



Modern Slavery Statement

For the financial year ending 2 July 2023

Crafted for life

R. M. WILLIAMS

EST. 1932, AUSTRALIA



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Summary of our response to the Modern Slavery Act 2018 (Cth)

The following table summarises how, and where, each of the mandatory reporting requirements under the *Modern Slavery Act 2018 (Cth)* are addressed in this statement.

Table 1: Summary of our response

Mandatory reporting requirement under Modern Slavery Act 2018 (Cth)	Description	Relevant page numbers
16 (1) (a) Identifying the reporting entity	R.M. Williams Group: R.M. Williams Holdings Pty Ltd, R.M. Williams Australia Holdings Pty Ltd, Percy Street Pty Ltd, Jackaroo Capital Pty Ltd and R.M. Williams Proprietary Limited (together referred to, along with owned and controlled entities, as "R.M.Williams" in this statement).	Introduction & Approval - Page 9
16 (1) (b) Describe the structure, operations, and supply chain of the reporting entity	R.M.Williams is an Australian footwear and clothing company. It is best known for producing Chelsea boots for men and women. The company was founded by Reginald Murray "RM" Williams and is currently owned by Tattarang Pty Ltd ("Tattarang").	Our Structure, Operations and Supply Chain - Page 13
16 (1) (c) Describe the risks of modern slavery in the reporting entity or any entity it owns or controls	R.M.Williams has identified the following modern slavery risks in its operations and supply chain: <ol style="list-style-type: none"> 1. Garment manufacture in China 2. Footwear component manufacture in Taiwan 3. Garment manufacture in Taiwan 4. Garment manufacture in Hong Kong 5. Textiles & apparel manufacture in Turkey 6. Garment manufacture in Pakistan 7. Garment manufacture in Madagascar 8. Leather manufacture in Bangladesh 9. Leather tanneries in India 10. Leather tanneries in Turkey 11. Textiles & apparel manufacture in Mexico 12. Rubber product manufacture in Morocco 	Risks screening - Page 20



Mandatory reporting requirement under Modern Slavery Act 2018 (Cth)	Description	Relevant page numbers
16 (1) (d) Describe the actions taken by the reporting entity to assess and address those risks including any due diligence or remediation processes	<p>We actively monitor the risk of modern slavery occurring in our operations and supply chains. Our overall modern slavery risk management process includes policies, contractual arrangements, risk screening and assessments, supplier engagement and training, and extensive onsite auditing of our High Materiality (significant raw materiality & finished goods suppliers). Major actions include:</p> <ul style="list-style-type: none"> Increasing supply chain traceability by improving transparency of our suppliers and their supply chains via secure platforms¹ to gather and share information with upstream suppliers. Information shared includes risk assessments, audit reports and evidence of remediation. Conducting due diligence on suppliers by introducing inherent risk pre-screening prior to onboarding. Ongoing supplier engagement activities which include audits, in-person visits, supplier self-assessment questionnaire, grievance mechanisms, whistleblower programs and investigating non-compliances. Supporting remediation of non-compliances through engagement with senior management at our respective suppliers and corrective action plans. Training our team members on human rights and modern slavery risks within our business operations. Collaborating with other organisations and subject matter experts to conduct living wage assessments and audits of both internal operations and significant (or High Materiality) suppliers. 	<p>Risk Screening - Page 20</p> <p>Supplier engagement - Page 24</p>
16 (1) (e) Describe how the reporting entity assesses the effectiveness of such actions	Implemented a 3-year plan with KPIs to report against each financial year.	Monitoring & Reporting - Page 32
16 (1) (f) Describe the process of consultation with any entity that the reporting entity owns or controls	Engagement across all entities for consistent modern slavery approach, including oversight by the Board and advice from Walk Free.	Consultation with owned & controlled entities - Page 34
16 (1) (g) Description of any other relevant information	Not applicable.	Not applicable.

¹ Platforms primarily used include Supplier Ethical Data Exchange (SEDEX), Worldly (Higg Index, Social & Labour Convergence, Fair Factories Clearinghouse) and QIMA.

Acknowledgement of Country

R.M.Williams acknowledges the Traditional Custodians of the lands on which we work and live throughout Australia. We pay our respects to their Elders past and present and to the continuation of the custodial, cultural, and educational practices of Australia's First People. We recognise their continuing connection to land, waters, and culture.

We value your feedback

R.M.Williams remains committed to a continuous improvement approach and continues to treat our modern slavery response as an integral feature of our broader business strategy. Please forward any comments to

sustainabilityrm@rmwilliams.com.au

Introduction & approval

A letter from our Chairman

This joint statement is published on behalf of the following entities in the R.M. Williams Group: R.M. Williams Holdings Pty Ltd, R.M. Williams Australia Holdings Pty Ltd, Percy Street Pty Ltd, Jackaroo Capital Pty Ltd and R.M. Williams Proprietary Limited (together referred to, along with owned and controlled entities, as "R.M. Williams" in this statement) for the year ended 2 July 2023.

R.M. Williams has been a mandatory reporting entity since the commencement of the Modern Slavery Act 2018 (Cth), and this is our fourth statement.

We continue to be aware the inherent risks modern slavery in global apparel supply chains and remain vigilant and committed to proactively identifying and mitigating risk. These supply chains are complex, and historically have not had a great deal of traceability. As such, identifying and mitigating modern slavery risk is an ongoing journey, and one that we place at the forefront of our supply chain management processes.

We have been systematically building our program, with increasing levels of traceability, documentation, and vendor engagement. We share our approach and journey in the spirit of both transparency, and to contribute to the discourse on best practice approaches.

During the reporting period this statement covers, we actively engaged and consulted with all owned and controlled entities as part of the preparation of this statement, and in relation to our modern slavery response in general.

This statement has been prepared by R.M. Williams' centralised corporate function in consultation with senior leaders, staff, and directors of R.M. Williams and the entities owned and controlled by R.M. Williams. The centralised corporate function has ensured that R.M. Williams' operational controlled entities have been involved in the activities undertaken by R.M. Williams to identify, address and mitigate modern slavery risk within their operations and supply chains.

