

MYER

Myer Holdings Limited (ABN 14 119 085 602)



Modern Slavery Statement
2022

MY STORE

Contents

About Myer 3	Our Operations 4	About Myer	3
Our Risks 7	Due Diligence 10	Our business & supply chain	4
Effectiveness 16	Our Plans 18	Our modern slavery risks	7
		Our actions and response	10
		Measuring effectiveness	16
		Our FY23 plans	18
		Consultation	19
		Modern Slavery Act reporting criteria	20

About this Statement

Myer Holdings Limited (ABN 14 119 085 602) is listed on the Australian Stock Exchange (ASX: MYR), registered at Level 7, 1000 La Trobe Street Docklands Victoria 3008. This modern slavery statement (statement) is made under the Commonwealth Modern Slavery Act 2018 (Cth) and covers all entities within Myer Holdings Limited including Myer Pty Limited, sass & bide Limited and Marcs David Lawrence Pty Limited for the period 1 August 2021 to 30 July 2022 (the reporting period or FY22).

References to "Myer, we, our or us" in this Statement refers to Myer Holdings Limited.

Any forward looking statements are based on current knowledge and assumptions that may exist and affect the Myer business and its operations in the future. Myer does not give any assurances that the assumptions will prove to be correct as these statements may be affected by a range of variables which may alter the actual results, performances or achievements to be materially different from the relevant statements. Readers are cautioned not to place undue reliance on forward-looking statements. Except as required by applicable laws and regulations, Myer does not undertake to publicly update, review or revise any of the forward looking statements or to advise of any change in assumptions on which any statement is based. Forward looking statements do not represent guarantees or predictions of future performance and equally past performance cannot be relied on as a guide to future performance.

Acknowledgement of Country

In the spirit of reconciliation, Myer acknowledges the Traditional Custodians of country throughout Australia and their connections to land, sea, and community. We pay our respects to their Elders past and present and extend that respect to all Aboriginals and Torres Strait Islander people.

About Myer



Myer is Australia’s favourite and most trusted department store, placing customers first in every decision we make and every action we take. Our values inform the behaviours and decisions of our team members and the way we do business. They reflect our commitment to ethical and socially responsible business practices.

Myer is an iconic Australian retail brand with a long and proud history supplying reliable and high quality products and services to Australians for over 120 years. We are a public company listed on the Australian Stock Exchange.

Our merchandise offer includes core product categories: womenswear, menswear, childrenswear, beauty, homewares, electrical goods, toys, furniture and general merchandise. The majority of Myer’s operations are in Australia and encompass Myer department stores, sass & bide and Marcs and David Lawrence. In addition to our Australian operations, we have a sourcing office located in Hong Kong.

Our workforce consists of over 9,000 Australian based employees across our support office, warehouses and retail stores; as well as contractors and agents engaged either by contractor or under award agreements.

Annual total sales ¹	Australia based team members	Overseas based team members	Total directly sourced suppliers	Total number of shareholders
\$2.98B	9,000+	53	245	41,271

