

2020

The Lowes logo is centered in the middle of the page. It consists of the word "LOWES" in a bold, white, sans-serif font. The text is contained within a red rectangular box with rounded corners. This red box is further enclosed by a thick blue border. The background of the entire page is a vibrant red, decorated with a repeating pattern of white hibiscus flowers and green leaves. The flowers are stylized with five petals and a prominent central stamen. The leaves are simple, elongated shapes with visible veins.

LOWES

Lowes Manhattan Pty Ltd

MODERN SLAVERY STATEMENT

This Document is approved by the principal governing body of the entity Mrs Linda Penn set out in the Modern Slavery 2018 (the Act) as per section 31(2).

MRS LINDA PENN
CEO/ MANAGING DIRECTOR



AUSTRALIAN ICON SINCE 1898

MANAGING DIRECTOR DIRECTOR	Mrs Linda Penn Mr Jeffrey Mueller
SENIOR LEADERSHIP	
MANAGING DIRECTOR / CEO	MRS LINDA PENN
Chief Advisor	Lucy Gibson
Chief Advisor	Sarann Ryan
Chief Financial Officer	Jim Kondonis
Head of People	Jason Heap
Head of Merchandise	Michael Manios
Head of Property	David Johnston
LOWES PANEL FOR MODERN SLAVERY COMPLIANCE	
Chief Advisor	Sarann Ryan
Head of School-wear	Timothy Bryant
Head of People	Jason Heap
Head of Merchandise	Michael Manios
CONTINUOUS IMPROVEMENT COMMITTEE	
Team Leader	Tim Zhu
Chief Advisor	Sarann Ryan
Head of School-wear	Timothy Bryant
Buyer Menswear	Don Phrachanh
Buyer School-wear	Kathy Adair



CONTENTS

Identify the reporting entity

ENTITY

3 Directors | Leadership

6 Modern Slavery statement

8 Reporting entity

9 Structure | Turnover

10 Mens Finance company

Describe the structure, operations and supply chains

STRUCTURE | OPERATIONS

11 Supply Chains

14 Our store locations

16 Our Brands

18 Lowes school uniforms

Describe the risks of modern slavery practices in the operations and supply chains

RISK

25 Identifying, Mitigating & Remediating risk of Modern Slavery

The reporting entity consulted on its statement with any entities it owns or controls

27 Consultation with controlled entities

28 List of suppliers and risk

Describe what actions the reporting entity is taking to assess and address the risks of modern slavery practices occurring

ACTIONS

30 Timelines

32 Addressing Modern Slavery | Lowes Panel

33 Lowes training & Internal accountability

35 Lowes Gateway process

36 Audit schedule

37 2021 commitments

Include information that you think is relevant, but that is not covered by the other six mandatory criteria

ANNEXURE

41 Lowes whistle-blower policy



LOWES MODERN SLAVERY STATEMENT

As a leader in the retail industry, Lowes takes its ethical and social responsibilities seriously. We are committed to upholding human rights and fair working conditions and ensure that our suppliers adhere to our legal, moral and ethical standards that are governed by the 2018 Modern Slavery Act.

We ensure that all products we purchase come from ethical sources and that we, by association or otherwise, are not party to any illegal or unethical manufacturing practices.

We have a range of measures in place that form our responsible sourcing guidelines. All employees of Lowes, or agents working for Lowes, must always comply with these guidelines. They must ensure that any supplier, either local or offshore, must always fully comply.

The following represents the minimum requirements Lowes requires in regards to all our suppliers.

All suppliers, either local or offshore, must comply with all laws, regulations, building codes, and industrial regulations of the country or countries in which they operate, always.

Every factory that produces garments for Lowes must provide Lowes or its agents with their annual compliance certificate.

Work conducted for Lowes cannot be subcontracted to another supplier. To ensure this every production run is checked both during manufacturing and at the time of shipping to ensure compliance as part of our quality assurance process.

Lowes staff members conduct inspections of the facilities and working conditions for all suppliers in the countries we source from.

Additional to this, Lowes has engaged third party provider 'Intertek' whom is a globally recognised leader in governance and assurance to conduct Audits of our factories and validation on previously obtained audit assessments.

Lowes will not accept, under any circumstances, any of the following practices from the suppliers we deal with:

- Child labour
- Unsafe working conditions
- Illegal conduct
- Corruption
- Excessive work hours
- Discrimination
- Forced labour of any kind
- Denial of the right of freedom of association and of collective bargaining.
- Inhumane treatment

Lowes' goal is to only engage suppliers who operate under acceptable human rights conditions and protect workers' human rights. To monitor this, every supplier is subject to an independent audit on an annual basis. Audits conducted under the Business Social Compliance initiative (BSCI) which is an initiative of the Foreign Trade Association (FTA) are an example.

The audit covers the following areas.

- Producer's background
- Management practice
- Health and social facilities
- Occupational Health and Safety
- Dormitories (if applicable)
- Environment
- Documentation
- Working hours
- Compensation
- Child labour
- Young Workers
- Forced labour
- Disciplinary measures
- Prison labour
- Freedom of association
- Collective bargaining
- Discrimination/harassment and abuse
- Working conditions.

Lowes will not source from a manufacturer who fails one of these annual audits.

Lowes seeks to form close, long-term relationships with its providers to better enable us to ensure that these guidelines are enacted.

This statement is made pursuant to section 11 (2) of the Modern Slavery Act 2018 and constitutes the Lowes – Manhattan Pty Ltd's slavery and human trafficking statement for the financial year ending 2020 and was approved by the CEO on 30th of June 2020.

SIGNED: MRS LINDA PENN



REPORTING ENTITY

ENTITY: LOWES - MANHATTAN PTY LTD
ABN: 31 000 307 666

Lowes is a leading Australian menswear, young menswear and schoolwear retail chain offering well-made clothing at affordable prices.

As a family-owned business, Lowes is part of a small but elite group of companies, which have been in business for 122 years and still 100% Australian owned.

For over a century, the company has been built on integrity, forward planning and financial success. Today, with 192 stores nationwide, it continues to expand steadily as it has for many years.

In a brand conscious society, while many outfitters have paid dearly to charge more for a somewhat pretentious, upmarket image, Lowes have maintained a simple, down to earth integrity in the way they have conducted business for over a century. Since it was founded in 1898, it has grown from a traditional “value for money” menswear store to become a well-known Australian icon in its own right.

Today, Lowes continues to offer the public a range of well-made clothing at affordable prices. Lowes has expanded from its traditional offering of menswear and business wear to offer a full range of school wear, menswear, sportswear, active wear, footwear and work wear.

Lowes Annual turnover ranges between 240 Million and 230 million with on average six and a half million transactions per year.

Anual turnover
\$235,500,000.00

Transactions
6,500,000

HEAD OFFICE

HEAD OFFICE:	240 Princes Highway Arncliffe 2205
State Office QLD	Unit 2/56-58 Burchill St Loganhome 4129
State Office VIC	Unit 29/350 Settlement Rd Thomastown 3074
State Office WA	Unit 3/3 Brennan way Belmont West 6104

OUR STRUCTURE

QUICK STATS

EMPLOYEES : 1206

SENIOR LEADERSHIP	7
HR	7
FINANCE	13
MARKETING	5
IT	10
SCHOOL-WEAR	33
CORPORATE	3
BUYERS	7
PLANNERS	3
ADMIN	8
LEASING	1

STORES 192
See pg 12

SCHOOLS: 742

NSW	522
ACT	84
QLD	108
SA	19
WA	50
VIC	79
TAS	7
NT	1

SUPPLIERS: 219
See pg 24

SUPPLYCHAIN | FREIGHT

3PL'S	1
ROAD FREIGHT	3
FREIGHT FORWARD	1
CALL CENTRE	1

Lowes has a combination of employees comprising of store staff both permanent, part- time and casual and head office support.

The head office support has two separate divisions Menswear and Schoolwear. With field support comprising of Area and State Managers for the store network and Account Managers for the school network.

Lowes is a 100% Australian family owned company and has always had a family feel to its culture, this is shown in how many of its staff have been employed for 10, 20, 30 or 52 and counting years. But it’s also shown in how our staff view Lowes as an employer. Lowes has won “Retail Employer of the Year” in the large employer category for 3 years running. This award is voted on by the employees of Lowes. Lowes values its employees and works hard to ensure that we are an employer of choice with fairness at the heart of everything we do.



Lowes “Retail employer
of the Year”
3 consecutive years!



MENSWEAR FINANCE COMPANY (MFC)

ZERO | EZYWAY
MENSWEAR FINANCE COMPANY (MFC)
ABN: 21002677778

MFC is a wholly owned entity that provides an in-store finance card for customers of Lowes menswear operating under the business name "Lowes Zero". It operates out of Lowes Menswear Arncliffe Head office and provides services solely for Lowes Menswear.

ACTIVE USERS: 133,306
AVERAGE APPLICATIONS PER YEAR: 23,710

Established in the early 1950's by Hans Mueller as one of the first credit providers in Australia, his mantra 'pay as you wear' was an instant success, it was relaunched in 2016 under the new product 'ZERO' managed by ezyway.



The Lowes credit facility is highly compliant and governed by responsible lending criteria, Lowes adheres to the strict NCCP legislation to maintain its credit lending license.

**The Zero card
represents 10% of
Lowes sales**



PAY AS YOU WEAR

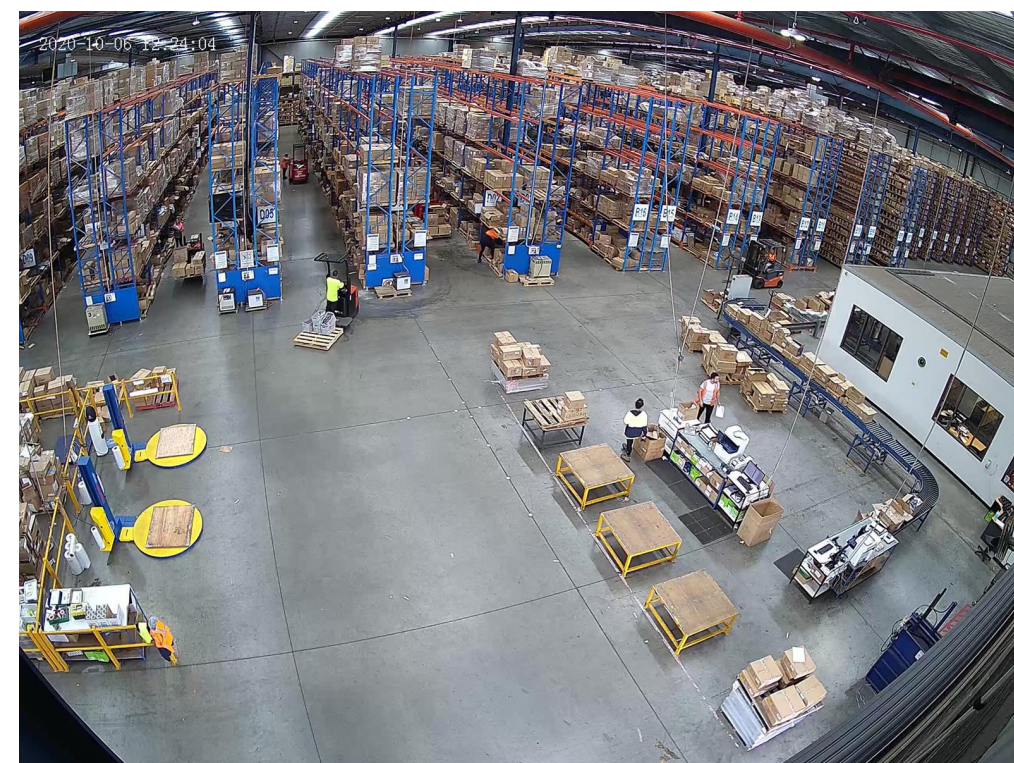
Flatten your expense curve by paying off your Lowes purchases over 12 months with your Zero card.

