



FREEDOM

MODERN SLAVERY
STATEMENT 2023



About this statement

This is Greenlit Brands Pty Limited's fourth modern slavery statement under the Modern Slavery Act 2018 (Cth). This modern slavery statement covers Freedom Furniture Australia Pty Limited, the reporting entity that is a subsidiary of Greenlit Brands Pty Limited. This statement no longer covers FF Holdco Pty Ltd and its subsidiaries (specifically Fantastic Furniture Pty Limited) (which is now run separately to Greenlit Brands), or Snooze Management Pty Limited, Futuresleep Pty Limited or G&G Furniture Pty Limited (which were sold and are no longer subsidiaries).



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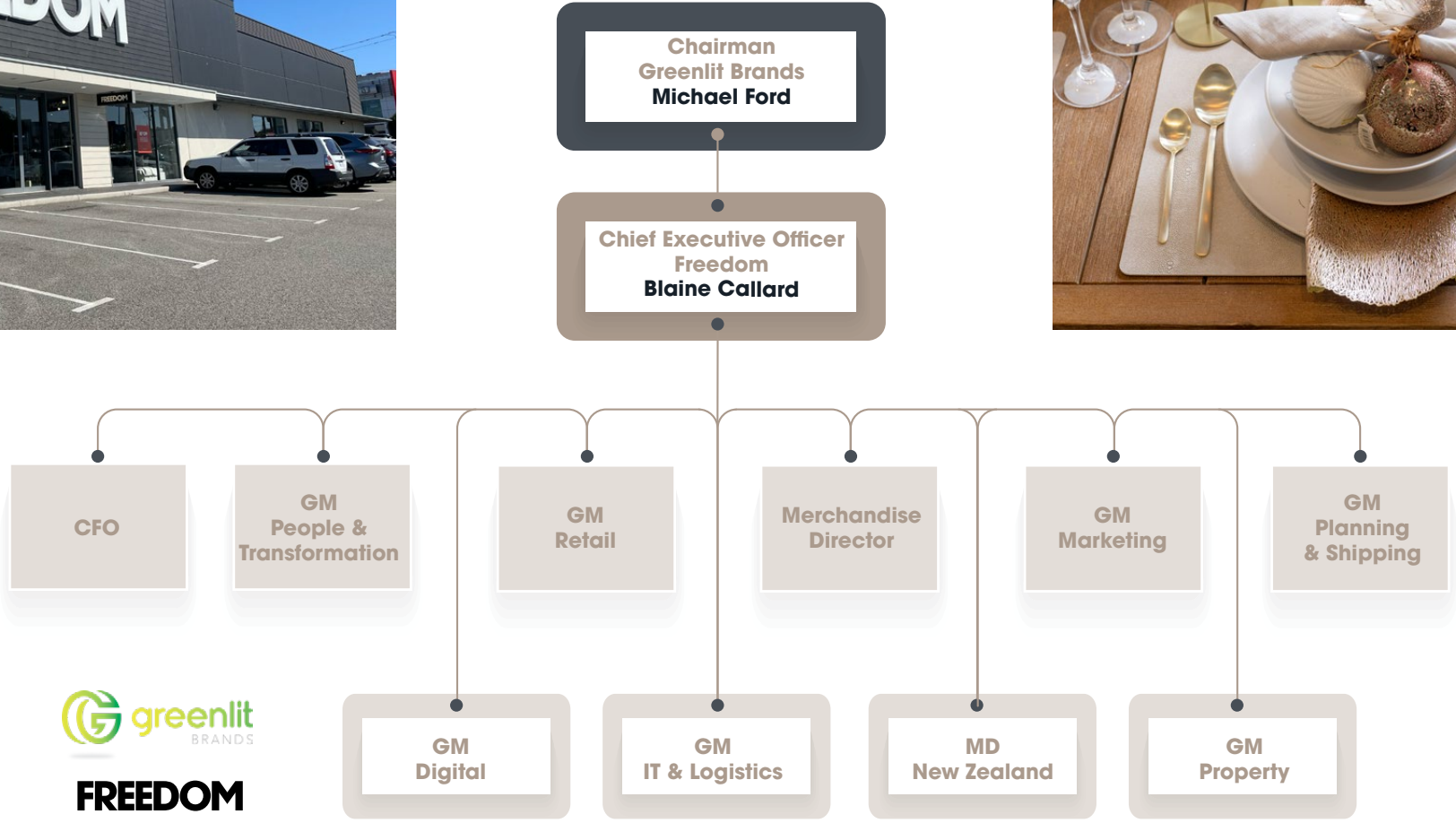
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Section 1

Leadership structure



Section 2

Our structure, operations and supply chains

Greenlit Brands Pty Limited and its subsidiaries (together the Group) is a retailer of household goods across Australia and New Zealand. The Freedom brand has been in operation for several decades. The Group sells a range of household consumer goods, including sofas, homewares, rugs, mattresses, bedding, upholstery cleaning products, tables, and chairs. The Group operates the Freedom brand.

