



Super Retail Group 

20 MODERN 23 SLAVERY STATEMENT

SUPERCHEAP
AUTO

rebel

BCF

macpac

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ABOUT THIS STATEMENT

Super Retail Group Limited (ACN: 108 676 204) is an Australian public company listed on the Australian Securities Exchange (ASX:SUL). The registered office is at 6 Coulthards Avenue, Strathpine, Queensland, 4500, Australia.

This is Super Retail Group's (**the Group**) Modern Slavery Statement (Statement) pursuant to the *Modern Slavery Act (Commonwealth) 2018* (the Act) for the financial year ended 1 July 2023 (FY23). This is a joint statement covering Super Retail Group and the entities described under Appendix 3 *Reporting Entities*. This Statement describes how Super Retail Group seeks to identify, assess and address risks and instances of modern slavery across its Operations and Supply Chain. It also sets out how the Group assesses the effectiveness of its approach.

This is our fourth Statement and it has been internally reviewed and subject to internal assurance.

The CEO and Board of Super Retail Group (as principal governing body of the entities described in Appendix 3 *Reporting Entities*) approved this Statement on 8 December 2023. This statement has been signed by Anthony Heraghty, Group Managing Director and Chief Executive Officer in his role as a responsible member of the Super Retail Group Board. Refer to Appendix 2 for approvals and confirmation of mandatory criteria according to sections 4 and 16 of the Act.

This report contains forward looking statements. Please read our disclaimer on page 5 of the [FY23 Sustainability Report](#) for more information.

Note: Key capitalised terms used in this Statement are defined in the Glossary in Appendix 1.

SECTION 1



Our CEO's statement

Our Modern Slavery Statement reflects our commitment to upholding human rights and fair working conditions throughout our supply chain and operations.

At the end of FY23, we had 500 active Factories in 15 countries. Of our active Factories, 462 were classified as high risk and subject to our compliance verification audit program, and 92 per cent of these were audited in the past two years – see page 18 for our Factory performance summary.

Through the audit reports, we identified that key areas requiring improvement include those relating to health and safety, working hours, wages, payroll, and social insurance. We are working closely with our Trade Partners and Factories to resolve critical issues.

In FY22, we identified and disclosed modern slavery issues at a Factory supplying products to us. We have since been working with the Trade Partner and an independent third party to follow up on the corrective action plans and provide the factory workers with an external grievance line. Based on the independent verification audit conducted in June 2023, the audit results for this Factory improved from a previous score of D to a score of A (see page 20 of this report).

In FY23, we identified a new potential modern slavery issue at another Factory related to excessive recruitment fees and service fees being charged to migrant workers. In accordance with the United Nations Guiding Principles on Business and Human Rights, we seek to prevent or mitigate adverse human rights impacts that are directly linked to our products. We are committed to working with our suppliers where possible to remediate such findings and improve the

impact on workers. In this case, we have tried to engage with and encourage the Trade Partner to resolve the issues and are now in the process of exiting the relationship responsibly (see page 19 of this report).

We have almost completed the implementation of the LRQA EiQ supply chain intelligence platform. Once fully implemented, this tool will provide greater insight to risk factors such as regional differences, inherent product and industry risks.

In September 2023, we set up the Board Risk and Sustainability Committee to assist the Board to discharge its responsibilities in relation to risk management, compliance, sustainability (including modern slavery) and corporate governance. This committee superseded the previous Audit and Risk Committee and a separate Board Audit Committee has also been constituted.

Identifying and addressing modern slavery risks are complex, and we are still learning. Change is gradual, but our organisational values continue to guide us – we know we are getting better every day and that we are stronger together on this journey.

Anthony Heraghty
Group Managing Director and Chief Executive Officer
8 December 2023

WE SUPPORT



Super Retail Group is a signatory to the United Nations Global Compact (UNGC), a participant of the Global Compact Network Australia (GCNA), and strongly supports the Ten Principles of the UNGC in the areas of Human Rights, Labour, Environment and Anti-Corruption. The Group aims to contribute to the UN Sustainable Development Goals (SDGs) through our Operations and Supply Chain.

Our structure, operations and supply chain

OUR STRUCTURE

Super Retail Group (ASX: SUL) is the proud owner of four iconic brands: Supercheap Auto, rebel, BCF and Macpac (Brands), and is one of Australia and New Zealand's largest retailers.

Our powerful Brands have leading positions in growing, high-involvement lifestyle categories of auto, sports and outdoor leisure. For our customers and highly engaged ten million active loyalty club members, we source, distribute and provide a mix of national and international consumer branded products, as well as Private Brand products, through online and in-store channels.

The Group provides centralised support services for the procurement and distribution of goods, including, e-commerce activities, customer service and logistics management.



SUPERCHEAP
AUTO

rebel



macpac

Supercheap Auto is Australia and New Zealand's largest specialty automotive parts and accessories retail business. With 331 stores, we provide a wide range of service parts, tools, and accessories, as well as products for the garage, travel, touring and outdoors.

rebel is Australia's leading sporting goods retailer with 159 stores across Australia. Through rich digital and in-store experiences, customers from all walks of life can harness the transformative power of sport. With a broad range of quality products and expert knowledge, rebel inspires all Australians to achieve their sporting dreams and passions.

BCF is a leading outdoor retailer with 157 stores across Australia. With expert knowledge and service, we provide everything you need for your next boating, camping, or fishing adventure, all under the one roof.

Macpac is New Zealand's original, technical outdoor brand, delivering quality gear, made responsibly, and trusted to last. Tested and proven in the ultimate outdoor test lab – New Zealand – our gear is designed to equip outdoor enthusiasts to adventure better. Launched in 1973, Macpac has 89 stores across Australia and New Zealand and is committed to delivering a great customer experience with expert advice.

OUR OPERATIONS AND STORES IN AUSTRALIA AND NEW ZEALAND

736 TOTAL RETAIL STORES¹

331 SUPERCHEAP AUTO
Australia and NZ

159 REBEL
Australia

157 BCF
Australia

89 MACPAC
Australia and NZ

7 ONLINE RETAIL CHANNELS

4 SUPPORT OFFICES

7 DISTRIBUTION CENTRES

3 COUNTRIES OF OPERATION
Australia, NZ and China

¹ During FY23, we closed 4 stores, relocated 16 stores, and opened 24 new stores.

OUR TEAM

15,599 DIRECTLY EMPLOYED TEAM MEMBERS

497² CONTRACTED TEAM MEMBERS

~3%³ UNION MEMBERS

78% COVERED BY AN ENTERPRISE AGREEMENT

Note: FY23 data unless otherwise noted.

² Approximate number of Team Members in our distribution centres contracted through labour hire agencies, amounting to 56% of distribution centre Team Members as of 12 April 2023. This number fluctuates throughout the year to address demand requirements.

³ Proportion of the total number of Team Members engaged by SRG in Australia and New Zealand in FY23 who hold union membership. Excludes Team Members based in China.

OUR SUPPLY CHAIN - RETAIL PRODUCTS⁴

Retail products are purchased via the following supply chain arrangements:

- Products sourced from factories directly contracted by our group including Direct Imports;
- Products sourced from manufacturing partners or factories - mainly Private Brand goods; and
- Products sourced from trade partners who manage their own supply chains. (This category of products is not managed by our responsible sourcing compliance verification program).

Suppliers need to meet our Responsible Sourcing Policy and Code expectations.

\$2.13b
ANNUAL SPEND

~933
TRADE PARTNERS⁵

OUR SUPPLY CHAIN - NON-STOCK PRODUCTS AND SERVICES

Non-Stock products and services include marketing and promotional materials, Team Member uniforms, capital expenditure, professional services, transport and logistics providers, and cleaning services, amongst others.

\$973m
ANNUAL SPEND

1,700+
SUPPLIERS

LOCATION OF FACTORIES⁶ INCLUDED IN COMPLIANCE VERIFICATION PROGRAM

For FY23, 85 per cent of Factories were in China. The remaining 15 per cent were in 14 other countries.

PRIVATE BRAND PRODUCTS PURCHASED AND SALES REVENUE

11,000+ Group Private Brand products purchased

15 Countries of manufacture
500 Factories⁶

29% Group revenue from Private Brand products⁷

SUPERCHEAP
AUTO

rebel

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36%

10%

35%

85%

Note: Data for FY23 unless otherwise noted.

⁴ Super Retail Group has retail operations in Australia and New Zealand.

⁵ Refers to retail Trade Partners supplying to the Group. Purchase arrangements with Trade Partners vary between ad-hoc orders (short-term) and regular orders (longer-term).

