected modern slavery within our tissue and timber supply chains.

Our **carbon reduction initiatives** indirectly support modern slavery risk mitigation by addressing climate-related drivers of vulnerability, including forced migration and economic instability. Investments in low- and zero-emissions distribution, renewable energy usage, local manufacturing and improved sourcing guidelines reduce reliance on high-risk global supply chains and contribute to greater supply chain resilience. While these measures do not directly eliminate labour



exploitation, they meaningfully reduce structural risk factors that can increase exposure to forced labour and human trafficking.

In **logistics and services**, we have strengthened risk mitigation through partnerships with suppliers demonstrating leadership in ethical labour practices. Our primary UK logistics partner's engagement with the Slave-Free Alliance provides additional assurance that risks within this high-risk sector are being actively identified and addressed through formal risk assessments, due diligence and remediation processes. This approach enhances our confidence in service-provider controls, although we recognise that logistics, warehousing and last-mile delivery remain areas requiring ongoing monitoring.

We have also improved effectiveness through **increased oversight of raw materials**, including enhanced certification requirements and direct on-site visibility at bamboo plantations, which reduces upstream opacity and improves confidence in labour practices at origin.

Finally, our **education and policy evolution initiatives** are critical to long-term effectiveness. Incorporating modern slavery training into onboarding for Supply Chain roles, expanding training to People & Culture, Finance & Risk and Legal teams, and strengthening procurement capability to identify red flags ensures that modern slavery risk management is embedded across the organisation rather than isolated within procurement. The planned finalisation and rollout of supplier grievance mechanisms, including tracking and annual reporting of grievances, will further strengthen worker voice and improve our ability to measure the real-world effectiveness of our controls over time.

In summary, our actions – particularly FSC certification, contractual enforcement, supplier training, and governance integration – are highly effective in mitigating modern slavery risk within our core product supply chains. While inherent risks remain in certain services and global logistics, our current controls meaningfully reduce residual risk, and our planned enhancements will further strengthen detection, accountability and continuous improvement.

5.2. Next Steps

We accept that our actions this year have not eliminated all risk and have taken steps to address residual risk in the coming year. Our priorities for FY26 include:

- **Deepening risk-based supplier due diligence:** We will further refine our risk-based approach to due diligence by applying enhanced scrutiny to higher-risk products, services and geos, including recycled materials, logistics and labour-intensive services. This will involve improving Tier 2-3 visibility where possible, refreshing geo and sector risk assessments, and tailoring due diligence activities to reflect changing risk profiles across the supply chain.
- **Finalising and operationalising supplier grievance mechanisms:** We will finalise the implementation of our supplier grievance and whistleblower mechanisms to ensure workers have safe, accessible and confidential channels to raise concerns. This will include clear procedures, supplier guidance and expectations around non-retaliation, as well as internal processes for reviewing, escalating and remediating grievances. We will track and report on grievances annually and incorporate learnings into future risk assessments and supplier engagement.



- **Strengthening oversight of service providers:** Recognising that service-based supply chains present elevated risks, we will strengthen oversight of logistics, warehousing, labour hire and last-mile delivery providers. This will include reviewing contractual requirements, assessing subcontracting and labour-hire arrangements, and seeking additional assurance from higher-risk service providers through self-assessments or third-party due diligence where appropriate.
- **Enhancing supplier engagement and collaboration:** We will continue to engage suppliers as partners in improving labour standards by sharing guidance on ethical recruitment, worker protections and grievance mechanisms. Where issues are identified, our focus will remain on remediation and continuous improvement rather than disengagement, supporting suppliers to address root causes and strengthen their own management systems.
- **Integrating climate and social risk more explicitly:** We will further integrate climate considerations into our modern slavery risk assessment, recognising that climate-related disruption can increase vulnerability to forced labour and human trafficking. This includes continuing to consider emissions and resilience in sourcing decisions and identifying areas where climate impacts may heighten labour risk within our supply chains.

6. Version Control

This policy statement is subject to change as laws and regulations evolve. We will periodically review and update the policy to ensure it's aligned with best practices and legal requirements.

Signed:

Simon Griffiths

Simon Griffiths, CEO, *December 2025*