



GODFREYS GROUP PTY LTD
MODERN SLAVERY STATEMENT

1 JULY 2022 - 30 JUNE 2023



INTRODUCTION

STATEMENT FROM CEO

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAINS

CRITERIA 3:
RISKS OF MODERN SLAVERY

CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD

BOARD APPROVAL

WHO WE ARE

Godfreys was founded in 1931 and now operates through retail, commercial and wholesale channels. The retail network contains 168 stores that comprise standalone “superstores”, shopping centres and retail shopping strips providing customers with a convenient way to purchase their cleaning products. Godfreys also sells its products through commercial and wholesale channels.

Godfreys endeavours to be Australia and New Zealand’s go to experts for tailored cleaning know how. We are known for offering a wide range of cleaning solutions including vacuum cleaners, steam mops, carpet shampoos and hard floor cleaners from many quality brands. Through our product range and friendly expert advice we aim to delight our customers.

INTRODUCTION

Godfreys Group Pty Ltd (“**Godfreys**”) has prepared this statement to meet reporting requirements under the *Modern Slavery Act 2018* (Cth). This is our fourth modern slavery statement. We are proud to outline our progress as we continue to develop and improve our modern slavery compliance framework. We recognise the importance of a continuous improvement approach as we endeavour to learn and seek opportunities to enhance our framework.

During this reporting period, we have focused on reviewing our mitigation of risk procedures. The planned amendments resulting from this review are to be formally implemented in FY24.

We are committed to upholding and prioritising a culture of corporate compliance and ethical behaviour to limit the risk of modern slavery occurring in our operations, supply chains or through our business relationships.

We are proud of the progress we are making, with this modern slavery statement highlighting the risks of modern slavery in our operations and supply chains and the actions we are taking to address those risks.



INTRODUCTION

STATEMENT FROM CEO

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAINS

CRITERIA 3:
RISKS OF MODERN SLAVERY

CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD

BOARD APPROVAL



John Morris, CEO

Godfreys continues to prioritise its modern slavery framework. Mitigating the risk of modern slavery in our supply chains and operations is a critical priority of our business. Accordingly, continuing to mature our existing processes and procedures has been the focus of this reporting period to ensure our risk mitigation strategies are effective and robust. With this we build upon the strong foundations that we have established and report on the progress we have made in what is our fourth modern slavery statement.

Continuous improvement is a commitment and key focus for us as we look forward to progressing our modern slavery compliance framework in the coming years and working with our suppliers, employees and other key stakeholders to ensure that this is an effective and collaborative effort.



INTRODUCTION

STATEMENT FROM CEO

**CRITERIA 1:
REPORTING ENTITY**

CRITERIA 2:
OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAINS

CRITERIA 3:
RISKS OF MODERN SLAVERY

CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD

BOARD APPROVAL

REPORTING ENTITY

The reporting entity is Godfreys Group Pty Ltd ABN 35 602 722 985 (“**Godfreys**”) on behalf of the Godfreys Group.

The Godfreys head office is located at:
Brandon Business Park, Building 3, Level 1, 530-540 Springvale Road
Glen Waverly, Victoria 3150

Website: <http://www.godfreys.com.au/>



INTRODUCTION

STATEMENT FROM CEO

CRITERIA 1:
REPORTING ENTITY

**CRITERIA 2:
OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAINS**

CRITERIA 3:
RISKS OF MODERN SLAVERY

CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD

BOARD APPROVAL

OUR STRUCTURE

Godfreys is a private company that is headquartered in Victoria, Australia and is the head company of the Godfreys Group.

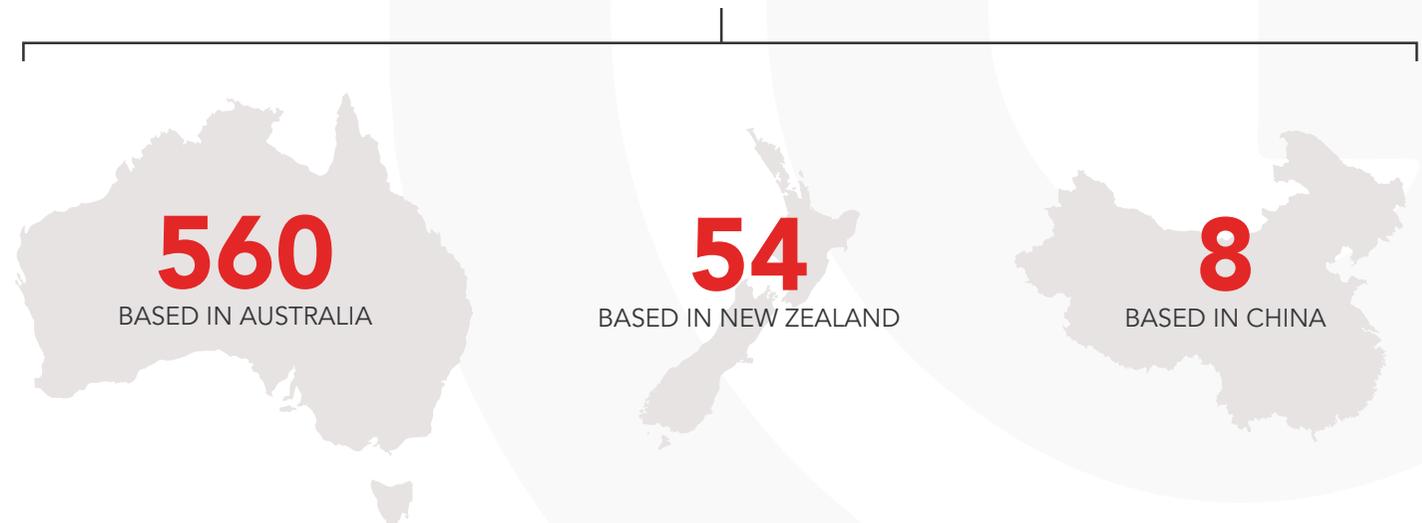
All entities within the Godfreys Group are wholly owned and controlled by a common board and executive leadership and a common suite of policies and procedures. Accordingly, all entities within the Godfreys Group are governed by the same governance framework.

One of the key entities within the Godfreys Group is Electrical Home-Aids Pty Ltd ACN 007 539 577 ("**Electrical Home-Aids**"). Electrical Home-Aids is the operating entity and is the franchisor to all franchisee arrangements within Australia. There are other entities within the Godfreys Group which do not have operational relevance for the purposes of this statement.

There are two entities within the Godfreys Group that are based overseas:

- New Zealand Vacuum Cleaner Co Ltd (Company Number 1075877) – Operating entity located in New Zealand
- Electrical Home-Aids (Suzhou) Ltd (registration number 320594400034162) – buying office located in China

GODFREYS EMPLOYEES AROUND **622 FULL TIME EQUIVALENT EMPLOYEES** ACROSS AUSTRALIA, NEW ZEALAND AND CHINA:



INTRODUCTION

STATEMENT FROM CEO

CRITERIA 1:
REPORTING ENTITY

**CRITERIA 2:
OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAINS**

CRITERIA 3:
RISKS OF MODERN SLAVERY

CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD

BOARD APPROVAL

OUR OPERATIONS

Godfreys sells domestic and commercial floorcare and cleaning products across Australia and New Zealand. Throughout Australia and New Zealand, Godfreys has a mix of company owned stores and franchised stores with offices in Australia and a designated buying office in China. Godfreys has an online presence in both Australia and New Zealand.

