



Modern Slavery Statement

Complete Office Supplies Pty Ltd FY24

This statement covers the activities of Complete Office Supplies Pty Ltd (ACN 001 634 715) (**COS**) during the year ended 30 June 2024.

This modern slavery statement is made under the *Modern Slavery Act 2018* (Cth) and sets out the actions we have taken to assess and address modern slavery risks in our operations and supply chains.

This reporting period, COS has continued to improve its approach to modern slavery, with a focus on working with our Local & Import Tier 1 Suppliers to raise their awareness of the importance of assessing and addressing modern slavery risk and supporting them to comply with our requirements regarding modern slavery. We have also continued to improve our due diligence processes, including by extending our due diligence to non-trade suppliers and enhancing our audit processes for exclusive label factories located overseas. Training and education has also formed a central role this reporting period, with an expanded modern slavery training and education program implemented across the workforce.

About us

At COS, we recognise that respecting the human rights of those affected by our business activities is important. We endeavour to make a positive and real difference to our immediate and greater community through our operations and wider supply chain.

We scrutinise every element of the supply chain and place a high level of importance on the behaviour of the total supply chain, as we believe this is where COS can make the most significant impact. A core focus of managing the relationships with our suppliers is ensuring that they share COS' commitment to social and environmental responsibilities. COS places preference with suppliers practicing ethically responsible methods of sourcing and manufacturing whilst maintaining world best practice labour standards.

Our Structure

COS is a company incorporated in New South Wales, Australia and our registered office is located at 25 Nyrang Street, Lidcombe New South Wales, 2141.

As a wholly owned subsidiary of D & M Lyone Holdings Pty Ltd, COS is a family owned and operated business. COS' employees are engaged by Complete Office Staffing Pty Ltd, a related entity which is also a wholly owned subsidiary of D & M Lyone Holdings Pty Ltd.

Our Operations

COS is Australia's largest privately owned business-to-business cleaning, kitchen, technology, furniture and office products supplier. COS was founded in NSW in 1977 by Dominique Lyone, whose visionary leadership

and unwavering commitment to service excellence underpinned by social responsibility laid the foundation for everything we do today. Dominique passed away in 2024, but his legacy continues to inspire and guide the values by which the business is operated. Today COS is run by Dominique Lyone daughters as Co-CEOs Belinda and Amie Lyone, who proudly continue his legacy as a second generation family business.

Since establishment, COS has grown to become a national supplier to Government, Corporate and Education institutions, offering a next day delivery service for thousands of products helping workers, students and patients to stay healthy, safe and productive to over 30,000 customers across Australia. COS operations span across Australia, with employees, warehouses and an extensive driver network in every state and territory. We are the proud employer of over 600 Australians. We also engage a variety of transportation services to deliver to our Australia wide network and recruit casual labour via hire agencies during peak periods in our warehouses.

COS retains a minority interest in the Muru Group, through our investment in Muru Office Supplies (ACN 601 516 545) (**MOS**). MOS is a majority Indigenous owned company that provides office supplies and stationery, as well as IT products and solutions. MOS use the operations and supply chains of COS to deliver to their customer base. MOS are responsible for the employment of their own employees which in FY24 was six, based around Australia. Although we do not manage this joint venture, COS is committed to supporting MOS with assessing and addressing its own risks of modern slavery.

COS also has an annual commitment to donating 1% of annual revenue to the Lyone Foundation. The Lyone Foundation was founded in 2013 and is focused on supporting Australian based charities focused on human welfare in Australia.

Our Supply Chain

We source products from over 400 suppliers from many countries including but not limited to China, Australia, Indonesia, New Zealand and Germany. Our suppliers are primarily located in Australia representing 79% of total supplier spend), however we acknowledge the majority of products we procure are manufactured overseas. We have identified key countries where the products we procure are manufactured (based on a percentage of supplier spend). The most significant countries include [China (34%), as well as Australia (25%), Indonesia (7%) , Germany (4%) and New Zealand (4%)].

The main types of goods and services that we procure are products that are used in any workplace, healthcare or education environment that we resell through to our customers. These can be grouped into a number of key categories including cleaning and bathroom supplies, office products, educational supplies, office furniture, technology, kitchen and catering supplies, mailroom and packaging supplies, personal protective equipment, as well as print and promotional products.