The Group is part of the IBEX Group (previously named the Steinhoff International Group) which is required to report under the United Kingdom's Modern Slavery Act 2015.

We operate in:

59 stores

6 distribution centres



The Group's premises are located throughout Australia and New Zealand. A range of services are provided to our operations from third parties. These third parties include cleaning services, waste services, property management, uniforms, transport and freight, security services, information technology services and products, communications and marketing, financial and superannuation services, and website and cloud storage.

The countries that we directly source and manufacture materials, products, and services from include Australia, New Zealand, China, Malaysia, India, Vietnam and Turkey. Our tier two and three supplier countries include Australia, China, Pakistan and Vietnam.

Section 2

Our structure, operations and supply chains

Until June 2023, Greenlit Brands Pty Limited was supported by a Group Services Team, including an Executive Team and several departments - Finance, Human Resources, Payroll, Safety, Internal Audit, Information Technology, Property, Legal, and Administrative Support. The Group Services Team was primarily involved in overseeing strategic objectives for the operating businesses and acted as a support to its various brands with operational requirements and initiatives.

Due to a restructure in the Group, from June 2023 these roles were transferred directly into Freedom itself.



Freedom

Freedom's leadership team comprises of a Chief Executive Officer, a Chief Financial Officer, and General Managers in Marketing, People and Transformation, Retail Operations, Information Technology & Logistics, Digital, Merchandise Director, General Manager of Planning, Supply and Shipping, and General Manager of Property. Freedom also has a Managing Director and Financial Officer for its New Zealand operations. The leadership team is supported by a General Counsel & Company Secretary. Freedom operates 47 stores across Australia.

765 full time /PT

27 casual

40 company stores in Australia

7 franchise stores in Australia

0 factories

6 distribution centres

Section 3

Risks of modern slavery in our operations and supply chains

Supply Chains

As with last year’s report, the two main modern slavery risks continue to be forced labour and child labour in the manufacturing of products for retail sale or of raw materials such as textiles, foam, metals, timber, plastics and adhesives sectors, or associated sectors where the material is used in product manufacturing. The risk of corruption across material-sector-countries that we source from remains an issue. Notwithstanding the above, we recognise that modern slavery is not limited to these sectors, materials or countries, and can occur at any time and place.

The Group remains on the path of continual improvement. We are taking on-going steps to identify gaps in our management systems and supplier management systems aimed at addressing human and labour rights.

None of the audits this year raised concerns in our supply chain in relation to forced labour, debt bondage, child labour or human trafficking.



Operations

Beyond tier one operational supply chains there is a lack of visibility, including unknown contractors and sub-contractors.

As identified in last year’s Statement, Blue Rock is a major supplier to Freedom and acts as a sourcing agent. As a consequence, Freedom does not have direct control over certain areas of sourcing in its supply chain. However, the risk is mitigated (but not eliminated) through a detailed SLA between Freedom and Blue Rock and frequent, on-going communications.

We believe the risk of slavery occurring in our non-trade suppliers is lower than it occurring in our trade suppliers. This is due to the fact that the vast majority of service providers we engage are in Australia or New Zealand. However we recognise that modern slavery can still occur domestically. Industries particularly at risk are those that engage a high percentage of migrant workers, such as the cleaning services industry. Freedom will be conducting a thorough review of the service providers it engages in this industry in FY24 to identify and address any modern slavery risks.

Section 4

Actions to assess and address modern slavery risks, including due diligence and remediation

In this section we outline Freedom’s actions and priorities to remedy situations where they may cause, or contribute to, modern slavery or modern slavery risks. The specific actions addressed in this section include:

- Dedicated roles
- Training
- Internal management systems
- Supplier’s management systems
- Supplier self-assessment questionnaires
- Social auditing

Freedom is continuing to build its knowledge of modern slavery risks associated with the Freedom business and operations. As this knowledge grows, so too will the goals and targets of the business.

Dedicated roles to modern slavery

The allocation of time and resources to roles and working group that are responsible for driving and implementing our actions in respect of modern slavery is critical to Freedom.

The Freedom Merchandise Head is responsible for compliance with modern slavery laws, with day to day responsibility held by the Merchandise Director and the Freedom Product team.

Freedom has included a modern slavery review in its Product Safety & Quality Committee meetings, which are chaired by the Quality Manager, and attended by the Merchandise Director, Customer Service Manager, Safety Officer and General Counsel. Freedom’s sourcing agent within Asia will continue to be engaged to ensure there is deeper discussion and action across Freedom’s supplier network. While it has not happened this year due to a change in personnel in the Quality Manager role, Freedom will ensure that in FY24 its Quality Manager spends time with key stakeholders and that regular meetings are held, an actions register is created and minutes documented.



Our process for continual improvement

The Group remains alert to the real possibility of modern slavery occurring in its brands’ supply chains and operations. Further, we are aware of the need to ensure that modern slavery risks are handled delicately and in a manner that does not jeopardise anyone’s safety. We are mindful of our obligation to contact local authorities in the event of any severe cases.