This statement was approved by the boards of the five reporting entities covered by this statement, being R.M. Williams Proprietary Limited (which approved this statement on 15 December 2023), and R.M. Williams Holdings Pty Ltd, R.M. Williams Australia Holdings Pty Ltd, Jackaroo Capital Pty Ltd and Percy Street Pty Ltd (which each approved this statement on 20 December 2023).

This statement is signed by John Hartman, in his capacity as a director of each reporting entity, in accordance with section 14(2)(e)(i) of the Act on 21 December, 2023.

Signed by



John Hartman
Chairman, R.M. Williams
Date: 21 December, 2023

Our Values

Humility
 Courage & Determination
 Empowerment
 Enthusiasm
 Family
 Frugality
 Generating Ideas
 Integrity
 Safety
 Stretch Targets

A letter from our CEO

Modern slavery is counter to the spirit of R.M. Williams - a company founded on integrity and community. The complexity of modern apparel and footwear supply chains means that identifying and eradicating modern slavery risks is a journey, requiring continuous improvement. We are committed to this journey and are excited by the increasing depth of relationships we build with our supply chains, and heightened cross functional collaboration we create through our advancing modern slavery risk mitigation program.

In last year's statement we shared our plan to focus on living wage conditions and cascading modern slavery awareness deeper into our supply chain. This year, our teams have gone above and beyond, concentrating on three things:

- 1. Increasing transparency**, through supply chain mapping of tier 2 suppliers and a pilot transparency program to get up to tier 4 visibility at the product level;
- 2. Comprehensive, location-specific baselining of living wage conditions in our supply chain**, through a living wage assessment of our significant raw material & finished goods suppliers and living wage audits of suppliers in high-risk locations; and
- 3. Investing in our systems** to allow increased engagement with direct suppliers and upstream suppliers, and heightened traceability, transparency and verification of our supply chains.

Increasing transparency requires collaboration from the initial design & product development, through to production, delivery, and compliance. Our team has stepped up to this challenge and we now have visibility to Tier 1 for 100% and Tier 2 (or beyond) for 65% of our

products. We've also piloted a product-level transparency program garnering insight to Tiers 3 and 4 for select products. We will be expanding this program across our portfolio in FY24.

Living wages are the next frontier. We already ensure our suppliers are paying above the legal minimum wage, but legal minimums do not always reach the level of living wages. We understand the impact our purchasing power has on our supply chain and the opportunity we have to work with suppliers on this topic. We have identified where there are potential gaps to living wage in our supply chain, and in FY24 are engaging with our suppliers to understand potential gaps in detail and opportunities to close the gaps.

The transparency and traceability required for rigorous modern slavery risk diligence entails extensive data and document sharing, which can quickly become unwieldy. Recognising this, we have been investing in our software infrastructure, onboarding a vendor management platform and a transparency data collection partner. We will be capitalising on these investments in FY24 to drive greater transparency and traceability of our materials.



Paul Grosmann
 CEO, R.M. Williams

Our structure, operations and supply chains

Our structure

Established in 1932, R.M. Williams is an Australian company specialising in the manufacturing and retailing of leather footwear, clothing, and craft products that are sold to Australian and international consumers. Through a dedicated publishing business, we also celebrate and share stories from the Australian outback via published magazines, connecting people along the way.

R.M. Williams is 100% owned by Tattarang, which was established by Andrew and Nicola Forrest and is one of Australia's largest private investment groups.

R.M. Williams Pty Ltd wholly owns the following Australian subsidiaries:

- R.M. Williams Publishing Pty Ltd, which publishes the Outback Magazine and other publications sold across Australia; and
- R.M. Williams Bushmen's Outfitters Pty Ltd, which owns the land our primary manufacturing site is located on in Salisbury, South Australia.

R.M. Williams Pty Ltd also has wholly owned trading subsidiaries in New Zealand, United Kingdom, United States, and the Netherlands. These trading subsidiaries are listed below:

- R.M. Williams (New Zealand) Proprietary Limited
- R.M. Williams (UK) Limited
- R.M. Williams US NY LLC
- R.M. Williams US Trade LLC
- R.M. Williams B.V

Other entities exist within the R.M. Williams Group which are non-trading and are either dormant or holding entities. These include the following Australian entities Percy Street Pty Ltd, Jackaroo Capital Pty Ltd, R.M. Williams Holdings Pty Ltd, R.M. Williams Australia Holdings Pty Ltd, and R.M. Williams The Original Bushmen's Outfitters Pt Ltd. Non trading international entities include R.M. Williams US Inc, R.M. Williams US CA LLC, and R.M. Williams US TX LLC.

Our Operations

Born in the Australian outback, R.M.Williams has become one of the best-known heritage footwear brands in the world. In addition to boots, we also make apparel, accessories, leather goods (e.g., bags, belts, wallets), and other footwear.

The R.M.Williams business comprises product research, design and development, sourcing, manufacturing, distribution, sales, and marketing. Our head office is in Sydney, New South Wales, and our manufacturing facility is in Salisbury, South Australia.

We operate more than 50 stores in Australia and New Zealand, one store in New York, and two stores in London.

