



greenlit
BRANDS

MODERN SLAVERY STATEMENT 2020

SEPTEMBER 2019-SEPTEMBER 2020



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www.greenlitbrands.com.au

This is Greenlit Brands Pty Ltd first Modern Slavery reporting statement under the Australian Modern Slavery Act 2018. While this is part of a legislative requirement, this is an issue that is close to our hearts, and we are committed to tackling and eradicating any modern slavery occurring in our business.

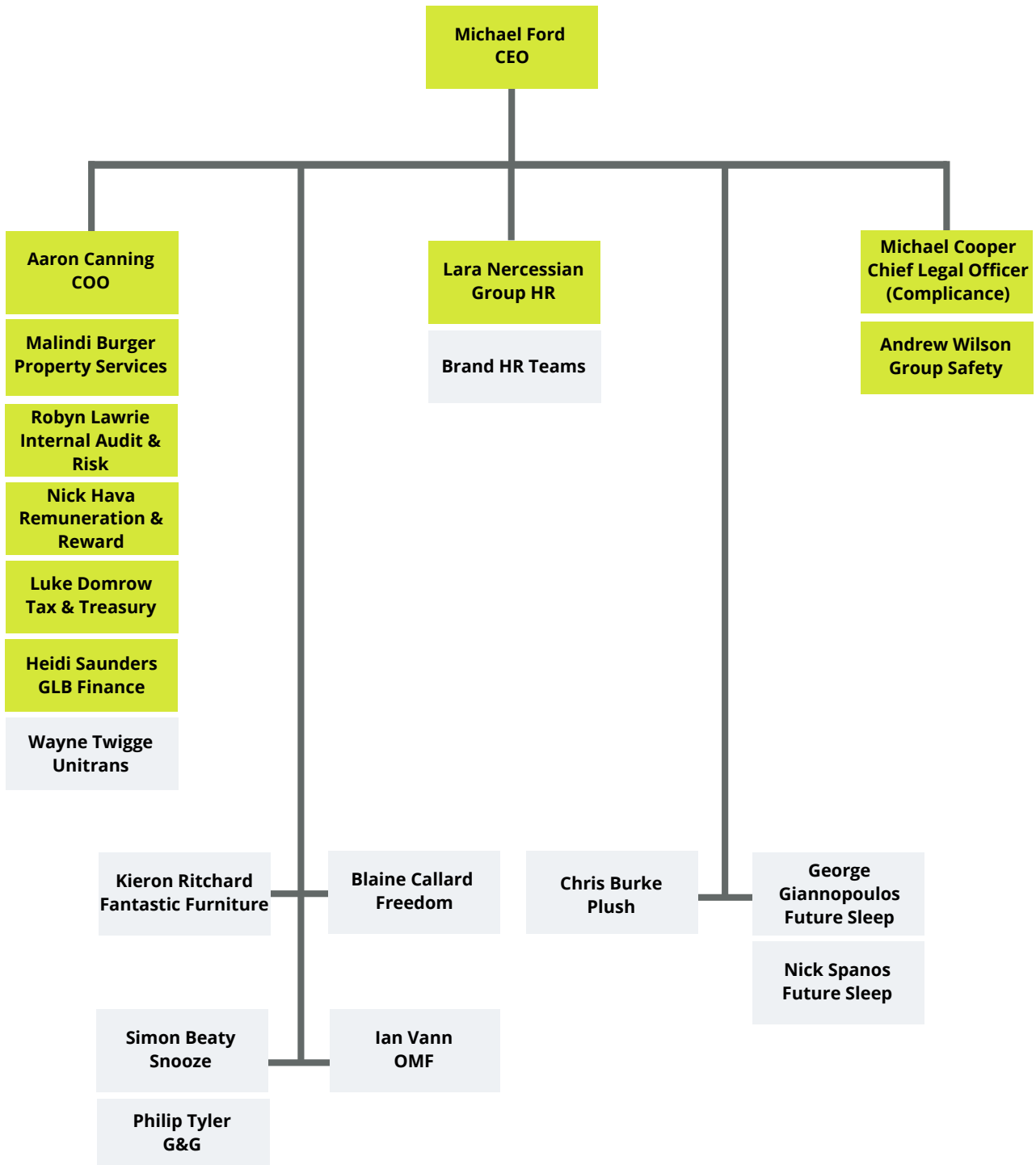
We recognise that identifying and addressing modern slavery is complex – and therefore, we have a lot of work to do to ensure human rights are upheld for the people right across our operations and supply chains. We understand the best approach for continual improvement is through consistent action and collaboration – and we will continue to partner with the appropriate organisations to ensure we are managing this issue with the utmost care. We are committed to tackling and eradicating any modern slavery in our business and supply chains, and we are working toward a more sustainable approach in our operations and supply chains.



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Leadership team



Our structure, operations and supply chains

Greenlit Brands Pty Ltd is an integrated retailer and manufacturer of household goods across Asia, Australia, and New Zealand. Greenlit Brands was incorporated in 2016 but our brands have been providing exceptional service to our customers for decades. Greenlit Brands is the parent company of eight brands, including:

- Fantastic Furniture
- Freedom
- FutureSleep
- G&G Furniture
- Original Mattress Factory (OMF)
- Plush
- Snooze
- Unitrans

Greenlit Brands Pty Ltd also operates under Steinhoff International, located in the United Kingdom, who are required to report under the United Kingdom's Modern Slavery Act 2015.