⁶ Factories which supply or manufacture Super Retail Group's Private Brand products; Factories directly contracted by the Group to manufacture products; Factories which supply or manufacture Private Brand Non-Stock products to/for the Group. These Factories are in the scope of our Responsible Sourcing compliance verification program as outlined in our Responsible Sourcing Code.

⁷ Based on approximate percentage of Private Brand products' sales revenue for FY23.

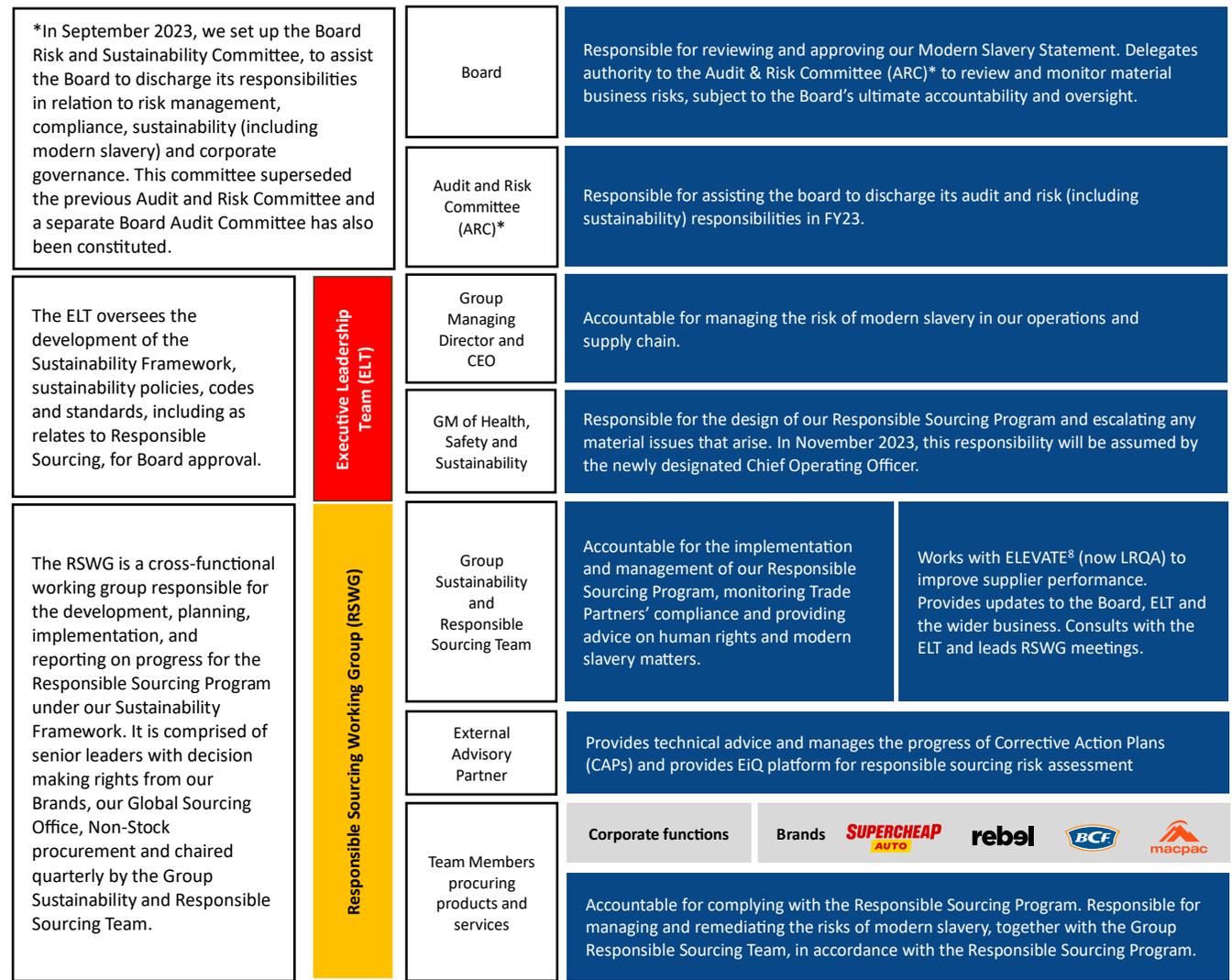
Our governance

HUMAN RIGHTS AND WAYS OF WORKING

Super Retail Group is committed to upholding human rights and fair working conditions for our Team Members, Trade Partners, Service Providers, and people in our Supply Chain. We aim to uphold human rights based on the principles of the following international guidance:

- International Bill of Human Rights including the Universal Declaration of Human Rights (UDHR);
- International Labour Organisation’s (ILO) Declaration on Fundamental Principles and Rights at Work and ILO Conventions;
- United Nations Guiding Principles on Business and Human Rights;
- United Nations Global Compact (UNGC) core values of human rights, labour standards, the environment and anti-corruption; and
- United Nations Sustainable Development Goals (SDGs) and targets relevant to our Operations and Supply Chain.

Our governance approach promotes ongoing consultation with the Brands and corporate functions on responsible sourcing issues, including modern slavery risk management. Key issues are reported to the Board as part of the Managing Director’s Report. Overall program outcomes are reported annually in our [Sustainability Report](#) and this Statement. A summary of our FY23 internal governance framework related to Responsible Sourcing and Modern Slavery is outlined on the right.



⁸ The company previously known as ‘ELEVATE’ was acquired by leading global assurance partner, LRQA, in April 2022. ELEVATE is now known as LRQA and will be referred to as such throughout this report.



SUSTAINABILITY FRAMEWORK 2030

Our overarching *Sustainability Framework 2030* sets our path forward for our five focus areas: *Team, Community, Responsible Sourcing, Circular Economy and Climate*. Our work across all areas is guided by strong Governance. These focus areas have 12 goals. **Goals 5, 6 and 7** relate to Responsible Sourcing and are linked to relevant targets (see below). Given the evolving nature of the sustainability and responsible sourcing landscape we expect to update these as we mature and the external environment changes. Our framework is driven by our vision and connected to our values.

OUR VISION, MISSION AND VALUES

Our vision is to inspire people to live their passion. This is how we create value. Our vision drives our corporate strategy and sits at the centre of what we do and how we do it.

Our vision, mission, and values help steward our organisation in a sustainable manner as we execute our corporate strategy.



Goals

2030 Targets⁹

	PEOPLE			PLANET	
	Team	Community	Responsible Sourcing	Circular Economy	Climate
	<p>GOAL 1: Invest in the health, safety and wellbeing of our team</p> <p>GOAL 2: Create an inclusive and diverse team</p> <p>GOAL 3: Support our team with purpose-led career development</p>	<p>GOAL 4: Invest in community programs that support our customers' and team's passions</p>	<p>GOAL 5: Improve transparency and disclosure of high-risk supply chains</p> <p>GOAL 6: Invest in sustainable supply chains through strategic partnering</p> <p>GOAL 7: Source materials and products more responsibly</p>	<p>GOAL 8: Design and procure durable products, with a circular mindset</p> <p>GOAL 9: Reduce waste and unnecessary packaging</p> <p>GOAL 10: Repair, reuse or recycle our products</p>	<p>GOAL 11: Develop a decarbonisation roadmap for our operations and customer offering</p>
	<ul style="list-style-type: none"> Implementing a holistic wellbeing program – participation rates Health & Safety TRIFR, 1st quartile performer in retail Develop Reconciliation Action Plan 40:40:20 for Board, executive and senior leadership positions Develop Disability Action Plan Program development for greater diversity and inclusion inc. LGBTQIA+ Deliver programs for purpose-led career development 	<ul style="list-style-type: none"> Identify key purpose-aligned community partnerships and agree a strategy for each Brand Contribute to conservation and regeneration programs 	<ul style="list-style-type: none"> Collaborate with and support strategic trade partners to improve their supply chains Contribute to industry level change Embed responsible purchasing practices in decision making across our business 	<ul style="list-style-type: none"> Develop a standard for design and procurement of products 100% of private brand packaging is reusable or recyclable¹⁰ Adopt the Australasian Recycling Label for private brand packaging 50% average recycled content must be included in private brand packaging¹⁰ Problematic and unnecessary single-use private brand plastic packaging must be phased out¹⁰ Increase waste diverted from landfills to 90% 	<ul style="list-style-type: none"> Zero Emissions – Scopes 1 and 2
	<p>GOVERNANCE GOAL 12: Enhance climate-related disclosures TARGET: Align climate-related reporting to the Task Force on Climate-related Disclosures</p>				

⁹ As our work in all these areas develops, we expect that our plans and targets will be updated.

