




MODERN SLAVERY STATEMENT

Financial Year 2
July 2023 to 30 June 2024

D / I S T R I C T



District acknowledge the Traditional Owners and Custodians of the lands on which we conduct business. We pay our respect to Elders past, present and future leaders, and we recognise the key to reconciliation is learning about First Nations diverse cultures and building strong and respectful relationships.

MODERN SLAVERY STATEMENT

District (formerly Table and Chair Company), founded in 1989, operates at the heart of a dynamic creative industry. We provide furniture and lighting solutions for commercial and residential spaces, serving as a link between designers, brands, craftsmen, manufacturers, and consumers both in Australia and internationally. Our extensive network brings with it significant responsibility to both people and the planet. We are committed to minimising any negative impact from our business and actively seeking ways to make positive contributions where possible.

What is Modern Slavery?

Modern slavery means the extreme exploitation of individuals for personal or commercial gain. It is a pervasive issue affecting millions of people worldwide, including in developed nations, where many are subjected to various forms of slavery. We recognise that there is a potential risk of modern slavery within our business operations and supply chains.

District is dedicated to eradicating modern slavery, and this statement outlines the measures we have taken during the financial year from July 1, 2023, to June 30, 2024, to minimise these risks within our supply chain.

This statement has been prepared in accordance with the Modern Slavery Act 2018 (Cth) and has been approved by the Senior Management Team at District.



This statement marks our second year of Modern Slavery reporting, and over the past year our team has been working to develop a robust foundation and strategy for improvement.

The due diligence process is complex but we understand the critical importance of this work.

Modern day slavery encompasses forced labour, child labour, and human trafficking, impacting millions of people worldwide. The furniture industry is not exempt from these challenges, making it essential to recognise the impact of our decisions.

At District, we are dedicated to fostering an environment rooted in understanding, respect, and collaboration.

Our commitment to eliminating modern slavery extends beyond corporate responsibility—it's about upholding the values of due diligence and actively contributing to a fair and inclusive society.

This statement serves as our road map for taking meaningful action and as the Director, I am proud to endorse it. This modern slavery statement underscores our commitment to minimising risks and eradicating modern slavery in every form.

This statement was approved by Joseph Merlino, Sole Director of District Australia Pty Ltd, on 30th August, 2024

Joseph Merlino
Managing Director
30th September 2024

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Criterion 1

Legal Name	District Australia Pty Ltd
Trading Name	District
ABN ACN	92 009 419 274 009 419 274
Legal Classification	Company (does not own any other entities)
Head Office	246 Hay Street, Perth WA 6008
Website	https://district.com.au/

Criterion 6 District Australia Pty Ltd does not own or control any other entities

Mandatory reporting criteria of the Modern Slavery Act

Criterion 1	Identify the reporting entity	Refer above
Criterion 2	Describe the reporting entity's structure, operations and supply chains	Refer District at a Glance
Criterion 3	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Refer Risks of Modern Slavery
Criterion 4	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Refer Action
Criterion 5	Describe how the reporting entity assesses the effectiveness of these actions.	Refer Effectiveness and Progress
Criterion 6	Describe the process of consultation with any entities the reporting entity owns or controls	Refer above
Criterion 7	Provide any other relevant information	Not applicable

DISTRICT AT A GLANCE

District represents a selection of leading furniture brands from Australia, New Zealand, and Europe, supplying to various markets including corporate, commercial, hospitality, retail, workplace, building, and residential sectors.



37

Team members

All directly employed
All located in Australia



5

Sites in total

Perth Showroom
Melbourne Showroom
Sydney Showroom
Perth Warehouse
Melbourne Warehouse



26 + 9

26 Brands from 9 different
countries

BRAND ORIGIN	BRANDS (TIER ONE SUPPLIERS)
1 Australia	Elements, Fomu, Studio Pip, District
2 New Zealand	Resident, Simon James, Nonn, Nodi, Evison
3 Denmark	Normann Copenhagen, New Works
4 United Kingdom	Toogood, Case
5 France	La Manufacture
6 Germany	Flokk
7 Sweden	Massproductions, Hem
8 United States	Humanscale, Sticky Glass, ROOM
9 Italy	Mattiazzi, Alias, Diemme, Mara, Pedrali, Giopato & Coombes

DISTRICT AT A GLANCE

In addition to sourcing, District also plays a crucial role in local manufacturing, where we have developed our “Manufacture Under Licence Program” where we manufacture products from international brands under licence in Australia, ensuring that these products meet the same quality standards as those produced internationally. District collaborates with a network of local manufacturers, designated as tier-one suppliers, to achieve this.

