Modern Slavery Statement 2023

# MY STORE

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### Contents

#### **About this Statement**

Myer Holdings Limited (ABN 14 119 085 602) is listed on the Australian Stock Exchange (ASX: MYR), registered at Level 7, 1000 La Trobe Street Docklands Victoria 3008. This modern slavery statement (statement) is made under the Commonwealth Modern Slavery Act 2018 (Cth) and covers all entities within Myer Holdings Limited including Myer Pty Limited, sass & bide Pty Limited and Marcs David Lawrence Pty Limited for the period 31 July 2022 to 29 July 2023 (the reporting period or FY23).

References to "Myer, we, our or us" in this Statement refers to Myer Holdings Limited.

Any forward looking statements are based on current knowledge and assumptions that may exist and affect the Myer business and its operations in the future. Myer does not give any assurances that the assumptions will prove to be correct as these statements may be affected by a range of variables which may alter the actual results, performance or achievements to be materially different from the relevant statements. Readers are cautioned not to place undue reliance on forward-looking statements. Except as required by applicable laws and regulations, Myer does not undertake to publicly update, review or revise any of the forward looking statements or to advise of any change in assumptions on which any statement is based. Forward looking statements do not represent guarantees or predictions of future performance and equally past performance cannot be relied on as a guide to future performance

#### Acknowledgement of Country

In the spirit of reconciliation, Myer acknowledges the Traditional Custodians of country throughout Australia and their connections to land, sea, and community. We pay our respects to their Elders past and present and extend that respect to all Aboriginals and Torres Strait Islander people.

## About Myer

Myer is an iconic Australian brand synonymous with style, fashion and community engagement spanning over 100 years. Our values inform the behaviours and decisions of our team members and the way we do business. They underpin our unwavering commitment to ethical and socially responsible business practices that considers the impact to people and communities in our operations and supply chain.

Myer operates department stores across Australia under Myer Pty Ltd, and also owns well known Australian fashion labels, Sass & Bide Pty Ltd and Marcs David Lawrence Pty Ltd. Collectively, we offer a diverse range of merchandise across womenswear, menswear, childrenswear, beauty homewares, electrical goods, toys and general merchandise.

Myer is committed to continuous progress to ensure we conduct our business in an ethical, social, and sustainable manner throughout out our operations and supply chain. This commitment extends to identifying, assessing, and addressing modern slavery risks. This is our fourth modern slavery statement, and we are proud to have continued to make progress on our commitment.

We have a longstanding history of fostering ongoing relationships with suppliers to ensure that we work together to address the challenges associated with safeguarding human rights. We are committed to supporting the rights and wellbeing of workers throughout our operations and supply chain and promoting awareness of modern slavery risks.

Throughout the year, we continued to develop our key areas of focus, which are increasing transparency, stakeholder engagement and engaging in meaningful collaborative efforts. We have updated and published a full listing of all our direct suppliers, which is available on the sustainability page of myer.com.au. We have improved our traceability by continuing tracing efforts beyond final production factories, achieving partial visibility of our inputs and processing facilities.

During the year, Myer continued its focus on strengthening its ethical sourcing program, alongside a continued emphasis on improving and implementing mitigation processes for identified modern slavery risks. The complexity of supply chains remains a key obstacle of our objective to improve traceability and map beyond our final production suppliers, to component manufacturers, processing facilities and raw material suppliers.

We continued to provide bespoke ethical sourcing training to our high risk team members to build capability and understanding of our ethical souring policy and modern slavery risks and completed our wage gap analysis to understand the disparity between wages paid and living wages. Our next step is to commence discussions with our suppliers to work towards closing the gap.

This statement has been prepared to meet the requirements of the Modern Slavery Act 2018 (Cth) and reflects the continued modern slavery due diligence efforts conducted on a group level, across Myer Pty Ltd and our subsidiaries, Sass & Bide Pty Ltd and Marcs David Lawrence Pty Ltd.

This statement was reviewed and approved by the Myer Holdings Limited board on 25 January 2024.



### Message from CEO



Our vision is to continue to build trust and shareholder value through strengthened partnerships with our suppliers aimed at driving positive change in improving the working conditions and promoting the human rights of workers in our operations and supply chain.

This is our fourth modern slavery statement, and we continue to make progress. We are pleased to have continued to deliver on our commitment to improve our business practices to ensure that we remain ethical, sustainable, and socially responsible in the way we work.

Our commitment to respect human rights and freedoms of every individual has remained constant. The respect for human rights remains our key focus and priority in delivering a sustainable and socially responsible business.

#### Priorities include

- Reviewing the effectiveness of our grievance mechanisms in line with the United National Guiding Principles on Business and Human Rights (UNGPs)
- Conducting a deep dive into potential modern slavery and broader human rights risks in our cotton supply chain
- Expanding our modern slavery training program to our suppliers and high risk sectors
- Wage gap analysis to understand disparity in wages paid
- Exploring opportunities to deepen our engagement with our suppliers through capacity building and other outreach

Our ethical sourcing program continues to mature and develop, with continued focus on program governance in monitoring and ensuring remediation of high risk audit findings. A review of buying practices was completed to ensure that it aligns and supports our commitment to source responsibly.

We continue to conduct third party audits of our private label merchandise factories. Through these audits, we ensure that fair wages, safe working conditions, and appropriate labour practices are maintained. Building on our existing program, we have focused on improved transparency and continue to work on a number of initiatives to strengthen the business in the areas of sustainability, living wages, equal opportunity, and worker empowerment. A dedicated sustainability page outlining our efforts and our private brand factory listing outlining the name, location, type of goods produced and the number of workers that assist us in manufacturing of Myer owned brands has been published. We have conducted an analysis to understand the wage gap between current worker wages and a living wage for where we manufacture with the view to work with our suppliers to assist them towards paying a living wage.

