

Modern Slavery Statement 2022

1. Introduction

Joyce's Modern Slavery Statement ("Statement") is made in accordance with the *Australian Modern Slavery Act 2018 (Cth)*. It applies to and describes the steps taken by Joyce Corporation Limited (the "Company" or "Joyce") and its subsidiaries ("Group") during the financial year ending 30 June 2022 to mitigate modern slavery in the Group's business and supply chains. This Statement is submitted as a joint statement on behalf of all reporting entities¹ within the Group.

Each of Joyce's divisions, including all reporting entities, were consulted in the development of this Statement. The Group's reporting entities are:

- Joyce Corporation Limited (and 100% owned subsidiaries); and
- KWB Group Pty Ltd.

Joyce recognises that modern slavery is a complex issue which directly impacts over 40 million people around the world and includes human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour and child labour. The Company does not tolerate any form of modern slavery anywhere in its business and is committed to ensuring that modern slavery does not exist within its business operations and associated supply chain.

2. Operations and supply chains

Joyce Corporation is a fast growing ASX-listed company operating and invested in and operating well-established and consistently performing Australian businesses with strong organic growth potential. For the purposes of this Statement, Joyce's divisions and associated supply chains are as follows:

KWB Group

Main operations: Operation of retail kitchen and wardrobe showrooms.

Supply chain:

- Cabinetry requirements sourced from Australian manufacturers.
- Retail requirements (including appliances) sourced from Australian distributors on behalf of overseas manufacturers.

Bedshed

Main operations: Franchisor of the Bedshed retail bedding franchise operation and owner of Bedshed retail bedding stores.

Supply chain:

- Franchise network.
- Retail requirements (including mattresses, bed frames, bedroom furniture) sourced from both Australian and overseas manufacturers.

Joyce Corporation

Main operations: corporate support functions.

Supply chain:

- Technology (hardware, software and cloud services).
- Utilities and professional services consultants.

¹ Reporting entities are defined in the *Australian Modern Slavery Act 2018 (Cth)* as an entity which has a consolidated revenue of at least \$100 million for the reporting period, if the entity is an Australia entity at any time in that reporting period or carries on business in Australia at any time in that reporting period.

3. Risks of modern slavery practices in Joyce's operations and supply chains

Joyce Operations

The operations of Joyce's divisions are all located in Australia, a low modern slavery risk country. Joyce's divisions monitor and maintain safe and fair workplaces for their team members under various policies and procedures, including the *Joyce Ethics and Code of Conduct* and *Diversity and Inclusion Policy*.

Joyce has assessed the risk of modern slavery in its operations as low because its workforces are in a low-risk country and maintain robust human resource policies and grievance mechanisms. The approach to the assessment of conduct for Joyce's third party contracts (used for services such as delivery, cleaning and repairs and maintenance) is included in the "Next Steps" section below.

Joyce Supply Chains

Joyce is committed to responsible supply chain management and recognises the importance of protecting human rights.

The Group's supply chain is diverse and includes operations within Australia and overseas. The greatest risk of involvement in modern slavery has been determined as being the risk of the Group being indirectly and unknowingly linked to such practises through supplier relationships and other third party relationships with suppliers outside of Australia. The approach to the assessment of conduct for the Group's Australia-based manufacturing partners is included in the "Next Steps" section below.

The Group acknowledges that it is in the early stages of its program to identify and investigate modern slavery risks across its supply chain. However, the Group has assessed that the risk of modern slavery within its overseas supply chain is low due to:

- only engaging with reputable suppliers for the ancillary products it purchases (for example, appliances in KWB's kitchens);
- the due diligence applied in selecting and onboarding new manufacturing partners (for example, Bedshed's bedding furniture manufacturers), including site visits by the Group's management and executives; and
- the close working relationships that the Group maintains with its manufacturers.

4. Actions taken to address identified modern slavery risks

Joyce is committed to the identification, monitoring and management of material modern slavery risks associated with its operations and supply chains.

Commitment

Joyce acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the *Australian Modern Slavery Act 2018 (Cth)*. Joyce does not knowingly enter into business with any other organisation which supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

Each reporting period, Joyce intends to set out the actions completed and critically consider the effectiveness of those efforts. This year, Joyce focussed on the foundational work that has been done.