District is committed to protecting and respecting human rights and firmly condemns slavery in all its forms. We take proactive measures to prevent and avoid contributing to acts of modern slavery within our supply chains whenever possible.

District remains committed and dedicated to ethical practices and the upholding of human rights throughout all aspects of our operations.



PRODUCTS

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

Workstation and meeting table components

Soft wiring

Seating

Shelving

Cabinetry

Rugs

Mirrors

Accessories

Screens

MATERIALS & COMPONENTS

The products offered 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

Powdercoat

Plastic

Textiles & Thread

Foam (including Dacron)

Seat Strapping

Glass

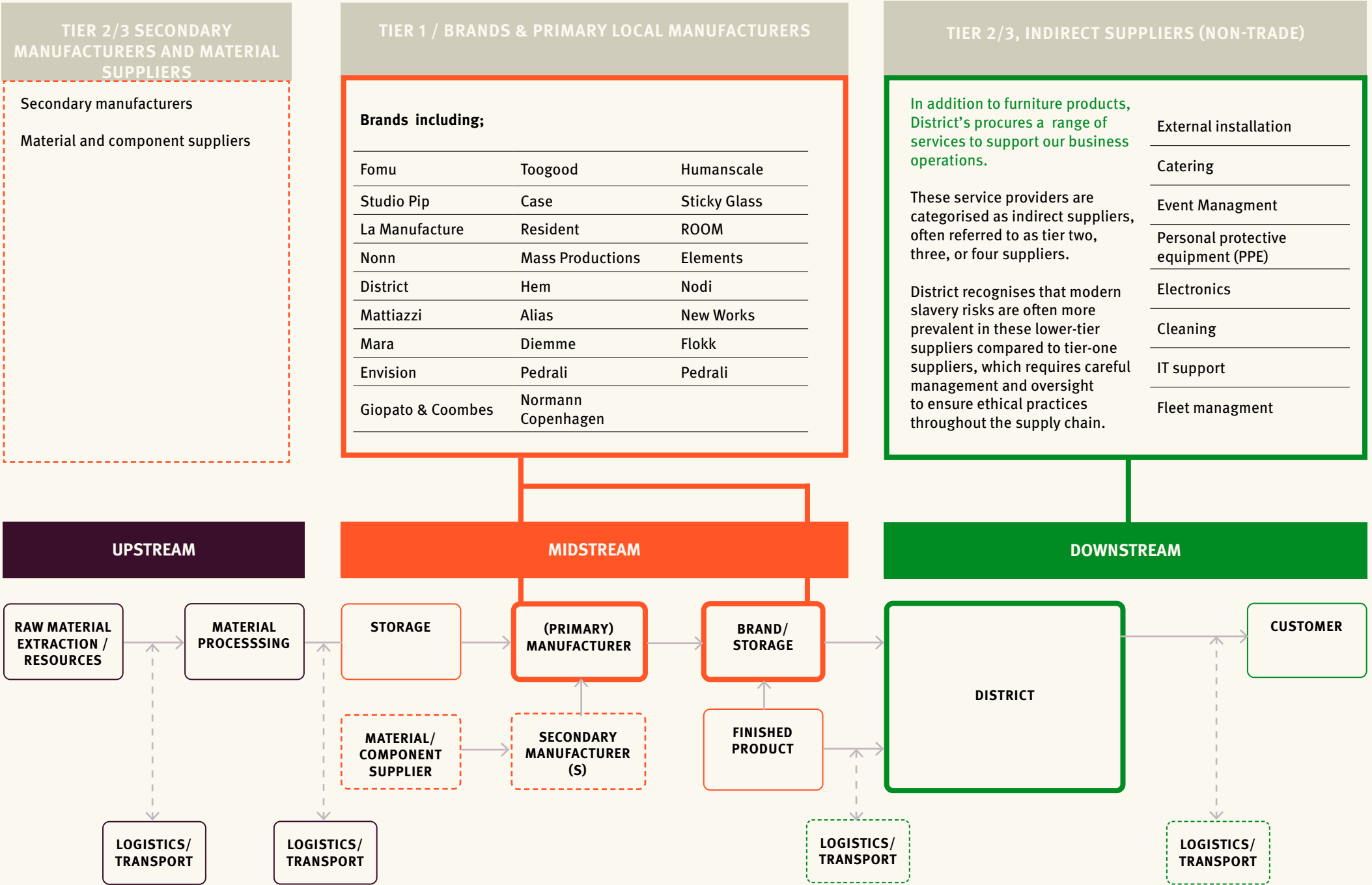
Paint, Stains & Adhesives

Fixings

Bamboo

Packaging materials

DISTRICT AT A GLANCE DEFINING SUPPLY CHAIN TIERS



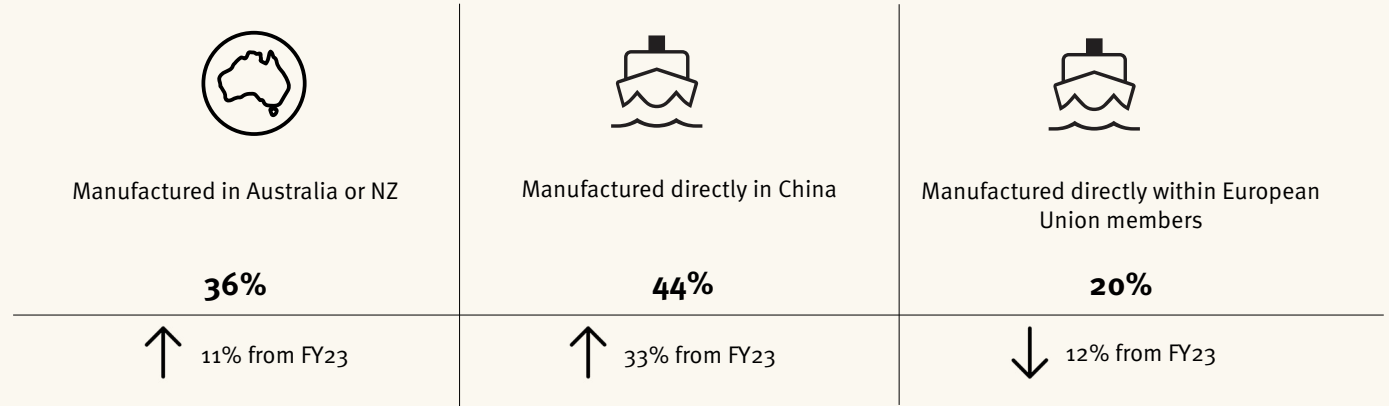
DISTRICT AT A GLANCE

Supply Chain - Tier 1 (Direct)

Brand relationships are usually long-term with product exclusivity to District provided sales targets are achieved. We partner with reputable suppliers and these relationship are contractual. For example, agreed prices where purchase orders are provided by District for supply.

District manufactures core products from international brands under license in Australia, utilising a network of local manufacturers and adhering to our GECA ecolabel license requirements.

FY2024 Supply Chain Statistics | Trade | Direct Suppliers



Direct suppliers are defined as a supplier who provides a product | service that is essential to our production process and revenue.

16 manufacturers have signed District’s supplier Code of Conduct. (Increased from 8 last FY)

Generally, raw material procurement is included in the manufacturing process.

12 brands have completed Districts Supplier assessment.

Labour is employed from the local region where the manufacturing is located.