Plus EXTRA 5% OFF your purchases

[Click here to find out more about our Zero card >](#)

SUPPLY CHAINS **OUTSOURCED LOGISTICS**

**5.5 MILLION UNITS
PER ANNUM
SERVICING
SCHOOLWEAR
& MENSWEAR
FROM IWS MINTO
LOCATION
TO OUR STORE
NETWORK**



* image of our 3PL Minto IWS.

3PL **INDEPENDENT WAREHOUSE SOLUTIONS**
LOCATION: SYDNEY, AUSTRALIA
ABN: 51 611 960 297



IWS is a Sydney-based third-party logistics (3PL) services company committed to consistent and continuous improvement within the warehousing and distribution operations industry.

Extensive range of value-add services at 2 Western Sydney facilities with over 18,000 sqm

Implementing best practices throughout supply chain, state of the art technological EDI solutions and system integration promotes efficiency and accuracy and reduces manual handling and cost.

Employing 55 employees executives and all other employees covered by the Australian award scheme.

Three Lowes employees are permanently situated at the Minto facility working in collaboration with the IWS team.

SUPPLY CHAINS

OUTSOURCED LOGISTICS

FRIEGHT

STOCKWELLS - STOCKWELL INTERNATIONAL PTY LTD

ABN - 19000871330

SYDNEY | QLD



Operating for 49 Years with;

- 28 employees on Clerks Private Sector Award.
- 22 employees on Roads Transport Distribution Award.
- 6 salaried employees.

“ To Provide the highest level of service – whether it is by air, sea or road at a competitive rate that will satisfy our client’s needs each and every time”

Stockwell International maintains the objective to ensure respect of human rights of individuals. All employees should enjoy a work environment free from all forms of modern slavery.

Stockwell International all staff support the responsibility to respect human rights and as a business enterprise Stockwell International retains the duty of avoiding causing or contributing to adverse human rights impacts through their own activities, and address such impacts when they occur. Stockwell International seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products, or services by their business relationships, even if they have not contributed to those impacts.

Stockwells policy here is to treat every suspicion seriously and report all modern slavery concerns to the appropriate authorities. By doing the right thing, we can try and abolish modern slavery for a brighter and fair future for everyone.

Operations o/s affiliated or owned – (Staff for overseas offices not included in above staff numbers as they fall under their own offices).

We are an Equal Opportunity employer and are ISO accredited in Health and Safety, Environment and Quality procedures and systems. We are audited yearly. With regards to our overseas offices they are also audited yearly for working conditions and acceptance and signing of all company policies and procedure (New Zealand/USA)

With regards to our agents, as they are a service provider only (FOB) and the person exporting the goods (or the owner of the supply chain) falls under their own modern slavery system, we have agreed to yearly office visits to our high volume countries.

TOLL

See Tolls Modern Slavery statement

<https://www.tollgroup.com/about/policies-procedures/modern-slavery-act-statement>



AUSPOST | STARTRACK

See Australia Post Modern Slavery statement

https://auspost.com.au/content/dam/auspost_corp/media/documents/publications/2019-australia-post-annual-report.pdf



CALL CENTRE

BDE GROUP



LOCATION: FIJI

ABN 68 601 293 403

14 agents

4000 inbound calls from Australia per week

The call center assist in taking calls for the ZERO card, customer care for our online division and service our head office switch.

BDE supply telephone system, IT Development, Applications software, Provide Australian support and management of outsourcing to Greymouse in Fiji .

Lowes staff inspect the working conditions in Fiji 4 times per year to ensure working conditions and standards.

BDE has star rating in Fiji with their employees getting paid 10-15% above award.

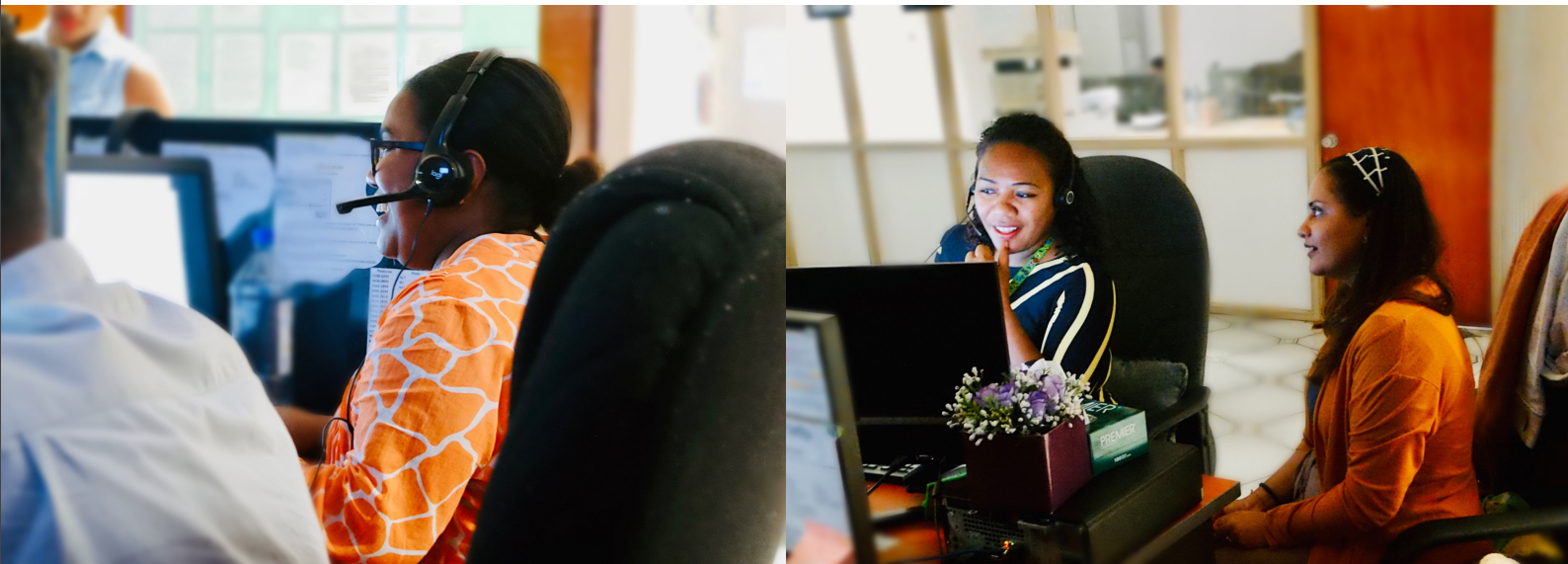
The call center also has a drop off policy where all staff are driven home after their shift or a taxi is provided.

A Security guard stands watch after 6.00pm every day and monitors all activity.

All staff have a Rostered Day off and have the 10 day sick leave per year as well as 4 weeks annual leave.

Greymouse is an equal opportunity employer and employs indigenous Fijians, Fijian Indians and other nationalities.

BDE have escalation procedures to raise any workplace issues.



* image of our fijian call centre in Suva, Viti levu.

OUR STORE LOCATIONS

Airport West
Albury
Armadale WA
Armidale
Arndale SA
Ballarat Central
Ballina
Bankstown
Bateau Bay
Batemans Bay
Bathurst
Beenleigh
Belconnen
Belmont
Belmont WA
Bendigo Lansell Square
Bendigo Marketplace
Blacktown
Booval
Brimbank
Brisbane
Broadmeadows
Browns Plains
Bundaberg
Burwood Plaza
Cairns Central
Cairns Earlville
Cairns Smithfield
Caloundra
Campbelltown
Campsie
Capalaba Park
Carindale
Carlingford
Castle Plaza
Castle Towers
Castletown
Centenary
Cessnock
Charlestown
Chatswood
Chermside
Clifford Gardens
Coffs Harbour
Colonnades
Coomera

Corio
Corner (Park House)
Cranbourne Park
Dalby
Dapto
Darwin
Dubbo
East Hills Girls High School
On Campus
Elanora
Elizabeth
Ellenbrook
Erina
Fairfield
Figtree
Forster
Fountain Gate
Glendale
Glenorchy
Gosford
Goulburn
Grafton
Grand Central
Green Hills
Griffith
Gungahlin
Gympie
Head Office
Helensvale
Hervey Bay
Highpoint
Hornsby
Horsham
Hurstville
Inala Plaza
Ingle Farm
Jesmond
Joondalup
Kardinya Park
Karingal Hub
Kawana
Kingaroy
Kippa-Ring
Kirwan
Knox
Kotara

Lake Haven
Leichhardt
Lilydale
Lismore
Lithgow
Liverpool
Loganholme
Macarthur
Macdonalds Jamison
Mackay
Macquarie
Maddington
Maitland
Mandurah
Maroochydore
Marrickville
Maryborough

‘Lowes has 192
stores nation
wide!’



Melton
Menai
Merrylands
Midland Gate
Mildura
Minto
Miranda
Mirrabooka
Morayfield
Morwell
Mt Druitt
Mt Gambier
Mt Gravatt
Mt Pleasant
Murray Bridge
Muswellbrook
Narellan
Newcastle
Noosa
Normanhurst Campus
Shop
North Lakes
Northland
Nowra
Oakleigh
Ocean Keys
Orange
Pagewood
Palmerston
Parabanks
Parramatta
Penrith
Perth Modern School On
Campus
Plenty Valley
Port Macquarie
Queanbeyan
Raymond Terrace
Redbank
Richmond
Riverlink
Robina
Rockdale
Rockhampton
Rockingham
Roselands
Rosny Park
Rouse Hill
Runaway Bay
Salamander Bay
Savvy Tuggeranong
Seven Hills
Shellharbour
Shepparton
Singleton
Southport
Springfield
St Joseph's On Campus
Shop
St Marys
Stafford
Strathpine
Taigum
Tamworth
Taree
Tea Tree
Toombul
Toormina
Top Ryde
Townsville
Tuggerah
Tuggeranong
Tweed City
Victoria Point
Wagga Wagga
Warrawong
Warriewood
Warringah Mall
Warrnambool
Warwick
Waverley Gardens
Werribee
West Lakes
Wetherill Park School
Uniforms
Wollongong
Woodcrest State college
Woodridge
Woy Woy
Wynnum
Yeppoon

