



**MODERN SLAVERY AND
HUMAN TRAFFICKING STATEMENT
FY 20**

MESSAGE FROM THE CEO

As a business that holds people at its core, we fully support and welcome the introduction of the Modern Slavery Act.

With a mission to provide the best shopping experience in the world, the foundation of the Winning Group is built on the care for our customers, as our highest priority. Integral to achieving our mission, is ensuring our stakeholders are valued and therefore respect and care, is deeply embedded into our relationships and our culture.

This is the Winning Group's first Statement, which has provided us with the valuable opportunity to review our policies and practices and to set strong foundations, for our Modern Slavery Action Plan. This Statement is an opportunity to educate ourselves, our teams and our stakeholders we engage with across our businesses on important issues.

We welcome transparency in our business and supply chain and thank our supply partners for their support on this journey, and with our intention to leave the world in a better place.



John Winning
CEO, Winning Group

OUR COMMITMENT

This Statement sets out Winning Group's (Group) commitment to prevent modern slavery in all of its business activities and within its supply chains.

It outlines the steps we have taken to ensure compliance with the Modern Slavery Act 2018 (Cth) (MSA).

This Statement covers the activities of Winning Appliances Pty Limited and each of its related entities, including Appliances Online Pty Limited, Winning Services Pty Limited, Home Clearance Pty Limited for the financial year commencing 1 July 2019 and ending 30 June 2020 (FY20 Statement Period).



Established in 1906, Winning Group is a family-owned, Australian company with a mission to provide the best shopping experience in the world.




We have over 2.2 million customers and pride ourselves on a combined Net Promoter Score of over 80.



OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

During the FY20 Statement Period, the Winning Group operated 17 Winning Appliances Showrooms across New South Wales, Victoria, South Australia, Queensland and Western Australia and five major distribution centres and distribution hubs, which ensures that we can deliver free next day to 95% of Australian population.

Our head office is located in Sydney and, during the FY20 Statement Period, we had approximately 800 people across our business including employees and contractors.

For the purposes of this Statement, our key operating entities, operations and associated supply chains during the FY20 Statement Period were as follows:

BUSINESS	MAIN OPERATIONS	SUPPLY CHAIN
Winning Group Head Office 	Finance Operations Technology Legal Sales and Marketing Customer Service	Categories of products and services include: <ul style="list-style-type: none"> • Office consumables • Technology (hardware, software and cloud services) • Utilities • Professional services and consulting
Winning Appliances Pty Limited 	Bricks and mortar retail showrooms of home appliances and related goods.	Categories of products include: <ul style="list-style-type: none"> • Refrigerators • Clothes Washers • Dishwashers • Clothes Dryers • Audio Visual • Ovens • Stoves • Cooktops • Barbeques
Appliances Online Pty Limited 	Online retailer of home appliances and related goods, such as fitness equipment and consumer electronics.	Categories of products include: <ul style="list-style-type: none"> • Refrigerators • Clothes Washers • Dishwashers • Clothes Dryers • Audio Visual • Ovens • Stoves • Cooktops • Barbeques

BUSINESS	MAIN OPERATIONS	SUPPLY CHAIN
<p>Home Clearance Pty Limited</p> 	<p>Online retailer of end of line and T2 home appliances and related goods.</p>	<p>Categories of products include:</p> <ul style="list-style-type: none"> • Refrigerators • Clothes Washers • Dishwashers • Clothes Dryers • Audio Visual • Ovens • Stoves • Cooktops • Barbeques
<p>Winning Services Pty Limited</p> 	<p>3PL, logistics, transport, warehousing, storage of home appliances and related goods.</p>	<p>Supply chain categories include:</p> <ul style="list-style-type: none"> • Uniforms and work attire • Property rental • Delivery and install contractors • Customer service repairs • Waste and recycling service providers • Forklift and equipment hire • Temporary labour hire