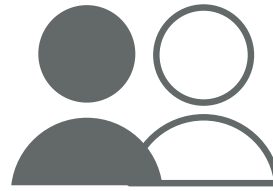
Across brands, we deliver a range of household consumer goods, including lounges, homewares, rugs, mattresses, bedding, upholstery cleaning products, tables, and chairs. We operate 304 stores, 5 factories and 21+ distribution centres located throughout Australia, New Zealand, and Asia. Our operations include cleaning services, waste services, property management, uniforms, transport and freight, security services, information technology services and products, communications and marketing, financial and superannuation services, and website and cloud storage.

The countries we directly source and manufacture materials, products and services include Australia, China, Malaysia, Germany, India, Taiwan, Singapore, Denmark, Vietnam, United States, Algeria, Indonesia, and Turkey. During this financial year, Fantastic Furniture was in a joint venture with a third party (with 60% ownership) to operate the Fantastic International Manufacturing China JV (a factory that supplies Fantastic Furniture). This venture closed in June 2020.

Our tier two and three supplier countries include Australia, China, Saudi Arabia, Finland, Malaysia, Pakistan, Germany, Vietnam, Indonesia, Netherlands, Japan, Thailand, South Korea, Italy, United Kingdom, Russia, Argentina, Costa Rica, and Brazil. We expect the list beyond tier one will continue to grow as we work with our suppliers and look further into our supply chains.



Greenlit Brands Pty Ltd itself comprises of a Group Services Team, including an Executive Team and several departments - Finance, Human Resources, Payroll, Safety, Internal Audit, IT, Property, Corporate Solutions, and Administration Support. The Group Services Team is primarily involved in setting brands-wide strategic objectives and acts as a support to the eight brands with operational requirements and initiatives. It also includes a legal team which is a shared function across brands.



46 full-time
0 part-time
0 casual
1 contractor



0 stores
0 factories
0 distribution centres

Snooze's managing director oversees teams in Marketing, Information Technology, Product and Operations, Finance, Human Resources and Administration. Snooze operates 88 stores nationally. Like the other brands, Snooze is owned by the parent company Greenlit Brands, which owns and operates other retail brands as well as two suppliers to the Snooze group (FutureSleep and G&G). Snooze has 50+ individual franchised entities downstream.



80 full-time
14 part-time
46 casual
0 contractors



88 stores
0 factories
0 distribution centres
30 suppliers

Plush comprises a Chief Executive Officer, General Manager, National Operations Manager who oversees area managers, National Trainer, National Logistics Manager, Finance Manager, Chief Marketing Officer, Visual Merchandising Manager, Product Manager, Inventory Manager, and Information Technology Manager.



128 full-time
57 part-time
82 casual
8 contractors



45 stores
0 factories
5 distribution centres
10 suppliers

G&G Furniture has a Managing Director who is responsible for the overall direction of the company with the support of the Financial Controller. There are two Sales Coordinators, Customer Service Officer, and Logistics Manager. Logistics work is shared through Unitrans, and Snooze manages Human Resources. G&G Furniture Imports does not operate any stores.



5 full-time
1 part-time
1 casual
0 contractors



0 stores
0 factories
0 distribution centres
19 suppliers

Freedom's leadership team comprises a Chief Executive Officer, a Chief Financial Officer, Chief Information Officer, Merchandise Director and General Managers in Marketing, People and Culture, Retail Operations, Digital and Visual Merchandising and an MD for New Zealand stores. Freedom operates 47 stores across Australia and New Zealand.



274 full-time
359 part-time
55 casual
0 contractors



47 stores
0 factories
5 distribution centres
157 suppliers

OMF's structure includes a Chief Executive Officer, Head of Finance and Inventory, Central Operations and Customer Engagement Manager, People and Culture Manager, Digital and Systems Manager, Senior Retail Operations Manager, and Retail Operations for Queensland, New South Wales, and Victoria. OMF has 12 suppliers, some of which are internal - Unitrans, FutureSleep.



55 full-time
72 part-time
57 casual
1 contractors



42 stores
0 factories
0 distribution centres
12 suppliers

FutureSleep's structure comprises of three main groups working with the Chief Executive Officer. The Innovation and Design Team which consists of Brand Account Management, Research Design and Innovation, Construction Methods and Pricing, Sourcing and Purchasing, and Supplier Relationships. The Operations Team includes Facilities Management, Customer Service and Logistics. The Professional Services Team includes Finance and Administration, Component Sourcing and Purchasing, Legal and Risk, and Human Resources and Safety. FutureSleep shares 2 factory locations with Unitrans (as part of integrated logistics)



201 full-time
3 part-time
107 casual
48 contractors



0 stores
4 factories
Distribution centres are part of manufacturing sites
30 suppliers

Fantastic Furniture is governed by a Chief Executive Officer with the following departments reporting directly: People and Safety, Supply Chain and Manufacturing, Marketing and Digital, Information Technology, Finance, Retail Operations, Products and Buying, and Customer Excellence. Fantastic Furniture operates 82 stores, 6 distribution centres and 1 factory – the Fantastic International Manufacturing China JV. Joint venture ceased in June 2020.



