

**MODERN SLAVERY
STATEMENT**

DISTRICT

FINANCIAL YEAR 3
01 · JULY · 2024 - 30 · JUNE · 2025

MODERN SLAVERY IS THE SEVERE EXPLOITATION OF PEOPLE FOR PERSONAL OR COMMERCIAL GAIN. IT AFFECTS MILLIONS WORLDWIDE, INCLUDING IN DEVELOPED NATIONS.^① WE ACKNOWLEDGE THAT RISKS MAY EXIST WITHIN OUR OPERATIONS AND SUPPLY CHAINS.

DISTRICT IS COMMITTED TO ADDRESSING THESE RISKS. THIS STATEMENT OUTLINES THE ACTIONS WE TOOK BETWEEN 1 JULY 2024 AND 30 JUNE 2025 TO HELP PREVENT MODERN SLAVERY IN OUR SUPPLY CHAIN.

THIS STATEMENT HAS BEEN PREPARED IN LINE WITH THE MODERN SLAVERY ACT 2018 (CTH) AND APPROVED BY DISTRICT'S SENIOR MANAGEMENT TEAM.

NOTE: AMENDED [17.12.2025] TO INCLUDE SIGNATURE

MESSAGE FROM THE MANAGING DIRECTOR

This statement marks District's third year of Modern Slavery reporting, covering the 2025 financial year. Over the past year, our team has continued to strengthen the foundations of our approach and refine our strategy for ongoing improvement.

We recognise that the due diligence process is complex, but we also understand its critical importance. Modern slavery, including forced labour, child labour, and human trafficking affects millions of people worldwide. The furniture industry is not immune, and it is essential that we acknowledge the impact of our choices and actions.

At District, we are committed to fostering a culture of understanding, respect, and collaboration. Our commitment to addressing modern slavery goes beyond compliance, it reflects our values of due diligence and our responsibility to contribute to a fair and inclusive society.

This statement is both a record of our progress and a roadmap for the work ahead. As Director, I am proud to endorse it on behalf of District.

This Modern Slavery Statement was approved by Joseph Merlino, Sole Director of District Australia Pty Ltd, on 30 August 2025.

JOSEPH MERLINO
MANAGING DIRECTOR

17.12.2025



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IDENTIFY THE REPORTING ENTITY

MANDATORY CRITERIA [A]

LEGAL NAME
 DISTRICT AUSTRALIA PTY LTD

TRADING NAME
 DISTRICT

ABN / ACN
 92 009 419 274 / 009 419 274

LEGAL CLASSIFICATION
 COMPANY

[DISTRICT DOES NOT OWN ANY OTHER ENTITIES]

HEAD OFFICE
 246 HAY ST, PERTH WA 6000

WEBSITE
 DISTRICT.COM.AU

DISTRICT AT A GLANCE

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DISTRICT AT A GLANCE

MANDATORY CRITERIA [B]



BUSINESS STRUCTURE

District operates as a distributor representing a selection of leading furniture brands from Australia, New Zealand, and Europe. We supply products across corporate, commercial, hospitality, retail, workplace, building, and residential sectors. District operates from Australia, sourcing and distributing design-led pieces on behalf of our partner brands, as well as locally manufacturing products under design licence.

LOCATIONS



EMPLOYEES

40+

**ALL DIRECTLY
EMPLOYED**

**ALL LOCATED
IN AUSTRALIA**



BRANDS

- MASSPRODUCTIONS** (ITA) (2017)
- GIOPATO AND COOMBES** (SWE) (2015)
- ALIAS** (ITA) (2016)
- RESIDENT** (NZ) (2013)
- NONN** (NZ) (2013)
- MATTIAZZI** (ITA) (2012)
- NORMANN COPENHAGEN** (DEN) (2015)
- LA MANUFACTURE** (FRA) (2022)
- HEM** (SWE) (2015)
- SIMON JAMES** (NZ) (2013)
- NEW WORKS** (DEN) (2015)
- KVADRAT RUGS** (DEN) (2024)
- ELEMENTS** (AUS) (2020)
- STUDIO PIP** (AUS) (2014)
- TOOGOOD** (UK) (2021)
- LOUISE ROE** (DEN) (2024)
- FOCIA** (SWE) (2024)

OPERATIONS

In addition to sourcing, District manufactures locally through our Manufacture Under Licence Program, producing international brands in Australia to the same global standards in collaboration with a network of tier-one local manufacturers.

PRODUCTS

District specialises in procuring and supplying high-quality furniture and related products.

Workstation and meeting table components

Soft wiring

Seating

Shelving

Cabinetry

Rugs

Mirrors

Accessories

Screens

MATERIALS & COMPONENTS

Products supplied by District consist of a variety of raw materials and components. These components are sourced from a multi-tiered supply chain, with essential suppliers providing materials to direct suppliers, ensuring the integrity and quality of the final products.

Timber

Steel

Aluminium

Plastic

Textiles, strapping & thread

Foam

Glass

Paint, powdercoat, stains & adhesives

Fixings

Bamboo

Packaging materials





SUPPLY CHAIN

District's brand partnerships are typically long-term, with product exclusivity provided in most cases. We work with reputable suppliers under formal contracts, which set out agreed pricing and require purchase orders issued by District.

Core products from our international brand partners are manufactured under license in Australia through a network of local manufacturers, in line with our GECA ecolabel license requirements.

We also work with several indirect suppliers who provide products or services that support, but are not essential to, our production process.

Addressing modern slavery requires visibility across the full supply chain, not only our direct suppliers, but also their suppliers, and each tier beyond.