Section 4

Actions to assess and address modern slavery risks, including due diligence and remediation

Training

Freedom takes its responsibility to ensure staff and suppliers are aware of what modern slavery is and how to respond in incidences of modern slavery seriously.

Freedom ensured that modern slavery training was undertaken by the Product team and all department heads in FY23. Freedom intends to ensure this occurs again in FY24. Further, Freedom intends to ensure training is rolled out more broadly across its staff members, and that its suppliers also undertake modern slavery training.



Internal management systems

Freedom has in place the following policies within its business:

- SpeakUp! (Whistleblower) Policy
- Grievance Policy
- Anti-Bribery, Corruption and Fraud Policy
- Appropriate Workplace Behaviour Policy

All employees are inducted in these policies during orientation. Further, all employees and a range of contractors are required to complete mandatory training (including refresher training) on their rights and obligations under the policies. The SpeakUp! Policy is available in staff public areas, such as amenities.

Freedom's online platform, called 'Workplace', is where team members can post issues, complaints, and/or improvements on day-to-day operations. Stores are also encouraged to log any incidents. The continued success of 'Workplace' has ensured that the gap between functions has been bridged, and it is easier for team members to express their feedback or concerns.

This year, Freedom has reviewed its supply agreement template and included new clauses dealing with modern slavery.



Suppliers' management systems

It is important for us to understand our suppliers' management systems in order to mitigate and remediate modern slavery risks in our supply chains and operations.

The majority of Freedom's trade suppliers are managed through the sourcing agent, BlueRock. As with last year, BlueRock conducts factory audits on Freedom's behalf at the start of the relationship, places all orders with those suppliers' factories, performs ongoing quality checks before products are shipped, and makes periodic visits each year to the factories.

Supplier self-assessment questionnaires

A supplier self-assessment questionnaire or declaration is utilised by Freedom to improve communications, actions, and due diligence with their suppliers about modern slavery. The questionnaire helps Freedom gain an understanding of its supplier's policies, processes, and procedures regarding modern slavery, labour rights, human rights, environmental compliance, anti-corruption, and quality management.

Freedom continues to work with its sourcing agent to ensure that questionnaires are sent out to suppliers.



Social audits

Freedom's sourcing agent also conducts a social audit. This involves a combination of document reviews, interviews and observations that seek to understand the supplier's knowledge of modern slavery including what current procedures and policies they have in place.

The audits looked at a supplier's social management system, worker's involvement and protection, the rights of freedom of association and collective bargaining, fair remuneration, decent working hours, child labour, bonded labour, and ethical business behaviour.

This information is used by Freedom to monitor modern slavery risks and encourage continuous improvement.

Section 5

Assessing the effectiveness of our actions

Group recognises that modern slavery risk is ongoing. While there has been no evidence of modern slavery across Freedom's operations and tier-one suppliers in this reporting period, Freedom intends to continue to improve its practices around the identification and remediation of modern slavery risks in its supply chains and operations in FY24.

Dedicated roles and working group

Freedom is considering the establishment of an Ethical Sourcing Working Group to compliment the work being conducted and monitored by the Merchandise Director, Quality Manager, and Product Safety & Quality Committee.

Product Safety & Quality Committee to continue monitoring and reviewing modern slavery risks.

Training

The Product team members and Freedom internal heads are to have refresher training in regards to modern slavery. Further training is to be rolled out to the broader Freedom team members.

Internal management system

Freedom intends to roll out its Ethical Sourcing Framework and policy. These structures and documents will help ensure the appropriate roles and responsibilities in respect of modern slavery are identified within the business.

The new trade supplier agreement template which has been updated to reflect appropriate compliance requirements with regards to modern slavery will be rolled out across trade suppliers this FY24.

Supplier relationships

Focus on continuing to collaborate and build engagement with suppliers.

New questionnaire to be rolled out across the business. Number of questionnaires returns to be monitored.

Social audits to be conducted and action plans created.



Section 6

Process of consultation

The process of consultation to develop our modern slavery statement for the 2022-2023 financial year is outlined below:

Freedom’s product and legal departments commence process

The Freedom team engages with Greenlit Brands

Freedom appoints a project manager to collate information

Draft statement is sent to Greenlit Brands for review and editing.

Final draft created from feedback.

Board of Directors approve final draft in March 2024.

The statement is submitted to the Australian Border Force.



This statement was approved in March 2024 by the board of directors of Greenlit Brands Pty Limited, which is a higher entity (as referred to in section 14 of the Modern Slavery Act 2018) of the reporting entity detailed below. This statement is signed below by Michael Robert Stransham Ford as responsible member of Greenlit Brands Pty Limited.

Michael Robert Stransham Ford
Chairperson
Greenlit Brands Pty Limited

This statement is also signed by the Chief Executive Officer of Freedom, however his signature is not included as a responsible member for the governing body of the reporting entity.

Blaine Callard
Chief Executive Officer
Freedom Furniture Australia Pty Limited