830 full-time
417 part-time
86 casual
139 contractors



82 stores
1 factory
6 distribution centres
105 suppliers

Unitrans' leadership structure comprises of a Chief Executive Officer, General Manager, Head of People and Culture, DC Managers, national Transport Manager, IT Manager and an Executive Assistant. Unitrans is the main logistics company across all brands. Unitrans looks after warehousing, deliveries, freight and transport and packaging across internal and external brands.



167 full-time
8 part-time
130 casual







0 stores
0 factory
5 distribution centre
340 suppliers

Risks of modern slavery in our operations and supply chains

We understand modern slavery as situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Modern slavery practices include human trafficking, forced labour, slavery-like practices such as servitude, debt bondage, deceptive recruiting, forced marriage, and child labour. We also recognise that we need to look further than this, as there are many indicators of modern slavery risk.

We undertook several assessments across all brands to identify how we may cause, contribute or are directly linked to modern slavery in our operations and supply chains. This includes a review of:

-  Internal management systems and how we address sustainable sourcing, including human rights
-  A high-level social life cycle assessment of our supply chains
-  Business operational risks
-  COVID-19 impacts on operations and supply chains, and our ability to assess and address modern slavery during this time

We identified potential modern slavery risks that relate to certain materials and products, industry sectors, countries, and inconsistencies across our management systems from this review process. While these potential risks have been identified, we are mindful that modern slavery can occur at any time and in any place in our operations and supply chains. We will, therefore, use the information from these assessments as guidance while we investigate further. As outlined in the 'Actions to assess and address modern slavery risks, including due diligence and remediation' section of this statement on page 16, we will continue to assess and address both identified and unidentified risks via several actions.

Review of internal management systems

Our first approach involved assessing our internal policies and procedures for the sustainable sourcing of materials, products, and services across our operations and supply chains. We looked at our frameworks, guidelines, sourcing requirements and adherence, current audit programs, supplier communications, corrective action plans and training programs. An external consultancy agency assisted in this review, helping to guide our thinking and response from an objective viewpoint, and providing scoring and recommendations for each brand.

We each identified our own strengths yet recognised risk where we each need to revise, improve or develop specific components in our management systems to ensure the people in our supply chains and operations are supported, and human rights are upheld. We also identified the opportunity to work together across brands where we can see synergies for greater impact. We will be working toward improving our management systems in the coming years (more details are outlined on page 18).

Identifying modern slavery risk in our supply chains and operations

Supply Chains

Each brand mapped out information on its products and services including worldwide manufacturing locations, materials used in a product or service, the material's country source (if known), and the use of third-party certifications. We then engaged an external consultant to conduct a high-level social hotspot assessment to understand potential risks in our supply chains relating to modern slavery (as well as other interlinked social risks).

The social hotspot assessment refers to the material, sector and country risks based on a multitude of references and methods. These data sources include intergovernmental databases, country statistics, non-government organisation's (NGO) reports, trade union research and academic papers. For example, the Global Slavery Index, International Labour Organization (ILO), United Nations Children's Fund (UNICEF), the World Health Organization (WHO), the World Bank and more.

Through this assessment, we identified our two main modern slavery risks to be forced labour and child labour in textiles, foam, metals, timber, plastics and adhesives. We identified several other social indicators for workers that can lead to modern slavery risk. While we have identified our core risks, we will continue investigating and monitoring all types of exploitation, prioritising areas where we can most influence and impact change.

Operations

We also looked at our operations, reflecting on our level of oversight and transparency in both in-house or outsourced services and the goods we use. We examined our workforce composition, cleaning services, waste services, and property management. We investigated where uniforms are used and where we source textiles. We also looked at our transport and freight, security services, information technology services and products, communications and marketing, financial and superannuation services, website and cloud storage, and any other direct or indirect operations.

We are proud to have strong relationships with many of our operational suppliers, enabling transparency, which is a central factor in mitigating modern slavery. We are in a rare position where we often source directly from each other's brands, increasing our ability to influence and impact our operations and suppliers collectively and internally. We predominately employ full-time, part-time, and casual workers (see pages 6-8) which means we largely have oversight over our operational workforce.

While cleaning services is considered a high modern slavery risk in Australia, we consider this service to be a low risk across our operations because this function is predominately completed internally.

However, we understand there is still risk across our brands due to our lack of transparency further down our operational supply chains beyond tier one. This means that we have varying degrees of control and oversight, which is a high risk of modern slavery, including unknown contractors and sub-contractors.

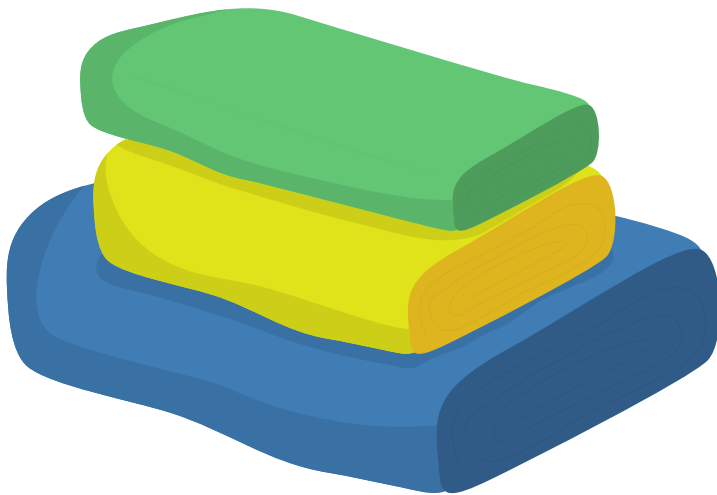
Textiles industry

The textiles industry is considered a high-risk material sector when it comes to modern slavery. We use a range of textiles including cotton, polyester, wool, leather, and other fabrics to make furniture products, mattresses, bedding, lounges, rugs, and homewares across our brands.