OUR BRANDS

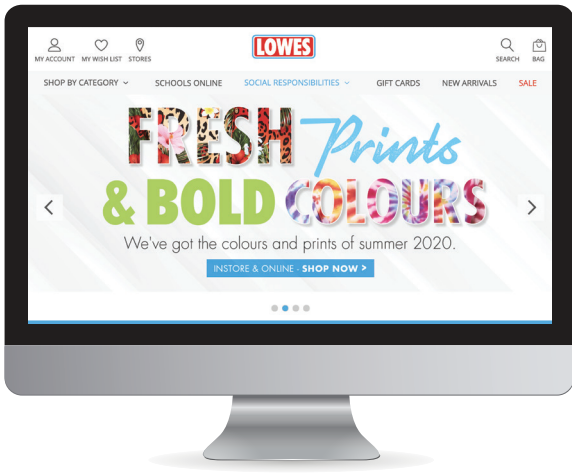
Lowes
lowes Kidswear
Baby @ Lowes
Pets @Lowes
DBK
COUGARS
Elliott's
Traders
Prodigy
Manhattan
Iconic Soul
Beare & Ley
Botany Bay Traders
Robert Huntley
Riley Adams
Outer Peak
Anglers Edge
Traders 308
Perizzi
Maxsport
Street

OUR CATEGORIES

Big Mens
Work-wear
Unisex
Hawaiian
Outdoor-wear
Formal Wear
School-wear
Sportswear
Swimwear
Matchy Matchy
Business Wear
Underwear Socks & PJ's
Shoes & Accessories
Baby-wear
Dog Wear
Home & Gifts

APPAREL TYPES

Shirts
Tops
T-Shirts
Tanks
Polos
Vests
Blazers
Shorts
Trousers
Jeans
Chinos
Overalls
Suits
Work Boots
Training Shoes
Socks
Jackets
Jumpers
Hats
Business shirts
Underwear Socks & PJ's
Rashies
Swimwear
Towels
Tunics
Skorts
Blouses
Womens Business Skirts
Sports Representative
Leavers bespoke tshirts / jersey



“LOWES PROVIDING A PREMIUM CONVENIENCE TO LOCAL SCHOOL COMMUNITIES ALL OVER AUSTRALIA, SELLING TO SCHOOLS FOR OVER 100 YEARS!”



LOWES SCHOOLS

Lowes Schoolwear is the largest provider of school uniforms around Australia. As part of the process in securing and retaining business Lowes participates in Tenders for schools and request for Tenders with procurement departments, including various religious archdiocese and state governments around Australia. Lowes submissions are required to satisfy criteria as set out in the tender documentation with past performance taken into consideration. Successful candidates must provide evidence and satisfy contractual terms and conditions during tenure. Terms and conditions are established to not only serve community expectations, but to satisfy requirements with applicable regulations or regulatory frameworks.

Lowes is and has been in contact with schools facilitating the supply of uniforms for over half a century. In recent times the move to centralise procurement for various groups has resulted in supplier qualifying under overreaching arrangements to ensure adherence and compliance with but not limited to, practices regarding, labour regulations, ethical employment practices, environmental impacts and Workplace health and safety.

Lowes Schoolwear has qualified under these arrangements based on our experience and performance with initiatives in place to ensure compliance and continual improvement, with the following governing bodies.

Queensland Government DETSOA 78764 Standing Offer of Arrangement for provision of school uniforms and accessories

Western Australian Government ED19088 Supply of School Uniforms and Specialty School Apparel – Panel

Catholic Education Department, Parramatta Archdiocese -Uniform Supply panel of preferred suppliers

Catholic Education Department, Wollongong Uniform Supply panel of preferred suppliers

Sydney Catholic Schools -Uniform Supply panel of preferred suppliers

Note: Lowes at present have submitted applications Requesting for Tender with ACT and SA Government.

Additionally, Lowes is currently tenured with various schools under Department of Education NSW, ACT, Victoria And Tasmania contracts.

CONTINUOUS IMPROVEMENT COMMITTEE AND OUR RECYCLING PROGRAM

Our waste Management approach is complicated comparative to regular fast fashion. Our garments are bespoke distinctive wear that cannot be resold or reused based on copyright and contractual obligations.

This paved way for an affiliate program monitored by our continuous improvement committee to have our textiles recycled and prevented from landfill.

We use an Australian Firm; MANRAGS <https://manrags.com.au> to manage our oversupply of fabric that cannot be resold or reused.

Of our discontinued schoolwear range we also donate school uniforms to developing countries such as Fiji, Papua New Guinea and Pakistan.

Our continuous improvement committee join the Lowes Modern Slavery panel on request to pitch for new and improved methods to handle waste management and sustainability.

‘THE GREATEST RISK OF WASTE IS TRANSITIONING UNIFORMS, OUR CONTRACTS UPHOLD A BI-LATERAL WASTE MANAGEMENT AGREEMENT THAT SHARES EQUAL RESPONSIBILITY BETWEEN RETAILER AND THE SCHOOL ‘



LIST OF SCHOOLS

Georges River College	Marist College - Kogarah	Masada College
St Mary Mackillop College	Carlingford High School	Homebush Boys High
Perth Modern High School	Freeman Catholic College	St Aloysius
St Clare's College	Ellenbrook Secondary	Pascoe Vale Girls College
St Patricks College Sutherland	Casimir College Years 7-10	Glenala State High School
Wollondilly Anglican College Y	Strathfield Girls High	Oran Park High School
Patrician Bros Fairfield	Magdalene Catholic High School	Caroline Chisholm Glenmore Par
Cardijn College	Nowra High School	Mackay North State High School
Mccarthy College Tamworth	East Hills Girls High School	Henry Kendall High
Arthur Phillip High School	Karabar High	North Sydney Girls High School
Waverley Christian College	Campbelltown Performing Arts	Springfield Central State Scho
John Therry Catholic High	Port Hacking High School Junio	Asquith Boys High Yr 7- 8
Cherrybrook Technology H/S	Telopea Park School	Hunter Sports Hs Gateshea
Marist Sisters College Woolwic	John The Baptist Ps	Gympie High School
Lilydale High School	Normanhurst Boys High School	Hunter River High
Emmaus College	Tomaree High School	Lisarow High School
St. Patrick's Marist College D	Gladstone Park Secondary Colle	Terrigal High School
Ryde Secondary College	Sydney Technical High	St. Pauls High School - Yrs 7-
Aquinas College	Figtree High School	Tamworth High
Cronulla High School	Burwood Girls	Harrison School
St. John's High Nowra	Oxley High Tamworth	Good Shepherd Plumpton
Epping Secondary College	St John Bosco High College Eng	Champagnat Catholic College
Endeavour Sports High School	Camden High School	Tempe High School
Hume Central Secondary Collage	Xavier High School	Oak Flats High School
Woodcrest State College	Murrumbidgee Regional High Sch	Rosehill Secondary College
Saint John Paul li College	Kirwan State High School	Mary Immaculate Ps Boss Park
Maronite College	Mernda Primary	Lara Secondary College
Blakehurst High School	All Saints College	Bethlehem College
La Salle College Bankstown	Holy Family Primary Menai	Amaroo School
Oran Park Public	Hornsby Girls High School	Rutherford Public School
Mount St Joseph Secondary Scho	Keira High	Wagga Wagga Christian College
St Marys College Ipswich	Macquarie Fields High School	St Justins Primary
Kildare Catholic College	Callaghan Waratah Campus	Coburg High
Kalamunda Senior High School	Jubilee Primary School	Manning Valley Ac Yrs 3-6
Richard Johnson Anglican Yrs 1	Singleton High School	Jerrabomberra Public School
St Francis Xavier College	Wamberal Public	Crusoe College
Illawarra Sports High School	Bossley Park High School	St Catherine Of Siena Preston
Lavalla Catholic Colleg	Tlsc - Tumby Umbi Campus	Ambarvale High School
Phoenix College	De La Salle Revesby	St. Therese's Primary New Lamb
St Joseph College	Kotara High School	Randwick Boys High School

Blue Haven Public
St Marys Primary Ipswich
Holy Spirit Primary Nicholls
Mount Stromlo High School
Rose Bay High School
White Friars Catholic School
St Keiran Catholic Primary
De La Salle Boys College Ashfi
Springfield Lakes State School
Spring Farm Public School
Glendale High
The Hills Sports Snr
Albury High School
De La Salle College Caringbah
Asquith Girls' High School
Sacred Heart Ps Booval
Canterbury Girls High
Immaculate Heart College
Our Lady Of The Rosary F'field
Camden South Public
Wheelers Hill Secondary College
St Thereses Ps Bentley Pk
Ashfield Boys High

Bethany Primary - Glenmore Par
Dapto Public School
Koorringal High
St Andrews Christian College
Blacktown Boys High
Belconnen High School
Good Shepherd Primary Amaroo
Thornton Public School
Sarah Redfern High School
West Wallsend High
Canberra High School
Wyong High School
St Gregorys Primary
De La Salle Senior College Cro
Ballarat High School
Mother Teresa Primary School
Al Zahra College
Aveley North Public
Kingsgrove High School
Kogarah High School
Erina High School
St Therese Ps Mascot

Northern Beaches State High School
Irrawang High School
Gold Creek School
Emmaus Christian School
St Pius Primary School, Banyo
St. Mary's Ps Warners Bay
Tlsc - The Entrance Campus
Stella Maris Catholic Primary
St Josephs Moorebank
Thuringowa State High
Salisbury High School
Maitland Christian School
Carlton Public
Richard Johnson Anglican Yrs 7
Putney Public School
Marrickville High School
All Saints Ps Seaford
St Carthage's School Lismore
St Mary & Josephne Primary Sch
St Mary's Primary Sch Casino
All Saints Senior Catholic Hig
Kincumber High School
Strathfield South High
Gungahlin College
Aveley Primary School
Peel High School Tamworth
Yarra Hills Secondary College
Tamworth Public School
Merrylands High School
North Bundaberg State High Sch

Mount Annan High
St Joseph East Maitland
Heatley Secondary College
Wagga Wagga Lutheran School
James Fallon High School
Warnervale Public School
Our Lady Of Rosary Ps Kensing
Grandis Primary School
St Paul's Camden Primary
Mary Immaculate Ps Eaglevale
St John's Catholic Primary Sch
Griffith North Public School
Melba Copland Secondary Sch
Red Cliff Secondary College
Holy Cross Ps Trinity Park
Saint Helena's Catholic Primar
St Michaels Nelson Bay
Surveyors Creek Public School
Kurnai College
Helensvale State School
West Lakes Shore School R-7
Coorparoo Secondary College
Thomas Reddall High
Kingaroy State High School
Dubbo Public
Hamilton South Public
Good Shepherd Catholic School
Orara High Coffs Harbour

St Marys Star Of The Sea Hurst
Singleton Public School
Our Lady Of Mercy College Burr
Glenroy College
Camira State School
St Thomas Ps Willoughby
Queanbeyan High School
St Francis Of Assisi Primary
Coolamon Central School
Picnic Point Hs
St Michaels Ps Tralalgon
Woolooware High School
St Josephs Merewether
Bellingen High School
Heathcote High School
St Joseph's Ps Warrnambool
Orange High School
St. Aidan's Primary Rooty Hill
St Anthony's Ps Wanniasa
Lake Gwelup Primary School
St. Michaels Nowra
Belmore Boys High
Clontarf Beach State School
St Patricks Primary Griffith
Malvern Springs Primary School
Kanwal Public
St Martha's Primary Strathfiel
Timboon P-12 School
Good Shepherd Ps Hoxton Pk
Sacred Heart Primary Cabramatt
Neville Bonner Primary School
St. Patricks Ps Blacktown
Lismore High School