¹⁰ Our packaging targets are aligned to those set by the Australian Government, with delivery expected by 2025.

POLICY FRAMEWORK

Super Retail Group has several policies and codes that articulate our values and the expectations of our Team Members, Service Providers and Trade Partners.

The policies and codes listed here relate specifically to modern slavery risk and ethical behaviour generally, with the **Responsible Sourcing Policy** and **Responsible Sourcing Code** embodying the Group's approach to modern slavery risk management (explained further in *Section 3 Identifying and assessing our modern slavery risks*). Each are subject to approval or oversight from the Board and its Committees, the CEO, or the ELT, as detailed in the table.

Notes: Super Retail Group sets the responsible sourcing policies, codes and procedures for Reporting Entities.

¹¹ *These policies and codes are publicly available on our website at*

www.superretailgroup.com.au.

¹² *These are internal policies and documents that are available to Team Members on our intranet.*

¹³ *Similar requirements to Trade Partners and Service Providers are documented in our Responsible Sourcing Code.*

POLICY OR CODE	CONTENTS AND PURPOSE	APPLIES TO SUPER RETAIL GROUP	APPLIES TO TRADE PARTNERS AND SERVICE PROVIDERS
<u>Code of Conduct</u> ¹¹	Sets out the expected standards of behaviour for business activities and outlines legal and ethical obligations for Team Members, officers, volunteers, work experience students, contractors, and labour-hire workers of Super Retail Group and wholly owned subsidiaries.	✓	N/A ¹³
<u>Compliance Policy</u> ¹¹	Outlines the Group's expectation and commitment to compliance with all applicable laws and Group values.	✓	✓
<u>Responsible Sourcing Policy</u> ¹¹	Provides a set of high-level expectations of Team Members, Trade Partners and Service Providers in relation to human rights, modern slavery and the environment drawing on international standards. The policy also references the Whistleblower Policy and relevant contact points.	✓	✓
<u>Responsible Sourcing Code</u> ¹¹	Outlines our monitoring programs, verification standards and expectations of Trade Partners and Service Providers. This Code supports the implementation of our Responsible Sourcing Policy and promotes business integrity; human rights and fair working conditions; environmental management; and sustainable sourcing throughout our supply chain.	✓	✓
<u>Responsible Sourcing Procedures</u> ¹²	These detail the Group's internal procedures to assess risk and verify compliance against our Responsible Sourcing Policy and Code, and outline our expectations related to Trade Partner and Service Provider compliance. There are separate internal procedures for Factories (Trade Partners) and Services (Service Providers).	✓	✓

<u>Whistleblower Policy</u> ¹¹	<p>Outlines for Team Members, Trade Partners, Service Providers and others, the mechanisms for reporting and investigating concerns about conduct suspected to be unethical, illegal, or contrary to our values. Concerns may be raised to the Integrity Officer in writing, by phone through the Integrity Line (for our China-based Team Members) or anonymously via ‘Whispli’ on https://superretailgroup.whispli.com/IntegrityLine</p> <p>The Audit and Risk Committee is provided with quarterly reports on whistleblowing and oversees the effectiveness and governance of the whistleblower program.</p>	✓	✓
<u>Anti-corrupt Practices Policy</u> ¹¹	<p>Outlines our commitment to recognising, reporting, and upholding laws and regulations relating to bribery and corruption.</p>	✓	✓
Workplace Resolution Policy ¹²	<p>Sets out our commitment for resolution of workplace issues. This Policy may be used in conjunction with the processes outlined in the Whistleblower Policy.</p>	✓	N/A ¹³
Union Representation and Membership Policy ¹²	<p>Details our commitment to, and support for, freedom of association within Super Retail Group.</p>	✓	N/A ¹³
Managing Young Workers Policy ¹²	<p>Outlines minimum requirements and expectations to safeguard workers under 18 years of age directly employed by Super Retail Group.</p>	✓	N/A ¹³
Harassment-Free Workplace Policy ¹²	<p>Outlines our commitment to maintain a professional work environment that is free from workplace harassment (bullying), sexual harassment and discrimination.</p>	✓	N/A ¹³

Notes: Super Retail Group sets the responsible sourcing policies, codes and procedures for Reporting Entities.

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¹² These are internal policies and documents that are available to Team Members on our intranet.

¹³ Similar requirements to Trade Partners and Service Providers are documented in our Responsible Sourcing Code.

SECTION 3

Identifying and assessing our modern slavery risks

This Section sets out how we review our risk profile for modern slavery on a regular basis to inform the actions in our Responsible Sourcing Program and mitigate adverse human rights risks and impacts. The forms of modern slavery risk identified as most relevant to our Operations and Supply Chain are the risk to people of Forced Labour, Debt Bondage, Deceptive Recruitment practices and Child Labour.¹⁴ These practices are prohibited under our Responsible Sourcing Code.

We consider inherent exposures across our Operations and Supply Chains to identify where the risks of modern slavery may be heightened by known factors. Those factors include the geographic location of a factory or service, the type of industry or commodity, or presence of specific workforce vulnerabilities.¹⁵

We have almost completed the implementation of the LRQA EiQ supply chain intelligence platform. Once fully implemented in FY24, this tool will provide greater insight to risk factors such as regional differences, inherent product and industry risks.

Super Retail Group also considers its potential relationship to modern slavery risks in line with

the **United Nations Guiding Principles on Business and Human Rights** “Protect, Respect, and Remedy Framework”. This acknowledges that businesses can directly *cause, contribute to, or be directly linked* to human rights risks and impacts.

Practices such as Forced Labour are found to be more prevalent in certain industries and sectors, notably manufacturing and its supply chains. Although not a direct operation of our business, manufacturing is a core component of our Supply Chain. Manufacturing therefore constitutes our largest exposure to modern slavery risk.

The Group’s assessment of risks to date has focussed primarily on direct business relationships and the first tier of our Supply Chains. While risks exist beyond these relationships and the first tier, management and oversight are complicated by layers of supply and reduced leverage. Consistent with our principle to focus our efforts where we believe we have the greatest risk and can have the greatest impact, we are focusing our efforts beyond the first tier of our supply chain on the highest risk inputs and components of our products (e.g. cotton which is considered higher risk due to the reported links to Child and Forced Labour across Central Asia).

As defined in the Modern Slavery Act 2018 Guidance for Reporting Entities¹⁵ (issued by the Attorney-General’s Department), an important

aspect of identifying modern slavery is acknowledging the connection to other potential practices of workplace and labour exploitation. ILO has outlined the following indicators of Forced Labour, recognising that some of these are enough to constitute Forced Labour, while others are significant warning signs:

1. Abuse of vulnerability;
2. Deception;
3. Restriction of movement;
4. Isolation;
5. Physical and sexual violence;
6. Intimidation and threats;
7. Retention of identity documents;
8. Withholding of wages;
9. Debt Bondage;
10. Abusive working and living conditions; and
11. Excessive overtime.

In line with the Modern Slavery Act 2018 Guidance for Reporting Entities¹⁵, Super Retail Group’s Responsible Sourcing Program considers modern slavery on a spectrum with other forms of labour exploitation and recognises that these other forms of exploitation could be signs that severe practices like Forced Labour may be occurring.

Our commitment to identifying and addressing these and other human rights abuses is reflected in our Due Diligence Process (i.e. the process by which we evaluate and address risks) and our supplier management practices.

We outline our efforts to promote compliance with the Responsible Sourcing Code and its relevant standards in the sections below.

¹⁴ Definitions for these types of modern slavery can be found in the glossary.

¹⁵ [Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities \(May 2023 update\)](#)

Our operations

We consider modern slavery risks in our operations in relation to our Team Members and the use of contracted services and labour. Super Retail Group does not own any manufacturing operations.

Most of our Team Members are employed directly by Super Retail Group. During FY23, we employed 15,599 Team Members, of which 78 percent were covered by enterprise agreements. The remaining Team Members were engaged on individual employment agreements, in accordance with relevant workplace laws. The standards, obligations and worker protections required by Australian and New Zealand labour laws result in a relatively lower risk of modern slavery within our team.

As of 12 April 2023, approximately 56 percent of workers at our distribution centres were contracted through labour hire firms. These firms are assessed under our Responsible Sourcing Program as part of their onboarding and contract renewal processes.