The textiles industry is known globally for its modern slavery risk. People are at risk, particularly in the early stages of the textiles lifecycle, such as in the extraction of materials and manufacturing.

In our hotspot assessment, we found a very high risk in the textiles industries for child labour, forced or compulsory labour, and corruption such as human trafficking.

According to a new brief from ILO released in November 2020, "the impact of COVID-19 on women in the garment industry has worsened due to underlying challenges including discrimination and harassment, under-representation of women's voice, wage gaps as well as unevenly shared unpaid care and family obligations."



There are also certain workers that are vulnerable and more at risk of modern slavery across industries, including textiles. More information can be found on page 13.

Child labour

An estimated 152 million children in the world (one in ten) are exposed to child labour (UNICEF). We have identified country-sector risks where child labour may occur. The textile and timber industries are considered very high risk for child labour across our brands.

Forced labour

Forced labour is a violation of fundamental human rights. The 2017 ILO Global Estimate of modern slavery indicates that at least 25 million people worldwide are involved in some form of forced or compulsory labour. Women and girls represent the greater share of forced labour victims. Our assessment found that some sectors and countries are at higher risk of using forced or compulsory labour than others. This considers the overall forced labour found in a country, the lack of labour laws in place for country or sector, and the ratification of labour conventions by a sector.

Corruption

Types of corruption may include bribery, extortion, cronyism, bias, patronage, embezzlement, drug trafficking, money laundering, and human trafficking. It is any misuse of power that undermines democracy and good governance procedures. We found a number of country-sector risks where corruption may occur, and where workers can be at risk.

Timber industry

We source various types of wood to use in our products across brands. This includes pine, teak, oak, hardwood, softwood, walnut, beech, particleboard, and more. Our tier-one suppliers also source these materials from a number of countries to manufacture wood-based products like sofas, lounges, bed bases, frames & ensembles, bedroom storage furniture, chairs & ottomans, tables, and storage accessories.

Our hotspot assessment shows that forced or compulsory labour is a sector-country risk in the forestry industry. Particular areas of concern include, the illegal harvesting of timber and associated child labour and corruption.

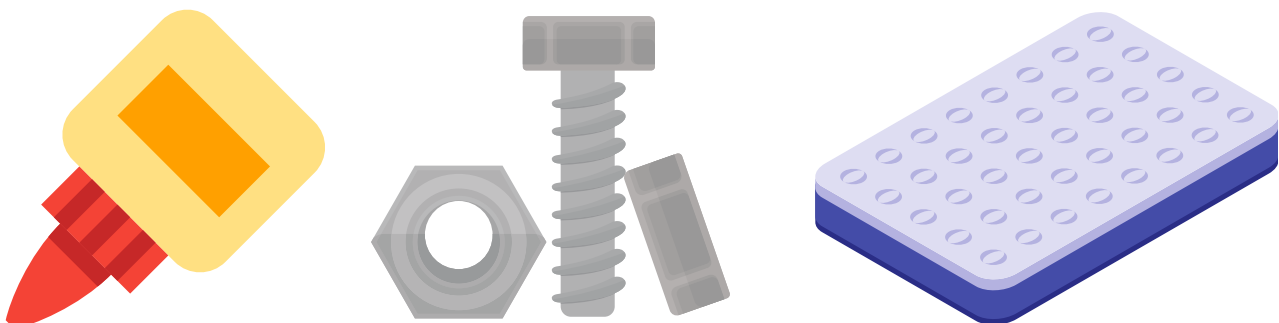


Other imported goods such as metals, adhesives, plastics and foam

In our hotspot assessment, we found a number of materials and products that are potential modern slavery risks depending on the country from which they are imported. This includes various metals, adhesives, plastics and foam.

We use these materials in a number of our final products. For example, foam is a core material for our mattresses. We use different types of metal materials, steel being a common type, as part of our mattresses, bed bases, bed frames and ensembles, storage furniture, sofas and lounges, and other types of furniture products. We also use adhesives for specific applications to bond pieces of a product together.

While there is always the possibility of modern slavery risk within the supply chain of any product or material, our assessment shows that we need to monitor the raw material inputs into manufactured products imported from at-risk countries listed in the Global Slavery Index.



Other indicators of modern slavery exploitation

In our hotspot assessment, we identified a number of indicators that can lead to various forms of modern slavery exploitation.

One indicator is that certain workers are more vulnerable to modern slavery risk. Vulnerability of workers can mean they are exposed to deceptive recruiting and debt bondage, among other modern slavery risks.

Migrant workers are a part of our workforce, across our suppliers and our internal operations. The problem is what migrant workers can often face, which is discrimination. Discrimination against migrants can lead to decreased access to employment, increased violence, exploitation, and poor working conditions. Our hotspot assessment found risk where countries in our supply chain have not ratified international conventions or set up policies for immigration that may leave migrant workers vulnerable.