Secret Harbour Primary School
Beverly Hills North Public Sch
St Marys Primary Dubbo
St Ann's School
St Mary's Primary Rydalmere
All Saints Ps Liverpool
Runcorn Heights State School
Arbor Grove Primary
Ellen Stirling Primary School
Chifley College - Bidwill
St Johns Primary Dubbo
Howrah Primary School
Upper Yarra Secondary College
St. Therese Ps West Wollongong
St Josephs Primary Tweed Heads
Pearsall Primary School
Border Christian College
Richmond River High



Minchinbury Public	Cobbitty Public School	Jurien Bay District College	Emu Plains Public	Our Lady Sacred Heart Merbein	Monash Primary School
Thurgoona Public School	St Mary's Ps Warwick	Craigie Heights Primary School	Dallas Brooks Community Primar	Aranda Primary School	Wyoming Public School
St. John's Ps Campbelltown	Currajong State School	Holy Spirit Ps Lavington	Gwynneville Public	Our Lady Of The Rosary Waitara	Wyrallah Road Public
Our Lady Of The Rosary St Mary	Horsham West & Haven Primary	Rainbow Street Public School	St Josephs Primary Kilaben Bay	Woori Yallock Primary School	West Goulburn Public School
St. Benedict's Primary Edgewor	Arkana College Kingsgrove	Sarah Redfern Public	St Laurence's Dubbo	Calare Public School	Lyneham Primary School
St Patrick's Parish Ps Albury	St Anne's Ps Nth Albury	Highfields Prep & Kindy School	Gymea Technology High School	Eaglehawk North Primary	Meadows Primary School
Hillarys Primary School	Nambucca Heads High School	Sacred Heart Primary School	Canley Vale Public	St Matthew's Primary School	Nanango State High School
Edney Primary School	Elernmore Vale Public School	St.josephs Primary Oatley	Lake Albert Public School	St Benedict's Primary School	Our Lady Of The Assumption, En
Butler Primary School	James Cook Boys Technology Hig	Our Lady Of The Way Ps Emu Pla	St. Anthonys Primary Marsfield	Sir Joseph Banks	Holy Trinity Primary Wagga
Nazareth Catholic Primary	Unanderra Public	William Ross State High School	Turner Primary School	East Hills Boys	Kelso Public
Matraville Sports High	St. Nicholas Primary Tamworth	Bathurst Public School	St.pius X School Unanderra	Galilee Catholic	St Mels Primary Campsie
Jones Hill State Primary Schoo	St James Primary	Belair Public School	Merriwa Primary	Fairview Heights State School	Catherine Mcauley
Mount Clear College	Our Lady Help Of Christian Ear	Merewether Heights Public	St. Cecilia's Ps Wyong	Findon Primary School	East Griffith Public
St Pauls Ps Gateshead	Mortdale Public School	The Hills Sports H/S Jnr	Fitzgerald State School	St Dominics Ps Broadmeadows	Corpus Christi Ps St Ives
Canterbury Boys High	Mary Help Of Christians Toormi	Moana Primary School	St Edward's Primary Tamworth	Barraba Central School	Balga Primary School
Ramsgate Public School	Holy Family Catholic Ingleburn	Calvary Lutheran School	Pitt Town Public	Chifley College - Dunheved Cam	Koorungal Public School
Heritage Christian School K-5	Delacombe Primary School	Taree High School	Woodmans Hill Campus	Ngunnawal Primary School	St Vincent's Primary School
Melrose High School	Brandon Park Primary	Cronulla Public School	St Gerard's Primary School	Aberdeen Public School	Mcauley Primary School
St Josephs Ps Bulli	Canobolas Rural Techology Hig	Rosetta Primary School	Golden Square Primary School	Aldridge State High School	Southern Montessori School
Queen Of Apostles Primary Scho	Great Lakes College	Grahamstown Public School	Yale Primary School	St John Vianney Ps Morisset	Taree West Public School
St. Thomas More School	St Gertrudes Smithfield	St Vincent De Paul Ps	Hendon Primary School	Orange Public School	Townsville Central State Schoo
Pioneer State High School	Gooseberry Hill Ps	Durack State School	St Peters Primary Stockton	Keilor Heights Primary	Blair State School
St Brendan's Ps Bankstown	Trinity Ps Kemps Creek	Figtree Heights Public School	Mount Austin High School	Rasmussen State School	St Marys District School
St Mary's Catholic School	Belmont High	Maida Vale Primary School	Leda Primary School	Moonee Ponds West Primary Sch	St John The Apostle Primary
Kanahooka High School	Campsie Public School	Horsham Primary School	Vincentia Public	St. Therese's Ps Denistone	St Mary Magdalene's School
Werrington County Public Schoo	Westdale Public School	Mildura West Primary School	Kingsford Smith School	Ipswich East State School	St Josephs Rockdale
Holy Family Primary School	New Town Primary School	St. Declans Primary	St Margaret Mary's Primary Sch	Penola College Buy Back	Branyan Road State School
St.luke's Ps Revesby	Mackillop College Bathurst	Cambridge Park High	Palmerston Primary School	Richard Johnson Anglican Schoo	St. John's Ps Lambton
Anne Hamersley Primary School	St Francis Xavier Ps Ashbury	Kingsgrove Public School	St. Joachim Ps Lidcombe	Sans Souci Public	Queanbeyan East Primary
Our Lady Of Mt Carmel Primary	Colyton Public School	St Joseph's School, Nundah	Bucasia State School	Maddington East Ps	Richmond Primary School
Beaconsfield State School	St Brigid's College	St Anthonys Primary Clovelly	Mundingburra State School	Chatham High	St. Felix Ps Bankstown
St Patricks Primary Wallsend	Bohlevale State School	Hughes Primary	St Brigids Primary Gwynneville	Golden Square Primary	Red Hill Public School
Woongarah Public School	Holy Spirit Carnes Hill	Granville South Creative & Per	Queanbeyan West Primary School	Kennington Primary School	North Parmelia Primary School
St. Francis Xavier Ps Arncliff	St Thomas Aquinas Primary	Serviceton South State School	Nareena Hills Public School	Quarry Hill Primary	St. Raphaels Primary
Oxley Vale Primary School	Lindisfarne Primary School	St. Christophers Primary Panan	St. John Vianney Doonside	Nulkaba Public School	Mabel Park State School
Moorefield Girls High School	St. Patrick's College Mackay	Avondale Primary School	Grafton Public School	Penola Catholic College	Holy Family Emerton
J J Cahill High School	Warwick West State School	St. Marys Primary Georges Hall	Queanbeyan South Primary Sch	Albury Public School	Raglan Public
Palmerston Chrstian College	Pleasant Heights Public	Our Lady Queen Of Peace	Quinns Rocks Primary School	Murray High School	Bambara Primary School
West Tamworth Public	Emmaus Catholic Primary School	Irrawang Public School	Bethel Christian School Mt Dru	Tomaree Public School	Heatley State School
Playford College	Our Lady Of Annunciation Ps	Churchill State School	Arncliffe Public School	Goodna State School	Caroll College
St Joseph's Kingswood	Our Lady Help Of Christian Ros	Mountview High Cessnock	The Entrance Public School	St Michael's Primary School	Nursery State Special School
Keilor Primary School	St Clare Of Assisi Primary	Antonio Catholic School	Kirwan State School	Namadgi School	St Joseph's Primary School
Eleebana Public School	Weetangera Primary School	Waraburra State School	Glengarry Primary School	Weir State School	Queens Park Primary School
Metella Road Public School	Hassall Grove Public School	Torrens Primary School	St. Therese Primary Sadlier	St.john The Apostle Narraweena	St Brendan's Primary School
Anna Bay Public	John Calvin Christian School	Wanniassa School K-10	Lavington Public School	Canterbury South Public	Fadden Primary
Chifley College - Mt Druitt Ca	Armidale Secondary	St Andrews Christian Community	Toormina Public	Yarrilee State School	Oakey State High School
St.patricks Primary Kogarah	Our Lady Of Dolours Chatswood	Swansea High	Leonay Public School	St. Paul Of The Cross Ps Enmor	St Patricks School Bundaberg
St Michaels Primary Meadowbank	St John The Apostle Ps C Beach	Westport Primary School	Gundagai High School	St Philomenas Primary	Our Lady Of Victories Ps
Townsville State High School	Holy Cross Ps Kincumber	Majella Primary School	Melton West Primary	St Patricks Ps Port Kembla	Woodport Public School
Wedge Park Primary School	Fort Street Public School	Kahibah Public School	Ben Venue Public Armidale	St Joseph's Primary Wagga Wagg	Riverview State School
St Kevins Eastwood	Tamworth South Public	Lake Illawarra High School	St Nicholas Of Myra Primary	Rosewood High School	Fairfield Heights Primary Scho
Our Lady Help Of Christians	St Mary Mackillop Ps Sth Pnrth	Seven Hills High School	Our Lady Help Of Christian Hen	St Joseph Primary Bileola	Campbelltown North Public Scho
St Anthony's Ps Kingscliff	Assumption College	Hillston Central School	Our Lady Of Rosary Ps Wyoming	Holy Family Primary Luddenham	Maryborough State High

Our Lady Queen Of Peace Glades
Blessed Sacrament Primary Scho
St. Fiacres Ps Leichhardt
Villa Maria Primary School
Verity Christian College
Forest Street Primary
Cessnock West Public School
Annandale State School
Osborne Primary School
Fraser Primary School
Bletchington Primary
St. Columba's Ps Leichhardt Nt
St. Bernadettes Dundas Valley
Sandgate State School
Cundletown Public School
Kangaroo Flat Primary
Marcellin Technical College
Broadmeadows Valley Primary Sc
Wagga Wagga Public School
St John The Baptist Freshwater
Northview State School
Redbank State School
Fern Bay Public School
Charlestown South Public Schoo
Kingswood High
Warriapendi Primary School
St. Michaels Stanmore
Holgate Primary
Hawker Primary School
Woodridge North State School
Calwell Primary School
Turvey Park Public School
Huntly Primary School
Mount Rowan Campus
St Mary's School Bellingen
Medina Primary School
Tuggerah Primary
St. Joan Of Arc Primary Haberf
Lilydale Primary School
Sacred Heart Primary Morwell
Jewells Public
Cronulla South Public School
Carrington Public
St Anne's Primary Strathfield
St Christophers Holsworthy
St Thomas The Apostle Primary
Big Hill Primary School
Padbury Primary School
Mackay State School
Muswellbrook South Public Scho
St John's Primary Riverstone

Coomealla High School
Preston North East Ps
Abermain Public
East Goulburn Public
St Francis Assisi Ps Warrawong
St Monica's Primary School
East Maitland Public School
Holy Family Elc
St Joseph's Primary Tamworth
St Pius Dubbo
Muswellbrook Public
St Mary's School Wellington
Ashtonfield Public School
Callaghan - Jesmond Senior Cam
Morwell Park Primary
Kurri Kurri Public School
Maddington Primary P&C Assoc.
Byford John Calvin School
St. Oliver's Harris Park
New Lambton South Public Schoo
St Annes K-10 Temora
Ballina Primary School
Rosary Primary School
St Michaels Thirroul
Ipswich North State School
Florey Primary School
Charles Conder Primary School
Evatt Primary School
Lightning Reef Primary
Western Suburbs Special Sch
Orange Grove Primary School
St. Agnes Matraville
Kelso State School
St Thomas More's Primary Sch
Sturt Public School
St. Paul's Primary Rutherford
Hill Top Public School
Eaglehawk Primary School
Cathedral Primary Bathurst
Mount Austin Public School
Kitchener Public
Queanbeyan Primary School
Rockingham John Calvin School
Ourimbah Public School
Armidale City Public
Albury North
Wagga Wagga North Prim.
Oakey State School
Raymond Terrace Public School
St.francis Xavier Belmont
Redcliffe Special School