We engage our suppliers in an annual supplier management program. Each year suppliers go through an annual review process including the updating of their company information, a recommitment to the current COS Ethical Sourcing Policy as well as an annual product range review.

We also have several other suppliers, including cleaning services for our office and distribution centres, suppliers of packaging goods for our warehouses, and maintenance service providers for our warehouse equipment. As noted above, we also engage a variety of transportation services who deliver to our Australia wide network and recruit casual labour via hire agencies during peak periods in our warehouses.

Modern Slavery Risks

We recognise that modern slavery may impact our business activities and we endeavour to take responsibility for reducing the risk that we might contribute to modern slavery through our operations and supply chains.

COS Risk Assessment Methodology

We utilise a risk assessment methodology which considers several indicators of modern slavery risks including geographic location and the level of automation in the production of goods as well as considering circumstances where accommodation is provided as part of an employment offer as an additional factor.

During this reporting period we reviewed our risk assessment methodology against other common frameworks to assess whether any changes could be made to improve the effectiveness of our risk assessment processes. This review confirmed our existing framework remains the most appropriate process for COS' operations and supply chains, which we will continue to improve and expand upon.

Using our existing COS Risk Assessment Methodology, during the reporting period we continued to undertake risk assessments of modern slavery risks in our operations and supply chains to consider the extent to which we cause, contribute to, or are directly linked to modern slavery practices. These risk assessments have confirmed that our operations and supply chain continue to have a medium potential for modern slavery risks.

As in previous years, we acknowledge that our recruitment of casual labour via hire agencies has a higher risk of modern slavery, due to reports of some agencies targeting specific individuals and groups from marginalised or disadvantaged communities. Whilst use of labour via hire agencies is relatively low, COS has implemented several safeguards to mitigate this risk including only using Australian agencies who are subject to Australian laws and regulations and imposing minimum standard on these recruitment processes including screening any new labour hire agencies through our due diligence program and requiring them to review and commit to the COS terms and conditions and ethical sourcing policy.

Therefore, our key area of vulnerability remains our exposure to manufacturing processes as well as some jurisdictions with an elevated risk.

Our broader risk profile is summarised in the table below.

Risk profile

| Risk | Description of risk |
|--|---|
| <i>People Reliance/ Level of Automation in Manufacturing Process</i> | <p>We acknowledge that manufacturing processes that rely heavily on manual labour have an increased risk of unfair labour practices, particularly in developing countries.</p> <p>We have identified certain product categories, that as a result of their manufacturing process, have a higher risk than others.</p> |

| | |
|--|--|
| <p><i>On Site Dormitory</i></p> | <p>We understand that providing accommodation as part of an employment offer creates an increased risk of modern slavery. We acknowledge these circumstances have a risk in the exchange of value for the accommodation as well as the potential of the employer to control living conditions and freedom of movement.</p> <p>While COS does not itself provide accommodation in connection with employment, we have identified industries such as product manufacturing which have a higher risk of exposure to on site dormitories or offsite accommodation.</p> |
| <p><i>Geographic/ Country of Manufacture</i></p> | <p>Embedded at the heart of modern slavery is local labour and employment laws of individual countries. Local regulations establish the minimum conditions relating to employment, such as minimum working age, minimum hourly wage and freedoms to terminate employment.</p> <p>We have identified a number of elevated risk jurisdictions in our supply chains, including China, Indonesia, and Malaysia.</p> |

Action to Assess and Address Risk

We understand the importance of working collaboratively with our employees, suppliers, and the broader industry to combat modern slavery. Over this reporting period, we continued to assess and address modern slavery in our operations and supply chains.

Due Diligence

As noted above, we undertook risk assessments to identify any key modern slavery risks that existed within our operations and supply chains. Consistent with previous reporting periods, the results of our due diligence have confirmed that our highest risk remains in the products we procure and resell to our customers, and this therefore remains our key focus area.

We continue to conduct due diligence on all new suppliers, as well as an annual audit process on existing suppliers. The Annual Audit via the COS Supplier Program is a targeted approach to audit existing suppliers to ensure all documents and questionnaires have been completed and up to date based off the Program requirements.

Our new suppliers, including both direct and indirect suppliers, undergo a screening process that involves information gathering and audit review for potential modern slavery risks. When a supplier is approved, they are allocated a risk rating in accordance with our Modern Slavery Risk Assessment Framework which as noted above is based on a matrix of geographic location and the level of automation in the production of goods as well as any accommodation arrangements for workers as part of employment.