Myer believes that the issue of modern slavery is complex and pervasiveness and requires a collaborative approach. We will continue to work with our valued suppliers and industry peers and non-government agencies to address the challenges associated with safeguarding human rights.

Despite our progress, we know there is still a lot of work to be done. We will continue to take steps to improve, monitor our approach, encourage transparency, and build on team member knowledge to address risks of modern slavery.

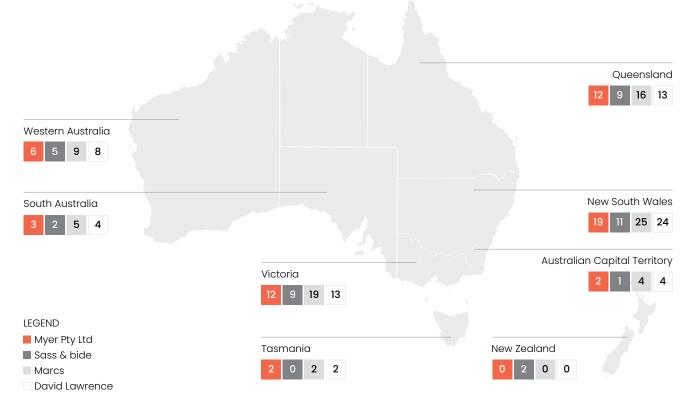
John King Chief Executive Officer and Managing Director

# Our business and supply chain

Myer recognises that social sustainability is important to our customers, shareholders, suppliers and team members. We continue to progress our sustainability strategy taking into account business activities and impacts as well as stakeholder concerns and interests.

Myer recognises its obligation to uphold global human rights standards, ethical business practices, and worker safety. Our sustainability strategy focusses on positive change and addressing the impacts, concerns, and interests resulting from our business activities.

Our retail store network comprises of 56 Myer department stores, 39 sass & bide stores<sup>1</sup>, 80 Marcs<sup>1</sup> and 68 David Lawrence stores<sup>2</sup> primarily across Australia, excluding the Northern Territory. Sass & bide has retail stores located overseas in New Zealand. Each brand also operates its own ecommerce platform. Our retail network is supported by our Support Office team located in Docklands, Victoria. We have a small sourcing office in Hong Kong that employs 49 employees across locations in China, Hong Kong and a small number in India and Bangladesh for quality control and assurance activities.



Our approach to modern slavery is company wide, with cross departmental accountability for the implementation and embedding of ethical business practices and initiatives. At the core of our modern slavery risk management is our commitment to ethical business conduct and prioritising practices that continue to uphold worker safety and rights. Our process encompasses the continuous identification and assessment of risks, measures to address identified risks and a transparent disclosure of actions taken. Internal training capacity building for team members in buying and procurement is fundamental to the identification and management of potential presence of modern slavery and related risks. We have adopted responsible sourcing principles which address risks identified and implemented procedures and monitoring to ensure compliance. Due diligence and remediation plans and procedures to address and manage issues of modern slavery have been developed.

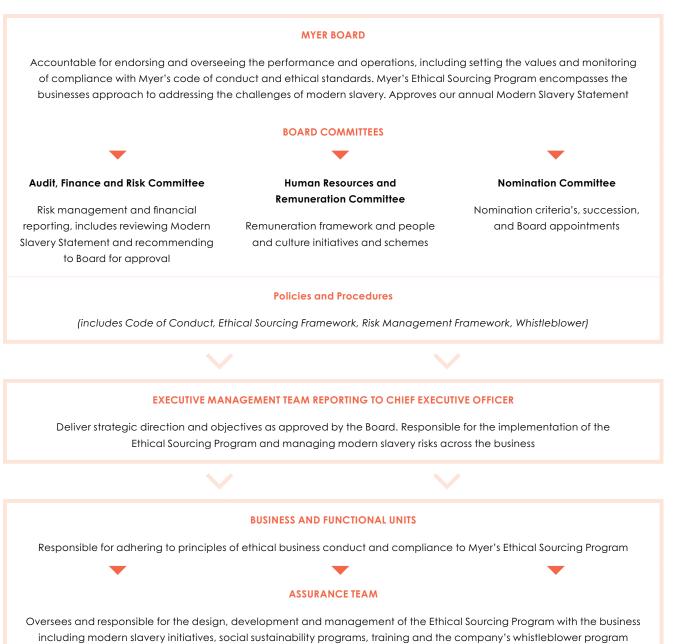
2 in department store formats

#### Governance

A governance structure is in place to oversee the management of business risks including modern slavery risks. The Myer code of conduct defines the expectations of all team members including company executives. The code requires awareness of, and compliance with, laws and regulations relevant to Myer's operations, including occupational health and safety and employment practices. Myer's Ethical Sourcing Program sets out the minimum standards for responsible and sustainable business practices. All team members, suppliers and business partners must adhere and uphold principles of accountability and ethical business conduct, as set out in our Ethical Sourcing Policy.

The Myer Board is accountable for and approves the Myer Ethical Sourcing Policy and framework, and through the Audit, Finance and Risk Committee of the Board, reviews and monitors effectiveness of ethical sourcing risk processes, activities, and initiatives. The Myer Board is also responsible for the activities undertaken to identify, assess, and address modern slavery risks, including our reporting obligations under the Modern Slavery Act.

Myer's governance framework is underpinned by various policies and procedures. The Chief Executive Officer together with the Executive Management team are directly responsible tor for the execution of the policies and procedures in their area of responsibility. The Assurance team, reporting to the Chief Financial Officer, is responsible for the development, implementation, and management of the broader Ethical Sourcing Program, including modern slavery initiatives and sharing information of modern slavery and broader human rights knowledge across our operations and supply chain.