Our key retail private brands include

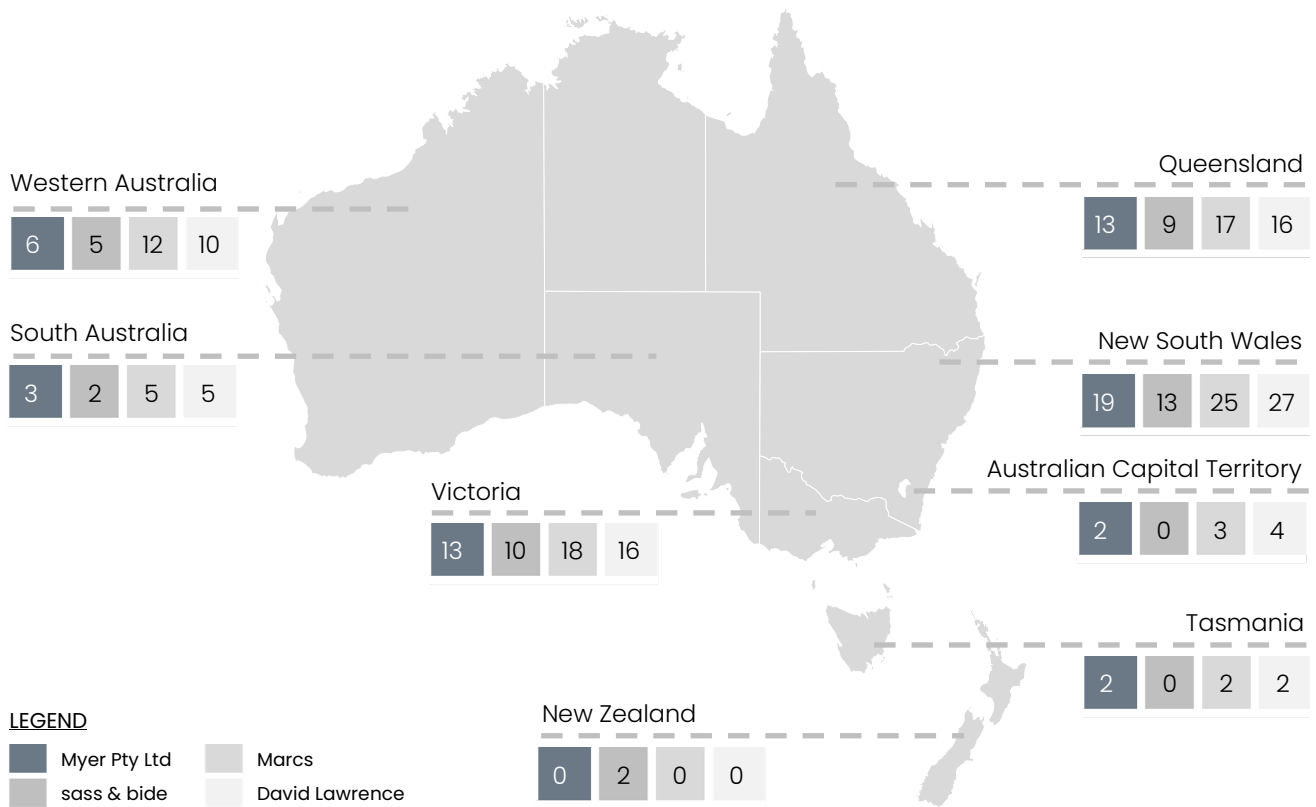
AH&G	Basque	Blaq	Chloe & Lola	David Lawrence	Heritage
Jack & Milly	Marcs	Milkshake	Miss Shop	Piper	Regatta
Reserve	sass & bide	Soho	Sprout	Tokito	Vue

¹ excluding concession sales and sales revenue deferred under customer loyalty program

Our business & supply chain

Myer is committed to ethical, sustainable and socially responsible procurement and business practices, which includes management of modern slavery risks and protection of employees and workers within our operations and supply chain..

Our retail store network encompasses 58² Myer department stores, 41³ sass & bide stores, 82⁴ Marcs stores and 80 David Lawrence stores across Australia, excluding the Northern Territory. Our retail network is supported by our Support Office based in Docklands. Each brand also operates its own ecommerce platform. We have a small sourcing office in Hong Kong which employs 53 employees across locations in China, Hong Kong, and a small number in India and Bangladesh for the purpose of quality control and assurance.



Our approach to modern slavery is company-wide, with a governance structure overseeing the management of modern slavery risks. The Myer code of conduct outlines the expectations of all team members including company directors. The code requires awareness of, and compliance with, laws and regulations relevant to Myer’s operations, including occupational health and safety and employment practices. The Myer Ethical Sourcing Program focuses on the identification, assessment and mitigation of modern slavery risks. Each team member of Myer has a responsibility to ensure compliance with our Ethical Sourcing Program with oversight by the Audit, Finance and Risk Committee of the Board.