OUR POLICIES

We operate a number of internal policies to ensure that we are conducting business in an ethical, fair and transparent manner. These policies include:

- **CODE OF CONDUCT** - we expect the highest standards of ethics, integrity and behaviour of our team members as set out in our Code of Conduct. This includes ensuring compliance with all laws applicable to employment including anti-discrimination, occupational work health and safety, fair work, anti-bribery and anti-corruption. Winning's expectations of ethical behaviour are underpinned by our company values.
- **EQUAL EMPLOYMENT OPPORTUNITY** - we believe that diversity of all kinds is required in order to achieve our Group mission of providing the best shopping experience in the world, one customer, one experience at a time. Our policy ensures that we have a team with diverse thoughts, cultures, backgrounds, life experiences and perspectives that reflects our customers. We aim to achieve an inclusive place to work, where everyone is treated with dignity and respect, and where all talent and skills are valued and everyone has a voice in the room.
- **RECRUITMENT POLICY** - we conduct checks on all prospective employees to verify that they are eligible to work in Australia, including criminal record checks. During the FY20 Statement Period, we hired additional internal recruiters, to assist with the co-ordination of recruitment activities across the Group.
- **WHISTLEBLOWING POLICY** - we encourage the reporting of any actual or suspected wrongdoing, or any other issues that may affect team member wellbeing at work or that may be affecting the Group, its customers or suppliers, including through our Speak Up/Whistleblower Policy. We recognise the importance of ensuring a safe, supporting and confidential environment where people feel confident to 'Speak Up' about wrongdoing and feel supported throughout the process.



OUR VALUES

Winning Group is committed to a culture of integrity, respect and care for our customers, our people, the environment and the communities we operate in. We live and breathe our values and are on a mission to provide the best shopping experience in the world. From this perspective, we deeply respect individual circumstances and human rights. People are at the core of our business and we recognise the impact we have on the daily lives of our customers, team members, suppliers and their supply chains.

Our focus on people and customer experience is anchored in our values which we live and breathe across all levels of the business. Our company values include:



IMPRESS EVERY CUSTOMER

Exceed your customer's expectations by going the extra mile, every time.

ONE IN, ALL IN

It's surprising how different work feels when you know you're not in it alone.

YOU'VE GOT TO BE KIDDING!

Fun and jokes are a huge part of who we are at the Winning group. It's not just about levity, it's about sharing.

OWN YOUR ROLE

If you see a way you can do things better, make it happen. If you see a way you can help make someone else's work more efficient, do it.

EMBRACE CHANGE

If we never change, we never improve. So we embrace change no matter who initiates it.



We say YES in a no world

For we're on a mission

And that mission is to provide the best shopping experience in the world. One customer, one experience at a time.

FAMILY MATTERS

A good work life balance is essential – not just to your work performance and your sanity but also to our culture.

ASSUME EVERY PROBLEM IS SOLVABLE

Obviously not every problem can be resolved, but most can. So when you encounter a problem, assume there's a solution.

BE RESPECTFUL

Respect your teammates. Make their day better by being friendly, helpful, giving and humble.

BE PROUD OF YOUR DIFFERENCES

At the Winning group we don't just embrace difference – we celebrate it.



POTENTIAL RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAIN

In 2019, we undertook a review of the potential risks of modern slavery practices across our operations and supply chains. During the assessment process, we considered risks that may possibly cause, contribute and/or be directly linked to modern slavery practices. We also took into consideration other risk factors such as the sector, industry, types of products and services and geographic locations.

As a result, the Winning Group has been able to identify areas of low risk, for example, in our operational activities that are directly undertaken by Winning team members and covered by our internal processes and policies.

We also identified potential risk hotspots, for example where a supply partner may source a products or services from overseas sources, where risks of modern slavery may be higher.