#### **Policies**

Myer has a suite of policies and procedures that support its Ethical Sourcing Program to effectively manage modern slavery and broader human rights risks which team members, suppliers and business partners must adhere. Myer is dedicated to adhering to the laws and regulations of the countries where our business is present. Our policies strictly prohibit activities related to modern slavery, and focusses on not only the risks to the business but also preventing and addressing risks to workers and respect for a safe working condition for all.

#### Key policies that support our Ethical Sourcing Program

#### POLICY, CONTROL DOCUMENT OR MECHANISM DESCRIPTION

Code of Business Conduct	Outlines the standards of behaviour and ethical conduct expected of team members
Ethical Sourcing Policy	Principles and framework for the supply of goods and services to the business, and the need to implement processes that acknowledge and respect worker rights
Whistleblower Policy	Mechanism for the confidential reporting of unethical or illegal business conduct such as modern slavery and the process and management of contacts received
Risk Management Policy	Statement of the management of risks, including social sustainability risks
Discrimination & Equal Opportunity Policy	Guidance on responsibilities and expectations of workplace behaviours
D&EO Complaints and Grievance Procedure	Outlines the process for resolution of workplace behaviour concerns or issues
Supplier Code of Conduct	Sets the minimum expectations of suppliers and factories in ensuring compliance with our Ethical Sourcing Policy, health and safety, labour rights
Child and Forced Labour Remediation Policy	Process for the management and remediation of identified child or forced labour

#### Our supply chain

Our supply chain network is extensive, interconnected, and complex with a global supplier network. We do not own or operate any factories that goods are manufactured, and as such we partner with suppliers that share our values towards modern slavery and the need to protect workers and improve transparency of operations. Our sourcing of products and services encompasses multiple suppliers and tiers of the supply chain. We have direct relationships with suppliers that provide final goods for sale for which have a stringent assessment process for onboarding and continued relationships, however these suppliers will generally source services and materials from sub suppliers or secondary suppliers such as inputs and processing facilities such as ginning and spinning mills, raw material suppliers such as cotton farms etc. We continue to collaborate with our direct suppliers to obtain transparency of their supplier network to ensure our ethical sourcing requirements are being met and to identify possible risk areas and exposures.

Our supply chain can be categorised as merchandise (goods for resale) and non-merchandise (non-trade). We source an extensive range of goods for resale, including goods for suppliers who manufacture for Myer private brands as well as goods manufactured for National and Brand Partner suppliers who operate separate proprietary entities with a trademark not owned by Myer.

SUPPLIER TYPE	DESCRIPTION	
Private brand supplier (direct supplier)	Myer owned brands manufactured under a Myer owned trademark	
National Brand supplier	Third party branded suppliers with local and/or international proprietary rights for resale by Myer where trademark is not owned by Myer	
Brand Partner supplier	Third party licensed suppliers selling branded product owned by the licensed business, operating a store- in-store business within Myer stores	
Non-Merchandise suppliers	Goods and services not for resale to customers, engaged to support our operations such as packaging materials, stationery, transportation, marketing, visual merchandise equipment, security, cleaning and professional services	

Whilst we do not own or control National Brand and Brand Partner suppliers, they are contractually obligated to follow Myer protocol including modern slavery and may be required to report under Modern Slavery Legislation. To increase our visibility of our supply chain, reviews of the management processes of key suppliers both merchandise and non-merchandise through their Modern Slavery Statement is undertaken to assist in identifying possible areas of risks that may have not been recognised and actions taken by the supplier to manage identified risks.



### Risks in our operations and supply chain

Modern slavery is a severe violation of human rights and describes situations where coercion, threats or deception are used to exploit victims and undermine their right to freedom. Modern slavey takes many forms and includes slavery by 'ownership' and offences such as forced labour, child labour, servitude, debt bondage, deceptive recruitment, forced begging, and human trafficking.

Myer's modern slavery program utilises a risk based and cross-departmental model. Our operations and supply chains are complex and having visibility over the working conditions beyond our direct suppliers continues to be a challenge. Consequently, we recognise that there is a potential exposure to human rights risks. To better understand our risk, we continue to monitor our risk profile through a combination of ongoing assessments including third party audits and advice, supplier questionnaire, grievances raised, industry trends, media reports and collaboration with our suppliers. Our buying, ethical sourcing and procurement teams work closely to monitor new and existing suppliers to ensure any risk exposures are managed.

Ongoing risk assessments allow us to better understand areas of focus and priorities. These assessments consider a number of indicators and the relevant changes both internally and externally, accounting for the nature of the relationship with the supplier and its network, the type and spend of goods or services, the geographic location, the level of human rights protection and vulnerability, and the ongoing monitoring of reputable media reports. They review not only possible modern slavery risks but also general human rights issues and assess the adequacy of controls. In the reporting period, we did not have instances of modern slavery reported within our operations or supply chain.

#### **Identified risks**

Our risk assessment identified four key potential slavery types that may exist in our operations and supply chain, and are areas of focus.