In FY24, we identified our non-trade suppliers as an area of focus. Non-trade suppliers are considered those companies we engage with as part of our operations and supply chain, but are not related to the procurement of goods for resale. This includes but is not limited to cleaning services and maintenance teams (noting these companies are often smaller and are perceived to have a higher risk of modern slavery due to the reported use of migrant labour).

In this reporting period we reviewed the appropriateness of our risk assessment procedures for managing non trade suppliers i.e. those suppliers who provide services and maintenance to our facilities across

Australia. Following this review, we extended the annual review process to include our non trade suppliers.

We successfully reviewed all service providers who visit our sites at least quarterly, with specific due diligence processes around labour hire practices, employment policies and safety measures in the work place.

In FY24 COS introduced and completed four sensory audits where a member of the COS strategic sourcing team visited a overseas factory that manufacture private or exclusive label products for COS to conduct an in-person sensory audit. The purpose of the audit is to physically use key senses of sight, smell, hearing and light to observe and address risks to those working in the factory, including risks associated with modern slavery.

Governance and Accountability Framework

An internal modern slavery working group leads the assessment of our risks of modern slavery and implements actions to address those risks. The modern slavery working group comprises eight COS employees across the business including our Co-CEOs and the General Manager- Strategic Sourcing who is the responsible for the appointment and management of product suppliers.

Policies and Procedures

Our policies and procedures ensure we have strong frameworks to enable us to assess and address modern slavery risks. These policies and procedures include:

- A Modern Slavery Risk Assessment Framework which allocates suppliers a risk rating and includes consideration of the additional risk of dormitories. In respect of dormitories, the Framework applies a separate Dormitory rating that identifies the Type of Dormitory and whether a third party audit has been performed. All suppliers were reassessed, and risk ratings modified accordingly.
- Self-Assessment Questionnaires – which were provided to all new and existing:
 - local and import suppliers with which we have preferred supplier arrangement in place, and we spend more than 0.5% of annual purchases (**Local & Import Tier 1 Suppliers**); and
 - local and import suppliers with which we have preferred supplier arrangement in place, and we spend more than 0.3% of annual purchases (**Local & Import Tier 2 Suppliers**).
 - local suppliers with which we have preferred supplier arrangement in place, and we spend more than 0.2% of annual purchases (**Local & Import Tier 3 Suppliers**).
- Ethical Sourcing Policy – which includes an overview of modern slavery has now been entrenched as a mandatory policy for new suppliers. All suppliers receive the policy and are asked to complete the self-assessment questionnaire which is aligned to the requirements of our ethical sourcing policy.
- Supplier introduction process – for both direct and indirect suppliers and includes a modern slavery risk assessment and policy onboarding.

- Indirect Supplier Management Framework – we introduced a standalone framework to identify and manage the risks of modern slavery within our indirect supply chains. This includes the development of a separate risk matrix for indirect suppliers.

Grievance Mechanism

We continue to review and enhance our grievance mechanism process, which allows employees to raise concerns of modern slavery easily and anonymously within our operations and supply chains. This process includes a form for customers, suppliers and members of the public to provide feedback or report concerns of modern slavery.

During FY24 our grievance mechanism identified one suspected instance of modern slavery, reported via a customer. This suspected instance involved a supplier with a supply chain located in India and was investigated by our modern slavery working group. We worked closely with the supplier and identified no modern slavery concerns. We allocated the supplier an increased risk rating to ensure we continue to support and monitor this supplier appropriately.

COS also maintains a Modern Slavery Register to track and report on suspected incidences reported through the grievance mechanism.

Training

All members of the Modern Slavery Working Group participated in specialised education regarding Modern Slavery. This training focused on the history of modern slavery, how to look for modern slavery and best practice response in the event you identify a potential risk of modern slavery. .

Specialised training continued as part of the induction process for new employees in identified roles in procurement, recruitment, facilities management and compliance to raise awareness of modern slavery risks and how they may arise in our business. In addition we introduced generalist training on modern slavery that is included in all new employee induction programs. We also ran a refresher training for all members of the sales team.

During the reporting period we also introduced an extra initiative by displaying educational posters regarding modern slavery in all the break rooms in our facilities across the country.