Our supply chain

SERVICE PROVIDERS

Our Responsible Sourcing Policy and Code applies across our supply chain operations and includes Service Providers. As part of our Non-Stock Group Procurement onboarding process, in general we require new service providers who enter into contracts with Super Retail Group to complete a self-assessment. The self-assessment includes a self-declaration of compliance with our responsible sourcing requirements. Some exemptions may be provided. Further documents, interviews or independent audits may be requested, depending on the residual risk.

We continue to consider that the following characteristics present heightened risks for Service Providers in Australia and New Zealand and this is the basis upon which we assess the risk of service types we could receive in our Operations:

- Use of labour brokers and third-party labour providers;
- Higher prevalence of migrant, overseas, other vulnerable or young workers (e.g. office cleaning and catalogue distribution); Multi-layer subcontracting models (e.g. where multiple subcontractors can be involved in completing the work or contractors can in turn subcontract further); and
- Franchisee business models.

The risk rating of the service types used in our operations remained mostly unchanged from FY22. General examples of service types and risk ratings are provided in the attached table. Risk ratings for a service type may be adjusted following additional review of information from a supplier. Therefore, Service Providers under similar Service Types may be allocated different risk ratings.

During FY23, we entered into contracts through our procurement process with 29¹⁶ Service

Providers across various service types, and 26 of these Service Providers were screened for compliance with our responsible sourcing criteria.

We investigated the onboarding process used for the other three service providers:

- For one of the relevant categories, we have consequently decided to re-assess suppliers and appoint those that meet our responsible sourcing requirements to a panel.
- For the other two service providers, we identified that human error led to the deviation from our process and will work on improvements.

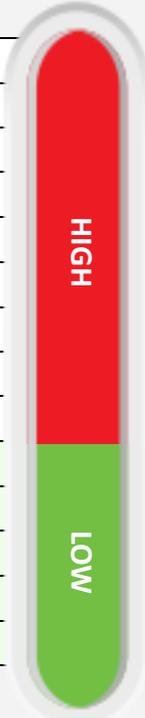
We commissioned and funded a sample independent audit of a high-risk Service Provider as part of our onboarding process. As a result of the audit, we discontinued onboarding of the relevant provider.

In FY23 we increased engagement of our Non-Stock Group Procurement team to help assess and support the management of Responsible Sourcing documentation relevant to onboarding of Service Providers.

We will conduct a further review of our Responsible Sourcing processes for Service Providers following the finalisation of our revised Responsible Sourcing Policy and Code.

SERVICE TYPE EXAMPLES

Office cleaning
Direct mail marketing – catalogues
Labour hire
Logistics (transport/ freight)
Physical security
IT services (if overseas workers are used)
Fitness equipment installation
Offshore services (i.e. warehousing)
Facilities maintenance
Energy supply ¹⁷
Insurance
Professional services
Travel
Waste disposal



¹⁶ Refer to *FY 2023 Sustainability Report*, page 40 for a breakdown of the 29 Service Providers' service types.

¹⁷ We note that we currently own solar panels on one site (Macpac Enfield). Our decarbonisation plan for 2030 is being revised and may include the addition of solar panels to our sites by our landlords or us. We acknowledge the potential risks involved in the procurement of energy infrastructure in this way. We will review these risks as part of our future assessments from an operational perspective as well as a Supply Chain perspective.

OUR PRODUCTS

For our **products**, we address risk according to the criteria set out in our Responsible Sourcing Code and Procedure. For FY23 our assessment of risks for the first tier Factories of our Supply Chain included the following three factors:

- Our proximity to, and business relationship with, the Factory;
- Inherent risk defined by the country of manufacture according to the Corruption Perceptions Index (CPI) rating ; and
- Insights gained through our compliance verification program and work with external partners, such as the findings reported in our FY22 Statement that there were heightened risks of modern slavery practices in Malaysia, Taiwan and Thailand due to higher migrant worker populations.

Proximity to supply

We focus our due diligence efforts where they will have the most impact. We do this by focusing on those business relationships where we have more influence on, and proximity to, the manufacture of the goods. We believe this provides us with the greatest potential to both understand how we might cause or contribute to

modern slavery practices in our Supply Chains, as outlined by *United Nations Guiding Principles on Business and Human Rights*¹⁸, and work with Trade Partners and Factories to effect positive change.

We have assessed Super Retail Group’s ability to influence its Supply Chain as highest in relation to:

- (a) Private Brand products, Direct Imports, licensed products that the Group is responsible for manufacturing; and
- (b) Non-Stock products with corporate branding.

For these types of products, Super Retail Group has the greatest transparency on pricing inputs, demand planning and further leverage to influence Trade Partners to improve performance.

Country risk

Throughout FY23, Super Retail Group continued to assess risks inherent to country of manufacture by reference to the Corruption Perceptions Index (CPI)¹⁹. The CPI is an index which ranks around 180 countries according to assessments and surveys of perceived levels of public sector corruption, which may include

abuse of power for private gain. A CPI rating of zero is considered highly corrupt, and 100 is considered the least corrupt. The overall global average rating for 2022 was 43, remaining unchanged for over a decade.

We update country risk annually according to the CPI. We consider countries with a CPI rating of less than 70 to have a higher risk of human rights violations, weaker protections for workers, and inadequate governance and enforcement of the rule of law. The CPI is then cross-referenced with other credible data sources such as the [Global Slavery Index](#) and the [US Department of Labor List of Goods Produced by Child Labor and Forced Labor](#).

¹⁸ As guided by the “Protect, Respect and Remedy” Framework.

¹⁹ As reported by Transparency International – see <https://www.transparency.org/en/cpi/2022>.

At the end of FY23, our relevant retail and relevant Non-Stock products were sourced from 500 active Factories located across 15 Manufacturing Countries.

The following table identifies for each Manufacturing Country, its CPI rating, and the number of Factories from which our Private Brand products, Direct Imports and licensed brands that we are responsible for manufacturing are sourced.

Given the concentration of our Factories in China, our reliance on CPI rating to drive our risk rating has resulted in most of our relevant Factories (92%) being classified as high-risk. Refer to *Section 4 (Our actions to address key modern slavery risks)* for further details on how we manage these risks.

LRQA's EiQ supply chain intelligence platform

In FY23 we almost completed the implementation of the LRQA EiQ supply chain intelligence platform, which will allow us to adopt a more nuanced approach to how we assess risk. With this tool, we have greater insight into risk factors such as regional differences, inherent product and industry risks, factory performance, leverage and other Environmental, Social, and Governance (ESG) risk ratings.

Once fully implemented in FY24, we will use this as part of our overall Responsible Sourcing Program review process to enhance our program's effectiveness and our targeted approach to supply chain risk management. The tool will help us to better focus our efforts where there are higher risks at Factories and where we can have more impact.

Country, Country Risk Rating and number of Factories in each country

FIRST TIER FACTORIES BY COUNTRY²⁰

MANUFACTURING COUNTRY	Number of Factories	Country Risk Rating (Corruption Perception Index) ²¹
Australia	31	75
Bangladesh	6	25
China	423	45
England	1	73
India	4	40
Indonesia	3	34
Italy	2	56
Malaysia	1	47
New Zealand	6	87
Philippines	2	33
South Africa	1	43
South Korea	4	63
Taiwan	8	68
Thailand	4	36
Vietnam	4	42
	500	
	Total	

²⁰ Number of Factories relate to our Private Brand products, Direct Imports and licensed brands that Super Retail Group is responsible for manufacturing. These are first tier Factories.

²¹ High-risk refers to countries with a CPI rating of less than 70; Low risk refers to countries with a CPI rating of 70 or greater. The CPI rating is used as a minimum threshold for our assessment of country risk.

Cotton – Forced Labour in China

We continued to monitor the situation in Xinjiang Uighur Autonomous Region (UAR), China, and our own Supply Chain throughout FY23. Based on the information available to us from our Trade Partners and Factories, no first tier Factories were located in Xinjiang UAR.

In FY22 we reported that, between two Factories, approximately 7.5 tonnes of cotton used in the FY22 manufacture of some of our Private Brand products had potentially been sourced from Xinjiang UAR.

To reduce the risk of raw material being sourced from Xinjiang UAR, for the above potentially impacted cotton products:

- We have transitioned the sourcing of the products from one of the affected Factories to another existing Factory managed by a different Trade Partner that uses 100% recycled cotton instead.

- We agreed with the second impacted Factory to put on hold production of the semi-finished goods that were impacted. Super Retail Group covered the associated costs, and agreed that the relevant items needed to be destroyed. In February 2023, we accompanied the impacted goods from the Factory to the destruction facility where they were to be destroyed by incineration. We continue to source products from them that use raw material that are not potentially sourced from Xinjiang UAR.