Hillvue Public School
Gowrie State School
Tallangatta Primary School
Timbumburri Public School
Theodore Primary School
Goodna Special School
St Mary's Catholic Ps Armidale
Toukley Public
Macgregor Primary School
St John The Baptist Ps Maitlan
Black Mountain School
St Brendans Primary Annandale
Aitkenvale State School
Broadmeadows Primary School
St Monicas Primary Footscray
Table Top Public School
Wondai State School
Sacred Heart Primary School
Inala State School
Walkerston Primary School
Ooonoonba State School
Chifley College - Shalvey High
Hendra State School
Ipswich East State School
Learn Achieve Celebrate
Lalor East Primary
Campbell Primary School
Curtin Primary
Sacred Heart Primary Villawood
Jennings Street School
Lavington East Public
Karangi Public School
St John Vianney Primary School
Caves Beach Public
St Therese's Primary Lakemba
Chapman Primary
Caladonian Primary
Lanyon High School
Padstow Park Public School
Riverlands Montessori School
St Kieran Catholic Primary
Sunshine Bay Public School
Wilsonton State School
Wooroloo Primary School
Yoogali Public School
Latham Primary School
Lilydale West Primary School
St Patrick's School Allora



RISK

IDENTIFYING, MITIGATING & REMEDIATING RISK OF MODERN SLAVERY

Risks of modern slavery in any international retail supply chains are dynamic and complex. We are constantly reviewing risks to prioritise our efforts where there is greatest impact to people in our operations and supply chain.

Since 2019, we have conducted risk assessments designed together with our advisor partner Intertek, a compliance and sustainability solutions provider. These assessments are informing our Responsible Sourcing Program and areas of focus. This year, we focused on supply chains. These assessments focused on the inherent risks of exploitation involved in producing the products in our supply chains.

Lowes Menswear acknowledges the following modern slavery risks as most salient in our supply chains.

The types included, forced labour, debt bondage, deceptive recruiting for labour, forms of child labour, restrictions of movement, intimidation, threats and human trafficking.

We do not directly employ any staff overseas so this lowers modern slavery risks within our direct team. Therefore, our operational risk assessment focused on the only areas of the business that use contracted labour or service providers whose workforce engaged with us in overseas locations. We have less direct visibility and control over

these workers and their employment terms. We have visited these locations and undertaken assessments of the work environments to ensure they comply with local legal conditions and do not provide conditions for potential risks for modern slavery conditions. We are working on improving auditing in this area as it is new operational environment.

The products we sell in our stores and online are sourced from 9 countries. Each of these products and sourcing countries presents a different set of human rights challenges, including risks of modern slavery. We source products from suppliers that are both vendor and non-vendor branded. With our own branded products we are more directly connected to these products because suppliers are producing and packing products directly for our business, which means we have greater connection to the workers and influence to remediate breaches.

Generic, wholesale or non regular suppliers will be subject to further risk assessment. Similarly where our suppliers themselves source their supplies from, such as cotton, provides additional levels of risk.

This risk assessment will allow us to “segment” suppliers into three groups: priority, moderate and minimum. Each segment will have different due diligence requirements based on associated risks. We are still developing our supplier segmentation methodology.

Mitigating and remediating risks of modern slavery is a high priority and we are developing new Policy frameworks to build upon our long standing practices of strict supplier agreements and regular 3rd party audits in the country of origin for our products.

We are enhancing our set of policies and procedures that articulate our values, ways of working and expectations of our suppliers that will be reviewed regularly. This policy framework will ensure that our suppliers clearly understand our expectations.

Strengthening supplier contracts is one of the key ways in which we articulate our human rights expectations and control the potential risk of modern slavery arising in our global supply chain is through our contracting process with our direct suppliers. Building on existing Responsible Sourcing provisions, modern slavery specific provisions have been incorporated in our many of our trade procurement contracts and Vendor Trading Terms. We intend to have these provisions in all agreements by 2021.

In the future, we intend to use a Slavery Compliance Statement, which is a supplier modern slavery compliance confirmation. We request the supplier to sign and provide this statement to Lowes on the commencement date of an agreement and on each anniversary of the commencement date during the agreement term.

“STRENGTHENING SUPPLIER CONTRACTS IS ONE OF THE KEY WAYS IN WHICH WE ARTICULATE OUR HUMAN RIGHTS EXPECTATIONS AND CONTROL THE POTENTIAL RISK OF MODERN SLAVERY”

Lowes recognises that it may contribute to a greater risk of slavery in our supply chain by placing pressure on suppliers by such means as asking for reduced costs or better quality. We will be factoring this into our future risk asesment profiles for suppliers

We recognise the importance of building greater understanding of modern slavery risks and our requirements with the team members who are responsible for supplier relationships and oversight so that they are equipped to provide guidance to our partners to comply. We have and will continue to raise awareness via training for all team members in this area.

CONSULTATION WITH CONTROLLED ENTITIES.

Where Lowes held a “controlling interest” in an entity (MFC) we met with the entire team to educate, raise awareness and set our expectations in mitigating modern slavery risks. We provided documentation outlining our expectations and will provide a copy of this document upon its completion. Lowes does not have a controlling or any other equitable interest in any other entity.

Lowes undertakes that if we do in the future look to taking a controlling interest in another entity, a full risk assessment and audit for risk of modern slavery will form of our assessment before we take control and based on that we will undertake the appropriate actions.



LIST OF OUR SUPPLIERS | ASSESSMENT OF RISK

CHINA

Risk assessment : **HIGH***

Afw Pty Ltd	Shaoxing Dengao Garment Co Ltd	Jiangxi Huyan Industrial
Shiny Pty Ltd	Shaoxing Daxin	Sunshine Industry (Hk) Ltd
Jiangxi Handsome Garments	Better International Jiangxi	Shaoxing Guyue Clothing Co.ltd
Ningbo Hongli Group Co. Ltd.	Ningbo Lianyi Imp & Exp	Excellent Promos Co.limited
Yichang Mingshen Garments.,Co	Yong Ri (China Adv)	Reason Imp. & Exp. Co. Ltd
Zhejiang Willing Foreign Tradi	Ningbo Yinzhou Karuisi Textile	Shanghai Shimei Garments Co.l
Ningbo United Group Imp & Exp	Quzhou Municipal Senior Trade	Suzhou Peifa Arts&Crafts Co.It
Hong Ho Precision Textiles Co	Jiangxi Boruang	Jinyu (Fujian) Dress Weaving
Beijing Textiles Imp&Exp Corp.	Anhui Garment Imp & Exp Co.ltd	Beijing Garments Imp & Exp
Smartex International	Shantou Zhongyuan (Tunnyfish)	Hubei Bbh International Trade
Beijing Chengfangjie Garment	Ningbo Yinzhou Yida Knitted	Jiangxi Angmai Industrial Co.,
Beijing Yuxi Costome Co Ltd.	Jiangxi Textile Group Imp&Exp	Nanchang Giant-Tex Industry Co
Qingdao Yijia E.t.i.	Jiangxi Ruizhi Garments Imp&Ex	High Hope Int'l Group
Sunny Jet Textiles	Taizhou Rongbang Imp.&Exp.co.l	Ningbo Huazhong Dress Co,Ltd
Time Develop Co.		

TAIWAN

Risk assessment: **MEDIUM***

Solid Textile Co Ltd

HONGKONG

Mel Enterprises
Uking Industrial Co.,Limited
Krayons Sourcing Limited

Risk assessment : **MEDIUM***

SINGAPORE

Jagger Pte Ltd

Risk assessment : **LOW***

BANGLADESH

J Mm Fashion (Boydtx)
Tamshna Fashion Wear Ltd.
Tung Hai Sweaters Ltd
Rifa Knitwear And Designer
Sisal Apparel Ltd
Mactex Industries Limited
Majumder Garments Limited

Risk assessment: **HIGH***

Risk assessment : **LOW***

Boyd International Pty Ltd
C & S Marketing Co Pty Ltd
Mdr Global Trading P/L (Usd)
Capital Link Imports Pty Ltd
Koala Clothing Australia P/L

First Choice Distributors P/L
Licensing Essentials
Brand Collective Pty Ltd
Isidor's Pty Ltd
Top Shoe International Pty Ltd

* REF: GLOBAL SLAVERY INDEX,INDEPENDENT PRIVATELY FUNDED INTERNATIONAL HUMAN RIGHTS ORGANISATION FUNDED IN PERTH, AUSTRALIA BY ANDREW FORRESTOR

“MITIGATING AND REMEDIATING RISKS OF MODERN SLAVERY IS A HIGH PRIORITY AND WE ARE DEVELOPING NEW POLICY FRAMEWORKS TO BUILD UPON OUR LONG STANDING PRACTICES”

ADDRESSING MODERN SLAVERY

TIMELINE

OCT 2017	QLD (SOA) standard offer arrangement formalises Lowes responsible stock management plan, this becomes the base approach for all contracts signed by all school procurement officers and business managers. * see pg16
JUNE 2018	Donating to countries such as New Guinea, Fiji, Pakistan.
JUNE 2019	Commonwealth Modern Slavery Act guide is distributed to Leadership group and key heads of departments for review. All groups are to report back on what their understanding is of ‘Modern Slavery’ and to determine and identify high risk in the business.
DEC 2019	CEO appoints a Select Group * to establish ‘Lowes Panel for Modern Slavery Compliance’. The Panel meets each Financial year quarter for 2 hours to deploy strategy for governance and outstanding actions. { *see panel p3.}
FEB 2020	Lowes Panel engage Third part ‘Intertek’ to run 3-day workshop with all Panel members. Annual budget is set for Factory Audits and other waste management initiatives. Schedule of current audit conversions and list of factories servicing over 25% supply is deemed first to be audited using Intertek

MAR 2020	Covid 19 Global pandemic significantly halts all WCA conversions and planned Audits until Sept 2020. Lowes submits it’s Modern slavery statement for review to green team. (<i>Green team is leadership members NOT partipating in Lowes Modern Slavery Panel known as red team</i>)
APRIL 2020	Lowes whistleblower policy *See Annexure. is published and sent to all Lowes Staff. Creating an escalation pathway and providing an internal environment and a culture of safety.
MAY 2020	All (SOA) standard offer arrangement now include waste minimisation plan on distinctive uniforms, including using brokers ‘active international’ selling direct to public in exchange for advertising trade credits.
JUN 2020	Establishment of Continuous Improvement Committee. Tim Zhu prepares audit schedule for 2021. Kathy Adair onboards Manrags fashion recycle group, whose mission is to reduce the number of textiles that end up in landfill, due to massive garment overproduction and non-existent recycling.
SEPT 2020	Statement moves to internal review with Leadership group*
OCT 2020	Statement moves to review with intertek and awaits publication.