Our suppliers (including indirect) operate in the following sectors:

MANUFACTURING

TRANSPORTATION AND STORAGE

LABOUR HIRE

Accommodation and Food Service Activities

Administration and Support Services

Arts, Entertainment and Recreation

Building services contractor

Cleaning

Construction

Education

Electricity, Gas, Steam and A/C supply

Finance and Insurance

Government administration, Defence and Social Security

Health and Social Work

Information and Communication

International organisations, Diplomatic and Consular Services

Maintenance and Repair of motor vehicles

Mining and Quarrying

Professional and Scientific Services

Real estate

Retail

Security services

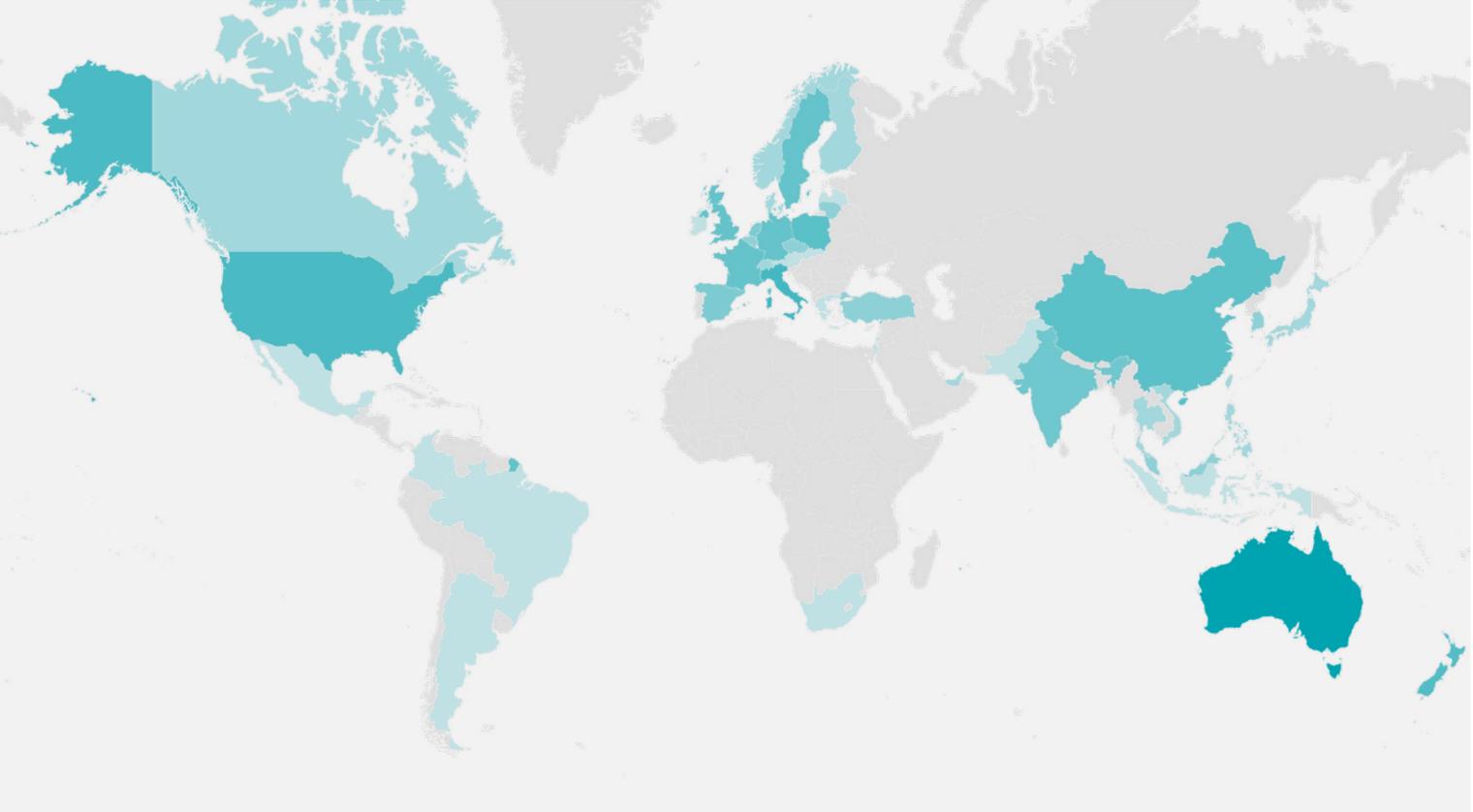
Water supply, Sewerage and Waste Management

Wholesale

SUPPLY CHAIN

OUR SUPPLIERS OPERATE IN MANY LOCATIONS ACROSS THE WORLD, INCLUDING:

Argentina	Malaysia
Australia	Mexico
Austria	Netherlands
Belgium	New Zealand
Brazil	Norway
Canada	Pakistan
China	Philippines
Colombia	Poland
Czech Republic	Republic of Korea (South Korea)
Denmark	Singapore
Finland	Slovakia
France	South Africa
Germany	Spain
Hong Kong	Sweden
India	Switzerland
Indonesia	Taiwan
Ireland	Thailand
Israel	Turkey
Italy	United Arab Emirates
Japan	United Kingdom of Great Britain and Northern Ireland
Latvia	United States of America
Lithuania	Vietnam



RISKS



MANDATORY CRITERIA [C]

RISK OVERVIEW

Modern slavery refers to various forms of exploitation and coercive practices that deprive individuals of their freedom, rights, and dignity. It encompasses situations where individuals are forced or coerced into labour, servitude, or human trafficking against their will. Modern slavery can take different forms, including forced labour, debt bondage, forced marriage, human trafficking, and child labour.