Our work to further understand the amount and source of cotton used across our relevant Private Brand products and Non-Stock range continues and we will further investigate options on how we can better manage the risk in this area.

CASE STUDY:

Macpac - Fairtrade & Global Organic Textile Standard (GOTS) Certified Cotton

Macpac continues its support of Fairtrade by sourcing all cotton T-shirts from Fairtrade suppliers. The compliance of Fairtrade farmers and supply chain operators with Fairtrade standards is externally verified, ensuring adherence to criteria such as monitoring for modern slavery, promoting gender equality, and ensuring fair pay. Farmers receive a more equitable price (the Fairtrade Minimum Price) and have access to a fixed additional income (the Fairtrade Premium).

Macpac has achieved certification to four top global fibre sourcing standards: the Global Organic Textile Standard (GOTS), to support its organic cotton program; the Responsible Down Standard (RDS); the Responsible Wool Standard (RWS); and the Global Recycled Standard (GRS) to support its growing use of recycled fibres.

SECTION 4

Our actions to address key modern slavery risks

APPROACH TO RISK MANAGEMENT

Our Responsible Sourcing Program and relevant policies, in conjunction with our processes for compliance verification, remediation, grievance reporting mechanisms, and capability building activities, together form our approach to managing and mitigating modern slavery risks.

Our Responsible Sourcing Policy and Responsible Sourcing Code requires Team Members, Trade Partners and Service Providers to:

- Conduct business with integrity;
- Uphold human rights and fair working conditions;
- Reduce our environmental impact in the sourcing process; and
- Source products in a sustainable and responsible way.

As explained in our FY22 Statement, new contracts and contract renewals utilising our General Business Agreement include a responsible sourcing clause which requires Trade Partners and Service Providers to comply with our Responsible Sourcing Policy and Responsible Sourcing Code.²² Compliance and

monitoring of this requirement across the Group are ongoing priorities, as is exploring other options on how we can best communicate our Responsible Sourcing requirements to existing Trade Partners who are not under written contractual arrangements.

We continue to work with Team Members across the Group to improve their understanding of our expectations and compliance when negotiating new contracts and contract renewals.

Trade Partners that we consider to be high risk in the context of modern slavery are asked to:

- Disclose to us the Factories being used to manufacture the products, including name, address, and factory contact details;
- Complete a third-party social audit according to our accepted requirements²²; and
- Complete Corrective Action Plans for any identified non-conformances, particularly critical non-conformances.

AUDITS

For those requiring audits, we have incorporated several allowances to reduce duplication and audit fatigue, ensuring we are not placing undue burden or unnecessary costs on suppliers. We accept third-party audit reports and certification conducted by

accredited auditors, in accordance with the following internationally recognised programs:²³

- Sedex SMETA 2 or 4-Pillar audits;
- Social Accountability International (SA8000) audit or Certification;
- Worldwide Responsible Apparel Production (WRAP) Certification;
- amfori Business Social Compliance Initiative (BSCI) audits;
- International Council of Toy Industries (ICTI) Ethical Toy Program Certification;
- Responsible Business Alliance (RBA) audits;
- Fair Labour Association (FLA) monitoring reports;
- ILO Better Work Programme; and
- Other audit reports issued by SAAS accredited or amfori-BSCI approved audit companies that meet the requirements of our Responsible Sourcing Code.

Relevant Factories are currently required to renew their audit reports biennially based on the date of their last approved audit. Factories that do not complete the audit on time, without an acceptable explanation, have their rating

²² Discretionary exemptions can be provided in some circumstances. Exemptions can also be given from audit protocol on a discretionary basis for orders with a value below \$10K USD and must be approved by Responsible Sourcing Team based on risk (this exemption cannot be made more than once biennially).

²³ Audit reports must include details of non-conformances and must not be older than nine months. Certifications must have a minimum of three months validity when provided.

downgraded. Extensions to due dates or exemptions based on consideration of circumstances can be provided at the discretion of the Responsible Sourcing Team.

Our process requires our Responsible Sourcing Team to review relevant audit reports and certifications prior to order placement with a factory. After review, the Responsible Sourcing Team assigns a rating of 'Approved', 'Conditionally Approved', 'On Probation' or 'Not Approved'. Rating definitions can be found in *Appendix 1 - Glossary*.

Trade Partners that fall outside the risk criteria set out in our Responsible Sourcing Code (as outlined in *Section 3 (Identifying and assessing our modern slavery risks)*) are not required to disclose their factory details and are not subject to our Responsible Sourcing Audits. However, they are required to comply with our Responsible Sourcing Policy and Responsible Sourcing Code.

AUDIT CORRECTIVE ACTION PLANS (CAPS) AND REMEDIATION

Relevant Factories can only receive an 'Approved' status once audit critical non-conformances have been addressed. Exceptions may apply when the Factory can provide a genuine reason and demonstrate continuous improvement. Critical

non-conformances are those that present significant risk to the workers' health, safety and rights, or which can often be legal breaches or significant risks to the environment. Examples include potential Forced Labour related non-conformances, failure to provide minimum wage or adequate overtime pay, failure to maintain a safe workplace, illegal or hazardous waste management issues, lack of required permits etc.

Where audits identify non-conformances with our Responsible Sourcing Code, we require our Trade Partners and Factories to take appropriate action to address our requirements. Where relevant, we communicate the actions required to address the non-conformances by preparing and issuing a Corrective Action Plan (CAP); and support capability requirements by delivering some relevant e-learning modules, through our advisory partner LRQA; and by engaging directly with Trade Partners and Factories if our expectations are unclear.

We require Trade Partners and Factories to remediate issues identified in CAPs within an appropriate timeframe, depending on the nature and severity of the non-conformance. Most non-conformances can be closed with photographic evidence or provision of electronic copies of documents, records and plans. However, an on-site re-audit may be required to verify some corrective actions.

FY23 FACTORY PERFORMANCE FOR PRODUCTS, BASED ON AUDITS

At the end of FY23, we had 500 active Factories in 15 countries. Of our active Factories, 462 were classified as high risk and subject to our compliance verification audit program, and 92 per cent of these were audited in the past two years. During FY23:

- 54 Factories were onboarded. These Factories were screened against our Responsible Sourcing Code requirements as part of our mandatory review process.
- We commissioned and funded nine independent audits of Factories. During an independent audit conducted at the end of the reporting period, a factory representative attempted to bribe the auditor, by offering cash in an envelope, which the auditor refused to accept. Throughout the course of the audit, several critical non-conformances were identified, including some repeat findings. Examples of findings included underpayments, unlawful deductions, excessive overtime and safety.

As was the case in FY22, we continued, through agreed CAPs, to work with Factories to address audit findings relating to potential modern slavery practices, critical health and safety concerns and issues related to working hours, wages and payroll etc. Given the concentration of Factories in China, and the rigorous pandemic-related restrictions imposed in China, access to Factories continued to be severely constrained this year. This resulted in delays, both for audits and the completion of work required to address non-conformances.

Where required by the circumstances, we extended deadlines by which Factories must demonstrate progress against agreed corrective action plans.

Despite the pandemic-related access restrictions and delays, we continued to work with Factories to seek to address non-conformances and drive positive change.

In FY23, new Factory critical non-conformances regarding modern slavery related to one Factory. An audit report identified several migrant workers who had paid recruitment fees to the agent in their home country. The workers also were required to pay monthly service fees

to the broker in the host country of work. The factory was reported as On Probation in our FY23 Sustainability Report. This non-conformance is a potential modern slavery issue (debt bondage) due to the amount of fees paid.

Based on the United Nations Guiding Principles on Business and Human Rights, we have determined that Super Retail Group did not cause or contribute to the situation arising, however we were directly linked through our business relationship with the Trade Partner in procuring products from the Factory. We have been communicating with the relevant Trade Partner to address the finding as per our remediation requirements and are now in the process of exiting the relationship responsibly.

FACTORY STATUS (end of FY23)

412

FACTORIES APPROVED

78

FACTORIES CONDITIONALLY APPROVED

10

FACTORIES ON PROBATION / NOT APPROVED

General key areas requiring improvement identified in the various audit reports include those relating to health and safety, working hours, wages, payroll, and social insurance. We have agreed Corrective Action Plans in each case and are working closely with our Trade Partners and Factories to resolve critical issues.