Our retail stores (both company owned and franchised stores) are spread across Australia and New Zealand as follows:



INTRODUCTION

STATEMENT FROM CEO

CRITERIA 1:
REPORTING ENTITY

**CRITERIA 2:
OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAINS**

CRITERIA 3:
RISKS OF MODERN SLAVERY

CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

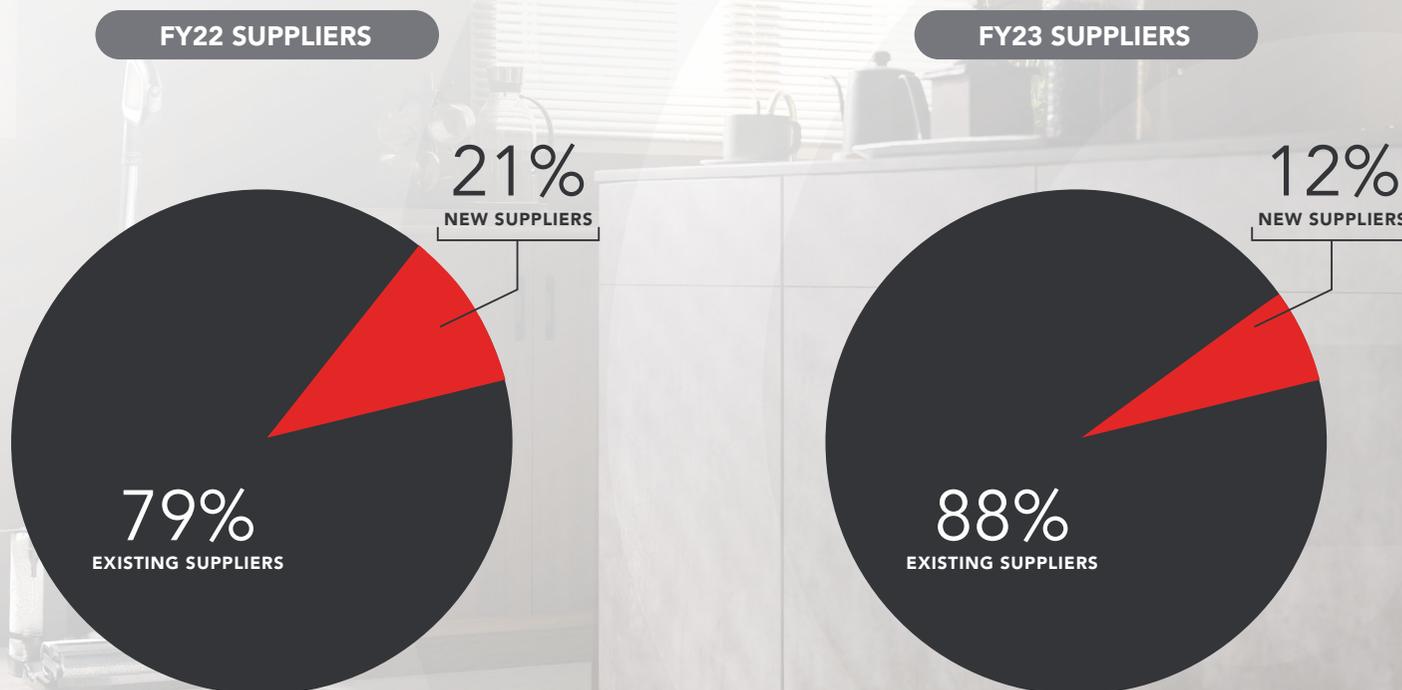
CRITERIA 7:
LOOKING FORWARD

BOARD APPROVAL

OUR SUPPLIERS AND SUPPLY CHAINS

We place priority on maintaining strong, long-term relationships with our suppliers. This allows us to maintain transparency with our suppliers and meet the expectations of our customers and other key stakeholders.

The breakdown of our long term and new suppliers¹ between FY22 and FY23 is as follows:



There has been a 9% increase in long-term suppliers between FY22 and FY23. This has been driven by a reduction of new suppliers engaged this year (135 last reporting period to 60 this year). The relatively high proportion of existing suppliers in both years shows our continued efforts to foster long-term relationships.

¹New suppliers" are suppliers who are captured for the first time in this Statement (i.e., suppliers who have been first engaged by Godfreys in FY23). "Long-term" suppliers are suppliers that have been captured under previous Modern Slavery Statements (i.e., have been engaged by Godfreys in previous reporting periods).



INTRODUCTION

STATEMENT FROM CEO

CRITERIA 1:
REPORTING ENTITY

**CRITERIA 2:
OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAINS**

CRITERIA 3:
RISKS OF MODERN SLAVERY

CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD

BOARD APPROVAL

OUR SUPPLIERS AND SUPPLY CHAINS

Vacuum cleaners and other products that we sell are made up of numerous components and parts, resulting in complex supply chains. During this reporting period, we engaged with a total of 510 suppliers.

Our supply chains can be categorised as follows:



RETAIL

This includes our lessors, fit-out providers, furnishing providers, cleaning services and uniform sourcing.



DISTRIBUTION

Freight services (national and international), software and the maintenance and design of our online store.



REPAIR

This covers our repair services and capabilities which are primarily based in Australia and occasionally in China. We source repair tools, spare parts, and PPE to undertake these repair services.



PRODUCTS

Our inventory and stock including vacuum cleaner components, cleaning products, packaging, assembly, software, electrical components, and PPE.