The International Labour Organisation estimates that over 50 million people around the world are victims of modern slavery. In recent years, supply chain transparency is a key policy strategy used by governments to identify and prevent business practices that lead to modern slavery.

Ongoing assessment of our operations identified the following areas as being higher risk of inadvertently support, contributing to or being impacted by modern slavery practices.



SUPPLY AND MANUFACTURE

MATERIAL EXTRACTION

INTERNATIONAL TRANSPORT

POTENTIAL RISKS WITHIN OUR SUPPLY CHAIN

- ① **Forced / compulsory and bonded labour** where all work should be voluntary and employees should be free to leave work at any time or terminate their employment
- ② **Worst Forms of Child labour** meaning no workers are under the age of 15 years or under the local legal minimum age for work or mandatory schooling age, whichever is the higher. Young workers under the age of 18 years, regardless of the local legal minimum age, must not do work that is mentally, physically, socially, or morally dangerous or harmful. Work should not interfere with children's schooling, or their ability to benefit from it.
- ③ **Migrant workers** with failure to uphold equal remuneration be provided for all workers.

SUPPLY CHAIN SECTORS

Our suppliers operate, produce, and source across different sectors. Some of these sectors can be described as high-risk. High-risk sectors are those in which human trafficking activities are known to occur and were identified in the Global Estimates of Modern Slavery and child labour exploitation that were separately identified in Child Labour: Global Estimates 2020 Trends and the Road Forward (ILO and UNICEF, 2021).^{②③}

This table illustrates the high-risk sectors in which our suppliers operate, produce, or source materials and the number of suppliers within each sector.

HIGH-RISK SECTORS

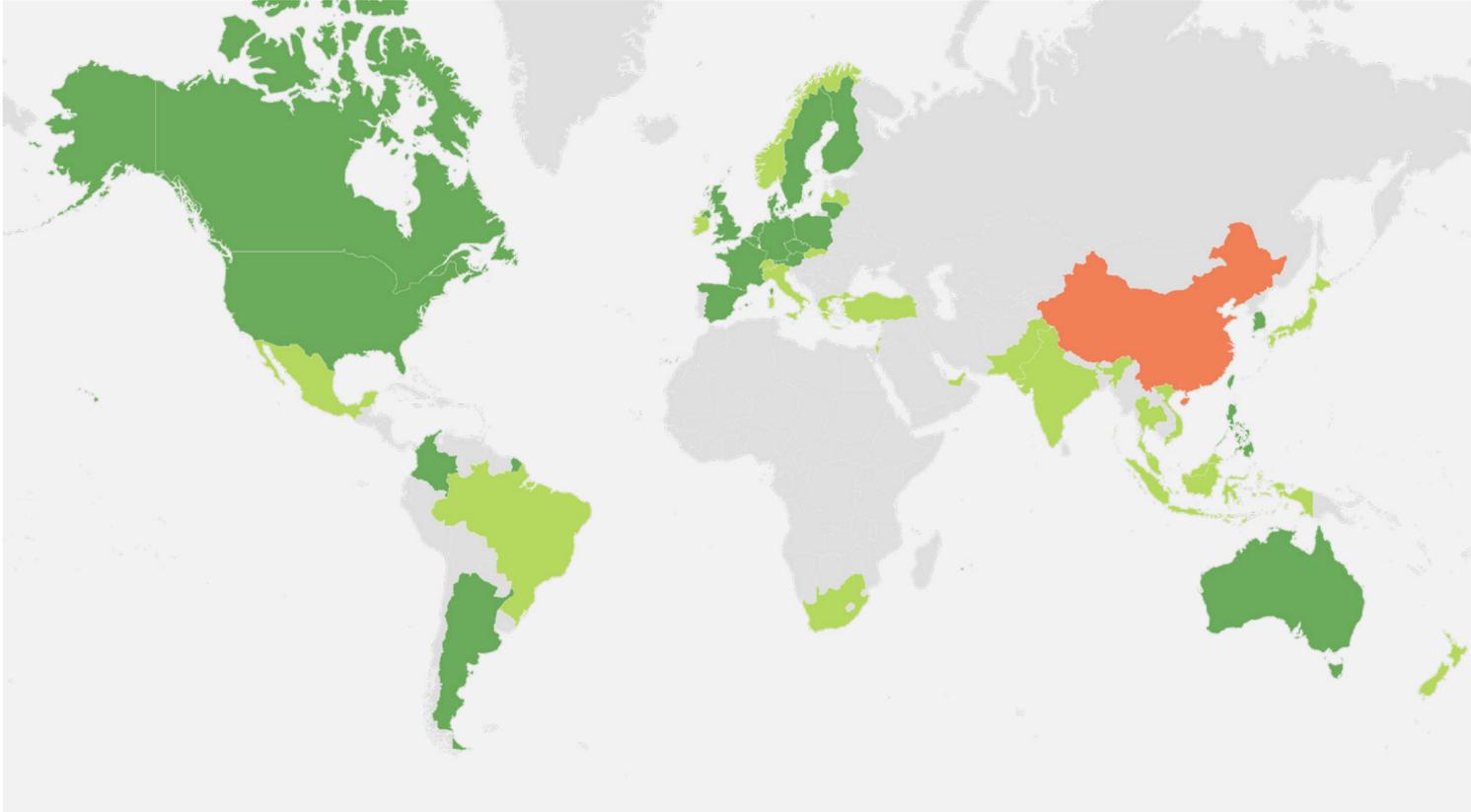
OUR SUPPLIERS

	Operations	Production & Services	Goods & Services
	Number of suppliers operating in the high-risk sectors	Number of suppliers producing good/services in high-risk sectors	Number of suppliers sourcing goods/services from high-risk sectors
ACCOMMODATION AND FOOD SERVICE ACTIVITIES	1	4	4
MANUFACTURING	27	19	23
TRANSPORTATION AND STORAGE	3	5	8
AGRICULTURE, FORESTRIES, AND FISHING	1	2	2
CONSTRUCTION	4	9	3
RETAIL	2	7	2
WHOLESALE	8	13	6
BUILDING SERVICES CONTRACTOR	1	6	
MAINTENANCE AND REPAIR OF MOTOR VEHICLES		1	4
CLEANING		2	4
MINING & QUARRYING		2	
SECURITY SERVICES			1
LABOUR HIRE			3