What we did: progress over time



In FY22, we reported that we had identified some critical non-conformances regarding modern slavery primarily relating to one Factory. Non-conformances for this Factory were identified following an independent audit commissioned by us and conducted by our external partner (LRQA). The audit findings included:

- Passport retention.
- Debt bondage in the form of recruitment fees.
- Deceptive recruitment.
- Withholding of wages (deposits and deductions).
- Abuse of vulnerability.

Based on the United Nations Guiding Principles on Business and Human Rights, we determined that Super Retail Group did not cause or contribute to the situation arising, however we were directly linked through our business relationship with the Trade Partner in procuring products from the Factory.

In FY23 we re-engaged LRQA to conduct a more detailed onsite investigation inclusive of off-site interviews with the migrant worker population.

We have since been working with the Trade Partner and LRQA to provide the factory workers with an independent external grievance line, including training in four languages, and following up on the corrective action plans to address the non-conformances.

We engaged LRQA to conduct another independent verification audit in June 2023 to check progress on implementation. The audit results for this Factory improved from a previous score of D to a score of A.

GRIEVANCE REPORTING MECHANISMS

Super Retail Group recognises both the importance of, and challenge in, establishing an effective grievance reporting mechanism.

As outlined in *Section 2 Policy Framework*, our [Whistleblower Policy](#) provides protection and support to enable whistleblowers to raise concerns, including those related to human rights and modern slavery. To support this, the Group has also established the following mechanisms:

- Integrity Officers who oversee the application of the Policy and the protection of whistleblowers;
- Various reporting channels, including post, email, and ‘Whispli’ (an online platform that uses contemporary technology) to facilitate anonymous and confidential reporting; and
- A dedicated telephone line service to facilitate anonymous and confidential reporting in English or Mandarin for our China-based Team Members and Trade Partners.

In addition, Macpac operates a WeChat based channel for workers in China, which can be accessed via a QR code posted in manufacturing facilities.

The Responsible Sourcing audits we accept generally include verification of the existence of grievance reporting mechanisms at Factories, but they do not offer detailed insight into the

efficacy of those mechanisms in resolving workers’ concerns. To improve our understanding of workers’ grievances, we conducted independent workers’ voice/worker sentiment surveys as part of the majority of the independent audits that we commissioned and funded throughout FY23.

Throughout FY24 we will:

- Continue to include independent workers’ voice surveys in relevant compliance verification programs for those Factories where we commission independent audits with LRQA; and
- Further engage with industry and third-party providers to explore whether there are more effective grievance mechanisms.

CAPABILITY BUILDING

We work collaboratively with our Trade Partners, Service Providers and Team Members to improve conditions in our Operations and Supply Chains. Throughout FY23, our Responsible Sourcing Team and our Global Sourcing Office remained an accessible contact for Trade Partners, Service Providers and Team Members, with a dedicated inbox to assist with concerns or queries.

We prioritise capability building across our Factories: We partner with LRQA to provide e-learning modules to support our suppliers’ understanding of our expectations for working conditions based on the types of non-

conformances they have in their audit reports. Examples of e-learning topics included health and safety, working hours, social insurance and chemical management. During FY23, representatives from 135 factories completed some online training.

We continue to build our own internal capability. Our Board and Responsible Sourcing Working Group receive updates on the performance of our Responsible Sourcing Program and emerging trends or issues.

In FY23, we delivered Responsible Sourcing training to 108 team members involved in the procurement of products and services on behalf of the Group.

We continued to partner with external advisors, both in Australia and in the countries where our Factories operate. We also partner with and learn from industry, including through our participation in the United Nation’s Global Compact Network Australia – Modern Slavery Community of Practice, the Australian Retail Association and The Collaborative Advantage in New Zealand.

We challenge ourselves through transparency. For example, Macpac actively engaged in the Better Buying Purchasing Practices Index (BBPPI) in FY23, continuing its commitment to enhancing purchasing practices. After receiving the first report from last year’s survey, the team identified opportunities for improvement, especially in forecasting. Macpac is now focused on forging a path forward to implement these

improvements. In addition, key members of the Macpac senior leadership team underwent training on responsible purchasing principles.

The BBPPI serves as the flagship survey of the Better Buying™ Institute, providing a platform for Trade Partners to anonymously rate the purchasing practices of the companies that procure their products. The Better Buying Institute utilises data to foster stronger relationships between Trade Partners and buyers. The aim is to enhance purchasing practices that not only drive profitability but also safeguard workers and the environment.

By participating in the BBPPI, Macpac aligns with its aspiration to establish transparent and mutually beneficial sustainable partnerships with suppliers.

SUPPLY CHAIN CHALLENGES – COVID

Access to Factories was once again impacted during the year due to the pandemic, particularly in China. This resulted in delays, both for audits and the completion of work required to address nonconformances. Where required by the circumstances, we have extended deadlines by which Factories must demonstrate progress against agreed corrective action plans. Where necessary, we engage external providers to assist us in investigating some of the findings further and checking on progress.

OPERATIONS CHALLENGES – TEAM MEMBER WELLBEING

In FY23, we continued to work hard to improve the health, safety and wellbeing of our people.

Mental Health - The 'I Am Here' program helps create a culture where 'it's ok not to feel ok, and it's absolutely ok to ask for help'. The program is designed to help us look out for ourselves and others to create a supportive work environment for team members, every day. More than 3,000 current team members are participating in the program, with regular activity underway to continually increase participation.

In response to managing the risk of psychological hazards, a Mental Health and Wellbeing framework has been developed. It focuses on individuals, teams and the whole organisation with tools to promote, respond/support and protect. Its objectives are awareness, education, support services, social response, research/education and compliance.

Respect@Work – In May 2022, we introduced our new Harassment-free Workplace Policy in response to the Respect@Work Bill (2022). This policy replaces an existing policy and provides clearer expectations on individuals and leaders within the business to take reasonable and proportionate measures to eliminate sexual harassment and other discriminatory conduct within the workplace.

We have introduced brand and organisation-wide Respect@Work Councils which bring key insights to senior executives and provides the Councils an opportunity to deep-dive on notable matters with operational leaders who facilitate investigations and outcomes and agree on prevention and response principles. Our engagement on this issue extends across every level of our operations, from Board to team members.

SECTION 5

Assessing the effectiveness of our actions

At Super Retail Group, we monitor our progress against our Sustainability goals and targets for responsible sourcing and assess the effectiveness of our work.

GOVERNANCE

The governance frameworks outlined in *Section 2* aim to support accountability for program delivery, program quality and target execution.

The Responsible Sourcing Working Group (RSWG) is comprised of senior leaders with decision making rights from each of our Brands, Global Sourcing Office, Non-Stock procurement, and Group Sustainability and Responsible Sourcing.

The RSWG meets quarterly and oversees the implementation of the responsible sourcing goals and targets, set out in our Sustainability Framework 2030. The RSWG also provides a forum to discuss risks and issues related to our Responsible Sourcing Program, including modern slavery risks. Risks are escalated to the Executive Leadership Team (ELT) where required. They are reported monthly, by the Group Managing Director (the CEO) to the Board.

CONSULTATION WITH EXPERTS

We work with external experts to get specialist advice and help us continuously improve our approach. In FY23, we worked with an expert who supported us to review our Responsible Sourcing Policy and Code and assess whether it was still aligned with industry expectations and market practice. As part of this work, we also reviewed our governance framework and approach to human rights due diligence. Our refreshed policy and code will be finalised and released in 2024.

INDEPENDENT AUDITS AND TRACKING

Our Responsible Sourcing Team verifies the extent to which our Factories maintain or exhibit an improvement of audit results through the completion of re-audit cycles and Corrective Action Plans. We also commission and fund a limited number of independent audits to verify the status of selected Factories and completed actions. The majority of these independent audits include a workers' voice/ workers sentiment survey, giving workers a voice to tell us their concerns and opinions.

GRIEVANCE REPORTING MECHANISMS

Our Whistleblower Policy facilitates anonymous and confidential reporting if issues arise. It is designed to provide opportunity for

transparency and allow workers to report complaints without fear of reprisal. Through our work with external advisors, we continue to look for opportunities to improve grievance reporting mechanisms.

CAPABILITY BUILDING

As part of the corrective action plan process for the Factory audit reports that we assess, we delivered online training to our Trade Partners and Factories via our advisory partner, LRQA. Examples of topics included health and safety, working hours, social insurance and chemical management. During FY23, representatives from 135 factories completed some online training.

In FY24, following the review of our risk assessment and segmentation process, our Policy and Code, we will review training effectiveness and identify additional training needs, to help Trade Partners and Team Members understand any changes to the program or our expectations.