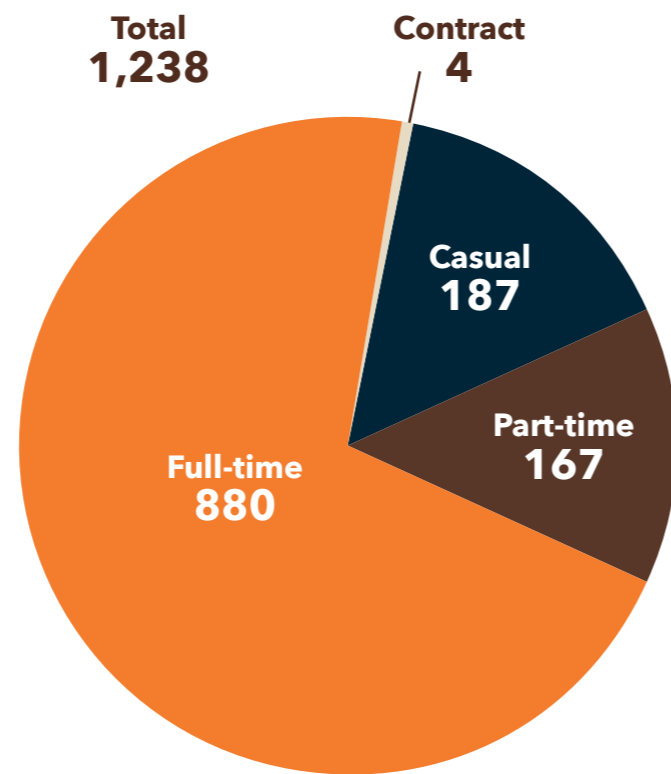
In addition, R.M.Williams is available at more than 600 stockists around the globe and exports to 15 countries, including Canada, Switzerland, Germany, France, United Kingdom, Ireland, Italy, New Zealand, Papua New Guinea, Sweden, United States and South Africa.

Our subsidiary, R.M.Williams Publishing is responsible for the creation and distribution of the R.M.Williams bi-monthly magazine, R.M.Williams OUTBACK, along with other occasional titles.

Our People

Our people are the foundation of R.M.Williams. We aim to create an environment where our people are supported and fulfilled within their roles. The global R.M.Williams team works in a diverse range of roles across our workshop, head office, distribution centres and retail stores. Employee numbers are set out in the table below.

Table 2: R.M.Williams Employees as at 30 June 2023



Our Supply Chains

R.M.Williams' supply chains comprise: (1) procurement of materials and components for manufacturing in the R.M.Williams workshop in South Australia; (2) procurement of finished goods from both domestic Australian and international supply chain partners; and (3) indirect procurement of goods and services for operational needs, such as maintenance, logistics, marketing, financial and data services.

The details of our significant direct suppliers for materials, other inputs, and finished products, remain publicly available on our website. This includes the supplier's names and addresses. For a list of our suppliers please visit [this link](#).

1. Raw material & components supply chains

Supply chains for products manufactured in the R.M.Williams workshop include:

- Leather
- Woven and knitted fabrics
- Footwear and craft components
- Clothing sundries
- Chemicals, such as adhesives and polishes
- Packaging items

In addition to our strong network of local product sources, material inputs are sourced from 21 overseas countries, including Bangladesh, China, France, Germany, Greece, Hong Kong, India, Italy, Japan, Madagascar, Mexico, Morocco, New Zealand, Pakistan, Portugal, Spain, Taiwan, Turkey, United Kingdom, United States and Vietnam. Our average supplier tenure exceeds 9 years, and we believe our long-term supplier relationships help facilitate transparent onsite independent auditing activities.

2. Finished goods supply chains

Finished items are procured across the following categories:

- Clothing, e.g. shirts, bottoms, knits, outerwear
- Accessories, e.g. headwear, socks
- Footwear, e.g. casual footwear
- Craft items, e.g. bags, wallets
- Packaging items

3. Indirect procurement

We also engage a range of suppliers that support our operations such as maintenance, logistics, marketing and advertising, financial and data services, and other professional services.

Our approach

We have a multi-step process for modern slavery risk management:

At R.M.Williams, we are committed to environmental sustainability and favourable labour conditions both in our own operations and our supply chain. We have zero tolerance of slavery, and we expect the same commitments from all organisations that we partner with.

No actual or suspected instances of modern slavery were identified in our operations or supply chains over the current reporting period. We did identify several non-compliances in third-party audits that could increase the risk of modern slavery and have worked with suppliers to address these (as detailed later in this statement).

We recognise the need to stay diligent, increase the level of transparency and engagement we have with our upstream supply chains, and continuously improve our modern slavery risk management program. To this end, we have a robust framework and roadmap that builds on the progress we have made to date. Our framework is structured in 5 themes: Governance; Supply Chain Screening; Direct Supplier Engagement; Training and Collaboration; and Monitoring and Reporting. Further detail is outlined in table below.

Table 3: R.M.Williams Modern Slavery Framework

Theme	Activity	Objective	How & when we do it	Who it applies to
A. Governance	Suite of modern slavery policies, guidelines, and contracts	Set clear expectations for all stakeholders, employees, customers	Modern Slavery Policy approved by Board and published on website Other supporting policies and guidelines reviewed annually	All R.M.Williams stakeholders
	Modern slavery committee	Cross-functional collaboration to ensure modern slavery diligence and mitigation is known across the business and efforts are holistic	Monthly meeting	CEO Supply chain Sustainability Product Development
	RMW Board updates	Inform RMW Board on risks assessments and mitigation actions	Reporting template and board meeting; conducted quarterly	RMW Board
B. Risk Screening	Industry-geography inherent risk screening	Guide focus areas for high levels of diligence by identifying suppliers that have amplified risk due to their industry and geography	Screening via proprietary risk database (SEDEX); run quarterly to identify suppliers with elevated risk	All suppliers
	Supplier materiality screening	Segment suppliers by the type of diligence needed based on each supplier's industry, geography, level of RMW spend, and number of employees	RMW supplier archetype framework	All suppliers: resulting segments are High Materiality (A), Mid Materiality (B), and Low Materiality (C)
	Living wage screening	Identify suppliers who are already paying all employees above the local living family wage and those who may have some living wage gap (based on reported minimums) and therefore we need to engage with further on living wage	Desktop assessment based on audits and questionnaires; conducted annually	High Materiality (A) Suppliers