- Forced labour where a person is forced or coerced to work against their will and restricted in movement under threat or punishment and for no or very little pay. There is a risk that forced labour could exist in our extended supply chain in inputs production such as fabric mills, and raw materials
- Child labour where a child is exploited for personal or commercial gain and exposed and required to work in hazardous conditions or the work is harmful to the child's physical and mental development. There is a risk that child labour could exist in our extended supply chain in inputs production such as fabric mills, and raw materials
- Bonded labour where a person is required to pay debts (such as from recruitment fees) to their employer or recruiter. Workers are often bound to the employer until the debt has been paid and in most instances such debts are extremely difficult to pay off. There is a risk that bonded labour could exist where subcontracting occurs or in areas where low skilled or migrant workers are employed. Migrant workers are at higher risk of exploitation due to lack of knowledge of local laws, reluctance to raise concerns or questions for fear of losing their job or facing deportation and possible better condition compared to their home country or area
- Deceptive recruitment where a person is enticed to work using false or deceptive practices about the details and working condition of a job and is later left in a vulnerable position once employment has commenced. There is a risk that deceptive recruitment could occur where third parties use to recruit workers, particularly vulnerable workers such as migrant workers, undocumented workers, or workers from areas with high unemployment or poverty

We have a strict zero tolerance policy towards any form of modern slavery. All subcontracting must be pre-approved by Myer following review and acceptance of a third-party audit.

#### Cotton

The demand for cotton across the world makes the industry extremely vulnerable to human rights abuses and exploitation. There are well known reports of forced and child labour in the harvest stages of production.

Cotton is one of Myer's primary raw materials, and as such we are aware of the potential exposure to modern slavery and as such have put processes in place to understand the origins of the cotton. We prohibit the sourcing of cotton from locations where there are known or reported human rights abuses such as Turkmenistan, Uzbekistan and Xinjiang.

Our modern slavery questionnaire validates this prohibition, and directly calls out these regions to identify if our suppliers or any of their suppliers, including contractors, employ workers from these regions or countries. We are also exploring other avenues to gain a greater understanding of the complex cotton supply chains that exist, to improve our understanding and further validate the sourcing location of cotton used in Myer products.

#### Supply chain risks

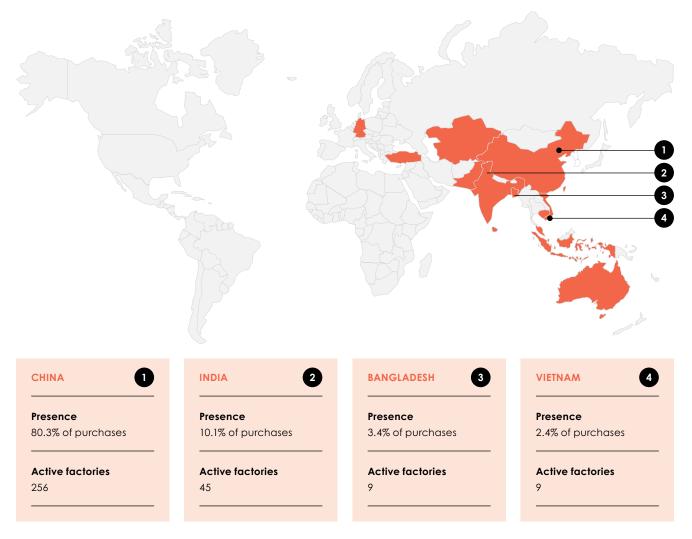
Our risk assessment identified risk areas that modern slavery may exist across operations and supply chains:

	Manufacturing	Factory workers may be forced to work with little or no pay particularly for excessive overtime and unable to leave the premises. Workers may not understand their rights, do not have written agreements or work in poor conditions impacting their health. Workers are often subject to excessive working hours and exploitative working conditions. Women and girls are overrepresented in garment manufacturing factories and are often subject to exploitation and compensated poorly. Migrant workers are at higher risk of being subject to discrimination, lower wages, risk of being subject to bonded labour and retention of identity documents
(C) (C)	Inputs production	Forced labour in fabric mills, component manufacturers, dyeing plants etc could be present as visibility into workers conditions is less transparent as there is no direct relationship. Reports of input and textile suppliers subcontracting production of textiles to home-based workers occurs to meet turnaround times and save on costs. Home based workers are mostly females who lack formal contracts making them vulnerable to mistreatment. Sumangali scheme is a common practice in India where women and girls are paid a lump-sum amount at the end of their contract and risk losing their accumulated income
×	Raw Materials	Forced labour and child labour could be present in the production or harvesting of raw materials such as cotton, timber, and minerals. The production of raw materials such as cotton, wool and leather have been linked with forced labour and child labour. Countries such as China, Turkmenistan and Uzbekistan have been reported to have state-imposed forced labour to produce cotton
R	Non-Merchandise Services	In operations such as cleaning, transportation, security services there is a higher proportion of migrant workers. There is a risk that workers may not understand their rights and have their identity documents or passports confiscated and be subject to forced or exploited labour through deceptive recruitment or debt bondage. Migrant workers engaged may not understand their rights and have their identity documents or passports confiscated and be subject to forced or exploited labour through deceptive recruitment or debt bondage

#### Supplier type risk

Private Brand suppliers are suppliers that present the greatest risk as the product is manufactured directly for Myer, providing increased leverage and influence to identify and remediate non-conformances. In the reporting period, we engaged over 250 private brand suppliers across 12 sourcing countries.

We continue to consolidate our supplier base to a smaller number of countries and suppliers to provide greater influence and importance of each of our suppliers and their factories. This also includes ensuring that Myer's requirements are met and assured throughout their operations, fostering a better relationship with final production suppliers, and allowing for greater information shared regarding mills and raw materials. We are committed to continuously improving the transparency of the supply chain connected to our private brand suppliers, as we recognise this is an important component of our ethical sourcing program.



Whilst we have a clear understanding of the final stage of our production, currently audits are not common for raw materials and inputs suppliers. In such instance, we utilise the supplier questionnaire and through discussions seek to understand their operations and processes. Contractual arrangements are between final stage production and Myer. Additional diligence and validation processes are consistently being explored to ensure transparency and supply chain is free from modern slavery.