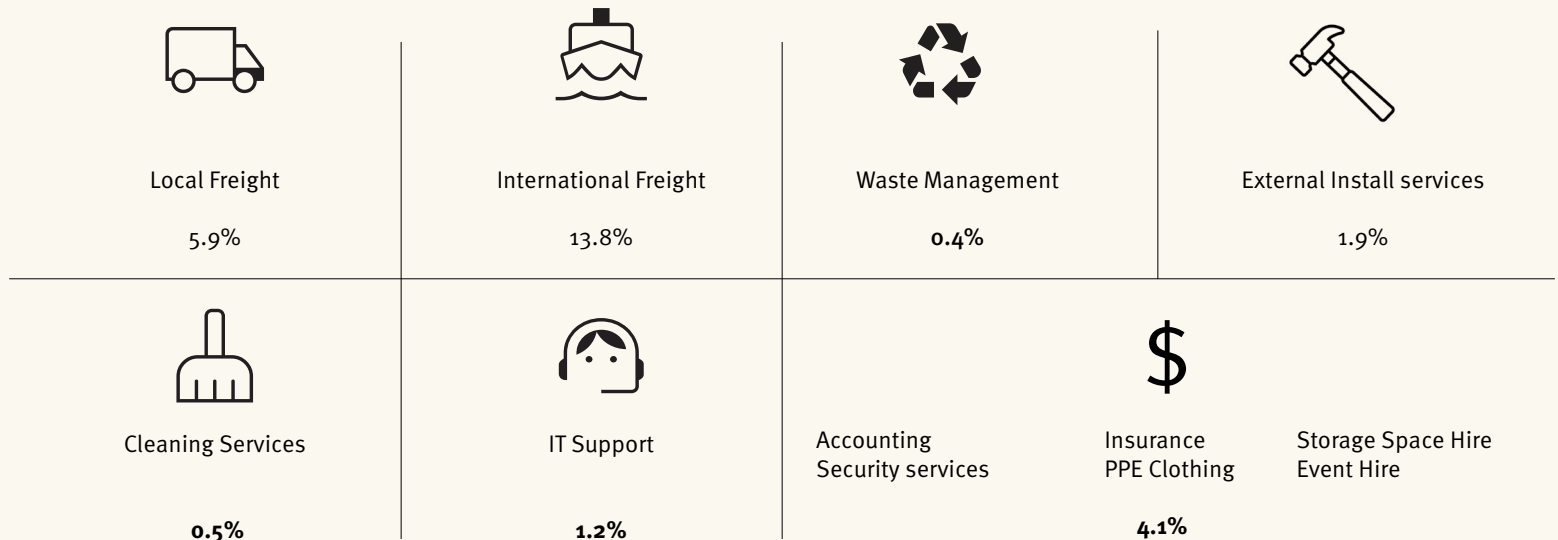
In 2024, District commissioned an on-site compliance audit in China.

DISTRICT AT A GLANCE

Indirect suppliers represented 27.8% of Districts total expenditure in FY23-24. Indirect suppliers are defined as suppliers who provide a product or service that is not essential to our production process but rather, facilitates it.

Effectively addressing modern slavery demands comprehensive visibility across the entire supply chain, encompassing not just our direct suppliers, but also their suppliers, and the suppliers beyond them, tier after tier.

FY2024 Supply Chain Statistics | Non-Trade | Indirect Suppliers



As it did for FY23, in FY24 international freight accounts for the largest share of our indirect supply chain.

Seafaring is one of the world’s most dangerous jobs. At any one time, there are around 1.9 million seafarers working in an environment with a high-risk of labour exploitation, including the risk of forced labour and other types of modern slavery. The modern slavery risks within shipping supply chains have been identified as isolation, restriction of movement, excessive overtime, abuse and poor working conditions, wage exploitation, and migrant worker status.¹

References
 1. Modern Slavery within Maritime Shipping Supply Chains published by the UNGCNA in December 2022

RISKS OF MODERN SLAVERY

Modern Slavery Governance

We address modern slavery and broader human rights risks in our operations and supply chain through our developing Environmental, Social & Governance (ESG) Program, as part of our commitment as a United Nations Global Compact (UNGC) participant. District adheres to the Ten Principles of the UN Global Compact, which outlines essential values for conducting business in a way that upholds fundamental responsibilities in human rights, labour, environment, and anti-corruption. This commitment ensures safe working conditions, respect for employees, and environmentally sustainable business practices.

Our ESG team is responsible for reviewing, monitoring, and conducting ongoing due diligence on our operations and supply chain to identify, manage, and address potential human rights issues, including modern slavery. The ESG team reports directly to the Managing Director and the Senior Management Team, providing regular updates on the effectiveness and progress of the program.

Policies

District conducts its business and interacts with suppliers in full compliance with all applicable laws, guided by our ESG framework, which includes the following policies:

- Vendor Code of Conduct (CSR002)
- Employee Code of Conduct (HR-DISo41)
- Human Rights Policy (CSR003)
- Anti-Corruption & Bribery Policy (CSR004)

Methodology

Our due diligence process encompasses onsite audits, self-assessments, and both international and domestic risk analyses:

- Conduct comprehensive due diligence reviews to identify potential human rights and modern slavery risks within our supply chain.
- Focus our efforts on areas with a higher likelihood of severe human rights impacts, including modern slavery.
- Seek opportunities to leverage our influence to drive positive change within our supply chains, such as expanding our manufacturing under licence program in Australia.
- Ensure a safe and transparent workplace by implementing worker voice programs through our Whistle blower Policy.