Theme	Activity	Objective	How & when we do it	Who it applies to
C. Supplier Engagement	Supply chain tracing	Understanding of and engagement with upstream supply chains by product, to continue to reduce the risk of Modern Slavery	Third-party data collection partner; Will be every 6 months with each season, currently in pilot phase	All Direct Raw Material & Finished Goods suppliers include High Materiality (A), Mid Materiality (B) and Low Materiality (C)
	Supplier onboarding	Establish baseline expectations with vendors on R.M.Williams' Code of Conduct and practices to identify and mitigate modern slavery risks, and gather baseline information from new suppliers including modern slavery policies and processes	Supplier Code of Conduct and Supplier Onboarding questionnaire; issued as new raw material and finished goods suppliers are onboarded	All Direct Raw Material & Finished Goods suppliers including High Materiality (A), Mid Materiality (B) and Low Materiality (C), once beyond initial sampling
	Third-party Audits & COVID-19 support	Verification of legal compliance, labour conditions, and environmental impacts via third-party on-the-ground assessment of supplier facilities	Third-party Audit methodologies & audit partners; conducted every 18 months. Where audits identify non-compliances, we monitor minor, major, and critical non-compliances	High Materiality (A) Supplier facilities
	Corrective Action Plans	Rectification of non-compliances identified through third-party audits, mitigating any real or perceived modern slavery risks	Outcome of Third-Party Audits; deadlines for rectification vary by non-compliance. Develop Corrective Action Plans where non-compliance is identified and monitor improvements (depending on the severity and type of non-compliance, R.M.Williams may decide to commission a follow-up audit to validate that the findings are remediated, or "closed").	High Materiality (A) Supplier facilities
	Comprehensive Self-Assessment Questionnaire	Comprehensive understanding of policies and practices regarding environmental and social practices for suppliers that have very few employees; verification through in-person visits by R.M.Williams employees	Annually	Mid Materiality (B) Supplier Facilities
	Modern Slavery specific Self-Assessment Questionnaires	Frequent monitoring and signalling of the importance of Modern Slavery diligence to suppliers in high-risk industry-geographies	Bespoke supplier questionnaires are developed to compliment the onsite activities undertaken as part of the audits Questionnaires are issued via supplier engagement platform; sent every quarter (individual supplier receives max 1 per annum) Also issued in pre-screening, prior to onboarding for potential new suppliers in high-risk geographies & industries	High Materiality (A) and Mid Materiality (B) supplier facilities Potential new suppliers in high-risk regions/industries
	Supplier Living wage roadmap	Understand actual living wage gap for those suppliers with a potential gap identified (based on Living Wage Screening), and engage with supplier on opportunities to reduce any actual gap	Supplier engagement and third-party audits on a case-by-case basis when gaps are identified	High Materiality (A) supplier facilities with potential living wage gap identified
D. Training & Collaboration	Grievance mechanism	Channel for workers to raise concerns confidentially, anonymously, and/or directly, without fear of reprisal or retaliation	Year-round mechanism	All employees & contractors, all suppliers, as well as their suppliers
	Employee training	Educate all R.M.Williams' employees on the existence, causes, and ways to reduce modern slavery	Employee training via training portal at onboarding and annual refresher training	All employees (corporate, workshop, retail)
	Supplier training	Share resources with suppliers to support on their individual Modern Slavery mitigation journeys	Proprietary resources; shared annually	Inherent high-risk prospective suppliers (identified in pre-screening) and existing inherent high-risk suppliers
E. Monitoring & reporting	Industry collaboration	External collaboration to ensure we are contributing to and benefiting from best practices to assess and address modern slavery	Frequent engagement with Tattarang modern slavery working group	Sustainability & Compliance team
	Modern Slavery Statement	Comply with Australia's Modern Slavery Act 2018 and share our approach and lessons learned in a transparent, structured way to help other companies setting up their own programs	Modern Slavery Statement (this document); submitted & published annually	n/a
	Modern Slavery Key Performance Indicators (KPIs)	Track operational metrics within Modern Slavery program	Monthly for Modern Slavery Committee Quarterly for RMW Board Meetings Annually for Modern Slavery Statement	Compliance Sustainability Modern Slavery Committee RMW Board

A. Governance

Our overarching governance model for modern slavery issues has not changed significantly since the last reporting period. The Modern Slavery Committee and Compliance team remains responsible for ensuring our modern slavery related policies, contracts and statements reflect our commitments to combating modern slavery and are compliant with our legal obligations. The legal team provides advice on policies and reviews documents where necessary.

Policies, guidelines and contracts

Key policies and legal frameworks that were comprehensively described in our previous three statements remain operational across all aspects of our business. All policies are available to employees via the internal R.M.Williams' portal. These include:

- Anti-Slavery Policy.**
 Our commitment to reducing the risks of modern slavery in our business operations and supply chains, and to managing incidents where they might occur, is outlined within our Anti-Slavery Policy.
- Supplier Agreements.**
 Our Supplier Agreement stipulates the terms and conditions required to be a supplier and was updated during the reporting period to include contractual provisions relating to modern slavery.
- Supplier Ethical Code of Conduct.**
 Our Code sets out our performance and behavioural expectations for our suppliers and was updated during the reporting period to include modern slavery considerations. This year we updated our Ethical Code of Conduct to restrict subcontracting and outsourcing for Chinese suppliers, given the well-established linkages between cotton harvested in China and alleged forced Uyghur labour schemes.
- Whistleblower Policy.**
 Our Whistleblower policy encourages employees, contractors, suppliers, and customers to raise concerns of suspected unethical, illegal, or fraudulent conduct. The policy provides protection for whistleblowers, so they feel safe to disclose any malpractice or misconduct.
- Workplace Behaviour Policy.**
 The Anti-harassment and Bullying Policy ensures all staff are treated and treat other with dignity and respect, free from harassment and bullying. It helps foster an environment in which our staff are comfortable to say something if they see something.
- Employee Code of Conduct.**
 Our Code of Conduct provides advice and guidance on how our employees, contractors, consultants, and board members should conduct business, ethically, and in accordance with all applicable laws, regulations and policies.
- Workplace Grievance Policy.**
 Our Workplace Grievance Policy is to ensure consistent and thorough handling of personal grievances that are raised in the workplace.