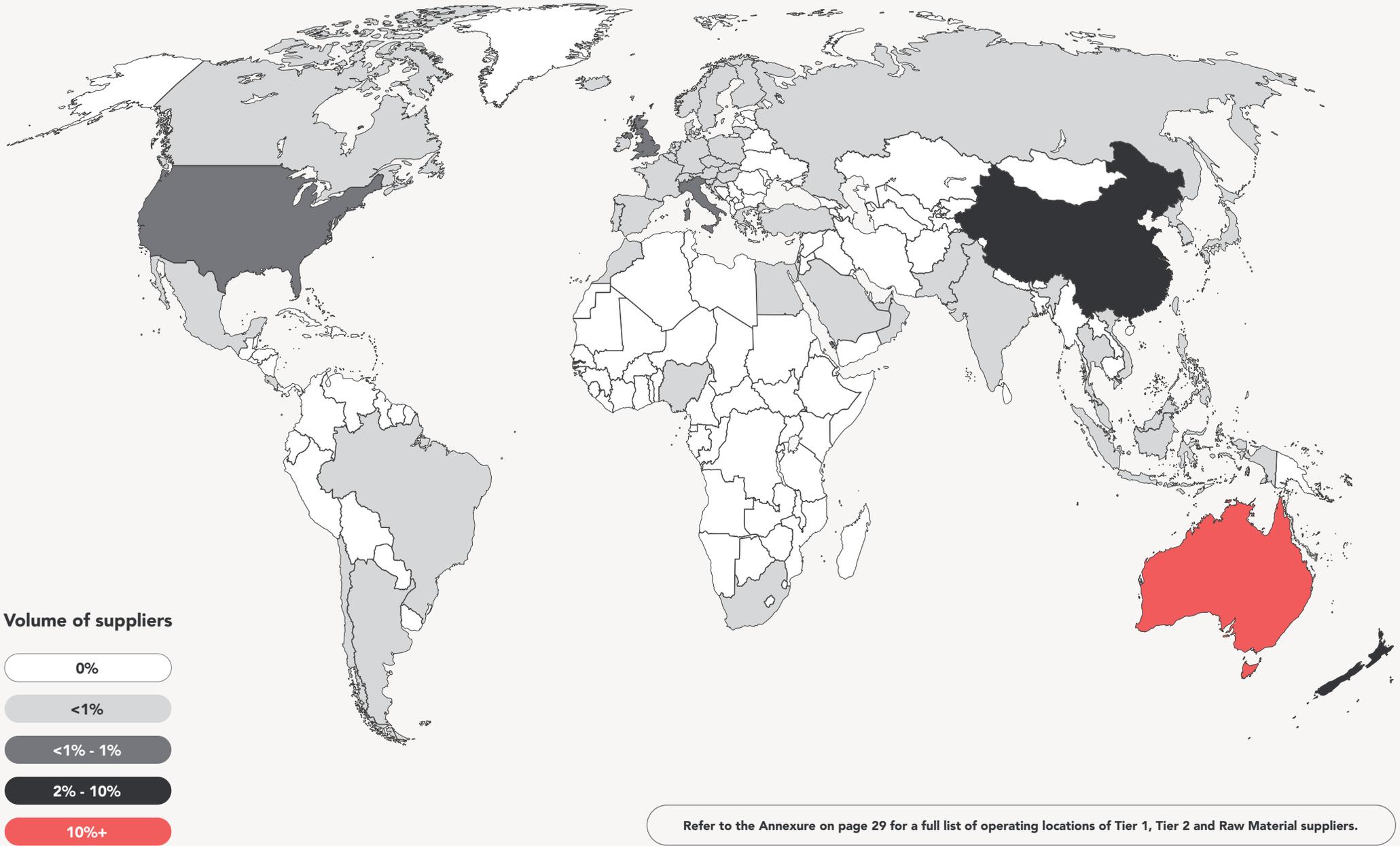


BUSINESS ADMINISTRATION AND FRANCHISEE MANAGEMENT

The procurement of legal advice, insurance, underwriting agencies, IT service providers, occupational health, and safety (OH&S) auditors and other professional services.

SUPPLY CHAIN BY VOLUME

Our supply chains are diverse and are located across the globe. 86% of our suppliers are located locally in Australia, 8% of suppliers are located in New Zealand and 6% of suppliers are overseas.



Refer to the Annexure on page 29 for a full list of operating locations of Tier 1, Tier 2 and Raw Material suppliers.

INTRODUCTION

STATEMENT FROM CEO

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAINS

**CRITERIA 3:
RISKS OF MODERN SLAVERY**

CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD

BOARD APPROVAL

Risks of Modern Slavery

Modern slavery is a complex, worldwide issue that permeates all entities, countries, and supply chains. The latest Walk Free Foundation statistics have shown that there are likely to be 41,000 cases of modern slavery in Australia.² This shows that modern slavery is prevalent even in Australia.

Godfreys operates as both a retailer and a wholesale provider in the electronics industry. The electronics industry generally is a notoriously high-risk industry for modern slavery. For example, the raw materials used in the manufacturing of electronics creates finished products that can carry heightened modern slavery risks. Examples of raw materials carrying heightened modern slavery risks are cotton, polysilicon, rubber, and cobalt.

The Xinjiang Uyghur Autonomous Region (“**Xinjiang**”) in China has been under scrutiny with allegations that the Chinese government has and is continuing to expand the use of forced labour camps for Uyghur’s and other minority groups. Polysilicon, a key component of certain electronics products, has been identified as one of the high-risk raw materials from this region.

In response, the United States introduced the *Uyghur Forced Labour Protection Act* (“**UFLPA**”) which imposes a presumption that any goods from or directly linked to Xinjiang have been made with modern slavery. These goods can be detained at the border and refused entry into the United States until the importer disproves the presumption that the relevant goods were made with modern slavery (which is a

² Walk Free Foundation Global Slavery Index 2023.

high evidentiary bar to meet). Godfreys has taken steps in this reporting period to investigate potential linkages to Xinjiang such as, for example, undertaking site audits of key high-risk suppliers.

The risks of modern slavery practices in our supply chains are fluid and ever-changing. The foundation of our risk identification processes is the UN Guiding Principles and the “cause, contribute to and directly linked to” framework. This allows us to identify the modern slavery risks to Godfreys that we either cause, contribute to or are directly linked to.

!!! CAUSE

Example: Operations may directly result in modern slavery practices (for example, forced labour being used in its stores or head office).

!! CONTRIBUTE TO

Example: Imposing impossible lead times on a supplier resulting in significant overtime and the use of child labour to meet demands.

! DIRECTLY LINKED TO

Example: Engaging with a supplier who is later found to be employing children in their factory which produces vacuum cleaners for Godfreys.

INTRODUCTION

STATEMENT FROM CEO

CRITERIA 1: REPORTING ENTITY

CRITERIA 2: OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

CRITERIA 3: RISKS OF MODERN SLAVERY

CRITERIA 4: ACTIONS GODFREYS HAS TAKEN

CRITERIA 5: MEASURING EFFECTIVENESS

CRITERIA 6: CONSULTATION

CRITERIA 7: LOOKING FORWARD

BOARD APPROVAL

Alongside this, we have developed a risk matrix which considers geographical factors, product and services factors, sector and industry factor and entity factors to assess modern slavery risk in our multi-factorial approach to assessing modern slavery risk.

For example, if a supplier was found to have been subject to sanctions for linkages to the Russian Government, this would pose a variety of environmental, social & governance (ESG) risks to Godfreys. Another example is if a supplier was found to have a factory based in Xinjiang, China which would pose direct modern slavery risks to Godfreys. As explained above, engaging a supplier from the Xinjiang province carries heightened modern slavery risks due to the regions linkages to forced labour. For the avoidance of doubt, the above examples are purely examples and showcase how the risk matrix assists Godfreys in assessing their suppliers across various ESG factors.

OPERATIONAL RISKS

As outlined above, Godfreys primarily operates within Australia with international operations in New Zealand and China. Because of our strong governance, values and policy mechanisms, Godfreys continues to maintain a low risk of modern slavery within its operations.