RISK OF HUMAN TRAFFICKING

Some countries or regions where our suppliers operate can be described as high-risk due to the possibility of a link to human trafficking.

The geographical regions where our supply chain partners operate are shown in the map on this page. This map has been overlaid with the colour tier system of the **Trafficking in Persons Report**.^④

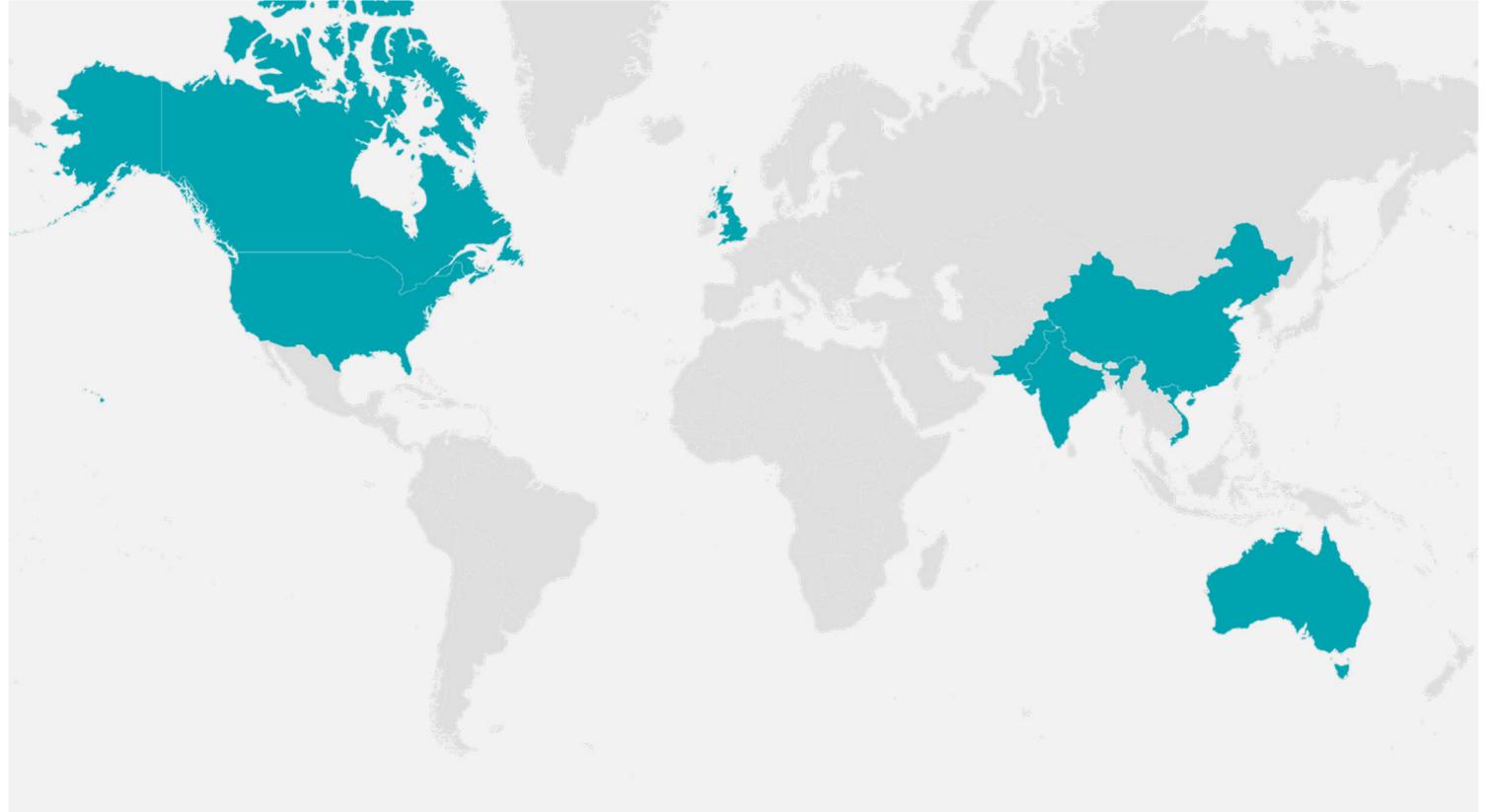


- Tier 1
Governments fully meet the minimum standards for eliminating trafficking.
- Tier 2
Governments do not fully meet the standards but are making significant efforts to comply.
- Tier 2 Watch List
Governments making efforts but with serious concerns, such as increasing trafficking or lack of evidence of progress.

RISK OR FORCED AND CHILD LABOUR

Some goods and services produced and sourced by our suppliers can be described as high-risk due to the possibility of a link to modern slavery practices such as forced labour and child labour.

The geographical regions where our supply chain partners produce and source goods and services that are considered high risk are shown in the maps below.