Image Credit: Mass Productions

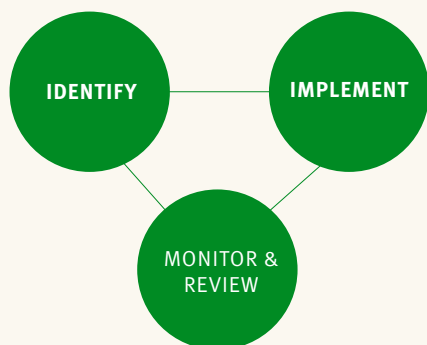
RISKS OF MODERN SLAVERY

Assessment

Districts approach to the identification and management of modern slavery risk is aligned with our overarching ESG strategy and risk management system.

District's due diligence process is divided into three parts:

- **Identification:** Identify and assess actual and potential modern slavery risks
- **Implementation:** Implement actions to prevent or mitigate identified modern slavery risks
- **Monitor & Review:** Continually track and assess the effectiveness of measures to address modern slavery and labour exploitation within our supply chain



As defined by the Australian Modern Slavery Act 2018 (Cth) modern slavery includes eight types of serious exploitation. Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities May 2023 Appendix 1 defines these in more detail as follows:

1. **Trafficking in persons**
Describes the recruitment, harbouring and movement of a person for exploitation through modern slavery.
2. **Slavery**
Describes situations where the offender exercises powers of ownership over the victim, including the power to make a person an object of purchase and use their labour in an unrestricted way.
3. **Servitude**
Describes situations where the victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work.
4. **Forced marriage**
Describes situations where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.
5. **Forced labour**
Describes situations where the victim is either not free to stop working or not free to leave their place of work.
6. **Debt bondage**
Describes situations where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.
7. **Deceptive recruiting for labour or services;**
Describes situation where the victim is deceived about whether they will be exploited through a type of modern slavery.
8. **The worst forms of child labour.**
Describes situations where children are:
 - Through slavery or similar practices, including for sexual exploitation;
 - Engaged in hazardous work which may harm their health, safety or morals;
 - Used to produce or traffic drugs.



Image Credit: Mass Productions 2024

RISKS OF 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

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

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.

Migrant workers with failure to uphold equal remuneration be provided for all workers.

District has conducted a comprehensive risk assessment of our supply chain , considering the following factors.

COUNTRY RISK PROFILE

We evaluated the risk associated with individual countries using the Global Slavery Index.

SUPPLIER SERVICES

We assessed the nature of business services provided by our suppliers.

VULNERABLE DEMOGRAPHICS

We examined the presence of vulnerable demographic groups within our supply chain.

NEWS ANALYSIS AND EXPERT INSIGHTS

We reviewed relevant news and incorporated insights from labour and human rights organisations.



Image Credit: Mattiazzi 2023

SUPPLY CHAIN	POTENTIAL RISK	ANALYSIS	RESOURCES INFORMING RISK ANALYSIS	RISK RATING
Geographic	Servitude Debt bondage Forced labour Deceptive recruiting for labour or services Worst forms of child labour	Manufacturing in China We acknowledge the risks may be greater in inherently higher risk jurisdictions, including mainland China where we indirectly support employment of workers through supply chain providers, there is poor governance and document transparency.	South 32 - 'Understanding the risks of Modern Slavery in Supply Chains' 2019 Link	HIGH
		Manufacturing within the EU Australian New Zealand <ul style="list-style-type: none"> The European Union Directive on Corporate Sustainability Due Diligence that includes provisions for mandatory human rights and environmental due diligence The Australian Government has a Modern Slavery Act in place 		LOW
		The List of Goods Produced by Child Labor or Forced Labor <ul style="list-style-type: none"> Comprises 159 goods from 78 countries and areas, as of September 28, 2022 Textiles Electronics 	US Department of Labour – List of Goods Produced by Child Labor or Forced labour - Link	MEDIUM
		The Global Rights Index Offers an important status report on the worldwide struggle to defend and exercise core pillars of democracy: the fundamental rights and freedoms of working people and trade unions.	ITUC – International Trade Union Confederation - Link	
Product	Servitude Debt bondage Forced labour Deceptive recruiting for labour or services	Modern slavery risks are often found beyond tier one suppliers at different stages of production including raw material extraction <ul style="list-style-type: none"> Timber has been identified as a “high risk product” District primarily partners with EU and Australian brands that source FSC-certified timber, ensuring compliance with EUTR or Australian Illegal Logging Legislation. We compile and save FSC certificates. The FSC Policy for Association requires license holders to avoid unacceptable forestry practices, including illegal logging and human rights violations. 	FSC & Hikari	HIGH
Services	Servitude Debt bondage Forced labour Deceptive recruiting for labour or services Worst forms of child labour	Indirect services to the business including: (Refer to page 05)	ITF Seafarers Inspectorate - Link	MEDIUM
Third Party Entities	Deceptive recruiting for labour or services	Third party agreements with lack of transparency on tier three and tier four suppliers i.e. local freight providers. <ul style="list-style-type: none"> AFRA membership includes a yearly audit of members to ensure all their staff are paid according to industry rates 	The Modern Slavery Register Australian Furniture Removers Association	MEDIUM
Employment	Deceptive recruiting for labour or services	<ul style="list-style-type: none"> We consider that the risk of modern slavery in our team is low due to direct employment. Strong policies, team member training, and accessible grievance mechanisms are used to mitigate the risk of modern slavery in our operations. We also recognise the importance of freedom of association and acknowledge the right of team members to negotiate collectively. 		LOW