CONTINUOUS IMPROVEMENT

Lowes embarked on a continuous improvement approach well before any sanctioned reporting and compliance. In order to officially report and demonstrate our commitment to respecting human rights, Lowes CEO, Mrs. Linda Penn developed a ‘Lowes panel’ to formalise agreements with all sectors of our Supply chain and goes to market to engage ‘Intertek’ to set strategic benchmarks to monitor activities in accordance with the Modern Slavery Act 2018

LOWES PANEL FOR MORDERN SLAVERY COMPLIANCE

Lowes is committed to bilateral long-term outcomes that benefit suppliers, schools and our consumers. We recognise robust negotiations are inevitable in business practice and contribute to innovation, efficiency and the long-term sustainability.

Lowes policy has always been for the suppliers to provide certification of factory audits as evidence of compliance.

These were usually in the forms of various certificates:

- BSCI
- SMETA
- QIMA

The Panel consists of 4 leadership members whose areas govern Technical operations, *Sarann Ryan*, Merchandise Control, *Michael Manios*, Human Resources *Jason Heap* and Head of school Operations *Tim Bryant*.

The panel meets every quarter to initiate, forecast and remediate on all supply chains.

This consists of;

- Reviewing and aligning all international standards and policies by communicating standards and requirements to our agents and business partners.
- Evaluating by continuing to monitor compliance by conducting a pre-sourcing assessment with our agents. All buyers and Merchant controllers submit any new supplier to the panel for review.

- Capturing the performance of our factories by reviewing the outcomes of all audits conducted by Intertek
- Schedule audits for the next fiscal year.

LOWES FORMALLY ENGAGES INTERTEK TO FACILITATE ALL ACTIVITIES

The panel recognised the need to engage a third party to validate audits.

Lowes understood the need to consult with third party resources and databases, by utilising consultants and having them evaluate slavery this would broker an arrangement to remediate identified deficiencies and where necessary terminate supplier factories that refuse / fail to comply with procedures and guidelines

Intertek results yield several decision-making factors based on previous audits and how these dictate future frequency of audits. Audits are scheduled in advance with the suppliers in order to foster relationships of co-operation and trust, we only suggest unannounced audits when we suspect violations.

LOWES GATEWAY PROCESS

MENSWEAR & SCHOOLWEAR PRODUCTION AND DEVELOPMENT TRAINING AND INTERNAL ACCOUNTABILITY

Our commitment to upholding global standards require that all areas liaising with external suppliers/ agents must adhere to company sanctioned policy. All staff at head office are required when onboarded into the company to review our core policies. Lowes has an extensive learning management system regulated by HR called the Lowes Academy.

INTERNAL TRAINING

Lowes Academy is for all 1206 staff and is sectioned into core areas managed by our internal intranet called the Lowedown.

All staff here have individual user profiles that monitor the training modules and the timeframe for completion.

These modules include all work health and safety modules, compliance and ethics training, our company may take disciplinary action against any worker who violates our policy.

WHISTLEBLOWER

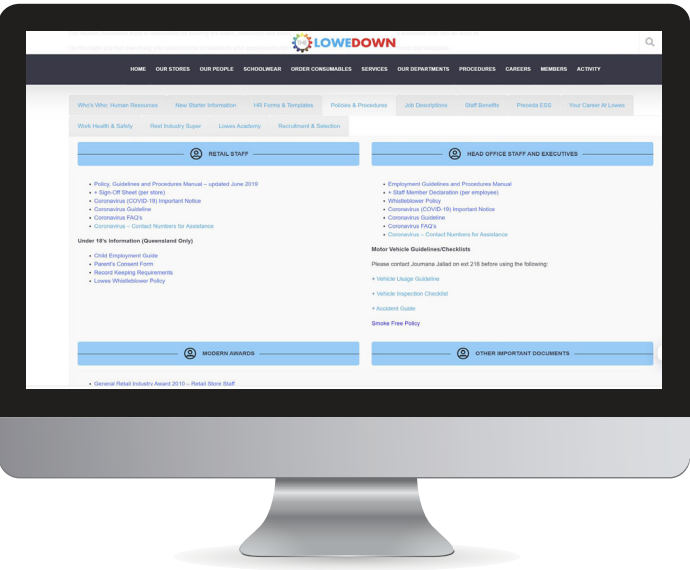
We have a whistle-blower hotline accessible on the Lowedown that is available to all staff and this has now been extended to agents and factories.

GATE PROCESS

Lowes developed The “Gate Process” which is a project management technique to keep all buyers, product developers and planners accountable in the developing, sourcing and purchasing phases. The gateway is reinforced at the leadership level, it unpacks the process to make sustainability and waste management a key performance indicator for all personnel involved.

The Gate way is divided over a few stages.

These stages are separated by ‘gates’. Each stage is the decision point for whether or not to proceed to the next stage. This decision is made by a manager or steering committee. The quality of the idea, finances, timeframe and succession rate is all assessed at each of the gates. After each gate, one of the following decisions can be made:



- **Go – Concept is good enough to proceed to the next stage**
- **Kill – Concept is not good enough to develop further and is therefore shut down**
- **Hold – Concept is not good enough to continue with development at this time but has enough merit to not be shut down. It will be put on hold to possibly be resumed at a later date.**

The Gate Process consists of several stages, which are connected to each other by gates. Each stage is designed to collect specific information:

- **Stage 1: Scoping/Range Justification/ Feasibility**
- **Stage 2: Design**
- **Stage 3: Development & Wear Trial**
- **Stage 4: Final Sign Off/Launch**

Gate 1: Scoping/ Range Justification/ Feasibility

- Concept – Describe idea and identify where it fits in core range/ our fashion demographic
- Design consideration - specify styles, colours, sizing, fit, features
- Proposed deletions – suggest any existing styles/ SKUs for deletion (e.g., style it will replace or styles that are not selling)
- Rationale – specify/justify reason(s) for launching and how it will grow the business (sales, profits etc.)
- Competitor analysis – present any competitor styles that have similar products already in their range.
- Competitive advantages – list the point of differences between our product and competitor's product (e.g., features and benefits, price point etc.)
- Target financials – target price per unit, proposed volume (per colour), proposed budget
- Agreed timing – to be discussed during Gate 1 (e.g. launched at the best time of year to ensure peak sales).
- Sign off

Gate 2: Design

- Design – present to team: research, initial design sketches, fabric options, colour options and costings.
- Sign off

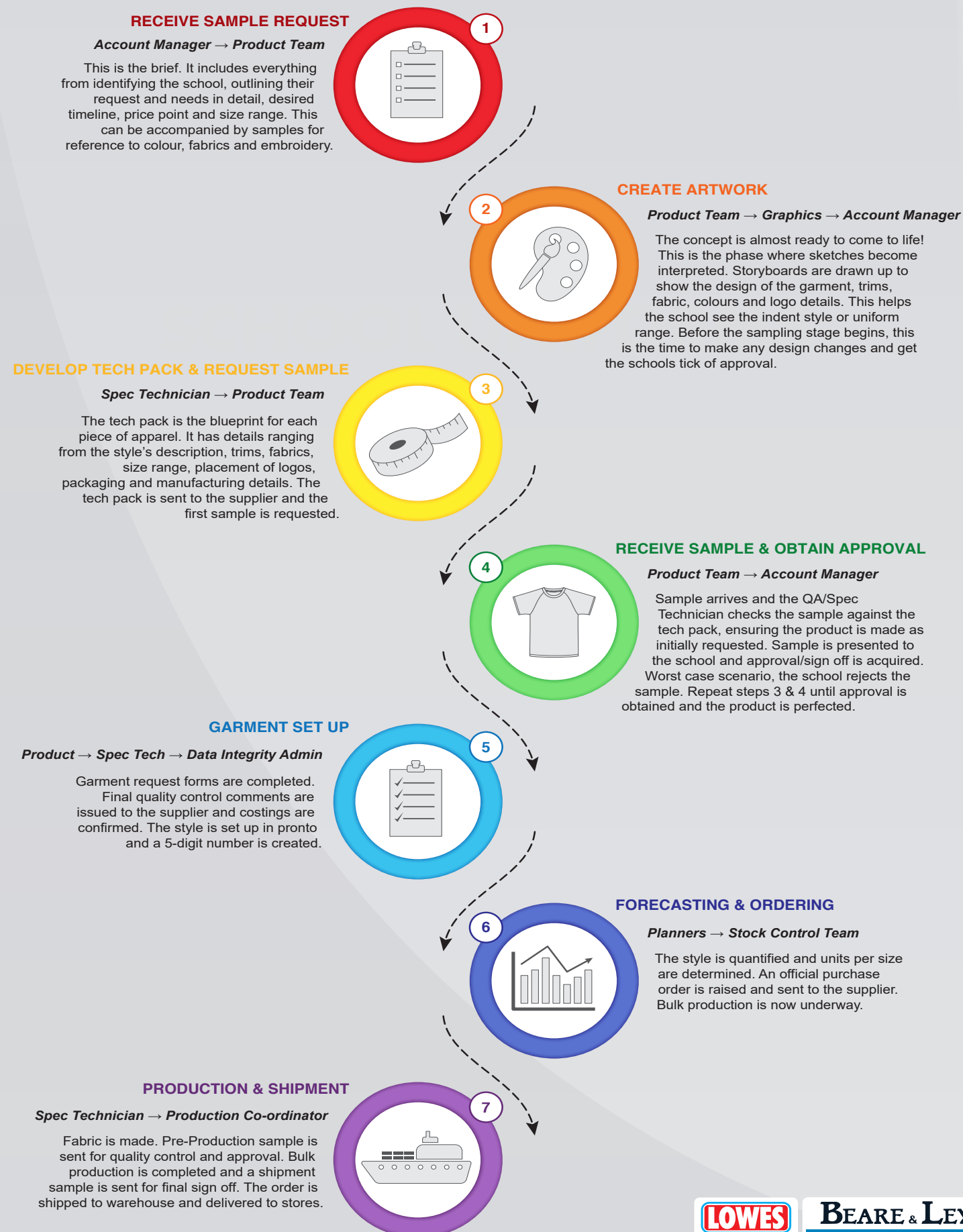
Gate 3: Development & Wear Trial

- Create specifications
- Arrange 1st development samples of the design in selected fabrics (jump size set)
- Conduct fit and wear trials (on numerous body shapes and sizes)
- Assess fit and wear trial feedback
- Revise specifications and organise 2nd development samples (if required)
- Present to team
- Sign Off

Gate 4: Final Sign Off/Launch

- Confirm styles, colours and order quantity
- Sign Off: price per unit, volume (per colour), total cost of order, GP%
- Issue final QC report to supplier
- Garment Set Up
- Raise Purchase order
- Lock in Ex/factory date