During the reporting period, we have further developed our internal policy framework to assess and address modern slavery issues and related human rights concerns in our supply chains and operations through the development of our Ethical Sourcing Program that includes (but is not limited to) the following:

- Sustainable Procurement Guidelines.**
 These guidelines were developed in the last reporting period to help employees, contractors, or those responsible for purchasing goods or services on behalf of R.M.Williams choose the most environmentally and socially responsible options that contribute to our sustainability goals to protect the environment and respect human rights. At R.M.Williams, we want to ensure that our purchasing practices support long-term partnerships with manufacturers and decrease modern slavery risks.
- Preferred Fibres & Materials Guidelines.**
 These guidelines were developed in the last reporting period to assist our Procurement, Design & Product teams in sourcing the most ethical, sustainable, and environmentally friendly third-party certified fibres & materials that align with our company values. This included training and development of various teams to understand what modern slavery is and how to find it, as well as what constitutes a preferred fibres or material.

- Risk-based, internally prioritised due diligence processes and audit framework.**
 Clear thresholds (based on factors such as operating country, industry category, supplier history and spend amount) for triggering auditing and other prescribed due diligence measures.

Modern Slavery Committee

The committee is responsible for discussing modern slavery risks, incidents, and responses, as well as establishing and implementing our Modern Slavery Framework and monitoring our progress across reporting periods. Committee members work with various teams across the organisation to implement modern slavery risk management into existing business processes and systems, ensuring that all relevant policies and procedures are followed. The committee is also responsible for the creation and deployment of modern-day slavery training for employees and continues to engage external subject matter experts to provide advice and assistance with our modern slavery response.

Board

The Board provides ultimate oversight of R.M.Williams' risk management, including our modern slavery risks and response. It receives updates from the Modern Slavery Committee and modern slavery progress reporting quarterly.

B. Risk screening

Industry-geography inherent risk screening

We screen all suppliers through proprietary databases on a quarterly basis to identify high risk supply chains. As we advance our Modern Slavery processes, we are expanding this screening in two ways; first, through screening our upstream Tier 2 and Tier 3 suppliers, and second, through pre-screening new suppliers prior to onboarding.

The risks identified below are all inherent risks based on geography and industry, not risks identified as specific to R.M.Williams supply chain partners. We use inherent risk screening to identify suppliers with whom we need more frequent engagement with on modern slavery risk mitigation.

Table 4: Risks identified via screening & mitigation actions

Industry	Risk type/s	Description	RMW Code of Conduct signed	Third-party Social Audits	Third-party Living Wage audit	Modern Slavery specific SAQ	Additional actions taken
Garment manufacturing in China	Forced labour Freedom of Association Working Hours	Forced Uyghur labour in cotton supply chains remains a high-risk, verified by our FY23 SEDEX inherent risk assessment.	✓	✓			<ul style="list-style-type: none"> Trained over 40 design, product development, and sourcing team members on our Preferred Fibres and Materials Matrix to ensure our product and sourcing teams are sourcing cotton with reduced risk of Modern Slavery. We prioritise sourcing more cotton from lower risk countries, such as Australia. Launched transparency and traceability programs to increase visibility into our cotton supply chains; piloted with China-based garment suppliers. Restricted subcontracting and outsourcing for Chinese suppliers.
Garment & footwear component manufacturing in Taiwan	Working hours Child Labour	Excessive working hours are problematic in Taiwan with over 40,000 estimated people in modern slavery across all industries.	✓	✓			Trained over 40 design, product development, and sourcing team members on our Preferred Fibres and Materials Matrix to ensure our product and sourcing teams are sourcing leather with reduced risk of Modern Slavery. We prioritise sourcing leather from gold rates Leather Working Group tanneries.
Garment manufacturing in Hong Kong	Freedom of association Working Hours Poor wages	Hong Kong has over 21,000 people in some form of modern slavery.	✓	✓			
Textiles & apparel from Turkey	Forced labour Child labour	These industries are recognised as being some of the most hazardous and unregulated industries, where forced labour, debt bondage and child labour are commonplace.	✓	✓	✓	✓	
Garment manufacturing in Pakistan	Forced labour Child labour Freedom of movement	<p>A high level of refugees in Pakistan makes the population vulnerable to modern slavery.</p> <p>Many garment sector workers are forced to operate in poor and/or dangerous conditions and face threats if they try to unionise. Female workers are particularly at risk of intimidation, harassment, and sexual violence at work.</p>	✓	✓	✓	✓	

Industry	Risk type/s	Description	RMW Code of Conduct signed	Third-party Social Audits	Third-party Living Wage audit	Modern Slavery specific SAQ	Additional actions taken
Garment manufacturing in Madagascar	Forced labour Child labour	Forced and child labour is common in the apparel and textile industries in Madagascar.	✓	✓			Trained over 40 design, product development, and sourcing team members on our Preferred Fibres and Materials Matrix to ensure our product and sourcing teams are sourcing leather with reduced risk of Modern Slavery. We prioritise sourcing leather from gold rates Leather Working Group tanneries.
Leather manufacturing in Bangladesh	Poor wages	Low wages are commonly associated with leather manufacturing and apparel industries in Bangladesh.	✓	✓	✓	✓	
Leather tanneries in India	Working hours Freedom of movement	Use of migrant labour or unskilled labour in tanneries makes workers more vulnerable to exploitation.	✓	✓		✓	
Leather tanneries in Turkey	Forced labour Working hours Freedom of association	Tanneries are heavily reliant upon migrants who may be more vulnerable to exploitative practices than local employees due to deceptive recruitment practices which can lead to debt bondage; their immigration status; a lack of familiarity with the language, their rights, and local laws; discrimination; and families that rely on them to send wages home, increasing pressure to stay.	✓	✓	✓		
Manufacturing of textiles in Mexico	Working hours Forced labour	Mass migration, high crime rates and weak judicial systems fuel forced labour in Mexico with estimated 850,000 victims of modern slavery. Migrants flee countries such as Venezuela and others and congregate on the border between the US and Mexico.	✓	✓			
Manufacturing of rubber products in Morocco	Working hours	85,000 people live in modern slavery in Morocco with higher prevalence in rubber and plastic factories.	✓	✓			

Supplier materiality screening

Following inherent risk screening, we assign a level of material risk based on inherent risk, number of employees, and size of our spend with suppliers. The level of materiality dictates the level of due diligence activities, and ensures we are focusing our resources on the highest risk parts of our supply chains.