Governance

While Joyce acknowledges that the Group is early in its program to assess and address modern slavery risks in its operations and supply chain, Joyce has adopted policies which seek to mitigate the risks of modern slavery across our operations and supply chains.

Joyce recognises that its success is dependent on the knowledge, experience and talent of its employees, the strength of its management team, the quality of its business strategy and its compliance with high standards of corporate conduct, ethics and governance. The Group is constantly working to reinforce and communicate our values to our employees, shareholders, customers, suppliers and the broader community.

All people employed, contracted by, associated with, or acting on behalf of Joyce are subject to Joyce's *Ethics and Code of Conduct* ("Code"). The Code provides a benchmark for professional behaviour throughout the Group. Breaches of the Code must be reported in accordance with Joyce's *Whistleblower Policy*. The Code is based on values of integrity, fairness and that the Group's business must be conducted honestly and ethically.

Joyce is committed to conducting business honestly, with integrity and in accordance with our values and standards of expected behaviour. Joyce's *Whistleblower Policy* encourages people to speak up if they become aware of potential misconduct, explains how to speak up and what protections a discloser will receive and outlines our processes for responding to reports. Joyces seek to promote a workplace environment in which everyone feels safe, supported and encouraged to speak up.

The Group is in the process of developing training that raises the awareness of the potential risk of modern slavery. The training will leverage Joyce's *Anti-Bribery and Anti-Corruption Policy* and it is anticipated that this training will be delivered to the Group's executives and senior managers as well as all other employees with procurement and purchasing responsibilities.

Supplier Standards

The Group has close working relationships with its overseas suppliers and these relationships have enabled the Group to establish a satisfactory level of confidence in the ethics of its international suppliers. Moreover, executives and senior managers of Joyce conduct regular site visits which assist in determining that employment conditions meet appropriate ethical standards. As a result of the COVID-19 pandemic, site visits were not generally possible during the 2022 financial year but have recommenced in the first half of financial year 2023.

The group is in the process of designing a supplier self-assessment and declaration framework that will require all suppliers to attest to their compliance with Australian and international modern slavery laws, as well as all relevant local legislation. Subsequent monitoring of suppliers under this framework will support the Company's management of the risks of modern slavery. The Group is also reviewing its standard terms of trade, to consider the inclusion of applicable modern slavery clauses.

Approach

Management of the risk of the Group's exposure to modern slavery risk is underpinned by the Risk Identification & Management Framework with oversight by the Audit & Risk Committee and Board of Directors.

5. Assessing the effectiveness of actions

The Group is establishing a framework to assess and address modern slavery risks, including assessing the effectiveness of agreed actions. The Board receives information regarding breaches of the *Ethics and Code of Conduct* and reports of incidents under the *Whistleblower Policy*. The Group intends on building on this and implementing additional processes to assess the effectiveness in identifying and managing modern slavery risks.

6. Next steps



Joyce is committed to continuously improving its approach to managing the risks of modern slavery, through regular risk assessments and the development of additional risk management programs.

In the next financial year, the Group is committed to maintaining the measures in place to address the risks of modern slavery and intends to undertake the following further initiatives:

- Where applicable, reviewing and updating risk-related policies and governance control measures as they relate to modern slavery, with oversight from the Audit and Risk Committee where appropriate;
- Reviewing and updating the supplier engagement and on-boarding processes, including design of a self-assessment and declaration framework (Australia based and overseas suppliers);
- Consideration of a third-party ethical sourcing on-boarding processes for suppliers.
- Developing training materials on the requirements of the *Australian Modern Slavery Act 2018 (Cth)*, including Joyce's approach to satisfying these requirements. Once complete, these materials will be used to provide training to executives and senior managers as well as all other employees with procurement and purchasing responsibilities;
- Building the general awareness of staff and key stakeholders (such as Bedshed franchisees);
- Engaging with industry peers to understand leading practices for the management of modern slavery risks;
- Expanding Joyce's Employee Assistance Program to specifically cover human rights related grievances; and
- Reviewing the terms of contract with key suppliers to consider the inclusion of modern slavery obligations.

It is intended that future statements will show the progress towards and outcomes of these steps.

This statement was approved by the principal governing body of Joyce Corporation on the 20th of December 2022.

Authorised By	Jeremy Kirkwood (Chair of the Board)	<small>DocuSigned by:</small>  <small>E7CB25D6963B442</small>
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