Indigenous people's rights continue to be at risk. Indigenous people and cultures are most often experiencing marginalisation, dispossession, or discrimination. We found risk in countries not adopting international conventions to protect indigenous people and a lack of laws to protect indigenous people, according to ILO and the hotspot data. We see this as an indicator for modern slavery risk in the lack of protection for indigenous people across our international supply chains, as well as here in Australia.

Occupational injuries and deaths are not necessarily considered modern slavery; however, if it is a common occurrence in a workplace it can show substandard work conditions, which may be an indicator of where modern slavery may exist. From the hotspot assessment data sources, there are various high risks of occupational injuries, hazards and deaths in the use of chemicals, timber, textiles, metal, plastic, latex, foam, adhesives, and cleaning materials, products and industries across brands.

All employees should have the right to freedom of association with others, including the right to form and join trade unions for the protection of interests. As well as the right to collective bargaining and the right to strike without penalty. While we do not see this as a high risk within our domestic operations, we recognised supply chain risk in our timber, metals, foam, and textiles industries across all brands. Currently, the number of workers represented by a union are 27 at Fantastic Furniture and 39 at Freedom. We want to ensure all workers know and have access to these rights.

Understanding COVID-19 impacts

The impact of COVID-19 has been unimaginable for our day-to-day lives, and on our family and friends. Local and international trade and supply chains no longer operate in the same way. Globally, the impact of COVID-19 varies between countries and regions.

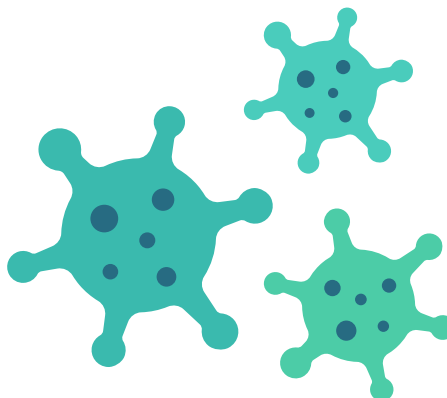
In terms of unemployment, Anti-Slavery International suggests in its report titled "Leaving no-one behind" that:

"Unemployment on this scale, even if only temporary, will shrink incomes for the workers and their families. This in turn, will lead to increases in household debt, particularly in places where debt is already endemic, due to poverty. Mass unemployment, high debt and little government safety net creates opportunities for traffickers, as well as business owners. They can cover their financial losses suffered during the crisis, by exploiting the cheap labour of people who have suffered sudden unemployment, once global demand resumes".

Other risks on a global scale include the fear of loss of income, meaning workers may be accepting substandard working conditions. Casual and temporary workers often have no safety nets and are not covered by labour laws or regulations, huge numbers of furlough workers (on mandatory leave of absence) are in limbo, many migrant workers are stranded overseas and are unable to return home. There is a lack of awareness of workplace rights, and the increased demand for some products and materials leads to excessive overtime, for which workers may not be paid. Alternatively, some sectors have experienced order cancellations and reduced order volumes, and many suppliers have been left to bear the cost of the raw materials, which could, in turn, mean that businesses have less money to pay their workers.

These factors increase the exposure of already vulnerable workers to modern slavery and other forms of exploitation.

From initial research, the high-risk sectors include transportation, agriculture, fashion, footwear and apparel. We acknowledge that it will take time to compile complete data on the impact COVID-19 has on modern slavery and exploitative labour practices. This is an emerging area of risk that requires ongoing tracking and monitoring to ensure these human rights risks are identified and carefully managed.



The effects of COVID-19 on our own supply chains and operations has varied across brands since it was declared a pandemic by the World Health Organization on 11 March 2020. Each brand has been in constant communication with staff, and with our local and international suppliers as we support each other throughout this time.



For some brands, COVID-19 has caused many issues. Some of the challenges we have faced are temporary and permanent store closures (particularly in Victoria), an initial drop in sales, delivery restrictions to certain states and regions (such as Western Australia and Queensland), shipping line and port disruptions locally and at origin, extended lead times from suppliers because of the volume of orders they are receiving and border closures, many local and international factories are unable to increase production as limited workers are allowed onsite for social distancing measures, and increased costs to cover these disruptions.

For example, there is currently a shortage of empty containers in Asia which is impacting shipping order schedules. The demand for space on vessels is exceeding capacity so as a result, freight costs have increased. Some vessels have been omitting Sydney from their schedule causing further delays to goods arriving.

While household goods in Australia have been one of the industries to benefit from increased sales during COVID-19, we understand this increases certain pressures on our operations and supply chains. We are working with our suppliers, our own factories, staff, and distribution centres to ensure no one is suffering. Please refer to page 21 of this statement for further information on how we are assessing, addressing, and evaluating our actions in this area.

We recognise the impact of COVID-19 is highly linked with modern slavery risk. We have therefore continued to prioritise our work this financial year to comply with the Australian Modern Slavery Act 2018 and to work towards continual improvement to protect human life as best we can.

Actions to assess and address modern slavery risks, including due diligence and remediation

This section of our statement includes information about the processes we have in place to remedy situations where we may cause, or contribute to, modern slavery. This includes due diligence and remediation as an effective response to modern slavery, and as per the key concepts in the United Nations Guiding Principles on Business and Human Rights. We will aim to improve our practices in this space in the coming years.