There is modern slavery risk associated with producing the following goods and services from the countries below:

AUSTRALIA

Building services contractor

CANADA

Building services contractor

CHINA

Electronics

Lithium-Ion Batteries

Textiles

INDIA

Embellished Textiles

PAKISTAN

Textiles

UNITED KINGDOM OF GREAT BRITAIN AND NORTHERN IRELAND

Building services contractor

UNITED STATES OF AMERICA

Building services contractor

VIETNAM

Furniture

There is modern slavery risk associated with sourcing the following goods and services from the countries listed below:

AUSTRALIA

Cleaning

Labour hire

CHINA

Aluminium

Electronics

Lead acid batteries

Lithium-Ion Batteries

Textiles

MALAYSIA

Electronics

VIETNAM

Furniture

ACTION



MANDATORY CRITERIA [D]



MODERN SLAVERY REPORTING OPENS THE DOOR FOR ORGANISATIONS TO LEARN, FOSTER CONVERSATION, AND ENHANCE TRANSPARENCY.

YEAR

①

FOUNDATION

In the first year of modern slavery reporting, District focused on laying the groundwork for future initiatives, particularly around managing modern slavery risks within our supply chain.

YEAR

②

DISCOVERY

In our second year, District focused on targeted supply chain mapping and risk assessments to improve visibility and understanding of modern slavery risks within our supply chain.

YEAR

③

EXPAND

The third year of our program has centered on gathering stronger data, extending our reach to a wider group of suppliers, and deepening engagement with suppliers and internal teams.

District uses a third-party tool, the **iPRO Modern Slavery Assessment Tool** to assess modern slavery risks in our supply chain. The risks identified in the previous section were all identified utilising this assessment tool. We engaged iPRO during the reporting period to conduct a bulk assessment of 74 of our suppliers. We intend to carry this process forward as an annual assessment of our supply chain.

Participating suppliers were asked to complete an online self-assessment. After each supplier completed and submitted the questionnaire, their responses were assessed to determine their modern slavery risk scores and associated risk category.

To determine the appropriate risk category, responses were first evaluated for risks inherent to a supplier's operations, production, and sourcing. This is referred to as the Inherent Risk Score. The Inherent Risk Score was calculated based on the geographical, type of

goods, industry sector, and workforce parameters that the supplier indicated in the Modern Slavery Assessment Tool (MSAT).

Next, the Unmitigated Risk Score was evaluated. This score was calculated based on the policy and procedure responses on the questionnaire. A supplier's Unmitigated Risk Score determined whether they were categorised as having inadequate, partial, or adequate risk control.

Then, the risk scores for each assessed supplier were aggregated and averaged, resulting in an Aggregated Inherent Risk Score and an Aggregated Unmitigated Risk Score for the overall supply chain.

District completed a self-assessment using the same process to determine a risk category for our operations.

ADDRESSING MODERN SLAVERY

Suppliers that completed the self-assessment were given action items to complete post-assessment. The action items provided to each supplier were based on their responses to the questionnaire, and if implemented, will reduce the unmitigated risks identified during the assessment.

Action items were also aggregated, giving District a focused view of the most impactful actions that could be taken by suppliers across the supply chain.

We have started rolling out a supplier follow-up initiative to further discuss the action items and address the risks identified through the assessment. Primarily this involves ensuring that suppliers have the right policies and procedures in place to mitigate inherent risks in their business.

District were also given action items to complete post-assessment to reduce the unmitigated risks identified for our operations which have been integrated into our ongoing actions.

Gaps in our operational risk management are already being addressed through the implementation of these actions.

Each supplier that completed the assessment was assigned one of the following risk categories:

RISK CATEGORIES	% OF SUPPLIERS PER RISK CATEGORY	# OF SUPPLIERS PER RISK CATEGORY
 High-risk (high levels of inherent risk)	0%	0
 High-risk (inadequate risk control)	30.8%	12
 Medium-risk (partial risk control)	48.7%	19
 Low-risk (adequate risk control)	20.5%	8
 Low-risk (low levels of inherent risk)	0%	0

Refer to page 26 for risk scores

ACTION PLAN

 In progress/ ongoing
  Incomplete
 Action achieved
  Exceeded

INDUSTRY COLLABORATION, EDUCATION & AWARENESS

ACTION	PROGRESS	STATUS	AMBITION FOR FY26
Undertake annual review of our Modern Slavery Statement actions to identify opportunities for improvement.	Third party gap analysis completed by Libby Staggs from Sustainable Business Matters in 2023 2024 iPRO software implemented to further support data management and reporting.		Evaluate 'meaningful questions' with the management team to identify areas for improvement and progress.
Advocate awareness among architects/designers.	Online article and interview with Libby published to District website. Districts Sustainability Manager is actively engaged in UN Global Compact Modern Slavery community-of-practice sessions Modern Slavery Statement published to company website		Continue to participate in UN Global Compact Modern Slavery session, providing industry feedback where feasible.
Monitor developments and emerging trends within the industry. Sustainability Manager to complete GBCA Training (Foundations & Advanced) by end of FY 2025.	GBCA Foundations completed.		GBCA Advanced to be completed by Sustainability Manager upon release of the GBCA Fitouts tool.
All logistics and purchasing personnel (5) to have completed the training module by June 2025. Expand the scope of our internal 'Sustainability School'/ Empower Sessions'. National training program to be implemented by end of 2024.	iPRO online training tool implemented. National training program in place. Additional 3 logistics personnel completed iPRO online training meeting goal of 5 team members.		Extend the education program to include 2 members of the brand team.
GECA; Evaluate the need for additional social compliance audits.	GECA social compliance gap analysis completed and criteria reviewed. Additional manufacturer site audited		Develop ongoing site audit program