ACTION | OPPORTUNITIES

Modern slavery reporting opens the door for organisations to learn, foster conversation, and enhance transparency.

Year 1 – Foundation

In the first year of our approach to modern slavery reporting, we focused on laying the groundwork for future initiatives, particularly in how we manage modern slavery risks within our supply chain.

Year 2 - Discovery

Currently now in year two, our focus has shifted to targeted supply chain mapping and risk assessments to enhance visibility and awareness of where modern slavery risks exist within our supply chain.

District has identified three key areas of opportunity that we will continue to focus on during our modern slavery due diligence process.

LEVERAGE

Leverage relationships to promote conversations and change in our sector and beyond.

SHARE

1. Support transparency and awareness by sharing our learnings with industry partners.
2. Partner with industry experts to facilitate training for designers.



Image Credit: Hem 2024

CONTRIBUTE & CONNECT

1. Contribute to research
2. Connect with industry experts to strengthen our knowledge

ACTION

Due Diligence Process

1. Supplier Assessments (document)

Conduct a desktop risk assessment for all new suppliers using the FRM-DISo69 Supplier Assessment Questionnaire (SAQ). This questionnaire includes sections on Worker Headcounts, Corporate Sustainability Management, Modern Slavery, Child Labour, Forced Labour, Bonded Labour, Human Trafficking, Employment Conditions, Health & Safety Management, Quality Management, Environmental Management, and Ecolabel Certification. The SAQ and any supporting documents are assessed and scored using the RC-DISoo6 SAQ Register. This evaluation determines a risk rating for each supplier, which informs District of any necessary potential red flags or corrective actions.

Next phrase: District has updated our Supplier Assessment Questionnaire (SAQ) to ask suppliers for detailed information about their supply chains, as we aim to enhance visibility into tiers three and four

2. Supplier Assessments (site)

Conduct site risk assessments for potential high-risk suppliers to ensure they meet our standards and expectations concerning modern slavery and labour exploitation, as well as comply with local legislation

and regulations, as demonstrated by a recent site audit we commissioned in 2024 for a supplier located in China.

3. Code of Conduct

Suppliers are required to review and sign the CSRo02 Vendor Code of Conduct, which outlines minimum standards in Human Rights, Labour, Health & Safety, Environment, and Anti-Corruption. Each section includes a “District Commitment” which specifies our minimum standards with an “As part of our Supply Chain, we expect you to” statement to be clear on the standards we expect from our suppliers.

4. Manufacture Under Licence Program

Expand our “Manufacture Under Licence Program” where District manufacture products from international brands under licence in Australia to reduce international shipping.

Seafaring is one of the world’s most dangerous jobs. At any one time, there are around 1.9 million seafarers working in an environment with a high-risk of labour exploitation, including the risk of forced labour and other types of modern slavery¹. The modern slavery risks within shipping supply chains have been identified as isolation, restriction of movement, excessive overtime, abuse and poor working conditions, wage exploitation, and migrant worker status¹

5. Eco-labeling Programs

Continue to partner with brands that manage products through eco-labeling programs. While these programs alone do not eliminate the risk of modern slavery or labour exploitation, they often include compliance criteria such as fair pay, workplace safety, equal opportunity, lawful conduct, and respect for human and labour rights. As a result, products are third-party verified as ethically manufactured. We believe that eco-labeling programs promote greater transparency and accountability within our supply chain.