#### **Geographic risk**

All countries in which private brand manufacturing takes place have undergone a risk assessment and been approved by our risk framework. No new sourcing country or supplier can be onboarded without a prior risk assessment being completed. This country risk profile is based on a number of social and economic indicators such as ILO Rights and Protection Index, OECD, Corruption Index etc. We consider the risks outlined in the country risk profiling when assessing and approving suppliers and factories.

The common modern slavery risks identified in our key manufacturing countries are:

#### **CHINA**

Forced labour, child labour, hazardous work for young workers, unauthorised subcontracting, bonded and deceptive labour China is the largest garment producer and exporter in the

world. It is also considered to be one of the least democratic countries in the world, where freedom of speech, assembly and religion are severely restricted by the government. Independent unions are not permitted, and overtime is prevalent.

State imposed labour continues to be a concern where individuals may be subjected to forced labour within cotton, garment and electronic factories. We are particularly aware of reports of forced labour imposed upon Uyghur and other Turkic and Muslim majority people in the Xinjiang Uyghur Autonomous Region in the harvesting of cotton.

While Myer's manufacturing is in the more developed parts of China where modern slavery is less prevalent, there is a potential risk that raw materials such as cotton sourced from Xinjiang may make its way into our products. We have taken steps to address the risk and will continue to explore ways to improve traceability.

#### BANGLADESH

### Unauthorised subcontracting, bonded and deceptive labour, subminimum wages, gender inequality

Bangladesh textile and clothing industries are the main source of growth in Bangladesh's rapidly developing economy. Low labour costs and discrimination against minority groups, displacement, violence, and limited monitoring of labour laws exposes the country to human rights violations. Building safety remains a concern.

The incident of Rana Plaza has led to reforms and improvements but there continues to be reports of forced labour exploitation with women and immigrants being the most vulnerable group in the garment industry.

Less than 4% of Myer's manufacturing is in Bangladesh. Processes have been put in place to specifically review building safety risks and review gender equality principles are respected.

#### INDIA

### Forced labour, child exploitation, unauthorised subcontracting, bonded and deceptive labour

India is the world's most populous country and is reported to have one of highest number of slaves. Bonded labour, deceptive recruitment and forced labour are common practices in India. Women and girls from minority groups particularly are exploited in informal factory settings.

Fueled by deep rooted socio-economic inequalities, castebased discrimination and abject poverty, individuals are coerced into working under deplorable conditions to repay debts, which often accrue exorbitant interest rates that can extend across generations. The lack of transparency over recruitment fees for foreign employment and the lack of enforcement of existing laws has led to vulnerable workers being ensnared in debt bondage due to exorbitant recruitment fees.

Based on our audits and assessments completed, we are not aware of instances of modern slavery within our Indian supplier and factory base.

#### VIETNAM

### Forced labour, child labour, unauthorised subcontracting, bonded and deceptive labour, gender inequality

Vietnam is the largest garment producer in Asia after China. Independent democratic trade unions are not permitted to operate, and overtime is prevalent.

There have been reports of forced labour such as deception, restriction of movement, intimidation and threats, abusive working and living conditions as well as excessive overtime. Bonded labour without pay or with significant wage deductions and child labour are also common. These issues primarily exist due to lack of enforced laws.

Based on our audits and assessments completed, we are not aware of instances of modern slavery within our Vietnam supplier and factory base.

### Our actions and response

#### Our Ethical Sourcing Program standardises our approach to ethical business conduct and responsible sourcing, embracing internationally recognised labour standards such as the Ethical Trade Initiative (ETI).

Our sourcing program details our commitment to continuously enhance due diligence systems to assess risks and compliance, improve traceability of our private-brand merchandise and build capability across our operations and supply chain.

#### **Our Policies**

Our policies and governance structure underpin our ethical sourcing framework to ensure consistency amongst our operations. The ethical sourcing policy outlines minimum ethical standards that suppliers must comply with. Suppliers are expected to uphold human rights, ethical business practices, have management systems in place to achieve and maintain compliance, cascade these requirements to their suppliers and co-operate with audits and corrective action plans to rectify any breaches.

The ethical sourcing policy along with our supplier code of conduct ensure that supplier uphold the rights of workers including include recognising the rights of workers, whether in our own or suppliers network, be treated with respect and dignity, be provided a safe work environment free from discrimination, abuse, harassment, are protected against slavery or slavery like practices such as forced labour or child labour, be compensated fairly and allowed the freedom of association and right to collective bargain. The Code of Conduct applies to all manufacturers, their approved subcontractors and suppliers within the factories' supply chain and operations. Factories are required to display the Code of Conduct where it is easily accessible to workers. These minimum requirements are also incorporated and referenced in supplier contracts.

Myer applies a collaborative approach when implementing our sourcing policy with suppliers, prioritising the wellbeing of workers within our supply chain and engaging with our suppliers to identify breaches and assist in the management of remediation. Myer reserves the right to suspend orders and terminate supplier contracts if a supplier is unwilling to appropriately remedy the breach.

Our current trading terms agreement for both merchandise and procurement is strengthened by modern slavery specific provisions and requires all suppliers to agree and adhere to the sourcing policy, comply with all modern slavery laws and regulations and have appropriate controls in place to identify and manage slavery practices.

#### Third party audits

All private brand suppliers undergo an assessment against are assessed against our ethical sourcing risk framework prior to onboarding. We require factories supplying our Private Brand goods to be audited by a third-party social compliance agency, prior to onboarding and on an ongoing basis. Suppliers located in extreme risk countries, as rated against Myer's country risk profiling, require an audit every 12 months, and those of lower risk countries every two years. Myer understands the operational and financial impacts of the audit process, and therefore offers mutual recognition of audits.