ACTION PLAN

 In progress/ ongoing
  Incomplete
 Action achieved
  Exceeded

ACTION	PROGRESS	STATUS	AMBITION FOR FY26
Increase brands using FSC/PEFC timber by 10% FY24 4 Brands	4 brands maintain FSC/PEFC certification		Increase brands using FSC/PEFC timber by 10%
Increase percentage of Australian manufacture by 10% FY24 36%	56% Local Manufacture Onboarded additional local upholsterer		Increase local manufacturing by by 5%
Develop shipping audit program and increase ships assessed by 25% (Action amended)	As control is limited, this action has been assessed as low impact and therefore amended		Key to meaningful impact is increasing local manufacturing to increase control measures and reduce risk associated with shipping.
Share Modern Slavery Statement with 50% suppliers by end of 2025	FY24-25 statement to be shared with all key suppliers (50%) upon completion		Share FY25-26 Statement with 100% suppliers/ brands
Create a Modern Slavery Guide for suppliers, outlining how they can identify, manage, and address potential human rights issues, including modern slavery to include a 'Remediation Response Plan'	iPRO software has replaced the guide, automatically generating supplier-specific action items		Implement a structured follow-up process with suppliers on identified action items throughout FY25-26, aiming to reduce supply chain unmitigated risk by 5%
Map Tier 1-3 suppliers and conduct modern slavery risk assessments for all. Supplier Assessment Questionnaire to be completed by 20 brands FY 23 Set goal to achive 10-15 entities FY 24 16% (12 entities)	Achieved 53% completion 40 Brands completed the assessment using the iPRO tool, significantly increasing engagement across District's supply chain.		Increase completion rate by 10%
Supplier Code of Conduct to be completed by 22 Suppliers (16 entities completed in FY24-25) (8 entities completed in FY23-24)	17 Brands/ Suppliers completed		Supplier Code of Conduct to be completed by 22 Suppliers
Complete 2025 GECA recertification	1 manufacturer received third party site audit in FY24-25 5 manufacturers listed on GECA licence		Develop an ongoing site audit program to support continuous risk assessment.

SUPPLIER ENGAGEMENT

ACTION PLAN

 In progress/ ongoing
  Incomplete
 Action achieved
  Exceeded

	ACTION	PROGRESS	STATUS	AMBITION FOR FY26
POLICY DEVELOPMENT	Develop 'Addressing Modern Slavery Action and Evaluation Plan'; Include Remediation Response Plan with NGO support.	iPRO software introduced District which has significantly improved supply chain visibility and recommended actions are sent via this software to suppliers		NEW ACTION: (via iPRO) Deliver policy feedback to the five GECA manufacturers to confirm alignment with policy requirements
RESOURCES	Develop a procurement policy guideline for indirect supplier by Feb 2025.	Draft prepared, now working to implement it effectively on a national scale. The introduction of iPRO software has significantly improved supply chain visibility, especially for indirect suppliers.		Facilitate a procurement workshop with the team to enhance engagement and deepen the broader teams understanding of modern slavery risk.
REPORTING/ KPI'S	Improve internal reporting; Compile FSC/certification/manufacturing origin data.	Operation team workshop completed, challenges with CRM identified. Now utilising iPRO to map and report		Review the supplier list prior to sending annual reporting emails to maximise engagement
	Supplier Assessment Completion rate in FY24-25 52.7% (up from 16% in FY24)	Introduced iPRO software to capture data, increase engagement and scale across supply chain.		Increase Supplier Assessment Completion by 5%
	Achieve a continuous year-on-year reduction in unmitigated risk score FY24 35.28%	Introduced iPRO software to capture data, increase engagement and scale across supply chain.	New Action	Improve Unmitigated risk score by 2%
SENIOR MANAGEMENT COMMITMENT	Annual management review as part of ISO 9001 compliance.	FY2024 review completed.		Complete annual review FY2025. Evaluate 'meaningful questions' with the management team to identify areas for improvement and progress.

REMEDATION

WHAT IS REMEDY?

Remedy may involve a range of actions, including improving access to health, legal, or psychosocial services, facilitating repatriation, providing financial compensation, and implementing measures to prevent future harm.

Ultimately remedy should “make good” the harm that has occurred, such as modern slavery. Remedies can be pursued independently by a company or in collaboration with other stakeholders like suppliers, customers, or partner organisations. The nature of the remedy should be guided by the needs and experiences of the workers who have endured the human rights violations.¹

IDENTIFICATION OF MODERN SLAVERY

As a participant of the United Nations Global Compact Australia (UNGCA) SME Working Group, we remain informed on critical aspects like due diligence, risk management, and continuous improvement to effectively combat modern slavery. Our grievance mechanism for reporting allegations of modern slavery or labour exploitation within our supply chain is detailed in both CSS-DIS002 Vendor Code of Conduct (external) and HR-DIS041 Employee Code of Conduct (internal).

MODERN SLAVERY RESPONSE & REMEDY FRAMEWORK

We have implemented the six steps of the Walk Free Modern Slavery Response[®] & Remedy Framework in cases when modern slavery or labour exploitation has been identified

Step One: Investigate & Verify

When a business identifies a risk to workers or receives an allegation of harm, it is essential to conduct an investigation.

Step Two: Remediate Harm to Workers

Following the investigation, a response and suggested remedy should be determined internally and, if necessary, approved in consultation with the complainants and any relevant parties.

Step Three: Mitigate & Prevent Future harm

An effective remedy must address the root cause of the harm and include measures to prevent its recurrence.