District holds a GECA licence for multiple products, across multiple manufacturers. The GECA ecolabel, meaning Good Environmental Choice Australia, is an independent “tick” that demonstrates our certified products are better for the environment, have a lower impact on human health and have been ethically manufactured; following a stringent assessment procedure to robust standards, meaning GECA certification is thorough and trusted. Whilst this does not solve the issues of modern slavery or labour exploitation within our supply chain, it does enable us to conduct document and site audits against social compliance criterion. This approach initiates a dialogue with our core manufacturers, helping us build momentum towards more ethical procurement practices.

6. FSC Certification

Continue to partner with brands that hold FSC Certification as the FSC Policy for Association requires license holders to avoid engaging in unacceptable forestry practices, including illegal logging and human rights violations. While FSC certification alone does not fully eliminate the risk of modern slavery or labour exploitation, it does provide some assurance of the brand’s commitment to ethical procurement within its supply chain.

7. ISO Certifications

Continue to partner with ISO-certified brands, which have undergone third-party assessments to verify that their internal systems, such as manufacturing processes or service procedures, meet internationally recognised standards for quality and consistency. While these certifications do not, by themselves, eliminate the risk of modern slavery or labour exploitation, they provide assurance of the brand’s commitment to ethical business practices.

1. Modern Slavery withing Maritime Shipping Supply chaings UNGCA, 2022

ACTION | REMEDIATION

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.

¹ Walk Free website <https://cdn.walkfree.org/content/uploads/2022/07/12132831/Walk-Free-Response-and-Remedy-Framework-1.pdf>

ACTION TYPE	ACTION	FY 2024 PROGRESS	STATUS	AMBITION FOR 2025
	Third party gap analysis (consultant review) of Modern Slavery Statement 2023	District engaged Sustainable Business Matters to undergo a gap analysis of our Modern Slavery Statement		N/A
	Review the modern slavery criteria and checks included in GECA audits to ensure comprehensive coverage and identify any social compliance gaps.	New action item		Schedule a meeting with auditors and GECA to establish baseline audit criteria for modern slavery. Evaluate the need for additional social compliance audits based on the findings.
Industry Collaboration	Advocate for increased awareness of Modern Slavery risks among architect, designers and District team. Develop and implement educational initiatives to guide industry professionals on how they can actively contribute to ethical practices and positively impact supply chains.	New action item		By Jan 2025: Upload District's Modern Slavery Statement to the company website to enhance visibility and demonstrate our commitment to ethical practices. Expand the scope of our internal "Sustainability Schools". National training program to be implemented by end of 2024. Sustainability Strategist to complete GBCA Training (Foundations & Advanced) by end of FY 2025.
Internal Communication	<p>Education & Awareness knowledge sharing: focus on ensuring a better technical understanding of business responsibility on human rights.</p> <p>Strategy:</p> <p>Phase 1: Training all logistics personnel in Modern Slavery awareness via UTS Online.</p> <p>Phase 2: Internal Sustainability Empower Sessions 1:1 consisting of regular half hour meeting slots where anyone interested can book in to discuss various topics, suggestions and challenges.</p>	Two personnel completed the training module		<p>All logistics and purchasing personnel to have completed the training module by June 2025. (5 team members)</p> <p>Conduct 5 1:1 empower sessions internally.</p>