Assessing Our Effectiveness

We are committed to reviewing the effectiveness of our actions by regularly reviewing our modern slavery processes, with senior management meeting annually to consider whether we are appropriately identifying and evaluating our modern slavery risks; and extending the function of the modern slavery working group to include conducting an annual review of our processes, policies and actions, to ensure we are appropriately identifying and evaluating our modern slavery risks.

We also monitor our performance against several key performance indicators. These include monitoring:

- the number of suppliers participating in our responsible sourcing program as a percentage of total procurement spend;
- the percentage of our procurement complying with sourcing policies;

- the number of supplier factory audits completed; and
- the number of incident and corrective action measures taken in response to actual or suspected incidences of modern slavery.

Consultation

As noted above, COS does not own or control any entities and consultation was therefore not undertaken with any other entities.

During FY24, there was consistent consultation and collaboration between the executive leadership of COS and the modern slavery working group within COS.

Prior to being put to board of directors of COS for review and approval, this statement was reviewed by the General Manager – Strategic Sourcing, Procurement Manager as well as Facilities Manager.

Related Activities

We passionately support the Lyone Foundation which was established to assist small to medium sized Australian charities, with a focus on human welfare to create a more prosperous future for disadvantaged, vulnerable and marginalised Australians.

Our customer network comprises some of the largest companies in Australia as well as state and federal governments. Our Commercial Director and senior members of the Executive, Commercial and Category teams have proactively sought opportunities to attend and participate in forums reviewing progress within Government and Industry in Australia relating to steps taken to prevent and address modern slavery. These forums include more than 150 meetings during the reporting period with Australia's largest Commercial and Government bodies as customers and prospective customers where respective modern slavery commitments, statements and committee progress were formally tabled and reviewed. In addition to this, the COS Commercial Director presented and supported panel discussions at the following events attended by collective representation of more than 400 Senior Executives responsible for modern slavery commitments across many industries.

- Procurement and Supply Chain Australia - Sustainable Procurement and ESG
- Procurement and Supply Chain Australia - Health and Aged Care Procurement Conference
- Hobart Chamber of Commerce in Conjunction with Cricket Tasmania - Social Procurement Breakfast
- IMPACT! - Procure with Purpose Conference

FY2025 Focus

In FY2025 we will continue to improve our initiatives and strategies, including:

- continuing the rollout of Sensory Audits in overseas factories achieving a minimum of five sensory audits during FY25
- extending and implementing a review of the COS Risk Assessment Methodology as it applies to indirect suppliers
- implementing a focused review process for cleaning services and third-party labour hire agencies
- participating in a minimum of three external roundtables or industry conferences to assist in awareness and education of modern slavery
- continuing to review the COS Risk Assessment Methodology and companywide compliance
- extending the trade suppliers new induction program to capture one off large purchases for solutions projects with a specific focus on service providers e.g. furniture and technology installers
- Plan to review and evaluate the new COS subsidiary, Kookaburra Educational Resources, practices against the existing COS supplier and operations due diligence program
- Explore and potentially support charities relating to modern slavery in Australia

Approval

This statement was approved by the board of Complete Office Supplies Pty Ltd (ACN 001 634 715) in their capacity as principal governing body of Complete Office Supplies Pty Ltd on 19 December 2024.

This statement was signed by Belinda Lyone in her role as a director of Complete Office Supplies Pty Ltd on 19 December 2024.

A handwritten signature in black ink, appearing to read 'Belinda Lyone', with a long horizontal line extending to the right.

Belinda Lyone
Co-CEO & Director

Mandatory criteria

This statement complies with the mandatory criteria for a modern slavery statement outlined in section 16 of the *Modern Slavery Act 2018* (Cth). The below table indicates where each requirement is addressed in this statement.

| Requirement | Page Number |
|--|-------------|
| (a) Identify the reporting entity. | 1 |
| (b) Describe the structure, operations and supply chains of the reporting entity. | 1 – 3 |
| (c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls. | 3 – 4 |
| (d) Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes. | 4 – 6 |
| (e) Describe how the reporting entity assesses the effectiveness of such actions. | 6 – 7 |
| (f) Describe the process of consultation on the development of the statement with any entities that the reporting entity owns or controls (if a joint statement has been made under section 14, also describe the process of consultation with the entity giving the statement). | 7 |
| (g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant. | 7 – 8 |