FY 20 HOTSPOT SUPPLY CHAIN



OPERATIONAL RISKS

During the FY20 Statement Period, Winning Group has identified the potential risks of modern slavery in our Operations as low. While the risk is low we understand that there is a risk of human rights issues in our operations due to subcontracting of services including transport, logistics and cleaning, as well as services that may be sent off-shore. These issues may include labour rights, equality, fair pay, discrimination and safety.

SUPPLY CHAIN RISKS

During the FY20 Statement Period, Winning Group has identified the potential risks of modern slavery in our Supply Chain as ranging from low, medium, to high and very high risk. The potential risks include labour rights and health & safety in overseas supply chains of parts, equipment and other manufactured goods including the production of metal products and in electronics supply chains.

ACTIONS TAKEN TO ADDRESS RISKS

Our key actions during the Statement Period include:

IDENTIFICATION, BRIEFING AND AWARENESS

In 2019, the Board was briefed on emerging legal and compliance requirements in relation to the MSA. The legal team commenced work with various key stakeholders in the Group, to assist in the identification of key risks;

ASSESSMENT OF CONTROLS

Assessment of potential risks against existing practices to identify improvements or new mitigating actions;

RISK PRIORITISATION

Assessment of our highest risk categories and suppliers and prioritisation of these based on areas of influence and control, to inform a roadmap of action;

POLICIES

We have reviewed and updated our Group policies including our Health & Safety Policies, Equal Employment Opportunity Policy and we have extended our Whistleblowing Policy to external suppliers;

SUPPLIER ENGAGEMENT We have had discussions with key personnel from a number of suppliers in relation to the actions they were taking to address the risks of modern slavery in their supply chains;

DEVELOPMENT AND EXECUTION

Group policies and procedures were modified to include and acknowledge the MSA, supplier terms and conditions were updated contractually requiring suppliers to comply with the MSA;

REPORTING

Annual reporting to commence from March 2021, including a review of the effectiveness of actions taken so far;

MONITORING

A monitoring and evaluation framework is being developed to guide reporting and improve upon future actions.

Over the next year, our key focus areas will be:

RECRUITMENT

Recruiting and engaging with ethical procurement and sustainability experts to review, oversee and manage our sourcing practices, compliance obligations, review and assess our risk-related policies and governance control measures, engage key stakeholders in the business and develop a Supplier Code of Conduct, as well as managing and overseeing our Due Diligence and Supplier on-boarding processes;

DEVELOPMENT

Development of a Supplier Code of Conduct and Ethical Sourcing Roadmap;

DUE DILIGENCE

Continued engagement and monitoring of key suppliers based on risk factors and ensuring compliance with our Supplier Code of Conduct, through development of a Due Diligence Framework;

UPDATING

Continue updating of agreements with our suppliers to reflect and communicate our commitment to and compliance with the MSA;

VOICE OF THE WORKER

We will actively promote and communicate our Whistleblower Policy to our supply chain, to ensure the voice of the worker is heard;

REMEDIATION PLAN

We will develop a plan for remediation in case we find modern slavery in our operations or supply chains, so that we are prepared and can respond in the way that best protects any victim of modern slavery;

TRAINING

Continue internal and external stakeholder engagement on this issue, including delivering appropriate awareness training sessions on modern slavery principles to all Winning Group team members and key suppliers.

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

The Winning Group reports to the Board monthly and as part of this, we will be tracking progress of our actions to prevent modern slavery. A monitoring and evaluation framework is being developed to establish metrics, so that we can track the implementation of our modern slavery mitigation actions. We will conduct an annual evaluation of the actions undertaken, to assess their effectiveness and based on the learnings, will incorporate this into the following years actions, to ensure that we are continuously improving and that our actions have a demonstrated impact.



This statement was resolved as approved by the Board of Directors of Winning Appliances Pty Limited at a Meeting of the Board of Directors of Winning Appliances Pty Limited on 31.03.2021.



John R Winning
Director



John W Winning
Director



Amy Cowper (Mar 31, 2021 13:18 GMT+11)

Amy E Cowper
General Counsel &
Company Secretary