Sustainability Workshop and the development of a Modern Slavery Working Group

The purpose of our Sustainability Workshop was to bring together executives and team leaders across brands to discuss sustainable sourcing and to commence the development of a joint sustainability plan – that includes modern slavery. We each committed to the development of a collective sustainability roadmap and agreed that a steering committee (with executives and management) would drive this. Where needed, sub-committees would be developed for focused sustainability areas – including a Modern Slavery Working Group.

While each brand has prime ownership over its actions to address and assess modern slavery, the role of the Modern Slavery Working Group is to lead and coordinate key learnings that can be shared across the brands. The Modern Slavery Working Group will meet on a quarterly basis and whenever necessary.

Modern Slavery Workshop and ongoing training

Each brand's executives and team leaders attended an online training session about what modern slavery entails and how to identify it, our vision individually and collectively, what the Australian Modern Slavery Act 2018 requires for compliance, along with tools to implement an action plan including mitigation, remediation, and evaluation. We felt that leadership training was an important first step in what will be continuous education for our brands, staff and suppliers in the coming years.



Using an Action and Evaluation Tool as guidance

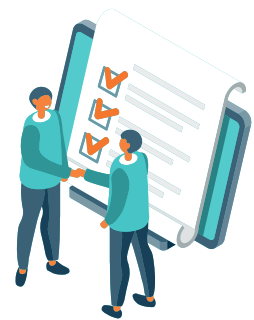
Our Modern Slavery Action Plan and Evaluation Tool is a multi-purpose resource that acts as a guide to track and evaluate our actions to assess and address modern slavery risks. The tool provides an extensive list of functions to:

- Formalise each brand's commitment to addressing modern slavery
- Ways to determine high risk areas in our operations and supply chains
- Adopt a management system approach to tackling modern slavery
- Take action to address modern slavery risks such as supplier engagement, contract management and collaboration
- Develop procedures and processes to assist in the remediation process
- Monitor the effectiveness of our actions to assess and address modern slavery risks.

This tool will act as a guide for each brand as part of our strategy for future implementation, where we set timeframes, allocate responsibilities, and track progress. It is designed to be flexible for each brand so we can respond accordingly.

Supplier Self-Assessment Questionnaires

We are issuing questionnaires to all our suppliers, as part of our improved due diligence processes. We hope in the long term our suppliers see the value of adopting principles and work processes to combat modern slavery, and that they will work with their suppliers to promote ethical business practices. The questionnaire helps us gain an understanding of our supplier's policies, processes and procedures regarding modern slavery, labour rights, human rights, environmental compliance, anti-corruption, and quality management.



Case study: Beyond tier 1

We are beginning to see the influence of the Australian and United Kingdom's modern slavery legislation on our global supply chains – beyond our tier 1 suppliers. For example, one of G&G Furniture's suppliers of upholstered beds is requesting that their suppliers make a voluntary modern slavery statement as well as a signed declaration in an effort to ensure modern slavery is not occurring in their business. This supplier purchases materials such as hardware, glue, fabric, and timber from various suppliers across the world.

By working collaboratively with our suppliers and developing relationships that are built on trust and transparency, we aim to encourage suppliers to pass on best practices when it comes to mitigating or remediating modern slavery risk. We want to work collaboratively to ensure human and labour rights are upheld and our suppliers are working to minimise risks.

Revising, improving, and developing effective internal management systems

Across brands, we each identified the areas in which we can revise, improve or develop our internal policies, processes, and procedures to address risks of modern slavery. We will continue to develop our management systems and prioritise modern slavery risks, such as child labour, and forced labour, and work with suppliers on other human rights issues such as the ones identified in this statement.

Policies, guidelines and roadmaps

Greenlit Brands Speak Up Whistleblower Policy

We are committed to creating and maintaining a genuine and respectful working environment in which all employees, directors, contractors, suppliers, partners and consultants are able to raise concerns regarding actual or suspected unethical, unlawful or undesirable behaviour. We recognise that any genuine commitment to detecting and preventing illegal and undesirable behaviour must include a mechanism where employees and others can report their concerns freely and without fear of retaliation or victimisation. The Speak Up Whistleblower Policy provides this mechanism and encourages all employees to report such behaviour. The purpose of this Policy is to:

- Promote an open, respectful and transparent culture
- Encourage employees, directors, contractors, suppliers, partners and consultants to report an issue if they believe an individual or a group of people have breached the Group Code of Conduct, our Anti-Bribery and Corruption Policy and any of our other policies or the law
- Demonstrate each brand's commitment to a fair workplace and outline the process for managing matters that are reported
- Protect individuals who in good faith report behaviour which they reasonably believe to be corrupt, illegal or unethical on a confidential basis, without fear of victimisation or discriminatory treatment.

Greenlit Brands Grievance Policy

Greenlit Brands has developed a Grievance Policy in our commitment to resolve workplace disputes and grievances. The policy applies to all Greenlit Brands' operations, its group companies and brands, employees, directors, franchisees, suppliers, contractors, partners and consultants.

The policy states that the reporting, investigation, and resolution process remain impartial and confidential so that no person is disadvantaged or victimised in any way because they have made a complaint. Any person who victimises another person based on raising a concern or complaint may be subject to disciplinary action.