Private Brand suppliers remain a key focus of our social compliance audit program, as these suppliers manufacture directly for Myer, which allows for greater leverage to influence and remediate non-conformances. Factories are assessed against a set of principles utilising the key criteria of the Ethical Trade Initiative (ETI), which ensures at a minimum, that all Private Brand suppliers have management systems in place covering all factories. It also includes a requirement to recognise the rights of all workers and to treat them with dignity and respect, providing them an environment that is free from discrimination, abuse, and harassment, and is considered in line by international community standards.

During the reporting period, Myer reviewed audits from 250 suppliers across 407 factories. Our review identified no zero tolerance issues, however 78 high risk issues primarily relating to excessive overtime hours. Myer continues to support factories and suppliers to address any non-conformances as our preference is continued business and an ongoing relationship with suppliers to ensure labour and worker rights are met. Alternative sources of supply will only be sought where there is a zero-tolerance issue raised or if it is evident a supplier is unwilling or unable to adequately remediate concerns. Suppliers with high-risk issues have co-operated with remediation actions.

A breakdown of audit review of our top four sourcing countries:

CHINA	INDIA	BANGLADESH	VIETNAM
Social compliance audits reviewed for 317 factories employing 53,850 workers.	Social compliance audits reviewed for 51 factories employing 20,253 workers.	Social compliance audits reviewed for 13 factories employing 25,414 workers.	Social compliance audits reviewed for 12 factories employing 8,423 workers.
Primary issues related to excessive overtime	Primary issues related to working conditions	Primary issues related to working conditions	Primary issues related to working conditions

#### **Wages and Benefits**

Myer supports freedom of association, collective bargaining and is committed to working towards living wages. We understand that purchasing practices have a direct impact on suppliers' abilities to provide wages, so we continue to work on improving our purchasing practices and ethical sourcing standards to assist suppliers towards paying a living wage to factory workers and create long-term and sustainable relationships.

Our ethical sourcing standards encourage factories to pay a fair and adequate wage for the work that is being done in compliance, at minimum with local laws. This includes being paid correctly in line with entitlements and fair in relation to their position within the organisation. We continue to provide training to our buying teams so that they incorporate ethical sourcing and sustainability criterias into their business decisions. We commit to supporting our factories by providing training on the importance of paying fair living wages and what it means for their workers. Our audit program also assesses and asks factories to establish a living wage calculation.

We have completed a wage gap analysis to understand the disparity current worker wages and a living wage for where we manufacture with the view to work with our suppliers to assist them towards paying a living wage and help mitigate some of challenges associated with paying a living wage. Based on our findings, we will engage our suppliers to discuss ways the gap can be bridged.

Myer acknowledges that the payment of wages and the continued improvement of wages and working conditions cannot be achieved in isolation and places a strong emphasis on working with other retailers and non-government organisations to enact change, for an example the development of a consistent and agreed benchmark to determine a living wage. Myer is open to NGOs lobbying with respective governments to ensure that base wages are fair, in line with the work being conducted.

#### Remediation

In line with our Ethical Sourcing Program, Myer supports and monitors factories to ensure that the required corrective action plans have been put in place to address non-conformances. It is our preference to work with the supplier to address these issues to foster a positive and ongoing relationship; with alternative sources of supply only sought where it is evident a supplier is unwilling or unable to adequately remediate concerns.

Where issues such as forced or child labour are found through our audit program, Myer has stringent remediation processes in place. The process sets a minimum action plan (phased approach), with additional actions required as determined by the nature of the case. In all instances the interest of the victim is paramount and tailored to the specific needs of the victim. Child services and local authorities may be consulted to complement Myer's efforts. The remediation process includes immediate actions such as removal of the victim from all work and ensure victim is in a safe place with basic needs such as food, accommodation and payment of stipend is in place. Contact and open dialogue with the victims' parent or caregiver is essential, particularly to ensure that the victim is aware of what is happening.

A responsible person is assigned to ensure the remediation plan is tailored to the requirements of the case, the required stakeholders are involved with clear roles and responsibilities and overall management of the case. The responsible person also manages the investigation into the specific circumstances of the case, the safe return of the victim to their home and ongoing monitoring of the victim to ensure their welfare. In the instances of child labour there will be an additional need to for ongoing monitoring of the child's progress at school until the child reaches working age.

Depending on the nature of the case (with all actions needing to be proportionate the case and issue), remediation plans are developed in consultation with relevant stakeholders such as local authorities, protection specialists, relevant reputable local NGOs and with the victim and/or their parent or caregiver. The remediation plan incorporates requirements and best practice from industry guidance on operations practice and indicators of forced labour, UN toolkit to combat trafficking on people, ETI base code guidance, and many other relevant resources.

#### Team member training

Training continues to be a focus of our ethical sourcing program, to ensure that our team members our equipped with the knowledge and resources to ensure that they able to identify unethical practices and modern slavery risks if present. We prioritise team member who are in high-risk roles such as buying and procurement.

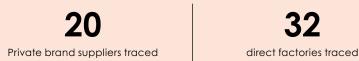
Training highlights the role buyer's play in ensuring their sourcing and purchasing practices are in line with business expectations, which includes ensuring that critical paths consider the impacts on suppliers, safeguard on time delivery and minimise pressure on factories. In addition, training explored common human rights issues affecting the manufacturing industry today, including case studies on modern slavery in developed economies, and cotton production in Xinjiang, Uzbekistan, and Turkmenistan. An online merchandise hub is also available for supplementary education for buyers to deepen knowledge on ethical sourcing practices, and common questions on our modern slavery program.