TRAINING

We continue to deliver Responsible Sourcing training to Team Members involved in procurement activities where modern slavery risk may be present. This enables our Team Members to better implement our policies and identify risks in their day-to-day roles.

In FY23, we delivered Responsible Sourcing training to 108 team members involved in the procurement of products and services on behalf of the Group.

The training also allows us to improve the program through any Team Members' feedback and provides the opportunity to communicate any major updates or changes to the broader team.

CONSULTATION WITH OWNED AND CONTROLLED ENTITIES

Consultation with the Reporting Entities and the Entities owned and controlled by them on the matters set out in this Statement, occurred throughout the reporting period as well as for the purpose of preparing this Statement.

Super Retail Group's Responsible Sourcing Policy and Responsible Sourcing Code apply to all wholly owned entities of the Group. These cover the requirements of our Responsible Sourcing Program including issues related to modern slavery. Implementation and oversight of the Group's Responsible Sourcing Program are managed by a centralised Responsible Sourcing team for Supercheap Auto, BCF and rebel, and for Macpac, by Macpac's head office in Christchurch, New Zealand.

Relevant members of the Responsible Sourcing Working Group (RSWG), and Executive Leadership Team (ELT) were consulted at various stages of the ongoing process. Refer to *Section 2 (Our governance)* for further details on governance, accountabilities and responsibilities including those related to this Modern Slavery Statement.

From a management perspective, the Managing Directors of Supercheap Auto, BCF, rebel and Macpac are directors of their respective Brand's trading entity. Under the Responsible Sourcing Program, the Managing Directors of these Brands and their teams are kept informed by the centralised Responsible Sourcing team or, in the case of Macpac, by their own in-house team, throughout the reporting period on modern slavery risks and issues in our Supply Chain and Operations, as well as actions taken or proposed to be taken to address any non-conformances. This in turn facilitates an effective and meaningful consultation process for the management of modern slavery risks and the preparation of this Statement.

In preparing this Statement, Super Retail Group consulted representatives from the Reporting Entities to confirm that the included information is relevant and accurate. This consultation took place through discussions with the Reporting Entities, the Responsible Sourcing Working

Group, and circulation as appropriate of summaries of program performance throughout the reporting period. We also distributed draft version of this Statement to the Managing Directors of the Reporting Entities, our Responsible Sourcing Working Group and members of the Executive Leadership Team for review.

The Board of Directors were provided opportunity for input and feedback prior to final approval of this Statement.

A declaration of principal governing body approval can be found in *Appendix 2* in accordance with the Act.

FY24 AND BEYOND

Our Sustainability Framework 2030 sets out our responsible sourcing goals, whereby we aim to:

- **GOAL 5:** Improve transparency and disclosure of high-risk supply chains
- **GOAL 6:** Invest in sustainable supply chains through strategic partnering; and
- **GOAL 7:** Source material and products more responsibly.

Over the coming year we will continue to strengthen our approach to identifying, mitigating and remediating risks. To do this, we have set ourselves a number of strategic priorities for FY24. These are to:

- Finalise the review of our policy and code and communicate these to Trade Partners, Factories, Service Providers and Team Members.
- Engage in a change management process for our revised policy and code with relevant parts of our supply chain and Team Members.
- Use LRQA's EiQ tool to enhance our risk assessment, segmentation and re-prioritise our audit efforts to align with this revised risk segmentation.

We will continue to focus our efforts to identify where we have the biggest risks and the potential for the greatest impacts. Guided by our corporate values, we know we must 'play the long game' and continue driving change throughout our supply chain.

Appendix 1 – Glossary

TERMS AND ABBREVIATIONS

Term	Definition
Act	Modern Slavery Act 2018 (Commonwealth).
Brand(s)	The four retail Brands of Super Retail Group: Supercheap Auto, rebel, BCF, Macpac.
Child Labour	<p>Child labour refers to work that is mentally, physically, or morally harmful to children; and interferes with their schooling by:</p> <ul style="list-style-type: none"> • depriving them of the opportunity to attend school; • obliging them to leave school prematurely; or • requiring them to attempt to combine school attendance with excessively long and heavy work. <p>Key areas of risk for Super Retail Group are where children are engaged in hazardous work including night work, work with machinery and chemicals.</p>
CPI	Corruptions Perception Index.
Controlled Entities	The subsidiaries, controlled entities, and investments of the Reporting Entities.
Corrective Action Plan or CAP	A plan issued by Super Retail Group setting out non-conformances of a Factory with our Responsible Sourcing Policy and Responsible Sourcing Code, the date by which evidence must be provided to the Group demonstrating corrective actions have been completed and non-conformances remediated.
Debt Bondage	Payment of excessive recruitment fees or associated costs, and retention of documents.
Deceptive Recruitment	False promise of a job, benefits, or conditions.
Direct Imports	Products we source or import direct from the Factories which manufacture them.
Due Diligence Process	The process by which we evaluate and address risks.
Executive Leadership Team or ELT	The Group’s Managing Director and CEO and his direct reports.
Factories	Focus of our Responsible Sourcing program is Factories which supply or manufacture Super Retail Group’s Private Brand products; Factories directly contracted by Super Retail Group to manufacture products; Factories that supply or manufacture Private Brand Non-Stock products to/for the Group.
Forced Labour	Restrictions of movement, intimidation, threats, including human trafficking.
the Group	Super Retail Group Limited and its Reporting Entities.

ILO	International Labour Organisation.
Non-Stock	Non-Stock products and services include marketing and promotional materials, Team Member uniforms, capital expenditure, professional services, transport and logistics providers, and cleaning services, amongst others.
Operations	The operations of Super Retail Group.
Private Brand	Products manufactured specifically for our Brands, using product brand names owned or licensed by Super Retail Group.
Reporting Entity	Super Retail Group follows the definition of a reporting entity as outlined by the Act: Any entity with a consolidated annual revenue of at least AU\$100 million over the twelve-month reporting period and is at any time in the reporting period either an Australian entity or a foreign entity carrying on business in Australia.
Responsible Sourcing Audit	An audit we may require of a Trade Partner or Service Provider following consideration of our Due Diligence process.
Responsible Sourcing Code	Sets out specific criteria for our Trade Partners to comply with the Responsible Sourcing Policy regarding business integrity; human rights and fair working conditions; environmental management; and sustainable sourcing.
Responsible Sourcing Policy	Provides a set of high-level expectations of Team Members, Trade Partners and Service Providers in relation to human rights, modern slavery, business integrity and the environment, drawing on international standards.
Responsible Sourcing Procedures	Sets out the processes used by Super Retail Group to verify compliance with its Responsible Sourcing Policy and Code.
Responsible Sourcing Team	Team responsible for managing and supporting the delivery of the Group's Responsible Sourcing Program.
Service Provider	Providers of services to Super Retail Group, such as information technology, cleaning, security services, etc.
Statement	This Modern Slavery Statement.
Supply Chain	The products and services (including labour) that contribute to our retail and Non-Stock products and services. Includes products and services sourced in Australia or overseas and extending beyond our direct suppliers, including indirect suppliers for raw materials, manufactured componentry and freight.
Team Members	All employees of Super Retail Group.
Trade Partners	<ul style="list-style-type: none"> • Suppliers of retail products, including agents and factories which supply or manufacture Super Retail Group's Private Brand products; • Factories directly contracted by Super Retail Group to manufacture products; and • Suppliers of Non-Stock products to/for Super Retail Group.
Xinjiang UAR	Officially Xinjiang Uyghur Autonomous Region, a region in the north-west of the People's Republic of China.

RESPONSIBLE SOURCING STATUS²⁴ DEFINITIONS:

Rating	Description	Effect of Rating
Approved	The Factory has no critical but some major and minor non-conformances.	An order can be placed with the Factory.
Conditionally approved	The Factory has some critical non-conformances (excluding child and Forced Labour) as well as major and minor non-conformances.	An order can be placed with the Factory. Group Responsible Sourcing will issue a Corrective Action Plan to the Factory including completion timeframes.
On probation	Renewed audit: repeated critical non-conformances. Conditionally approved Factory: critical non-conformances overdue by 3 months OR audit renewal over 30 days overdue.	Allow existing orders to complete. No new orders until all critical non-conformances are closed out. Re-audit may be required before new orders are placed.
Not approved	New Factory (i.e. no current orders) with critical non-conformances relating the use of child and Forced Labour. 'On Probation' Factory that has critical non-conformances overdue by more than 6 months. New Factory that has not provided an audit report for evaluation. Existing 'Conditionally Approved' Factory overdue for audit renewal (over 60 days).	Orders must not be placed. Audit/Re-audit is required before placing any orders.