From a policy perspective, our Code of Conduct and Modern Slavery Policy outline our expectations of our employees and suppliers. Our Whistleblower Policy and our Employee Assistance Program provide employees and other relevant stakeholders with grievance mechanisms to ensure that any grievance is dealt with through the most appropriate mechanism.

³Estimated proportion of population living in modern slavery per thousand people.

⁴Vulnerability to modern slavery out of 100. A higher score reflects greater vulnerability.

Employees and stakeholders can use these mechanisms to report any concerns or grievances, including any concerns of modern slavery or modern slavery risk factors.

Furthermore, across all our operations (both in Australia and internationally), we ensure that we:

- pay our employees in accordance with local legal requirements;
- operate and maintain our facilities in accordance with OH&S and WH&S laws; and
- provide our employees with appropriate grievance mechanisms and resources.

Whilst we are confident that we continue to maintain a low risk of modern slavery in our company owned operations, Godfreys is aware of the differing modern slavery risks in our operations depending on the location of our operations. This is particularly relevant for our China operations as China has a much higher prevalence and vulnerability to modern slavery than Australia and New Zealand.

WALK FREE FOUNDATION GLOBAL SLAVERY INDEX 2023 SCORING

	AUSTRALIA	CHINA	NEW ZEALAND
PREVALENCE ³	1.6	4	1.6
VULNERABILITY ⁴	7	46	8

INTRODUCTION

STATEMENT FROM CEO

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAINS

CRITERIA 3: RISKS OF MODERN SLAVERY

CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD

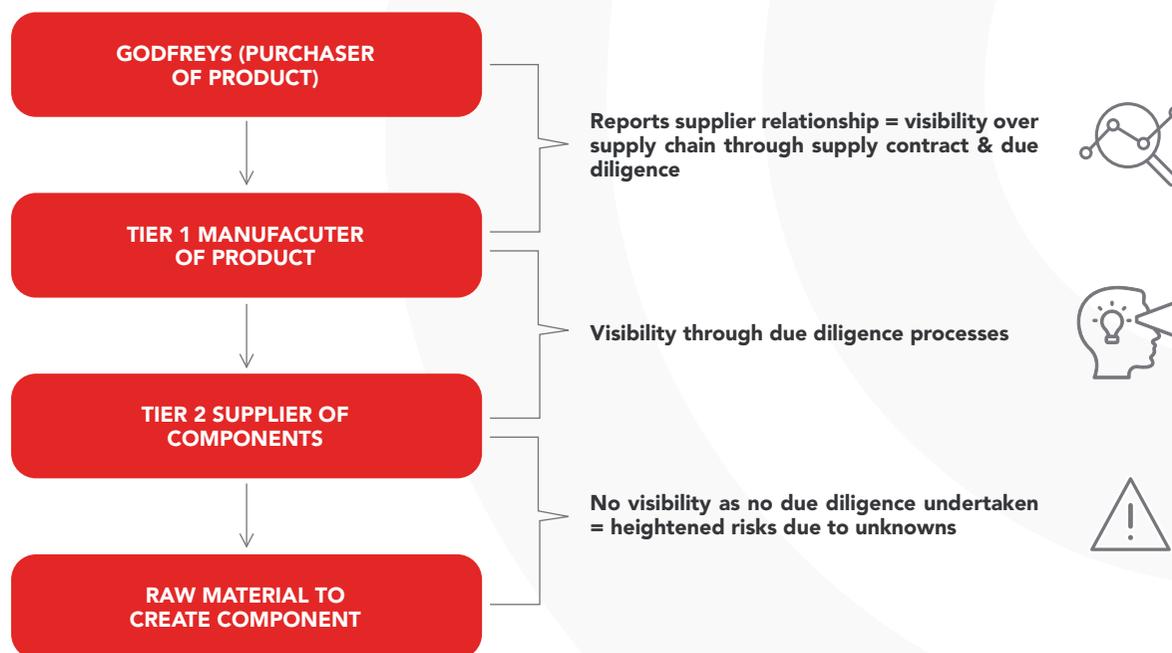
BOARD APPROVAL

Godfreys monitors its internal operations closely, particularly its operations in China which are more susceptible to modern slavery by nature of its location. Furthermore, as outlined above, as a business in the electronics sector, Godfreys' operations are inherently heightened for modern slavery risk. In saying this, Godfreys are confident that because of our strong governance, values, and policy mechanisms that all company owned operations maintain a low risk of modern slavery.

SUPPLY CHAIN RISKS

As described in Criteria 2, our supply chains are varied and complex, with certain supply chains using raw materials and other components which carry higher modern slavery risks.

These risks are likely to be present deeper in the supply chains (i.e., Tier 2 and beyond level). For example, as outlined in the below example diagram, the modern slavery risks here lie in the raw material supplier as no due diligence has been undertaken on this supplier. Therefore, obtaining transparency over supply chains and delving into the deeper tiers of supply chains is critical to assessing our overall risk profile for modern slavery.



INTRODUCTION

STATEMENT FROM CEO

CRITERIA 1: REPORTING ENTITY

CRITERIA 2: OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

CRITERIA 3: RISKS OF MODERN SLAVERY

CRITERIA 4: ACTIONS GODFREYS HAS TAKEN

CRITERIA 5: MEASURING EFFECTIVENESS

CRITERIA 6: CONSULTATION

CRITERIA 7: LOOKING FORWARD

BOARD APPROVAL

In addition to the heightened risks of modern slavery deeper within our supply chains, Godfreys is aware that certain suppliers and supply chains carry heightened risks due to their specific industry in which they operate. We continue to focus on the heightened modern slavery risks associated with electronics products, cleaning products, apparel, waste management and other raw material suppliers.

Using the “cause, contribute to and directly linked to” method from the UN Guiding Principles on Business and Human Rights, an analysis of the risks associated with these supplier categories is outlined below:

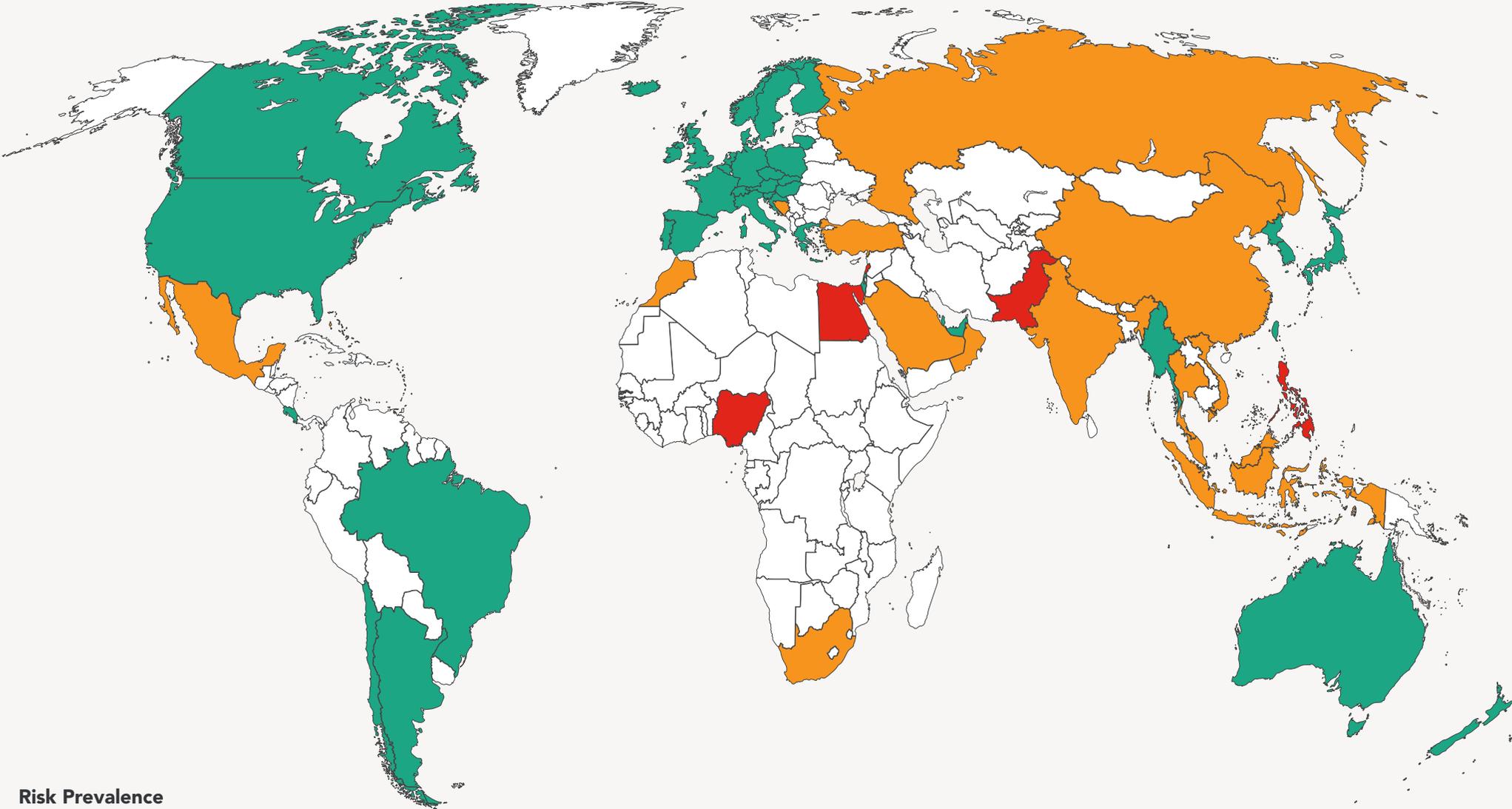
CATEGORY OF RISK		APPLICABILITY OF RISK
CAUSE	Modern slavery that the organisation causes via its activities and / or omissions	<i>Based on our processes and procedures, we consider that this category of risk does not apply.</i>
CONTRIBUTE TO	An organisation’s activities that facilitate, enable or incentive harm to workers.	<i>Based on our processes and procedures, we consider that this category of risk does not apply.⁵</i>
DIRECTLY LINKED TO	An organisation being linked to harm via its products, services or business relationships (for example, suppliers).	<i>We have assessed that the following supplier categories carry heightened risks for being directly linked to harm:</i> <ul style="list-style-type: none">- Electronic products- Cleaning products- Cleaning- Apparel- Waste management and recycling

Deepening our due diligence is key to us gaining visibility over our supply chain risks. During this reporting period, Godfreys has taken additional steps to address the heightened modern slavery risks deeper in its supply chains which are described further in Criteria 4 below.

Based on our assessment above, our main supply chain risks are the risks that Godfreys would be directly linked to modern slavery. To address these risks, Godfreys continues to progress its due diligence and risk analysis to gain visibility over its supply chains and address any new risks as and when they arise.

⁵ Any risk of Godfreys “contributing to” modern slavery is an inadvertent risk. “Contributing to” modern slavery usually arises in a situation where, for example, time pressures are placed on suppliers which results in employment conditions amounting to modern slavery. Godfreys monitors this risk closely and considers, for example, lead times placed on orders.

SUPPLY CHAIN BY RISK



Risk Prevalence

- LOW RISK
- MODERATE RISK
- HIGH RISK

Refer to the Annexure on page 29 for a full list of operating locations of Tier 1, Tier 2 and Raw Material suppliers.



INTRODUCTION

STATEMENT FROM CEO

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAINS

CRITERIA 3:
RISKS OF MODERN SLAVERY

**CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN**

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD

BOARD APPROVAL

Actions Godfreys has taken

The focus of this reporting period has been on improving our mitigation of risk strategies by reviewing current processes and systems and planning and developing initiatives for implementation in FY24.

The steps that we have undertaken in this reporting period will mature our modern slavery compliance framework to enable us to gain further visibility and transparency over our supply chains.

Our modern slavery compliance framework is entrenched within our organisation and these new initiatives will continue to build on progress made in previous reporting periods.

SYSTEMS AND GUIDANCE

THIRD PARTY ASSISTANCE AND MODERN SLAVERY PORTAL

In this reporting period, we have continued to engage our third-party legal consultants to provide us with ongoing assistance and guidance with the development and maintenance of our modern slavery compliance framework. This includes assisting us in developing an action plan for each reporting period which sets out our goals for the relevant reporting period with the aim of continuously developing and improving our modern slavery compliance framework.

Our third-party legal consultants provide us with our modern slavery portal ("**MS Portal**") which we use to undertake due diligence and communicate with our suppliers. Our MS Portal implements and automates our procurement and due diligence framework.

Through the MS Portal, suppliers are automatically assessed against the risk matrix and scored using a traffic light system (green = low risk, yellow = moderate risk, red = high risk). This is consolidated with scores from screenings, supplier questionnaires and audits which the MS Portal automatically scores based on the responses recorded.

The MS portal also allows us to communicate directly with our suppliers and have visibility over when a supplier has opened correspondence or begun an action item (for example, began responding to a supplier questionnaire). We are also able to produce reports from the MS Portal which contains data analytics which assist us in monitoring our supply chains and our overall supply chain risk management. The results of our due diligence are outlined below.

INTEGRATION WITH CONTRACTOR AND SUPPLIER MANAGEMENT PLATFORM

In this reporting period, we have begun planning the integration of aspects of the MS Portal with a new contract and supplier management platform. The contractor and supplier management platform can provide us with alerts when contracts are up for renewal and will be a database for the maintenance of supplier and contractor details on the one electronic system. Modern slavery considerations have been incorporated into the planning and development of the new contractor and supplier management platform to allow for further visibility and monitoring over our suppliers.

INTRODUCTION

STATEMENT FROM CEO

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAINS

CRITERIA 3:
RISKS OF MODERN SLAVERY

**CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN**

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD

BOARD APPROVAL

GOVERNANCE AND OVERSIGHT

EXECUTIVE OVERSIGHT

Our Modern Slavery Committee continues to be in control of our modern slavery compliance framework. Our Modern Slavery Committee has members from our procurement, finance, and executive teams.