Suppliers are segmented into five risk categories with corresponding due diligence requirements (see Table 5 below). The greater the risk, the more controls we have in place to request information.

Living wage screening

We see living wages as the next horizon for an advanced modern slavery program, creating conditions in our supply chain that do more than meet legal requirements, by creating jobs that enable individuals and families to enjoy a decent standard of living.

Living wage: direct operations (our own R.M.Williams employees)

Last year we completed a living wage audit for all R.M.Williams employees in Australia, United States, United Kingdom and New Zealand.

We used the Anker Family Living Wage methodology and confirmed that, at all locations, our remuneration packages are more than sufficient to meet the calculated living wage for that locality.

Living wage: raw materials & finished goods suppliers

In FY23 we took two major steps forward on living wage in our supply chain. First, we established a formal living wage analysis process for High Materiality (A) and Mid Materiality (B) suppliers (the process has been implemented for High Materiality (A) suppliers and is in the process of being implemented for Mid Materiality (B) suppliers). We evaluated minimum pay levels against the relevant local Living Wage benchmark (using the Anker Family Living

Table 5: Due diligence requirements according to supplier archetype

Supplier category	Materiality	Archetype	Inherent risk	Number of employees	R.M.Williams spend	Resulting level of diligence
Raw Material & Finished Goods suppliers	High Materiality (A)	High spend, large company	Low-High	Mid-High	High	High (policies, third-party audits, annual SAQs, CAPs)
		Mid spend, High risk	High	Low	High	High (policies, third-party audits, annual SAQs, CAPs)
	Mid Materiality (B)	High spend, small company, low risk	Low	Low	High	Mid (policies, annual SAQs, in person visits)
		Mid spend, low-mid risk	Low-Mid	Low-Mid	Mid	Mid (policies, annual SAQs, in person visits)
Indirect suppliers	Low materiality (C)	Small spend	Low-High	Low-High	Low	Low (policies, annual SAQs)
		Indirect, Low risk	Low	Low-High	Low-High	Low

Wage methodology and the Global Living Wage Coalition resources). Second, we commissioned living wage audits on six high risk suppliers, conducted by our third-party audit partner QIMA.

The approach taken in each jurisdiction drew upon geographically specific expenditure data and the minimum expenses within a family related to the following:

1. Food costs per month for a single worker.
2. Housing costs including rent for acceptable housing; utilities; minor repair.
3. Transportation.
4. Healthcare.
5. Other necessities and funds for emergencies.

Through these analyses we have identified our suppliers who have a potential living wage gap, and the share of those potential gaps that are attributable to R.M.Williams'

procurement from the respective facilities. Our next step in FY24 is to engage with these suppliers. We will be seeking to understand the other forms of compensation provided by suppliers such as included meals and healthcare. If there is a gap between living wage and full compensation, we will be engaging with suppliers on opportunities to reduce the actual gaps.

Supply chain tracing

During the reporting period, we focused on supply chain tracing so we could better understand the processes and people behind our products (see Table 6 below).

Table 6: Supply chain tracing status

Tier	Definition	Examples	Relationship	Mapping Status
1	Factory & Production Workshops	Our own factory in Salisbury, South Australia or another factory that cuts, makes and processes R.M.Williams product that is shipped to us for sale.	Direct & Upstream	100% styles & materials mapped to Tier 1 facilities
2	Fabric Mills & Accessories Suppliers, Dyeing & Printing Mills	Where fabric or material is produced. Trim supplier such as buttons or zips. Includes processing mills that fabric mills use to dye or print fabrics and accessories. Also includes tanneries.	Direct & Upstream	65% styles mapped to Tier 2 or beyond (i.e., to Tier 3 and 4 for some styles)
3	Yarn & Spinning Mills	Textile mills and spinners of yarns.	Upstream	Piloted mapping; scaling in FY24
4	Raw Material Sources	Cotton farms, livestock farms, man-made chemical processing.	Upstream	Piloted mapping; scaling in FY24

C. Supplier engagement

R.M.Williams is committed to partnering with our suppliers and building deeper relationships with them to maximise positive impact on the most vulnerable individuals in our supply chains. We believe direct engagement with our suppliers - through Self-Assessment Questionnaires, On-Site Auditing, and Corrective Action Plans - is the most effective way to reduce the risk of modern slavery in our supply chains.

Supplier onboarding

R.M.Williams has a comprehensive onboarding process for engaging new vendors at both a corporate and factory level. This onboarding process has also been made mandatory for all existing suppliers.

As part of our onboarding process, new suppliers are required to disclose the following information to help us determine their appetite and awareness of engaging with modern slavery issues:

- If the vendor has policies prohibiting forced labour.
- If the vendor has policies expressly disavowing child labour.
- Whether the vendor has a remediation policy.
- If the vendor is compliant with other human rights related concerns, such as providing freedom of association with unions, maintaining safe work sites, providing minimum wage standard, ensuring that working hours are in accordance with local laws, and implementing a recruitment policy commitment for migrant workers.

- Determining whether the vendor is agreeable to complying with R.M.Williams' Ethical Code of Conduct, to the extent that they publish the Code on their factory floors.
- Details of any social initiatives that the vendor participates in.

We also request that our individual supplier factories provide us with a registration and capability assessment, which provides us with the following additional information:

- The workforce composition, including the number of migrant workers, non-local workers, and non-English-speaking employees.
- The formal accreditations or certifications of the factory.