²⁴ Extensions to due dates and status (based on considering circumstances) can be provided at the discretion of Group Sustainability (Responsible Sourcing Team).

Appendix 2 – Modern Slavery Act 2018 (Cth) Annexure

MODERN SLAVERY STATEMENT APPROVAL

PRINCIPAL GOVERNING BODY APPROVAL

This Modern Slavery Statement was approved by the Board of Super Retail Group Limited as the principal governing body²⁵ of Super Retail Group on behalf of all reporting entities specified in the Statement on 8 December 2023.

SIGNATURE OF RESPONSIBLE MEMBER

This Modern Slavery Statement is signed by a responsible member²⁶ of the Super Retail Group Limited Board of Directors as defined by the Act:



Anthony Heraghty

Group Managing Director and Chief Executive Officer
8 December 2023

²⁵ Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

²⁶ Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorized to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the Corporations Act 2001—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.

MANDATORY REPORTING CRITERIA

This statement has been prepared to meet the mandatory reporting criteria set out under the Modern Slavery Act 2018 (Cth). The table below summarises where each criterion is disclosed in this Statement.

Mandatory Reporting Criteria	Reference in this statement
1. Identify the reporting entity.	Reporting entities Page 2 and Page 31.
2. Describe the reporting entity's structure, operations and supply chains.	Section 2. Our structure, operations and supply chain Page 4-6.
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.	Section 3. Identifying and assessing our modern slavery risks Pages 11-16.
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.	Section 4. Our actions to address key modern slavery risks Page 17-22. Grievance reporting mechanisms Page 21 Capability building Page 21
5. Describe how the reporting entity assesses the effectiveness of these actions.	Section 5. Assessing the effectiveness of our actions Page 23-25.
6. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	Consultation with owned and controlled entities Page 24. Governance and Policy Framework Page 7-10. Principal Governing Body Approval Page 2 and Page 29. Signature Of Responsible Member Page 3 and Page 29.
7. Any other information that the reporting entity, or the entity giving the statement, considers relevant.	Supply chain challenges – COVID Page 22. Operations challenges – Team member wellbeing Page 22. FY24 and beyond Page 25. Link to FY23 Sustainability Report .

Appendix 3

LIST OF REPORTING ENTITIES

Super Retail Group Limited (ACN: 108 676 204) makes this Statement on its own behalf and on behalf of the following entities for which it is the ultimate holding company (Reporting Entities):



Super Cheap Auto Pty Ltd ACN 085 395 124



Rebel Group Limited ACN 110 006 678 (Rebel Group), Foghorn Holdings Pty Ltd ACN 122 558 874 (Foghorn), and Rebel Sport Limited ACN 003 283 823 (Rebel Sport), noting that Rebel Sport is the trading entity and Rebel Group and Foghorn are Reporting Entities because of their ownership of Rebel Sport



SRG Leisure Retail Pty Ltd ACN 110 667 411



Macpac Holdings Pty Ltd ACN 609 407 436 (Macpac Holdings), MP Finco Pty Ltd ACN 634 448 598 (MP Finco), Macpac Group Holdings Pty Ltd ACN 638 577 625 (Macpac Group Holdings), and Macpac Retail Pty Ltd ACN 129 716 025 (Macpac Retail), noting that Macpac Retail is the trading entity, and Macpac Holdings, MP Finco, and Macpac Group Holdings are Reporting Entities because of their ownership of Macpac Retail

For the reporting period, there were no other reporting entities (such as joint ventures, wholly or partially owned entities) required to be named in this joint Statement.

The subsidiaries, controlled entities, and investments of the Reporting Entities (Controlled Entities) can be found on page 141 of our [FY23 Annual Report](#) and have also been included on the next page.

INVESTMENTS IN CONTROLLED ENTITIES (Extract from page 141 of our [FY23 Annual Report](#))

The Group's subsidiaries at 1 July 2023 are set out below. Unless otherwise stated, they have share capital consisting of ordinary shares that are held directly by the Group, and the proportion of ownership interests held equals the voting rights held by the Group. The country of incorporation is also their principal place of business.

Name of Entity	Country of Incorporation	Principal Activities	Equity Holding	
			2023 %	2022 %
A-Mart All Sports Pty Ltd ⁽¹⁾	Australia	Sports retail	100	100
Auto Trade Direct (NZ) Limited	New Zealand	Auto retail	100	100
Auto Trade Direct Pty Ltd ⁽¹⁾	Australia	Auto retail	100	100
BCF New Zealand Limited	New Zealand	Outdoor retail	100	100
Coyote Retail Pty Limited ⁽¹⁾	Australia	Sports retail	100	100
Foghorn Holdings Pty Ltd ⁽¹⁾	Australia	Sports retail	100	100
Goldcross Cycles Pty Ltd ⁽¹⁾	Australia	Sports retail	100	100
Infinite Retail Pty Ltd ⁽¹⁾	Australia	Sports retail	100	100
Infinite Retail UK Limited ⁽²⁾	United Kingdom	Sports retail	100	100
Macpac Enterprise	New Zealand	Outdoor retail	100	100
Macpac Group Holdings Pty Limited ⁽¹⁾	Australia	Outdoor retail	100	100
Macpac Holdings Pty Ltd ⁽¹⁾	Australia	Outdoor retail	100	100
Macpac Limited	New Zealand	Outdoor retail	100	100
Macpac New Zealand Limited	New Zealand	Outdoor retail	100	100
Macpac Retail Pty Ltd ⁽¹⁾	Australia	Outdoor retail	100	100
MP Finco Pty Limited ⁽¹⁾	Australia	Outdoor retail	100	100
Mouton Noir IP Limited	New Zealand	Outdoor retail	100	100
Mouton Noir Management Pty Ltd ⁽¹⁾	Australia	Outdoor retail	100	100
Oceania Bicycles Pty Ltd ⁽¹⁾	Australia	Sports retail	100	100
Oceania Bicycles Limited ⁽³⁾	New Zealand	Sports retail	100	100
Ray's Outdoors New Zealand Limited	New Zealand	Outdoor retail	100	100
Ray's Outdoors Pty Ltd ⁽¹⁾	Australia	Outdoor retail	100	100
Rebelsport.com Pty Limited ⁽¹⁾	Australia	Sports retail	100	100
Rebel Group Limited ⁽¹⁾	Australia	Sports retail	100	100
Rebel Management Services Pty Limited ⁽¹⁾	Australia	Sports retail	100	100
Rebel Pty Ltd ⁽¹⁾	Australia	Sports retail	100	100
Rebel Sport Limited ⁽¹⁾	Australia	Sports retail	100	100
Rebel Wholesale Pty Limited ⁽¹⁾	Australia	Sports retail	100	100
SRG Equity Plan Pty Ltd ⁽¹⁾	Australia	Investments	100	100
SRG Leisure Retail Pty Ltd ⁽¹⁾	Australia	Outdoor retail	100	100
SRGS (New Zealand) Limited	New Zealand	Product acquisition and distribution	100	100
SRGS Pty Ltd ⁽¹⁾	Australia	Product acquisition and distribution	100	100
Super Cheap Auto (New Zealand) Pty Limited	New Zealand	Auto retail	100	100
Super Cheap Auto Pty Ltd ⁽¹⁾	Australia	Auto retail	100	100
Super Retail Commercial Pty Ltd ⁽¹⁾	Australia	Auto retail	100	100
Super Retail Group Services (New Zealand) Limited	New Zealand	Support services	100	100
Super Retail Group Services Pty Ltd ⁽¹⁾	Australia	Support services	100	100
Super Retail Group Trading (Shanghai) Ltd	China	Product sourcing	100	100
VBM Retail (HK) Limited ⁽²⁾	Hong Kong	Sports retail	100	100
Infinite Retail NZ Limited ⁽⁴⁾	New Zealand	Sports retail	-	100
Workout World Pty Limited ⁽¹⁾	Australia	Sports retail	100	100

⁽¹⁾ These controlled entities have been granted relief from the requirement to prepare financial reports in accordance with ASIC Corporations (Wholly-owned Companies) Instrument 2016/785 issued by the Australian Securities and Investments Commission.

⁽²⁾ Investment is held directly by Infinite Retail Pty Ltd.

⁽³⁾ Investment is held directly by Oceania Bicycles Pty Ltd.

⁽⁴⁾ Ceased to be a Group entity upon deregistration on 21 December 2022.

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