Step Four: Escalation

In the event that a third party is suspected of intentionally lying or withholding information, or if they have caused or contributed to the harm but are uncooperative and do not make any effort to remedy the harm (e.g., by adhering to the terms of a corrective action plan), the following courses of action will be implemented:

1. Meeting with the senior management team of the company to discuss the issues and attempt to comprehend any obstacles or worries; strive to reach a solution that allows for remedial action to be taken which can entail getting more help or extending the corrective action plan's timeline.
2. If nothing changes, send out a formal warning or breach notice that reiterates the provisions of the contract, the policy, the code of conduct, or the Core Principles (if disclosed). Determine whether there are any chances to combine leverage with other interested parties.
3. If there is no further cooperation, terminate the business engagement with the supplier or third party and start working towards a responsible exit strategy that takes human rights harms into account.
4. Think about reporting unlawful activity to the police; the choice to take such action will be based on the country where the harm is occurring as well as the acceptability of such actions in this particular jurisdiction.

5. Consider alerting other parties to the situation by sharing relevant information.
6. If the relationship is crucial, and no reasonable alternative exists, demonstrate the continuous attempts to mitigate harm for as long as the relationship with the other party exists, however the extent of the harm should be considered when determining how long to continue that relationship.
7. It is still our responsibility to provide or assist in providing a solution to people who have been damaged, even in cases when a third party declines to act.

Step Five: Incident Reporting & tracking

Human rights violations will be documented within our incident management system (CertCrowd)

Step Six: Review

Conduct an internal review of the remedy provided for effectiveness and to identify further opportunities for improvement

EFFECTIVENESS AND PROGRESS



MANDATORY CRITERIA [E]

EFFECTIVENESS AND PROGRESS

We utilise the benchmarking and KPI's in the iPRO Modern Slavery Assessment Tool to assess the effectiveness of our actions.

As this is the first year we have used the platform to conduct our assessments and due diligence, we will be able to objectively measure the effect when the assessments are completed during the next reporting period.

The main KPI's we are using to benchmark our efforts are the risk scores that are generated as part of the assessment process.

Each organisation who completed the assessment questionnaire was assessed and given 2 risk scores.

Inherent Risk Score

Unmitigated Risk Score

The Inherent Risk Score measures modern slavery risks that are intrinsic/built-in to the operations of an organisation. This is determined by asking which countries, regions, sectors, and high-risk goods are part of their operations, production, or supply chain.

The Unmitigated Risk Score measures the organisations risk that is still present (remains) after accounting for modern slavery risk controls that have been implemented. This is determined by asking suppliers about the policies, processes, and procedures in place to reduce modern slavery risks.

Distirct is provided an aggregated risk score of all the assessed suppliers, and we use this aggregated score to measure the risk on an overall supply chain level.

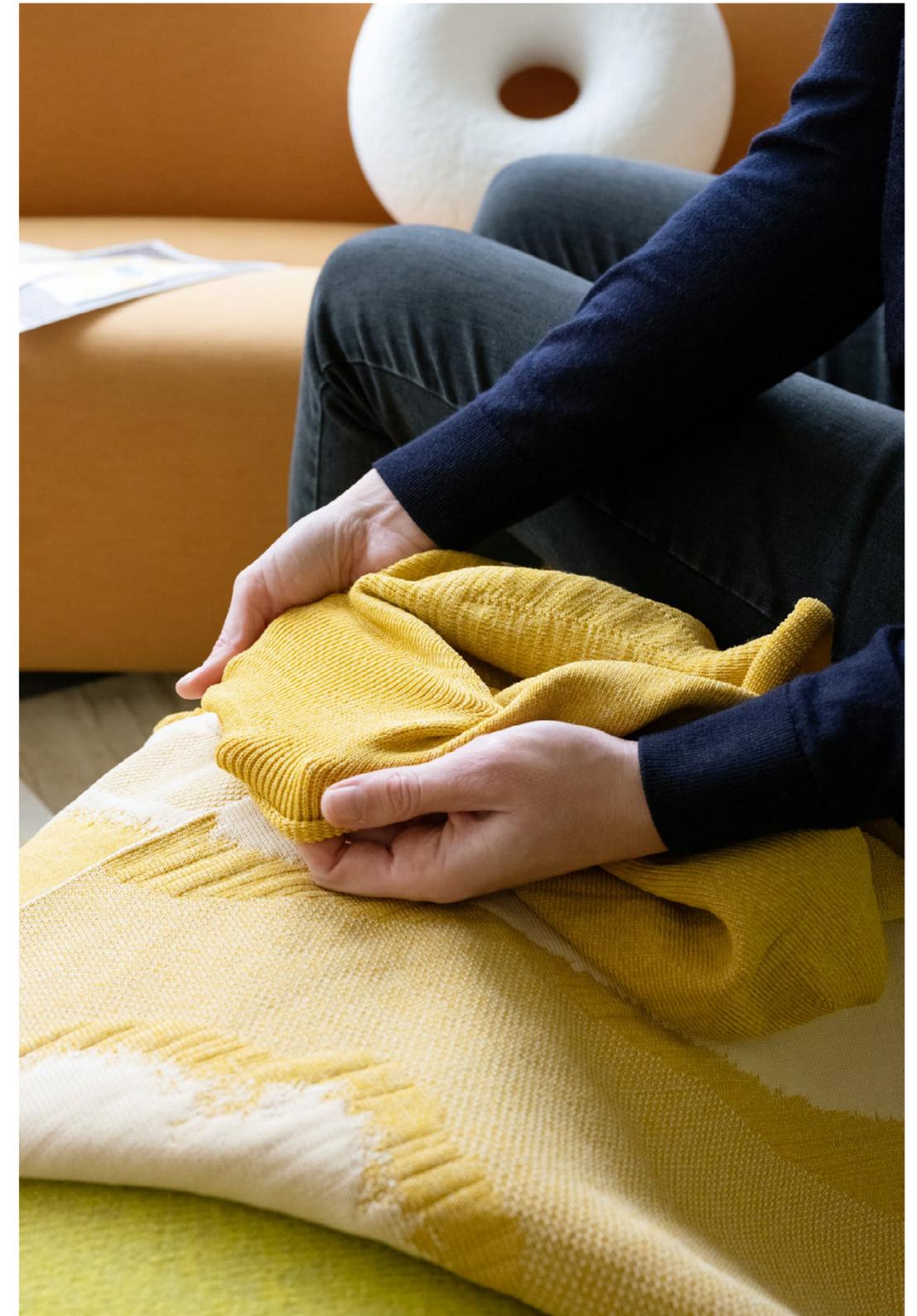
We aim to continuously improve on these KPI's.