Third-party audits & corrective action plans

This reporting period we updated our audit policy, shifting to industry standard, comprehensive social and environmental audits to reduce audit fatigue, contribute to a streamlined industry-wide approach to compliance, and enable us to collect audits from upstream suppliers. We onboarded the industry platforms SEDEX (Supplier Ethical Data Exchange) and HIGG to gather and share information with suppliers.

We also introduced audit program key performance indicators (KPIs), which are shared in the table below. We commenced tracking the rate of third-party social audits and those with critical & major non-compliances related to modern slavery risks.

Table 7: Summary of current audit results for High Materiality (A) suppliers

Audit program KPIs	
Number of High Materiality (A) Facilities	63
% with third-party social audits	
• At end of reporting period (End FY23)	74% facilities / 78% of spend*
• At time of submission (December 2023)	78% facilities / 83% of spend
Of third-party social audits complete:	
% with non-compliances related to Forced Labour	0%
% with non-compliances related to Child Labour	0%
% with non-compliances related to Freedom of Association	1.6%

* Audits received as a percentage of total facilities is lower than our previous reporting period, largely due to increasing the depth of auditing in our supply chain and therefore the number of facilities. We expect to be above 98% of spend by 31 January, 2024.

We also identified several facilities with non-compliances related to "Hours, Wages & Benefits". Our actions to address these non-compliances are outlined below. We see this category of non-compliances as a flag for modern slavery risk and, in line with our focus on living wages, will be focusing on this topic specifically in FY24 in our supplier engagement.

The identification of non-compliances via audits is only one step in our modern slavery program. We have a set of further engagement tools that we deploy on a case-by-case basis as risks are identified. These tools include corrective action plans, desktop reviews of non-compliance rectification, third-party follow up audits, modern slavery specific self-assessment questionnaires (SAQs) and living wage audits, along with direct engagement with our suppliers.

The following table sets out a summary of critical & major non-compliances with our modern slavery policies that may increase modern slavery risk, and the actions we've taken with suppliers to mitigate those risks.

Table 8: Summary of critical & major non-compliances related to modern slavery and actions taken to remediate.

Industry	Description of critical or major non-compliances	Corrective action plan issued	Corrective action plan status	Modern Slavery SAQ issued & residual risk calculated	Living wage audit commissioned
Textile, Apparel, Footwear & Accessories	<ul style="list-style-type: none"> Inadequate record keeping of wages Some employees not provided with government provided benefits Facility has not maintained meeting minutes for committees related to labour conditions 	✓	Third-party follow-up audit requested	✓	✓
Textile, Apparel, Footwear & Accessories	<ul style="list-style-type: none"> Overtime exceeded local limits Non-compliances related to rest days, leave requirements, work stoppages, and other types of leave (e.g., public holidays, sick leave) Non-compliance related to in-kind benefits 	✓	Desktop confirmation received for rectification of all non-compliances; third-party follow-up requested	✓	
Garment	<ul style="list-style-type: none"> Overtime premium & deductions could not be adequately verified Some business contracts were missing wage information Some workers did not receive pay slip 	✓	Third-party follow-up audit requested		✓
Garment	<ul style="list-style-type: none"> Labour contract had insufficient detail related to hours. 	✓		✓	✓

Industry	Description of critical or major non-compliances	Corrective action plan issued	Corrective action plan status	Modern Slavery SAQ issued & residual risk calculated	Living wage audit commissioned
Garment	<ul style="list-style-type: none"> Overtime exceeded local limits Only some employees have social insurance 	✓	Facility has purchased commercial injury insurance for the small number of employees not included in social insurance scheme		
Garment	<ul style="list-style-type: none"> Weekly days off limits not necessarily followed Overtime exceeded local limits 	✓			
Textile, Apparel, Footwear & Accessories	<ul style="list-style-type: none"> Overtime premium not in line with requirements 	✓	Third-party follow-up audit requested		
Textile, Apparel, Footwear & Accessories	<ul style="list-style-type: none"> Overtime exceeded local limits 	✓	Third-party follow-up audit requested		
Textile, Apparel, Footwear & Accessories	<ul style="list-style-type: none"> Workers unable to form union of their choosing Overtime exceeded local limits 		Third-party follow-up audit requested		
Textile, Apparel, Footwear & Accessories	<ul style="list-style-type: none"> Missing code of conduct 	✓			
Textile, Apparel, Footwear & Accessories	<ul style="list-style-type: none"> No document to state that employees are paid for overtime (however, evidence shows workers are paid for overtime) 			✓	

Impact of COVID-19

Since the onset of the pandemic, R.M.Williams' has continued to engage fairly with suppliers, maintaining orders to ensure business continuity. Our third-party audits have a strict checklist regarding the correct use of Personal Protective Equipment (PPE) which in turn helps prevent the spread of disease and infection such as COVID-19. In addition, we have provided all employees with training and shared best practices to provide COVID-safe workplaces.

Grievance mechanism

At R.M.Williams we define a grievance as any type of complaint, concern or problem which is related to an employee's work or working environment, job or working relationships, that may cause undue concern or distress, or a feeling of injustice or resentment at having been treated unfairly. All reported grievances and complaints are treated seriously and there is a commitment to ensure that these matters are fully investigated and dealt with in a consistent, fair, timely and confidential manner.

We communicate a grievance mechanism in our Supplier Code of Conduct and require that suppliers implement their own mechanism.

We are continuously improving our processes, and in FY23 updated our internal grievance mechanism. In FY24, we will be reviewing our external grievance mechanism against best practice as defined by the United Nations Global Compact Implementing Effective Modern Slavery Grievance Mechanisms guidelines.



D. Training & collaboration

Employee training

All employees, contractors and suppliers working for, or on behalf of, R.M.Williams are responsible for identifying, preventing and addressing modern slavery risks.

Over 95% of employees have completed our bespoke modern slavery training. During the reporting period, the modern slavery training continued to be assigned to all new and existing employees.