APPAREL DEVELOPMENT PROCESS



SCHEDULE OF AUDITS

2020						
LOWES SUPPLIER	PRODUCTS	FACTORY NAME	FACTORY LOCATION	RECENT AUDIT REPORT	PASS AUDIT DATE	INTERTEK WCA SCORE
Sunshine	Apparel/Garments	Ningbo Chenhong Garments Co.Ltd.	YinZhou District Ningbo	BSCI	20/7/20	90
Elegant	Apparel/Garments	Elegant Knitting International Ltd.	Biyagama, Malwana, Sri Lanka	SMETA	03/7/20	100
AFW Pty Ltd.	Apparel/Garments	Yangzhou Yiju Garmnets Co. ltd	Hanjiang District, Yangzhou City China	SGS	19/1/20	96
Georges Apparel	Apparel/Garments	PT. Dan Liris	Indonesia	SMETA	30/8/19	98
	Apparel/Garments	Th Ning Bo Blossom Knitting	Hangcheng Street, Changle City Fuzhou, China	QIMA	06/10/19	87
Shiny	Apparel/Garments	Fujian Changle Sanhe Garment CO. Ltd.	Hangcheng Street, Changle City Fuzhou China	BSCI	28/10/19	84
AZD	Apparel/Garments	Hongze Sainty Fortune Garment	Hongze County Huai'an, Jiangsu, China	BSCI	09/07/20	87
Mitch Dowd	Socks	Zhejiang FENLI Hoses Industry Co.,Ltd	Beiyuan Industrial Zone, Yiwu, Zhejiang, China	BSCI	13/12/19	88
	Socks	Zhejiang Greenwood Knit Co., Ltd	Fotang Town, Yiwu, Zhejiang, China	BSCI	19/05/19	90
	Socks/Tights	Zhuji Hongfei Socks Factory	Beiting Village, Jiyang Jiedao,Zhuji Zhejiang, China	BSCI	07/09/20	89
UMS	Apparel/Garments	Uniform Management Services	Vung Tau City, Ba Ria, Vung Tau Province Vietnam	SMETA	17/7/20	96
Noone	Accessories - Tie	PT Trisco Tailoired Apparel Manufac-turing	Katapang,SOREANG, Bandung, Indonesia	BSCI	13/03/20	Under Verification
Spartan	Bags/Hats/Accessories	Factory audit is scheduled end Oct 2020				Under Verification
Kootex	Apparel/Garments	Factory audit is scheduled end Oct 2020				Under Verification
Instyle	Apparel/Garments	Factory report received and Ineterk Verification is under progress				Under Verification
Mackahat	Hats	Factory report received and Ineterk Verification is under progress				Under Verification
Epicentre	Hats	Factory report received and Ineterk Verification is under progress				Under Verification
OnTrack Sportswear	Sportswear	Factory report received and Ineterk Verification is under progress				Under Verification
Calcoup	Knitwear	Factory report received and Ineterk Verification is under progress				Under Verification
Midford	Apparel/Garments	Factory report received and Ineterk Verification is under progress				Under Verification
PNW (Bocini)	Apparel/Garments	Factory report received and Ineterk Verification is under progress				Under Verification

2021 COMMITMENTS

2021 Report						
LOWES SUPPLIER	PRODUCTS	FACTORY NAME	FACTORY LOCATION	RECENT AUDIT REPORT	Expired & Follow Up Date	INTERTEK WCA SCORE
Sunshine Industries (HK) Ltd	Apparel/Garments	Ningbo Chenhong Garments Co.Ltd.	YinZhou District Ningbo	BSCI	2021 May	
Elegant Knitting	Apparel/Garments	Elegant Knitting International Ltd.	Biyagama, Malwana, Sri Lanka	SMETA	2021 July	
AFW Pty Ltd.	Apparel/Garments	Yangzhou Yiju Garmnets Co. ltd	Hanjiang District, Yangzhou City China	SGS	2021 Jan	
Georges Apparel	Apparel/Garments	PT. Dan Liris	Indonesia	SMETA	2021 Aug	
	Apparel/Garments	Th Ning Bo Blossom Knitting	Hangcheng Street, Changle City Fuzhou, China	QIMA	2021 Oct	
Shiny Pty Ltd	Apparel/Garments	Fujian Changle Sanhe Garment CO. Ltd.	Hangcheng Street, Changle City Fuzhou China	BSCI	2021 Oct	
AZD (Australia) Pty Ltd	Apparel/Garments	Hongze Sainty Fortune Garment	Hongze County Huai'an, Jiangsu, China	BSCI	2021 July	
Mitch Dowd	Socks	Zhejiang FENLI Hoses Industry Co.,Ltd	Beiyuan Industrial Zone, Yiwu, Zhejiang, China	BSCI	2020 Dec	
	Socks	Zhejiang Greenwood Knit Co., Ltd	Fotang Town, Yiwu, Zhejiang, China	BSCI	2021 May	
	Socks/Tights	Zhuji Hongfei Socks Factory	Beiting Village, Jiyang Jiedao,Zhuji Zhejiang, China	BSCI	2021 Sept	
Uniform MGMT/Corporate	Apparel/Garments	Uniform Management Services	Vung Tau City, Ba Ria, Vung Tau Province Vietnam	SMETA	2021 June	
Noone	Accessories - Tie	PT Trisco Tailoired Apparel Manufacturing	Katapang,SOREANG, Bandung, Indonesia	BSCI	2021 Mar	
First Choice Distributors P/L	Apparel/Garments	Nanchang Qunde Garments Co., Ltd	HighTech industrial park Nanchang, Jiangxi, China	Intertek	2021 Sep	
	Apparel/Garments	Wuhu New Garments Co.,Ltd	Suncun Town Industrial Area, Wuhu, China	Intertek	2021 Sep	
Spartan School Supplier	Bags/Hats/Accessories	Will follow up with supplier once 2020 WCA compliance is completed				
Kootex International Pty Ltd	Apparel/Garments	Will follow up with supplier once 2020 WCA compliance is completed				
Instyle	Apparel/Garments	Will follow up with supplier once 2020 WCA compliance is completed				
Mackahat	Hats	Jiangsu Holly Manufacturing Co., Ltd	Xihua North Rd, Dongxing Town, Jiang-jiang Jiangsu, China	BSCI	2021 June	
Epicentre Trading Pty	Hats	Will follow up with supplier once 2020 WCA compliance is completed				
OnTrack Sportswear	Sportswear	Not Applicable (under NDA)	GuangDong Province, China	INTERTEK	2021 Jan	
Calcoup	Knitwear	Not Applicable (under NDA)	Nadi, Fiji	SMETA	2021 June	
Midford	Apparel/Garments	Will follow up with supplier once 2020 WCA compliance is completed				
PNW (Bocini)	Apparel/Garments	Will follow up with supplier once 2020 WCA compliance is completed				
Jiangxi Handsome Garments	Apparel/Garments	Will follow up with supplier once 2020 WCA compliance is completed				
Zhejiang Willing Foreign Tradi	Apparel/Garments	Will follow up with supplier once 2020 WCA compliance is completed				
Shaoxing Daxin	Apparel/Garments	Will follow up with supplier once 2020 WCA compliance is completed				
Jiangxi Ruizhi Garments Imp&Ex	Apparel/Garments	Will follow up with supplier once 2020 WCA compliance is completed				
J Mm Fashion (Boydtex)	Apparel/Garments	Will follow up with supplier once 2020 WCA compliance is completed				
Krayons Sourcing Limited	Apparel/Garments	Will follow up with supplier once 2020 WCA compliance is completed				

Overview

Lowes Manhattan Pty Ltd is guided by its company values. These values are the foundation of how we conduct ourselves and interact with each other, our clients, customers, employees, suppliers, directors and other stakeholders. The Company is committed to ensuring corporate compliance and promoting ethical corporate culture by observing the highest standards of fair dealings, honesty and integrity in all of our business activities.

This policy applies to all directors, executives, all staff, contractors and consultants at Lowes Manhattan Pty Ltd. This policy also extends to customers, clients and suppliers. This Whistleblower Policy will be widely disseminated to and easily accessible by all within and outside the business. For internal use, this will be made available on the company’s intranet and training via the Learning Management System. For external use, the policy can be accessed by selecting the link on Lowes Manhattan Pty Ltd website.

Purpose

The purpose of this policy is to provide all employees, former employees, contractors, associates, trustees, relatives of or dependants of aforementioned to safely and securely report any wrongdoing such as policy breaches, illegal, unethical or undesirable behaviour involving the business. This policy protects individuals who make a confidential disclosure to the officers. Employees who wish to report other issues such as grievances i.e personal work-related grievances should refer to the Policy, Guideline and Procedures Manual and/or the Employment Guidelines and Procedures Manual.

Examples of Grievances that include Personal Work-Related Grievances:

➤ Interpersonal conflict between colleagues;

➤ A matter that does not involve a breach of workplace laws;

➤ Decisions about internal promotions or external recruitment; and

➤ Disciplinary actions, suspension or termination of an individual.

Definitions

Terms used in this policy are:

Whistleblower/ Whistleblowing	A person who anonymously discloses information to an officer or higher authority about any wrongdoing within a business. A person who is a witness of actual or suspected wrongdoing
Wrongdoing	Conduct and/or behaviour that includes but is not limited to: <div><div>- Illegal or dishonest behaviour;</div><div>- Unethical or undesirable behaviour;</div><div>- Is an unethical breach of the Code of Conduct of Lowes Manhattan Pty Ltd</div><div>- Has financial or non-financial loss detrimental to the interest of Lowes Manhattan Pty Ltd;</div><div>- Repeated breaches of administrative procedures;</div><div>- Unreasonably endangers the health and safety or the environment;</div><div>- Is dishonest or fraudulent;</div><div>- Is an offence against any other law of the Commonwealth is punishable by imprisonment for a period of 12 months or more;</div></div>

1 | Page

	<div>- Breaches legislation, regulations or local government by-laws or is otherwise illegal (including whistleblower laws, corporations law, theft, drug sale, use, violence or threatened violence or criminal damage against property).</div>
Ethical	Rules and standards for right conduct and practices in business.
Suspecting	The Whistleblower making the report has reasonable grounds for suspecting the reportable wrongdoing.
Whistleblower Protections Officer	Provides support and protection to the Whistleblower.
Whistleblower Governance Officer	The person that will receive whistleblower disclosures of wrongdoing and oversee a resolution.

Policy Statement

Lowes Manhattan Pty LTD is committed to the highest standards of conduct and ethical behaviour to support and promote a culture of honesty and ethical behaviour, corporate compliance and good corporate governance. People who have a working relationship with Lowes Manhattan Pty Ltd are often the first to realise that there may be something seriously wrong. However, they may not wish to speak up for fear of appearing disloyal or may be concerned about being victimised or subject to reprisals for reporting wrongdoing.

Lowes Manhattan Pty Ltd (“The Company”) encourages the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving Lowes Manhattan Pty Ltd and provides protections and measures so that those persons who make a report may do so confidentially, safely and without fear of intimidation, disadvantage or reprisal.

When an aforementioned person makes a disclosure in **confidence**:

➤ Their identity must **remain confidential according to their wishes**;

➤ They will be protected from reprisal, discrimination, harassment or victimisation for making the disclosure;

➤ An independent internal inquiry or investigation will be conducted or if appropriate an external investigator may be approved;

➤ Issues identified from the inquiry/investigation will be resolved and/or rectified;

➤ They will be informed about the investigation and outcomes;

➤ The disclosure can still qualify for protection even if their disclosure turns out to be incorrect;

2 | Page

➤ Any retaliation for having made the disclosure will be treated as serious wrongdoing under this Policy.