#### Tracing and transparency

Our program priorities transparency to ensure workers are respected and their human rights are protected and to reduce risks of modern slavery occurrences. Transparency means knowing where our private brand products are made and making this information publicly available.

We continue work to gain greater visibility of our extended supply chain, including inputs, processing, and raw materials suppliers. Whilst we have coverage of our final production suppliers, we only have partial visibility of our textile, input, and raw material facilities. We appreciate that the complexity of our supply chain means that there may be risks in managing and achieving full transparency, however we remain committed to continuously re-analyse and re-educate ourselves to ensure minimisation of risk within our extended supply chain.

Consistent with our risk based approached, private brand suppliers were selected based on location of factories, merchandise type, the raw material sourced and their response on completed supplier questionnaire specifically in relation to their tracing efforts. During the reporting period, we made significant progress in key commodity areas such as cotton and continue to evolve our approach and implement strong foundations based on findings.



150 identified facilities

In line with our commitment to transparency, we publish our manufacturing supplier list includes factory names, locations, types of goods produced, and numbers of workers. We update our supplier list every six months with the information received from our mapping and audit processes.

#### **Supplier Questionnaire**

Supplier questionnaires are an integral part of our due-diligence program. It is a requirement for all private brand suppliers to complete a modern slavery questionnaire. The questionnaire allows suppliers to self-assess their ethical sourcing efforts but also allows Myer to get an understanding of risk in our suppliers' operations and supply chain. The questionnaire assesses suppliers' policies and procedures, knowledge of migrant workers, global risks, as well as information on raw materials used and sourcing locations, validating our prohibition on the use of cotton and or raw materials from the Xinjiang, Uzbekistan, or Turkmenistan regions.

Consistent with our risk assessment, this questionnaire was delivered to all private brand suppliers and their factories for completion. As approximately, 84% of our supplier base is in China, this questionnaire was translated and provided in both Chinese and English.

The questionnaire is incorporated into the on-boarding process to capture any new suppliers, ensuring that no suppliers are brought on without adequate processes in place to mitigate modern slavery and to trace their supply chains. Where responses provided to the modern slavery or prequalification questionnaires are identified as presenting a risk, the diligence process may require further assessments and/or continuous monitoring as a requirement of on boarding. We continue to work back with our suppliers to understand potential risk areas and/or areas for improvement. No instances of modern slavery have been found through the Questionnaire.

#### Non-merchandise suppliers

According to our risk-assessment, suppliers of non-merchandise and procurement services were categorised as having higher risk of modern slavery, due to these industries typically employing 'low skilled' labour forces, who are usually migrant workers that may be unaware of their working rights in Australia. Subcontracting is also a common practice in these industries, which presents a risk to Myer as these suppliers may not be visible to Myer. Due to this concern, the Modern Slavery Questionnaire was included as a pre-requisite to the onboarding process. No suppliers and their subcontractors may be on-boarded without successfully completing the Modern Slavery Questionnaire, and supplying adequate details about their policies, procedures, and appropriate knowledge of their supply chain.

This Questionnaire is in addition to the pre-existing procurement prequalification questionnaire process, which requires service providers to provide internal policies and procedures, and independent site audit reports.

#### **Grievance Processes**

We understand the importance of workers being able to communicate concerns regarding human rights and modern slavery risks arising in their work environment. We encourage all stakeholders to report any suspected unethical, illegal, fraudulent, or undesirable conduct within Myer's operations and supply chain. In accordance with this commitment, we have established a number of grievance mechanisms that allows us to capture and remediate risks within our operations and supply chain.

Our ethical sourcing policy makes it a requirement for suppliers to provide workers and their wider community with appropriate channels of communicating grievances, that are both confidential, anonymous and free of retaliatory consequences.

We also provide an alternative grievance mechanism to our workers, which allows them to scan a QR code on their smartphone to raise an issue confidentially and if they choose, anonymously to Myer. This process utilises a process familiar to workers (e.g. WeChat in China) and allows them to report the issue when convenient to the worker i.e. a quick scan for contact later. WeChat.

Consistently communicated to our suppliers through our Supplier Code of Conduct, onsite visits and summarised Ethical Sourcing Policy, this program is communicated to workers through a poster to be displayed on the walls of every factory. This code of conduct was delivered to all private brand factories and was translated into Chinese for distribution. This poster is also available on the Myer Supplier Website. Where issues are raised and validated, we will take appropriate action, including involving external agencies where necessary. It remains imperative that the welfare of the worker is protected in all instances; as such, we will seek to understand and prioritise their individual's needs and ensure appropriate remedy is provided. To date, no instances of modern slavery have been reported through the mechanism. In the reporting period, we did not have any reports made through the grievance process from suppliers. We note however of the factories audited, all had a grievance or worker group committee in place.

In addition to this grievance mechanism, the Myer Whistleblower hotline is available to all those within our supply chains both Australia and overseas. Operated independently by a third party to ensure anonymity, this hotline investigates issues, and prompts appropriate action, including the involvement of external agencies if necessary. We seek to understand and prioritise the needs of the victim and ensure an appropriate remedy is provided.

Our modern slavery program places a strong emphasis on collaboration because we recognise that achieving the program's objectives is not possible alone. To ensure that our program is effective in identifying and reducing human rights risks, various internal business units within the organisation collaborate, including those in finance, ethical sourcing, goods, and procurement.

Myer also collaborates with non-governmental organisations and other groups to share information, improve our understanding, and substantiate modern slavery efforts. We continued to collaborate with organisations such as National Retail Association (NRA) Modern Slavery Committee and the Australian Retailers Associations Sustainability Workgroup. Open discussions in these groups centre around sharing best practice, and the development of systems to achieve mutual goals and to avoid duplication of work, particularly that which places the compliance burden on supplier.