Greenlit Brands Anti-Corruption and Bribery Policy

We are committed to a zero-tolerance approach to bribery and corruption. All stakeholders of Greenlit Brands, including employees, casual employees, and any individuals or entities that have a direct business relationship with Greenlit Brands, including suppliers and contractors, are expected to share this commitment and will be subject to this policy.

We are committed to ensuring that we do business lawfully, ethically and with integrity. Accordingly, bribery, corruption and any other form of dishonesty or unethical business practice will not be tolerated. Bribery and corruption violate our values, ethics, policy and violate the law. All stakeholders must conduct themselves as per our values, policies, procedures, as well as all relevant laws relating to bribery and corruption and must read and abide by the terms of this Policy. Our anti-bribery and corruption policy prohibits employees from directly or indirectly soliciting, accepting or offering bribes to or from government officials or private individuals, even if it means lost business opportunities.

Greenlit Brands Code of Conduct

Our Code of Conduct acts as a reference tool, guiding on expected behaviours and responsibilities as representatives and brand advocates of Greenlit Brands and our brands. Our Code outlines the standard conduct expected of everyone within Greenlit Brands in Australia and New Zealand, including while working or traveling overseas on business. Parts of the Code also apply to Greenlit Brands' suppliers and contractors. While we have provided a set of guidelines that can be applied to a wide range of workplace situations, our code encourages our workers to seek guidance from direct leaders or a member of senior management when faced with an ethical matter. The code specifically outlines our commitment to workers, suppliers and contractors and the community on:

- diversity and inclusion
- flexibility at work
- feeling safe from bullying, sexual harassment and discrimination
- compliance with regulations and laws
- competition and consumer law
- privacy and confidentiality of information.

We also outline our expectation from workers, suppliers, and contractors regarding:

- corruption
- fraud
- conflicts of interest.



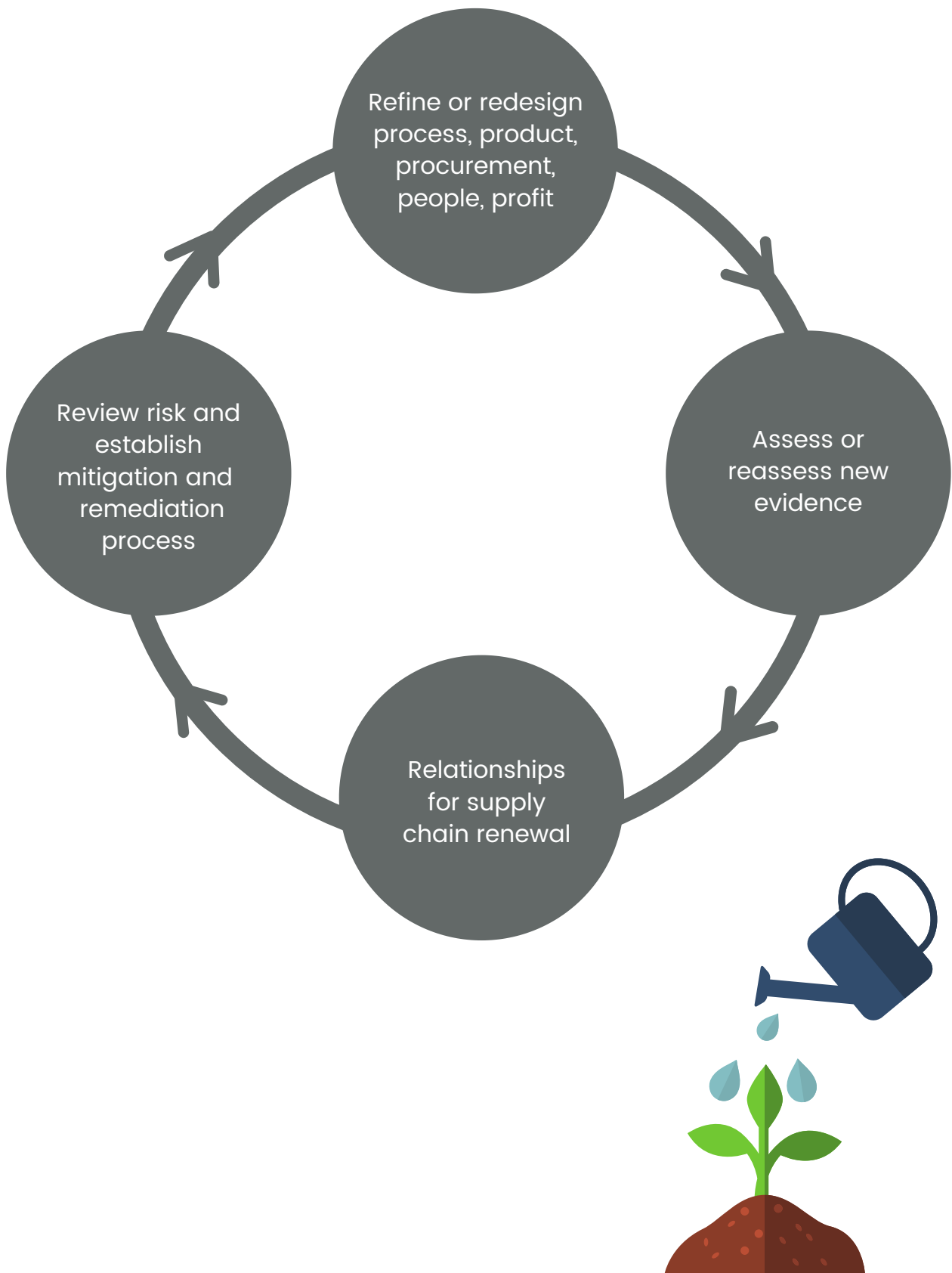
A spotlight on Unitrans

Unitrans is unique amongst the brands in that it functions as the brand's logistics company. This means Unitrans coordinates warehousing and deliveries across brands.