Having representation on the Modern Slavery Committee from a wide range of members within Godfreys means that employees in multiple teams and levels have buy in and engagement with our modern slavery compliance framework. This ensures that our strategies and action items are influenced by a wide range of individuals who are involved with suppliers in various forms.

Our Modern Slavery Committee reports up to our Board and CEO who have general oversight over our modern slavery compliance framework.

AMENDMENTS TO MODERN SLAVERY POLICY

An action item for this reporting period was to prepare amendments to our Modern Slavery Policy to better reflect the maturing of our modern slavery compliance framework.

For example, we amended the “due diligence” section of the Modern Slavery Policy to better reflect our due diligence thresholds and our remediation processes. The new Modern Slavery Policy will also implement our new prospective procurement and due diligence workflow which is discussed below.

The Modern Slavery Policy will be considered by the Board and formally implemented in FY24.

DUE DILIGENCE

NEW SUPPLIERS

All new suppliers are subject to due diligence as part of their onboarding process as a supplier. When a supplier is onboarded, we undertake a risk assessment against our risk matrix which assesses our supplier risk against risk factors such as location and industry.

After the risk assessment, due diligence is undertaken in accordance with our due diligence framework, which is outlined in the below diagram:

INTRODUCTION

STATEMENT FROM CEO

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAINS

CRITERIA 3:
RISKS OF MODERN SLAVERY

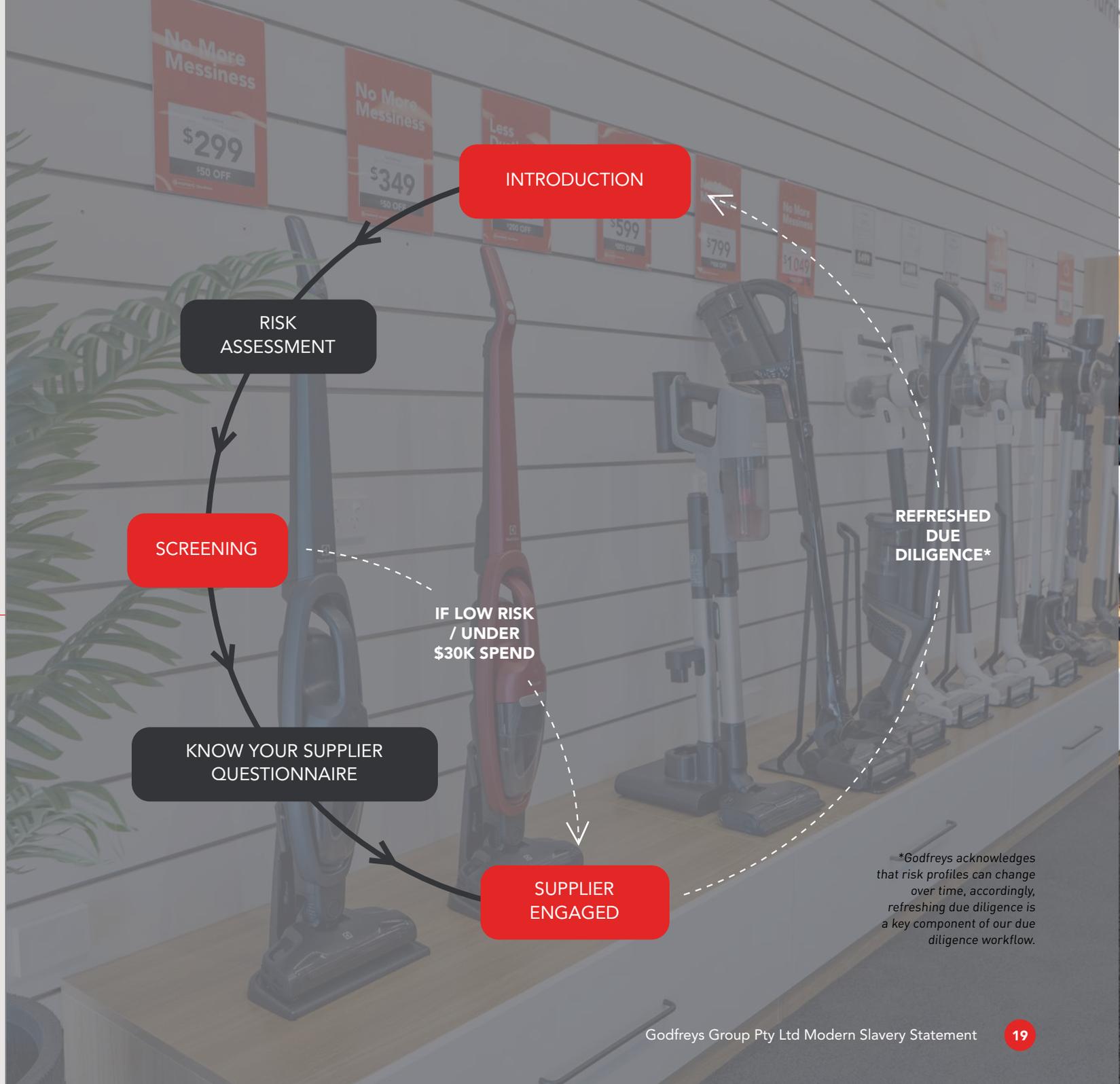
**CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN**

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD

BOARD APPROVAL



**Godfreys acknowledges that risk profiles can change over time, accordingly, refreshing due diligence is a key component of our due diligence workflow.*

INTRODUCTION

STATEMENT FROM CEO

CRITERIA 1: REPORTING ENTITY

CRITERIA 2: OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

CRITERIA 3: RISKS OF MODERN SLAVERY

CRITERIA 4: ACTIONS GODFREYS HAS TAKEN

CRITERIA 5: MEASURING EFFECTIVENESS

CRITERIA 6: CONSULTATION

CRITERIA 7: LOOKING FORWARD

BOARD APPROVAL

EXISTING SUPPLIERS

Our existing suppliers undertake annual due diligence in accordance with our ongoing due diligence approach.

Each reporting period, our suppliers are re-assessed against our risk matrix and are re-screened to ensure that Godfreys is aware of any changes in a suppliers' risk profile. Where any changes occur in the risk profile of the supplier (for example, a supplier is now graded as a high-risk supplier), further due diligence may occur such as the issuance of a supplier questionnaire to a site audit being undertaken. Godfreys takes a risk-based approach in this respect.

RESULTS OF DUE DILIGENCE

In this reporting period, we undertook:

- 510 risk assessments;
- 510 screenings;
- issued 34 questionnaires; and
- undertook 7 site audits.

In this reporting period, a key focus was on our audit program. We chose 7 of our high-risk suppliers and ordered independent audits on these suppliers.

From the audit results in this reporting period, no explicit instances of modern slavery were identified. However, the most common non-compliances identified were:

- Significant overtime hours being worked by employees.
- Record keeping inconsistencies for attendance records and wage records.
- Inadequate storage of chemicals.