As we take actions within our organisation, and with our suppliers, we will be able to assess the effectiveness of our modern slavery action plan to reduce the Unmitigated Risk Score by introducing relevant policies and procedures.

We also measure the effectiveness of our engagement with suppliers and will continue to encourage participation in our assessment program to better identify and mitigate modern slavery risks in our supply chain.

'I WAS SURPRISED TO LEARN HOW OFTEN MODERN SLAVERY HAPPENS IN AUSTRALIA. YOU ALWAYS THINK IT'S HAPPENING IN OTHER, LESS FORTUNATE COUNTRIES BUT IT'S LIKELY RIGHT UNDER OUR NOSES IN SERVICES THAT WE USE ALL THE TIME.'

On Modern Slavery Training, District Purchasing Manager



FY 2025 KPI'S

DISTRICT SCORE

OUR OPERATIONS RISK SCORES

90.00 / 100	90.00 / 100
26.97 / 100	26.97 / 100

SUPPLY CHAIN SCORE

AGGREGATED SUPPLY CHAIN RISK SCORES

Inherent Risk Score	49.36 / 100
Unmitigated Risk Score	35.28 / 100

Currently, on average, our suppliers have partial risk control.

SUPPLIER ASSESSMENT COMPLETIONS

	FY 24-25	FY 23-24
Completions	39 / 74	20/74
Completion Rate	52.7%	27%



THE TOUGH QUESTIONS

To make genuine progress, we need to confront some hard truths. Last year we created a list of tough questions which this year - we answered.

IMPACT OF ACTIONS

Are our actions truly making a difference?

We are not perfect, but engagement and awareness have grown year on year. In 2025, participation increased significantly with the introduction of iPRO software. However, site visits and social compliance audits remain the most effective tools for assessing compliance and mitigating risk. District aims to implement a site audit program by the end of FY26.

SUPPLIER ENGAGEMENT

Are we engaging with our suppliers in a meaningful way? Are we clearly communicating the importance of this work and guiding them on how to address these issues within their supply chains? Do we share our Modern Slavery Statement with them?

Engagement with our assessments have grown significantly since 2022. This year marks the first year we will share our Statement with all key suppliers to further generate awareness. To simplify communication, District plans to develop short video content for manufacturers who may not always be desk-based.

INTERNAL COMMUNICATION

Are we effectively communicating with our internal team about how our practices might contribute to modern slavery and labour exploitation?

By utilising iPRO software, training has been simple, and engagement improved.

WORKER EMPOWERMENT

Are we creating an environment where workers feel safe to report exploitation or abuse?

Grievance mechanisms and whistleblowing channels are in place. We propose holding a national workshop to give workers the opportunity to ask questions and better understand District policies.

INDUSTRY COLLABORATION

Are we working with industry partners, such as eco-labelling organisations, NGOs, and consultants, to gain a better understanding of modern slavery?

This year we collaborated with the UN Global Compact, GECA and auditors and are strengthening our understanding of modern slavery. There is always more to be done, so will continue to collaborate and drive awareness in FY25-26.

SENIOR MANAGEMENT COMMITMENT

How committed is our senior management team to addressing modern slavery? Do they have a solid understanding of the issue?

Senior Management endorse and support Districts strategy however Districts ESG team primarily manage this program, there is an opportunity for further shared learning.

RESOURCE ALLOCATION

Do we have sufficient resources to take meaningful action against modern slavery?

iPRO has streamlined our assessment process, however District requires additional resources in local manufacturing procurement to strengthen regular onsite assessment.

'LEARNING ABOUT THE DIFFERENT FORMS THAT MODERN SLAVERY CAN TAKE WAS ALSO INCREDIBLY ENLIGHTENING – IT MADE ME REALISE HOW WIDESPREAD AND COMPLEX THE ISSUE REALLY IS.'

On Modern Slavery Training,
District National Logistics Manager

PARTNERS



REFERENCES

- ① **WALK FREE FOUNDATION [N.D.] WALK FREE.**
Available at: <https://www.walkfree.org/>
- ② **INTERNATIONAL LABOUR ORGANIZATION [N.D.] FORCED LABOUR, MODERN SLAVERY AND TRAFFICKING IN PERSONS.**
Available at: <https://www.ilo.org/topics-and-sectors/forced-labour-modern-slavery-and-trafficking-persons>
- ③ **UNICEF AUSTRALIA [N.D.]**
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- ④ **UNITED STATES DEPARTMENT OF STATE, TRAFFICKING IN PERSONS REPORT. [2024]**
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- ⑤ **WALK FREE, MODERN SLAVERY RESPONSE & REMEDY FRAMEWORK**
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