# Procter & Gamble Australia Modern Slavery Statement FY24/25

The Modern Slavery Act 2018 (Cth) requires commercial organizations carrying out business in Australia with an annual consolidated worldwide revenue of more than A\$100 million to submit a modern slavery statement to the Australian Minister for Home Affairs. The following describes the steps Procter & Gamble Australia Pty, Ltd. ("P&G") has taken to combat slavery and human trafficking.

#### **OUR ORGANIZATION**

We are a part of the Procter & Gamble group of companies (Group), and our ultimate parent company is The Procter & Gamble Company. The Procter & Gamble Company has its head office in the United States of America. The Group has about 109,000 employees worldwide. More details of the structure of our business can be found at https://anz.pg.com/structure-and-governance/corporate-structure/.

The Group manufactures branded consumer packaged goods. The Group's products are sold in more than 180 countries and territories through mass merchandisers, e-commerce (including social commerce) channels, grocery stores, membership club stores, drug stores, department stores, distributors, wholesalers, specialty beauty stores (including airport duty-free stores), high frequency stores, pharmacies, electronic stores and professional channels. We also sell direct to consumers.

The Group has on-the-ground operations in approximately 70 countries, including 99 manufacturing sites. In total, across our entire supply chain, (e.g., raw materials, packaging, services, equipment), the Group works with tens of thousands of suppliers. However, in Australia we are purely a distributor market. We have no on-the-ground manufacturing sites in Australia. We do not own or control any other entities.

#### **OUR POLICIES**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. The Group's Human Rights Policy Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

# **DUE DILIGENCE PROCESSES**

The Group has in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Openly engage with our business partners and stakeholders to understand potential human rights impacts and develop meaningful actions to work to address adverse impacts.
- Protect whistle blowers (employees and third parties).

In order to facilitate compliance with the Modern Slavery Act 2018 (Cth), the Group has established a multi-functional team, which includes representatives from Purchases, Product Supply, Human Resources, Research & Development, Finance & Accounting, Global Business Services, Corporate Communications, Ethics & Compliance, Government Relations and Legal functions. Led by The Procter & Gamble Company's Director for Human Rights, this team has designed and implemented processes for supply chain review, supplier and employee outreach, due diligence and risk management.

Specifically, as part of our initiative to identify and mitigate risk, the Group evaluates its suppliers and identifies high-priority suppliers on a number of parameters including known risks and country location. The Group requires that an independent, third-party auditor audits high-priority suppliers, and, if outages are found, that supplier is re-audited within two years. These audits are announced beforehand, and the auditors utilize the Sedex Members Ethical Trade Audit (SMETA) Best Practice Guidelines and audit report format.

Other actions the Group has taken, particularly to address risks deeper in the supply chain, have included:

- Requiring compliance with heightened due diligence requirements around the specific risks of modern slavery;
- Developing sourcing strategies that seek to avoid higher-risk supply chain partners or sourcing geographies, require independent certifications and compliance with external standards, or seek to increase our leverage with supply chain partners;
- Engaging with supply chain partners by using leverage to seek to prevent and address risks.

Suppliers and stakeholders are encouraged to report any ethical concerns or policy violations, as outlined at https://pgsupplier.com/guidelines/report-a-concern. This reporting mechanism is operated by a third-party supplier to help ensure anonymity. More details on our process can be found at https://us.pg.com/ethics-and-corporate-responsibility/responsible-sourcing/.

### Identified Risks

Based on the Group's activities and supply chains, the potential risk of modern slavery, specifically forced labour and child labour, is most significant in certain agricultural raw materials supply chains, at the level of raw material cultivation several tiers down the supply chain, often where migrant labour or contract labour are present.

## Assessing Effectiveness

As outlined above, the Group actively monitors the risks of modern slavery in its operations and supply chains. The Group uses the outputs from such activities to assess its performance in relation to mitigating modern slavery risk. Further, the Group monitors complaints raised through its grievance mechanisms to identify trends and further strengthen its due diligence. The Group also regularly engages with expert organizations and civil society stakeholders on its actions. In line with international standards, the Group is continually assessing its human rights due diligence measures to identify areas where its measures might be further strengthened to be most effective.

# SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

The Group's Worldwide Business Conduct Manual (WBCM) explains the global standards to be followed in our daily business activities as well as our legal and ethical responsibilities. The WBCM applies to all employees and members of the Board of Directors, regardless of location, seniority level,

business unit, function, or region. The Group's Responsible Sourcing Expectations for External Business Partners extend these commitments through our supply chain. External business partners, their subcontractors and suppliers are expected to be informed of and share the Group's commitment to these standards. The Group reserves the right to conduct audits, assessments or investigations to assure compliance with these expectations and reserves the right to discontinue any relationship should the external business partner violate, fail to correct, or have a pattern of violating these expectations.

### No Child Labour

The International Labour Organization (ILO) states that "Child Labour is often defined as work that deprives children of their childhood, their potential, and their dignity, and that is harmful to physical and mental development. It refers to work that: is mentally, physically, socially or morally dangerous and harmful to children; and interferes with their schooling by: depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work."

We do not permit the exploitation of children and will not use child labor in our end-to-end value chain.

#### No Forced Labour

We support the Global Consumer Goods Forum Priority Industry Principles, which state: "Forced labour is an unacceptable human rights violation that can take multiple forms and must be addressed. While certain employment and recruitment practices may not initially appear problematic, in aggregate or combined with other forms of leverage, they can result in forced labour, particularly among vulnerable workers. We will take active measures to apply these Principles across our global value chains and own operations, to cases where such practices may lead to forced labour. We will seek to apply these Principles to all workers regardless of their employment status, location, contractual arrangements, or role. We do this as part of our collective journey to advance the human rights of workers and positively shape global labour markets:

- Every worker should have freedom of movement. The ability of workers to move freely should not be restricted by their employer through abuse, threats, and practices such as retention of passports and valuable possessions.
- No worker should pay for a job. Fees and costs associate with recruitment and employment should be paid by the employer, not the employee.
- No worker should be indebted or coerced to work. Workers should work freely, aware of the terms and conditions of their work in advance and be paid regularly as agreed.

## Speaking Up

We are committed to creating a work environment, both internally and with our business partners, that fosters open communications and supports individuals in reporting potential violations of Company policies or the law. Employees and individuals in our operations or extended supply chain can report violations at the Worldwide Business Conduct Helpline, which is staffed by an independent third party 24 hours a day, seven days a week and includes, where permitted by local law, an anonymous way to report concerns.

The Group manages all allegations arising in relation to its supply chain through its Supply Chain Grievance framework, which is aligned with the effectiveness criteria of the United Nations Guiding Principles on Business and Human Rights (UNGPs) and seeks to enable remedy for affected stakeholders when impacts have occurred that are linked to the Group's products or services.

We are committed to reviewing all allegations of wrongdoing with trained teams who ensure thorough, impartial, and fact-based investigations. We believe that this is essential to promoting a culture of integrity, reducing the likelihood of incidents occurring and driving willingness to proactively raise concerns. Retaliation for raising concerns in good faith is inconsistent with our Values of Integrity and Trust and simply will not be tolerated.

## TRAINING

The Group conducts compulsory training on forced labour and child labour for employees in key functions. We have developed a library of engaging, custom-built training courses, which are available to all employees as a resource and are further assigned based on role and location to maximize relevance and impact.

As part of a wider learning program, the Group developed a series of short videos (less than 2 minutes each) to help its employees, and those of its vendors and contractors, recognize human rights issues in the workplace. By educating them to spot problems in the office and manufacturing facilities, the Group empowers them to speak up and seek help for others. These tools are offered through our Respecting Human Rights Learning Page and Training Curriculum.

This statement is made pursuant the Modern Slavery Act 2018 (Cth) and constitutes P&G's slavery and human trafficking statement for the financial year ending 30 June 2025. This statement has been approved by the governing body in Australia, Procter & Gamble Australia Pty Ltd. Namely, it has been approved unanimously by the Board of Directors of Procter & Gamble Australia Pty Ltd on 20 November 2025.

Neal Reed Director

P&G Australia Pty Ltd
Date: 20 November 2025