Since last year's statement we created a new version of our training which has been rolled out via our new online learning platform. As of 30 June 2023, 411 employees had completed the revised training. Our modern-day slavery training is mandatory for all new employees and is part of the onboarding process. Employees are required to repeat the training on a yearly basis.

Supplier training

As part of our work this reporting period, we revised our vendor engagement process to include a more proactive pre-screening process where we will engage prospective suppliers in modern slavery training (prior to onboarding) if they're classed as high inherent modern slavery risk.

We have developed a comprehensive training, with learning modules and other capacity building resources to support these organisations in understanding the level of transparency required to effectively address (and, where necessary, remediate) modern slavery issues.

Implementation will be rolled out in FY24, and we will report progress in next year's statement as we monitor completion.

Industry collaboration

We recognise collaborating with on-the-ground experts onshore and offshore helps us formulate better processes and remediation processes.

R.M.Williams is a listed member of the internationally recognised Leather Working Group. The Leather Working Group is a globally collaborative not-for-profit industry group that works to improve the sustainability of the global leather industry through supply chain auditing.

Members of R.M.Williams executive and governance team continue to work with Tattarang's Modern Slavery Working Group which includes members of Minderoo Foundation's Walk Free Initiative.



E. Monitoring & reporting

To maintain a strong due diligence system and ensure that modern slavery risks are being identified, managed, and remedied, we regularly assess the effectiveness of our systems and processes.

We have assessed effectiveness in two ways. First, we have set Key Performance Indicators (KPIs) to measure the effectiveness of our practices. Second, we track progress against our annual objectives in our Modern Slavery roadmap.

Effectiveness key performance indicators

We have set KPIs that align to our program framework, set out in the table below. In the theme of continuous improvement, we will continue to review and enhance these KPIs in future reporting periods.

Table 9: Key performance indicators (KPIs)

Theme	Metric	Current Performance
Governance	% High Materiality (A) and Mid Materiality (B) Supplier contracts with Modern Slavery clauses (via Supplier Ethical Code of Conduct).	90%
Risk Screening	% Suppliers screened via inherent risk screening.	100%
	% High Materiality (A) with living wage screening.	45% facilities / 56% of spend
Supplier Engagement	% High Materiality (A) facilities with third-party social audits	74% facilities / 78% of spend* 78% facilities / 83% of spend
	<ul style="list-style-type: none"> At end of reporting period (End FY23) At time of submission (December 2023) 	
Training & Collaboration	% employees allocated modern slavery training in learning pathway.	100%
	% employees who have completed modern slavery training	95%
Monitoring & Reporting	Establishment of KPIs and annual Modern Slavery statement.	This table & statement

* Audits received as a percentage of total facilities is lower than our previous reporting period, largely due to increasing the depth of auditing in our supply chain and therefore the number of facilities. We expect to be above 98% of spend by 31 January, 2024.

Effectiveness roadmap tracking

An important measure for transparency in our overall modern slavery response is ensuring continuity between reporting periods. This involves providing detailed information on those areas where we have been able to effectively implement key performance indicators, and those where this has not yet been achieved.

Table 10: Roadmap progress report: measuring the effectiveness of our goals & actions in our 3-year plan

Theme	Activity	FY23 progress	FY24 objectives
A. Governance	Suite of modern slavery policies, guidelines, and contracts	Updated Ethical Code of Conduct Formalised Ethical Sourcing program	
	Modern slavery committee	<i>Continued path from FY22</i>	Commence monthly monitoring of KPIs
	RMW Board updates	Implemented quarterly reporting dashboard	
B. Risk Screening	Industry-geography inherent risk screening	Expanded to upstream suppliers and to pre-screening prospective suppliers	Continue expansion upstream (building on increasing traceability)
	Supplier materiality screening	Launched in FY23; expanded from inherent to holistic risk screening	Introduce residual risk KPI
	Living Wage screening	Launched in FY23	Expand to all High Materiality (A) and Mid Materiality (B) facilities
C. Supplier Engagement	Supply chain tracing	Mapped 65% to Tier-2 and piloted program to Tier-4	Increase Tier-2 visibility and scale upstream traceability program for Tiers 3 & 4
	Supplier onboarding	Invested in software system for more comprehensive onboarding & data gathering	Launch updated onboarding program
	Third-party Audits	Updated program to reduce audit burden & increase reach upstream	Explore additional mechanisms to verify audit results (e.g., worker voice)
	Corrective Action Plans	<i>Continued path from FY22</i>	
	Comprehensive Self-Assessment Questionnaire	Invested in software system for regular SAQ cadence	Introduce annual SAQ for standardised data collection & risk monitoring
	Modern Slavery specific Self-Assessment Questionnaires	Embedded in vendor management system for existing and prospective suppliers	Expand program
	Supplier Living Wage roadmap	Launched in FY23	Engage with facilities identified as having a potential living wage gap in screening Embed lessons from supplier engagement in living wage roadmap
D. Training & Collaboration	Grievance mechanism		Reviewing Grievance mechanism for alignment to UN Best Practice
	Employee training	Develop shortened refresher modern slavery Training Program.	
	Supplier training	Developed modern slavery training program for high-risk prospective suppliers	Roll out training & early engagement with high-risk prospective suppliers
E. Monitoring & reporting	Industry collaboration	<i>Continued path from FY22</i>	
	Modern Slavery Statement	<i>Continued path from FY22</i>	
	Modern Slavery Key Performance Indicators (KPIs)	Launched in FY23	Review and improve KPIs

Consultation with owned & controlled entities

This statement has been prepared by R.M.Williams' centralised corporate function in consultation with senior leaders, staff, and directors of R.M.Williams, and all our owned and controlled entities (entities outlined in the Introduction & Approval section of this statement).

Our owned and controlled entities have been involved in all the activities undertaken by R.M.Williams to identify, address, and mitigate modern slavery risk within their operations and supply chains.



Crafted for life

R. M. WILLIAMS

EST. 1932, AUSTRALIA