Myer remains open to working back with retailers, non-government organisations and multi-stakeholder initiatives, which promote collaboration to achieve outcomes.



# **Measuring effectiveness**

We acknowledge the importance of assessing the effectiveness of our actions to manage and mitigate risks of modern slavery within our operations and supply chain. We continue to work to understand and track the effectiveness of our actions and performance through internal and external mechanisms. We have assessed the effectiveness of our actions against the following activities.

ΑCTIVITY	MEASUREMENT
Governance	Board has oversight of the ethical sourcing framework
	<ul> <li>Reviewed and revised policy and procedures to ensure compliance to modern slavery</li> </ul>
	<ul> <li>Employee code of conduct approval and oversight</li> </ul>
	Ongoing training to team members
	Standard contract templates with standard anti-slavery clauses embedded and reviewed
	Supplier code of conduct delivered to all private brand suppliers
	<ul> <li>Reporting and progress provided to Audit, Finance and Risk Committee and Board</li> </ul>
Participation	<ul> <li>Executive management and senior leadership engaged</li> </ul>
	• Acceptance of Myer contractual terms, specifically to comply with all Myer policies and standards
	• All new and recontracted suppliers agreed to the Myer Ethical Sourcing Policy and Whistleblower Policy
	<ul> <li>Consent from private brand suppliers to access factory sites</li> </ul>
	Requirement for all private brands to complete the modern slavery questionnaire
	<ul> <li>Engaged with industry stakeholders and peers - our risk management approach is validated against a broad network of stakeholders and external organisations, including other retailers, valued suppliers, investors, non-government organisations and human rights global benchmarking tools. In collaborating with a variety of external experts, our modern slavery approach was validated</li> </ul>
Risk Management	<ul> <li>Annual risk review and assessment to identify and validate risks</li> </ul>
	Risk profiling and rating matrix refined
	Over 190 high risk team members trained in FY23
	• Engaged high-risk suppliers, private brand, and procurement suppliers. No concerns or issues were raised
Monitoring	• Third party audits - findings from audits completed, including the number of corrective action plans or those considered to be high-risk or require immediate attention are used to establish potential indicators of modern slavery. Monitoring and benchmarking of suppliers assists to understand the extent our Ethical Sourcing Program is effective
	• Modern Slavery Questionnaire sent to all private brand suppliers to assist in further risk identification and to validate risk assessment previously conducted
	• Identification of at-risk suppliers through the supplier questionnaire, remediated through collaboration with supplier
	<ul> <li>Identification of factory falsifying audit document, termination of factory</li> </ul>
	• Corrective action plans - 78 high risk issues were identified, almost all relating to excessive working hours. Detailed corrective action plans in place to address findings. We continue to work with suppliers to ensure that actions are implemented in a timely manner and are sustainable. We will terminate contractual arrangements where the supplier shows an unwillingness to remediate non-conformances identified
	• Site visits - supplier and factory onsite visits allows us to review processes and validate audit results and corrective action plans. Due to the pandemic, limited site visits were conducted in the reporting period
	• Worker voices and engagement - no reported incidents of modern slavery or modern slavery like practices
Training	• Targeted training delivered to providing insight into key modern slavery risks, how to identify red flags, how to mitigate these risks, ethical purchasing practices and remediation processes
Grievance mechanism	<ul> <li>Worker voices are heard through our confidential and anonymous Whistleblower hotline. No reports of modern slavery or modern slavery indicators reported</li> </ul>
	<ul> <li>Additional grievance (contact) mechanism added, no reports of modern slavery or modern slavery indicators have been identified through the mechanism</li> </ul>

### Our 2024 priorities

We will continue to evolve and improve our ethical sourcing program. Our key FY24 plans include:

Traceability         Continue to trace deeper into our supply chain and operations		
Raw Materials	Increase our use of preferred raw materials such as sustainable cotton, timber and polyester	
Training	Build capacity through ongoing training to the business to raise awareness and to assist with identification and management of modern slavery risks	
Partnership	Strengthen partnerships through increased collaboration with industry peers and networks	
Worker Voice	Enhance worker voice and grievance mechanisms to better understand issues and concerns requiring rec	

### Consultation

All brands reporting into Myer Holdings Limited operate under a common and consistent governance framework to build expectations, raise awareness and approach in assessing and addressing modern slavery risks in our operations and supply chain. All brands share the same executive management team and have contributed to the framework and assisted in the drafting of this Statement.

A cross-departmental consultation process was implemented to write this statement, with inputs from leaders across multiple teams, including Human resources, retail operations, and our sourcing office.

The final statement was approved by the Myer board after a careful evaluation, reaffirming our dedication to a strong and coordinated strategy for addressing modern slavery risks.

### Mandatory reporting criteria

This statement was prepared to meet the mandatory reporting criteria outlined within the Modern Slavery Act 2018 (Cth). The below table provides a reference for where each criterion is addressed within the statement.

CRITERIA	RELEVANT SECTION IN STATEMENT
Identify the reporting entity	About Myer
Describe the structure, operations, and supply chains of the reporting entity	About Myer,
	Our business and supply chain
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Risks in our operations and supply chain
Describe the actions taken by the reporting entity and any entity that the reporting	Our actions and response
entity owns or controls, to assess and address those risks, including due diligence and	
remediation processes	
Describe how the reporting entity assess the effectiveness of such actions	Measuring effectiveness
Describe the process of consultation with any entities that the reporting entity owns or	Consultation
controls	
Provide any other information that the reporting entity, or the entity giving the statement, considers relevant	Next Steps



**Myer Holdings Limited** 

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