Whilst these non-compliances are not specific instances of modern slavery, they are risk factors which may allude to broader modern slavery practices being evident in the supplier. Godfreys takes these non-compliances seriously and

requires suppliers to remediate serious non-compliances and provide evidence of the remediation.

MODERN SLAVERY TRAINING

In this reporting period, we refreshed our modern slavery training for all executives and key staff involved in supplier onboarding and management.

Within this training, our staff were trained on:

- The definition of modern slavery, the different types of slavery and servitude that come within this definition (i.e., debt bondage, child labour) and why action against modern slavery matters.
- Godfreys' obligations as a reporting entity under the Act.
- How the Act operates, including the reporting requirements and the continuous improvement approach that is built into the Act.
- The proposed amendments to the Act.
- High risk industries for modern slavery and contributors to modern slavery.
- The linkages between procurement and modern slavery and the importance of due diligence.
- Practical scenario questions and examples of supply chain tracing.

This training was important to ensure that all of executives and staff involved in supplier onboarding and management were trained on modern slavery and aware of why Godfreys is focusing on supplier due diligence. This was particularly timely with the proposed changes to the Act being released only weeks before this training took place.

INTRODUCTION

STATEMENT FROM CEO

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAINS

CRITERIA 3:
RISKS OF MODERN SLAVERY

**CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN**

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD

BOARD APPROVAL

Case Study

We undertook an audit on a supplier in FY22 and identified various serious non-compliances. Some examples of the non-compliances include:

- Working hours could not be identified and verified due to inconsistencies between production records and attendance records.
- Minimum wages could not be verified due to lack of documentation.
- Emergency exits were blocked amongst other work health and safety issues.

The supplier was not responsive to our correspondence asking whether they had remediated these non-compliances. In response to this, we had initially organised a limited scope audit to be undertaken which was limited to ascertaining whether the non-compliance had been remediated.

However, the supplier later made us aware that they had moved factories. Due to the significance of the non-compliances identified above, the high-risk nature of the supplier and the lack of response from the supplier as to whether the non-compliances had been remediated, Godfrey's decided that a full audit be undertaken at the new factory site.

The new site audit indicated that adequate PPE and WHS procedures were being followed, meaning that the third critical non-compliance had been remediated. Furthermore, upon a review of their payroll system, the audit indicated that minimum wage was being paid to all employees and overtime rates were being paid, indicating that the second non-compliance had also been remediated.

However, there were still inconsistencies between production and attendance records, meaning that overtime could not be identified. In FY24, we will continue to communicate with this supplier to ensure that these remaining critical non-compliances have been remediated.

INTRODUCTION

STATEMENT FROM CEO

CRITERIA 1: REPORTING ENTITY

CRITERIA 2: OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

CRITERIA 3: RISKS OF MODERN SLAVERY

CRITERIA 4: ACTIONS GODFREYS HAS TAKEN

CRITERIA 5: MEASURING EFFECTIVENESS

CRITERIA 6: CONSULTATION

CRITERIA 7: LOOKING FORWARD

BOARD APPROVAL

The aim is for a training module to be implemented in the next reporting period so that relevant employees are refreshed on this training each year. This is vital so that employees are aware of any legislative changes that occur or if any changes occur in Godfreys' modern slavery compliance framework.

SUPPLY CHAIN TRACING PROJECTS

TIER 2 SUPPLY CHAIN TRACING PROJECTS

In addition to focusing on supplier audits in this reporting period, Godfreys has turned its mind to assessing its modern slavery risks deeper within its supply chains. In this reporting period, we have prepared a list of suppliers that we intend to progress Tier 2 supply chain tracing projects on in FY24. We took a risk-based approach with selecting these suppliers and chose suppliers based on their modern slavery risk profile.

The supply chain tracing projects will involve issuing questionnaires to the selected Tier 1 suppliers and asking them to provide us with information about the suppliers that they engage to provide products and services to Godfreys. Once we receive the details of those suppliers (our Tier 2 suppliers), we will undertake due diligence on these Tier 2 suppliers and have visibility over our Tier 2 modern slavery risks.

US SUPPLIERS

As part of planning our Tier 2 supply chain tracing projects for FY24, we have begun planning specific supply chain tracing projects for certain products which are imported into the US.

In 2022, the US implemented the UFLPA which places a presumption on goods imported into the US from or that are directly linked to Xinjiang are made with modern slavery, with the onus on the importer to disprove this presumption.

The presumption of modern slavery carries a very high evidentiary burden, meaning that importers into the US need to be able to trace down their supply chains to raw material level to disprove this presumption.

Accordingly, it is important that Godfreys undertakes steps to attain visibility over these supply chains.

TRANSITION TO PROSPECTIVE DUE DILIGENCE

As outlined in Criteria 7 of our FY22 Modern Slavery Statement, Godfreys is shifting to a prospective due diligence approach on all new suppliers to ensure that all new suppliers are assessed for their modern slavery risks prior to their formal engagement.

We have made significant advancements in the planning phase of our new prospective due diligence workflow in this reporting period, for example, by investigating how we integrate prospective due diligence into the MS Portal and our new contract management platform.

As part of our in-person modern slavery training provided to our employees in June 2023 (as further described above), our third-party legal consultants outlined the importance of prospective due diligence as an effective risk mitigation tool. Prospective due diligence is a key part of risk mitigation. By undertaking due diligence on suppliers prior to them being formally engaged, this allows us to assess their risk prior to Godfreys being "directly linked to" the supplier. We can then make an informed decision about the supplier based on their risk assessment.

When life gives you messiness **Godfreys** gives you cleanliness



Display area for various vacuum cleaners, including stick vacuums and canister vacuums, arranged on shelves and in a central display unit.

tineco
The intelligent cleaning experience

Price tags: \$999, \$999, \$1,099

Display unit for Tineco cordless stick vacuums.



Electrolux | BOYAKS | robotdick

Electrolux

Display unit for an Electrolux upright vacuum cleaner.

Display area for various cleaning products, including bottles of spray cleaners and other household items.



INTRODUCTION

STATEMENT FROM CEO

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAINS

CRITERIA 3:
RISKS OF MODERN SLAVERY

CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN

**CRITERIA 5:
MEASURING
EFFECTIVENESS**

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD

BOARD APPROVAL

Measuring Effectiveness

Within this reporting period, we have made significant progress on increasing Godfreys' risk mitigation approach to its modern slavery compliance framework by taking steps to implement a prospective due diligence approach. The gradual move to prospective due diligence has arisen out of reviewing how we can improve and mature our modern slavery compliance framework to mitigate risks prior to engaging with the supplier.

Additionally, we have undertaken site audits on high-risk suppliers and have planned for supply chain tracing projects to take effect in FY24. Both site audits and supply chain tracing projects are forms of risk mitigation as it allows us to have visibility over modern slavery risks that we would otherwise be able to identify through screenings and other desktop forms of due diligence.