Further, the purpose of this policy (where applicable):

➤ Encourages disclosures to report wrongdoing;

➤ Ensure disclosures are dealt with appropriately and on a timely basis;

➤ Provide transparency around Lowes Manhattan Pty Ltd framework for receiving, handling and investigating disclosures;

➤ Ensure individuals and/or groups who make a disclosure of wrongdoing can do so securely, and safely with confidence that they will be protected and supported throughout the entire process;

➤ To support Lowes Manhattan Pty Ltd values and code of conduct;

➤ To support Lowes Manhattan Pty Ltd long-term reputation and sustainability; and

➤ Meets Lowes Manhattan Pty Ltd legal and regulatory obligations.

Responsibilities

1.1 Whistleblowers

Protection is available to Whistleblowers who disclose wrongdoing that is made with grounds reasonable to believe it is true which include but not limited to:

➤ Identity protection;

➤ Protection from detrimental acts or omissions

➤ Compensation and other remedies; and

➤ Civil, criminal and administrative liability protection.

To ensure that all employees are treated fairly and that resources are not wasted, protection is not available where the disclosure is:

➤ Trivial or vexatious in nature with no substance. This will be treated in the same manner as a false report and may itself constitute wrongdoing.

➤ Unsubstantiated allegations which are found to have been made maliciously, or knowingly to be false. These will be viewed seriously and may be subject to disciplinary action that could include dismissal, termination of service or cessation of a service or client relationship.

A Whistleblower must provide information to assist any inquiry/investigation of the wrongdoing disclosed.

Making a disclosure may not protect the Whistleblower from the consequences flowing from involvement in the wrongdoing itself. A person’s liability for their own conduct is not affected by their report of that conduct under this policy. However active cooperation in the investigation, admission and remorse may be taken into account when considering disciplinary or other action.

Even though a Whistleblower may be implicated in the wrongdoing they must not be subjected to any actual or threatened retaliatory action or victimisation in reprisal for making a report under this policy.

3 | Page

Further, a Whistleblower may choose to remain anonymous while making their disclosure, over the course of the investigation and after the investigation is finalised. A Whistleblower if they do not want anyone to know their identity including officers may adopt a pseudonym for the purpose of their disclosure.

1.2 Whistleblower Protection Officer

If the Whistleblower wishes, the WHS/RTW Officer may be appointed to support and provide protection to the Whistleblower according to this policy.

The protection officer must have a direct reporting line to a governance officer from an area of the organisation that is independent of line management in the area that is the subject of the report of wrongdoing.

The protection officer will provide mentoring and other support deemed necessary.

The Protection Officer is responsible for keeping the Whistleblower informed of the progress and outcomes of the inquiry/investigation subject to considerations of privacy of those against whom a disclosure has been made.

1.3 Identity Protection

This will state the measures and/or mechanisms for protecting the confidentiality of a Whistleblowers identity (where applicable):

➤ All personal information or reference to the individual witnessing and event will be redacted;

➤ The discloser will be referred to in a gender-neutral context;

➤ Disclosures will be handled and investigated by qualified staff;

➤ All paper and electronic documents and other materials relating to disclosures will be stored securely;

➤ Access to all information relating to a discloser will be limited to those directly involved in managing and investigating the disclosure;

➤ Only a restricted number of people who are directly involved in handling and investigating a disclosure will be made aware of a discloser’s identity (subject to the discloser’s consent) or information that is likely to lead to the identification of the discloser;

➤ Communications and documents relating to the investigation of the disclosure will not be sent to an email address or to a printer that can be accessed by other staff; and

➤ Each person who is involved in handling and investigating a disclosure will be reminded about the confidentiality requirements, including that unauthorised disclosure of a discloser’s identity may be a criminal offence.

1.4 Whistleblower Governance Officer

The Whistleblower Governance Officer is the Head of People. The Head of People will receive whistleblower disclosures of wrongdoing and overseeing resolution.

The Whistleblower Governance Officer must (after a reasonable preliminary inquiry):

➤ Protect the identity of the Whistleblower;

➤ If the Whistleblower agrees to appoint the WHS/RTW Officer, the WHS/RTW Officer will provide support to the whistleblower

➤ Be satisfied that each disclosure of wrongdoing they received was appropriately inquired into or investigated

4 | Page

38 | Lowes Manhattan Pty Ltd Modern Slavery Report 2020

Lowes Manhattan Pty Ltd Modern Slavery | 39

- Be satisfied that action taken in response to the inquiry/investigation is appropriate to the circumstances
- Provide governance oversight over any inquiry/investigation into retaliatory action taken against the Whistleblower

Alternatively, if the disclosure contains allegations against any Lowes Manhattan Pty Ltd executive or where the Whistleblower has a reasonable belief that the Whistleblower Governance Officers are not sufficiently independent a report may be made to the Managing Director of Lowes Manhattan Pty Ltd.

1.5 Protected Disclosures Coordinator

The Protected Disclosures Coordinator is the Head of People. The Head of People will receive all information about all whistleblower events and performs the following functions:

- Support the welfare of disclosers
- Arranges for an inquiry/investigation into the disclosures made by the Whistleblower
- Ensures appropriate government agencies are notified about Whistleblower events where required
- Maintains a Whistleblower Register for trend analysis and to identify systemic issues requiring attention

1.6 Investigator

Lowes Manhattan Pty Ltd will investigate all matters reported under this policy as soon as practicable after the matter has been reported. The Protected Disclosures Coordinator who is the Head of People will appoint either an internal or external investigator to investigate the matter. Lowes Manhattan Pty Ltd may not be able to undertake an investigation if it is not able to contact the discloser. An example is if a disclosure has refused to provide, or has not provided, a means of contacting them.

The internal investigator may be the Governance Officer and or an appropriate person as appointed by the Governance Officer.

1.7 Investigation

The investigation will be conducted in an objective and fair manner, and as is appropriate having regard to the nature of the disclosure and circumstances. Where a report and/or matter is submitted anonymously, Lowes Manhattan Pty Ltd will conduct the investigation and its enquiries based on the information provided. Further, anonymity can at times prevent the business from taking the issue further if Lowes Manhattan Pty Ltd is not able to obtain further information from the source of the report.

1.8 Managers and Line Supervisors

All managers and line supervisors who receive a disclosure about wrongdoing must notify the governance officer and provide particulars and maintain confidentiality at all times.

1.9 Protection from detrimental acts or omissions

Lowes Manhattan Pty Ltd may refer to the following measures and mechanisms for protecting disclosers from detrimental acts or omissions (where applicable):

- processes for assessing the risk of detriment against a discloser and other persons (e.g. other staff who might be suspected to have made a disclosure), which will commence as soon as possible after receiving a disclosure;
- support services (including counselling or other professional or legal services) that are available to disclosers;

- strategies to help a discloser minimise and manage stress, time or performance impacts, or other challenges resulting from the disclosure or its investigation;
- actions for protecting a discloser from risk of detriment—for example, the business could allow the discloser to perform their duties from another location, reassign the discloser to another role at the same level, make other modifications to the discloser’s workplace or the way they perform their work duties, or reassign or relocate other staff involved in the disclosable matter;

1.10 Reporting a Disclosure

Lowes Manhattan Pty Ltd will need to assess each disclosure to determine whether:

- Disclosures will be handled confidentially,
- Each disclosure will be assessed and may be subject of an investigation;
- When an investigation needs to be undertaken, the process will be objective, fair and independent;
- It qualifies for protection; and
- A formal, in-depth investigation is required.

(a) Internal Whistleblowers

(Current or former employees, directors, contractors or consultants)

Internal Whistleblowers are encouraged to report their concerns to the Whistleblower Governance Officer to seek an immediate response. Where the internal Whistleblower believes this is not appropriate, then an alternative reporting mechanism is to report the matter to the Whistleblower Protection Officer.

(b) External Whistleblowers

(These individuals include: clients, customers, suppliers)

Where an external Whistleblower is reluctant to report it to the Governance Officer or the Protections Officer, they can report their concerns to the Managing Director of Lowes Manhattan Pty Ltd.

(c) Anonymous Reporting

Anonymous reports of wrongdoing are accepted under this policy. Anonymous reports have significant limitations that may inhibit a proper and appropriate inquiry or investigation. These limitations include the inability to provide feedback on the outcome and/or to gather additional particulars to assist the inquiry/investigation. Specific protection mechanisms may be difficult to enforce if you choose to remain confidential.

1.11 Protection

Lowes Manhattan Pty Ltd will adopt the principle of protection of the identity of internal and external Whistleblowers.

1.12 Confidentiality

Lowes Manhattan Pty Ltd will not disclose a whistleblower’s identity unless:

- The disclosure is required or authorised by law; and
- It is necessary to further an investigation and the Whistleblower consents to the disclosure.

Lowes Manhattan Pty Ltd will take reasonable precautions to store any records relating to a report of wrongdoing securely and to restrict access to authorised persons only.

1.13 Retaliation

Lowes Manhattan Pty Ltd will not tolerate any retaliatory action or threats of retaliatory action against a Whistleblower or against a Whistleblower’s colleagues, employer (if a contractor, consultant or supplier) or relatives. Any retaliation in reprisal for a disclosure made under this policy will be treated as a breach of serious misconduct and will result in disciplinary action.

A Whistleblower must not be disadvantaged or victimised for having made the report by:

- Dismissal or termination of employment, services or contracts
- Demotion of contract
- Discrimination, victimisation, bullying and harassment
- Aforementioned matters above.

1.14 Disclosure Management

Lowes Manhattan Pty Ltd recognises that individuals against whom a report is made must also be supported during the handling and investigation of the wrongdoing report. The business takes reasonable steps to treat fairly any person who is the subject of a report, particularly during the assessment and investigation process in accordance with an established support protocol which may be extended to include appointing an executive member of the leadership group to provide support.

Where a person is identified as being suspected of possible wrongdoing, but preliminary inquiries determine that the suspicion is baseless, no evidence or unfounded and that no formal investigation is warranted, then the Whistleblower will be informed of this outcome and the matter laid to rest.

Lowes Manhattan Pty Ltd will give its full support to a person who is the subject of a report where the allegations contained in the report are clearly wrong

Therefore, where an investigation does not substantiate the report, the fact that the investigation has been carried out, the results of the investigation and the identity of the person who is the subject of the report must be handled confidentially.

Further, where an investigation is conducted and the investigator finds there may be a case for an individual to respond, the Investigator must ensure that a person who is the subject of a disclosure:

- Is informed of the substance of the allegations;
- Is given a fair and reasonable opportunity to answer the allegations before the investigation is finalised;
- Has their response set out fairly in the Investigator’s report; and
- Is informed about the substance of any adverse conclusions in the investigator’s report that affects them.

1.15 Failure to Comply

Any breach of this policy may result in disciplinary action that could result in severance from Lowes Manhattan Pty Ltd.

Current Officials for this Policy

Officers		
Whistleblower Protections Officer	WHS/RTW Officer	Joumana Jallad
Whistleblower Governance Officer	Head of People	Jason Heap
Protected Disclosures Coordinator	Head of People	Jason Heap

TIM ZHU LOWES PRODUCTION MANAGER AND LEADER OF THE CONTINUOUS IMPROVEMENT COMMITTEE IS FLUENT IN CHINESE AND IS USED AS A MANDATORY REPORTER FOR ANY SUSPICIOUS ACTIVITY.

HE COMMUNICATES FREQUENTLY WITH OUR FACTORIES IN CHINA AND LETS WORKERS KNOW DISCREETLY THAT THEY CAN ESCALATE ANY ISSUES DIRECTLY TO HIM.



LOWES