Unitrans has developed an Ethical Sourcing Policy, Guidelines, and Ethical Sourcing Roadmap to set out its expectations in regards to labour and human rights, environmental, health and safety and business integrity. As a result, it is expected that customers, suppliers and contractors are committed to the same standards.

Every supplier and contractor are required to agree to the principles outlined in the Unitrans Ethical Sourcing Policy during the trade agreement exchange. The policy is reviewed annually to ensure it meets best practice standards, aligns with changes in regulations and meets its approach to ethical sourcing.

Our process for continual improvement



Third-party social audits



Fantastic Furniture commenced social auditing with its suppliers to determine its next steps for best practice in human and labour rights. The brand is currently 25% through its audits with suppliers and will continue auditing in the next financial year.

Addressing COVID-19 impacts

To ensure we monitor the impact of COVID-19 on human and labour rights, we have a specific COVID-19 questionnaire for our suppliers (and for use as an internal checklist for the management of our operations). We aim to use this questionnaire as an ongoing communication tool with our suppliers (whether through conversation or issuing the questionnaire itself) to maintain a transparent relationship on the impacts of this issue.

We have also implemented several mitigation and remediation strategies throughout this time to ensure the safety of our people. For example, Fantastic Furniture and G&G Furniture Imports are supporting its suppliers by ensuring a healthy order bank and timely payments, so suppliers are not forced to take short cuts or reduce their workforce. Unitrans developed a new arrangement for deliveries and customer pick up from sites to maintain the new COVID-19 measures and communicated this early and effectively to all customers and suppliers, receiving excellent cooperation through this period.

We will continue to monitor the impact COVID-19 has on our operation business, and respond in an appropriately to provide support



When we do find modern slavery

We understand that if, or when, we find modern slavery occurring in our operations and supply chains that we need to handle it in a manner that does not jeopardise the person's safety. For severe cases, we understand our responsibility to contact our local authorities. From our training on modern slavery, we have a list of organisations we will reach out to, so we are prepared to appropriately respond and support any victims of modern slavery in our operations and supply chains.

Assessing the effectiveness of our actions

Using an Action and Evaluation Tool for assessment

We will be using our Modern Slavery Action and Evaluation Tool to guide and track our assessment on the effectiveness of our actions in addressing modern slavery risk. This tool will assist in evaluating how we are progressing through the implementation phase and keep us on track for meeting deadlines. For example, how we are monitoring the amount of supplier questionnaires we receive and the quality of responses, or whether we are addressing our modern slavery risks via policies and procedures and to what level. The tool includes several guiding questions and categories to assess our impact.

Sustainability Roadmap

We understand the definition of sustainability is wide-reaching and requires a holistic and flexible approach that considers environmental, health, and ethical matters. We are currently developing a Greenlit Brands Sustainability Roadmap that will outline how we will work with our suppliers and our internal operations - that includes improving human and labour rights practices. Our roadmap will help us to define synergies across brands and set a clear pathway towards sustainable practice, including goals and how we define success. We want to go beyond modern slavery compliance and recognise that there are broader factors at play that can affect quality of life for people right across our operations and supply chains.

We know we have a lot of work to do. We will continue to assess the effectiveness of our actions toward modern slavery in the coming years.



Process of consultation

We are committed to addressing any modern slavery in our operations and supply chains. Our process of consultation across brands will continue to evolve as we consult with staff, suppliers, contractors, directors, team leaders, stakeholders, and external organisations each year.

To ensure a robust consultation process in this reporting period, Greenlit Brands' Head of Group Safety coordinated and consulted with each of our eight brand executives and team leaders throughout the entire process - including the development and review of this statement. Greenlit Brands also sought external expertise from civil society groups to assist in the risk assessments and for additional guidance. Below is a process map of our consultation this financial year.



This statement was approved by the Board of Directors of Greenlit Brands Pty Limited (Greenlit Brands), the principal governing body for Greenlit Brands. This statement was approved by the Board of Directors of Greenlit Brands for Greenlit Brands and for each of its subsidiaries that are covered by this statement. This statement was originally approved without this paragraph on 30 March 2021 and was re-approved with this paragraph included on 30 June 2021.



Michael Robert Stransham Ford
Executive Chairperson and Group Chief Executive Officer
Responsible Member



Chris Burke
Plush - Think Sofas Pty Limited



Philip Tyler
G&G Furniture Import Pty Limited



George Giannopolous
FutureSleep Pty Ltd



Kieron Ritchard
Fantastic Furniture Pty Limited,
Fantastic Holdings Pty Limited, FHL
Distribution Centre Pty Limited



Wayne Twigge
Unitrans Asia Pacific Pty Limited



Ian Vann
Original Mattress Factory Pty Limited



Simon Beaty
Snooze Management Pty Ltd



Nick Spanos
FutureSleep Pty Limited



Blaine Callard
Freedom Furniture Australia Pty Limited