In this reporting period, there have been additional challenges imposed on our business because of key personnel changes. As a result of this, we have focused on training staff on modern slavery risks to ensure that all key staff involved in the onboarding of new suppliers and ongoing engagement of existing suppliers are aware of what modern slavery is, the risks that it poses to Godfreys and what Godfreys is doing as part of its modern slavery compliance framework (including the prospective due diligence approach).

In doing so, as set out as our goal for FY23 in the FY22 Modern Slavery Statement, we have continued to acknowledge that improving the development and maturity of our modern slavery compliance framework is a priority. We are looking at these key personnel changes as an opportunity to re-enliven

our modern slavery compliance framework through our new employees.

We will continue this risk mitigation approach in FY24 by progressing other action items as outlined in Criteria 7 below.

A key aspect of our "assessing effectiveness" approach this year was to have monthly meetings with our third party legal consultants where we review progress on our action items for the reporting period and discuss our responses to supply chain issues or risks as they arise. These meetings will continue to occur in FY24. To further improve our approach to assessing effectiveness, we will be engaging our third-party legal consultants to undertake a benchmarking exercise which will assess our modern slavery compliance framework against industry competitors and those in a similar revenue threshold based on set benchmarking criteria. This will assist us in developing action items for following reporting periods to continue to improve and develop our modern slavery compliance framework.



INTRODUCTION

STATEMENT FROM CEO

CRITERIA 1: REPORTING ENTITY

CRITERIA 2: OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

CRITERIA 3: RISKS OF MODERN SLAVERY

CRITERIA 4: ACTIONS GODFREYS HAS TAKEN

CRITERIA 5: MEASURING EFFECTIVENESS

CRITERIA 6: CONSULTATION

CRITERIA 7: LOOKING FORWARD

BOARD APPROVAL

Consultation

Godfreys (as the head company) governs and controls the Godfreys group. As Godfreys has overarching governance and control of all subsidiaries within the Godfreys group, this Statement has been made as a group-wide response to the requirements of the Act.

Throughout the process of drafting this Statement and in the progress of developing our modern slavery compliance framework throughout the reporting period, we have engaged with key staff, including managers, procurement, people and culture and leadership. As these teams operate across the entire Godfreys Group, there was extensive consultation across all entities within the Godfreys Group.

Additionally, a portion of those individuals are part of the Modern Slavery Committee who meet monthly to discuss and progress matters relating to Godfreys' modern slavery compliance framework. This means that risk assessment, due diligence and the development of Godfreys' modern slavery compliance framework is applied across the entire Godfreys Group. Overseeing this entire process is the Executive Team and the Board (who has general oversight over this process).

Our external legal consultants support this internal consultation process and assist us in developing our modern slavery compliance framework in each reporting period and be up to date with legislative changes. This has been particularly vital with the proposed changes to the Act being released in May this year. We meet with our external legal consultants monthly.

Accordingly, consultation across the Godfreys for the development of this Statement and for the ongoing efforts in progressing the Godfreys' modern slavery compliance framework was comprehensive and robust.

INTRODUCTION

STATEMENT FROM CEO

CRITERIA 1: REPORTING ENTITY

CRITERIA 2: OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

CRITERIA 3: RISKS OF MODERN SLAVERY

CRITERIA 4: ACTIONS GODFREYS HAS TAKEN

CRITERIA 5: MEASURING EFFECTIVENESS

CRITERIA 6: CONSULTATION

CRITERIA 7: LOOKING FORWARD

BOARD APPROVAL

Looking Forward

In this reporting period, Godfreys has continued to progress and develop its modern slavery compliance framework, building on the progress made in the last 3 reporting periods.

This reporting period has largely been focused on risk mitigation through the development of a prospective due diligence workflow, extensive site auditing of high-risk suppliers and the planning of supply chain tracing projects in FY24. The focus on risk mitigation will continue into FY24. We intend to make progress in the following areas:

- 1. Undertaking supply chain tracing projects on suppliers chosen in FY23.**
- 2. Practical implementation of prospective due diligence workflow stemming from workflow development and planning efforts in FY23.**
- 3. Implementation of annual modern slavery training module for key employees.**
- 4. Amend our modern slavery policy in light of implementation of prospective due diligence workflow.**
- 5. Undertake industry benchmarking to develop action items for FY25 onwards.**

As indicated throughout this Statement, Godfreys is aware that the proposed amendments to the Act were released on 25 May 2023. In consultation with our third-party legal consultants, we are keeping an eye on the proposed amendments as they are tabled for review in Parliament and implemented into a bill to formally amend the Act.

We are also aware of the proposed New Zealand Modern Slavery legislation that is currently in consultation as at November 2023 when this Statement was drafted. We will monitor this closely to ascertain our dual reporting obligations between Australia and New Zealand.



THANK YOU



INTRODUCTION

STATEMENT FROM CEO

CRITERIA 1:
REPORTING ENTITY

CRITERIA 2:
OUR STRUCTURE, OPERATIONS
AND SUPPLY CHAINS

CRITERIA 3:
RISKS OF MODERN SLAVERY

CRITERIA 4:
ACTIONS GODFREYS
HAS TAKEN

CRITERIA 5:
MEASURING
EFFECTIVENESS

CRITERIA 6:
CONSULTATION

CRITERIA 7:
LOOKING FORWARD

BOARD APPROVAL

Board Approval

This modern slavery statement is for the reporting period of 1 July 2022 to 30 June 2023 and has been approved by the Godfreys Board.



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Signed by
Grant Hancock
DIRECTOR

Date:

Annexure

SUPPLIER BY VOLUME

10% +

AUSTRALIA

<1% - 1%

ITALY
UNITED KINGDOM
UNITED STATES

<1%

2% - 10%

CHINA
NEW ZEALAND

- ANTIGUA AND BARBUDA
- ARGENTINA
- AUSTRIA
- BAHAMAS
- BAHRAIN
- BELGIUM
- BOZANIA AND HERZEGOVINA
- BRAZIL
- BRUNEI DARUSSALAM
- CANADA
- CHILE
- CROATIA
- CZECHIA
- DENMARK
- EGYPT
- FIJI
- FINLAND
- FRANCE
- GERMANY
- GREECE
- HONG KONG
- HUNGARY
- ICELAND
- INDIA
- INDONESIA
- IRELAND
- ISRAEL
- JAPAN
- KOREA, REPUBLIC OF
- LEBANON
- LITHUANIA
- MALAYSIA
- NETHERLANDS
- NIGERIA
- NORWAY
- OMAN
- PAKISTAN
- PHILIPPINES
- POLAND
- PORTUGAL
- QATAR
- RUSSIA
- SAUDI ARABIA
- SINGAPORE
- SLOVAKIA
- SLOVENIA
- SOUTH AFRICA
- SPAIN
- SWEDEN
- SWITZERLAND
- TAIWAN
- THAILAND
- TURKEY
- UNITED ARAB EMIRATES
- VIETNAM

RISK ANALYSIS

- LOW RISK
- MODERATE RISK
- HIGH RISK