In progress



Complete



New Action Item

ACTION TYPE	ACTION	FY 2024 PROGRESS	STATUS	AMBITION FOR 2025						
Manufacturing	Calculate the percentage of brands within District's portfolio that manufacture under an ecolabel program with evaluation criteria for social compliance, noting that not all products from these brands are certified.	45% of brands operate under a third party program		Increase by 10%						
	Calculate the percentage of brands within District's portfolio that manufacture under an FSC/ PEFC program, noting that not all products from these brands are certified.	4 Brands carry FSC/PEFC certification 6 brands utilise FSC or PEFC-certified timber.		Increase percentage of brands who use FSC/ PEFC timber by 10%						
	Develop a two-phase shipping audit program to ensure regular vessel inspections are conducted.	Ships Assessed in 2024		Increase ships assessed by 25%						
	Phase 1: Identify the major carriers and conduct a due diligence assessment on their company policy, procedures and performance standards	Risk Level 149								
	Phase 2: Review freight forwarder "Order Status Summary Report" quarterly, to conduct a diligence assessment of vessel names for ITF Inspection Case History Target for FY2024 Program implementation	<table border="1"> <tr> <td>Low</td> <td>44</td> <td>29.52%</td> </tr> <tr> <td>Medium</td> <td>77</td> <td>51.68%</td> </tr> <tr> <td>High</td> <td>28</td> <td>18.79%</td> </tr> </table>			Low	44	29.52%	Medium	77	51.68%
Low	44	29.52%								
Medium	77	51.68%								
High	28	18.79%								
Australian Manufacture targets: 1. Increase percentage of products which are manufactured in Australia. 2. Increase localised (state) manufacture to reduce reliance on freight.	36% Australian Manufacture		Increase by 10%							
Strategy: Conduct audit on local freight suppliers to identify potential risk. Target for FY2024 Program development										
Supplier Engagement	Strategy: Phase 1: Share our Modern Slavery Statement to key brands and suppliers so that they develop an understanding of what we are trying to achieve	New Action Item		Share Districts Modern Slavery Statement with 50% of suppliers by 2025						
	Phase 2: 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"									
	Number of brands and suppliers who have completed our Supplier Assessment Questionnaire (SAQ) with supporting documentation. Figure for FY2023 10-15 entities Target for FY2024 Increase completion rate by 50%	12 International brands		Increase to 20 brands						
	Brands and suppliers signed the FRM-DIS075 Supplier Code of Conduct Figure for FY2023 8 entities Target for FY2024 Increase completion rate by 50%	Figure for FY2024 16 brands and suppliers		Increase to 22 suppliers/ brands						








In progress



Complete



New Action Item

ACTION TYPE	ACTION	FY 2024 PROGRESS	STATUS	AMBITION FOR 2025
	Number of suppliers who have completed a third-party assessment site audit (Bureau Veritas) Figure for FY2023 6 entities Target for FY2024 Increase by 25% or redirect 25% work to accredited suppliers	Figure for FY2024 2 international brands 6 Australia suppliers		Complete 2025 GECA recertification
Policy Development	Develop an “Addressing Modern Slavery Action and Evaluation Plan” to document our goals, prioritise “Ambitions”, set timeframes and responsibilities, and evaluate the effectiveness of our measures. This plan will serve as a tool to assess whether our actions have been impactful. Include a “Remediation Response Plan” that incorporates reaching out to NGO’s for assistance to assess and resolve issues of modern slavery and labour exploitation	New Action Item		Develop “Addressing Modern Slavery Action and Evaluation Plan” by February 2025
Resource Allocation	Map all indirect suppliers and implement modern slavery risk assessments on each Strategy: Phase 1: Develop a procurement policy guideline for indirect suppliers. Phase 2: Implement supply chain mapping software to enhance visibility across our supply chain, allowing us to closely examine and understand the operations of our tier-three and tier-four suppliers	Completed feasibility study on two potential software platforms		Phase 1: Develop a procurement policy guideline for indirect supplier by Feb 2025. Phase 2: Workshop ways in which our current system can support greater visibility.
	Ability to Report: Improve visibility/ ability to report to collate data	Compiled the reporting requirements for an internal workshop to be held Sep 2024.		Ability to report on FSC, third party certification and manufacturing origin.
Senior Management Commitment	Annual management review meeting as part of ISO9001 compliance	FY2024 completed		Annual review FY2025



In progress



Complete



New Action Item

EFFECTIVENESS AND PROGRESS

In our first year of reporting, our goal was to develop a strategy to better understand the risks of modern slavery and how they might manifest within our supply chain. For the upcoming reporting period, we are shifting our focus to evaluate whether our actions are effectively reducing modern slavery risks in our business operations and supply chains.

To achieve this, we will concentrate on “Meaningful Action” and identify which actions will have the greatest impact. While we will continue to manage modern slavery from a risk perspective, we also aim to uncover opportunities within our business and industry to drive positive change.



Meaningful Action – The Tough Questions

To make genuine progress, we need to confront some hard truths.

Impact of Actions: Are our actions truly making a difference?

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?

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

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

Industry Collaboration: Are we working with industry partners, such as eco-labeling organizations, NGOs, and consultants, to gain a better understanding of modern slavery?

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

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

District proposes to conduct a survey at the end of each financial year moving forward, using these questions to assess our effectiveness.

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Image Credit: Mattiazzi 2023