The Myer Board is accountable for and approves the Myer Ethical Sourcing Policy and program framework, and through the Audit, Finance and Risk Committee of the Board, reviews and monitors effectiveness of ethical sourcing risk processes, activities and initiatives. The Executive Management team is responsible for the execution of the policy and framework in their area of responsibility. The Assurance team, reporting to the Chief Financial Officer, is responsible for the development, implementation and management of the broader Ethical Sourcing Program, including modern slavery initiatives.

² Exited Blacktown NSW store during the reporting period
³ Comprises of standalone and department store formats
⁴ In department store formats

The Myer Board and all levels of management are committed to good corporate governance that underpins our objective and values. The Chief Executive Officer is responsible for instilling a culture that aligns with Myer’s values and commitment to be an ethically and socially responsible business.

MYER BOARD

Responsible for overseeing the performance and operations of the company and approves the values and monitoring of compliance with code of conduct and ethical standards. Approves Myer’s Modern Slavery Statement

BOARD COMMITTEES

- Audit, Finance and Risk** risk management and financial reporting
- Human Resources and Remuneration** remuneration framework including executive pay, human resources issues, initiatives and schemes
- Nomination** new Board appointments, nomination criteria’s and succession

Procedures and practices are in place to ensure that the committees effectively communicate with each other for matters and areas of shared responsibility

POLICIES AND PROCEDURES

includes Code of Conduct, Ethical Sourcing Framework, Risk Management Framework, Whistleblower

EXECUTIVE MANAGEMENT TEAM REPORTING TO CHIEF EXECUTIVE OFFICER

Deliver strategic direction and objectives as approved by the Board

ASSURANCE TEAM

Oversees and responsible for the development, embedding and management of the ethical sourcing program, including modern slavery initiatives and company’s whistleblower program

BUSINESS AND FUNCTIONAL UNITS

Adhere, implement and monitor compliance with company policies and procedures

Our supply chain

Our supply chain operations are large and complex, and includes a diverse and multi-layered supplier network. Myer does not own or operate any factories that goods are manufactured, and as such relies upon supplier relationships and due diligence processes to ensure protection of workers and to provide transparency of operations. Our sourcing of products and services involves multiple suppliers and tiers of the supply chain. We have direct relationships with our tier one suppliers, however a tier two supplier will generally service or supply a tier one supplier. We continue to work collaboratively with our suppliers to understand and obtain transparency of the multi-tiered supplier network, and to ensure ethical sourcing requirements including remediation activities are met and operations are continually improved upon.



Our supplier chain can be categorised as merchandise (goods for resale) and non-merchandise (non-trade). We source an extensive range of goods for resale. Goods for resale include those made from proprietary suppliers labelled with a trade mark not owned by Myer, as well as goods from suppliers who produce Myer private brands. In the case of branded merchandise such as National Brands and Brand Partner, we do not own or control the manufacturing of these products however these suppliers are contractually bound to adhere and follow Myer processes and procedures including modern slavery. This applies regardless of whether these suppliers are required to report under Modern Slavery legislation.

Supplier Type	Description
Private Brands	Myer owned brands manufactured under a Myer owned trade mark
National Brands	Branded suppliers with local and/or international proprietary rights for resale by Myer where trade mark is not owned by Myer
Brand Partner	Licensed suppliers selling branded products owned by the licensed business, operating a store-in-store business within Myer stores
Non-Merchandise	Goods and services not for resale to customers, and are engaged to support our operations such as packaging, transportation, visual merchandising materials and equipment, security, cleaners and other professional services

Our modern slavery risks

Modern slavery is a severe violation of human rights and relates to situations where a person is coerced into work and exploited for personal or commercial gain. It also includes conduct that undermines workers right to freedom and includes offences such as forced labour, child labour, servitude, debt bondage and deceptive recruitment.

Our ethical sourcing program has been in place for over 15 years and governs the sourcing, manufacturing and supply of products. Our supplier code of conduct aims to protect workers' rights, the environment and strengthen our supplier relationships through our commitment to traceability, transparency and sustainability. We take a risk based and cross-department approach in ensuring and assessing our operations and supply chain risks. Due to the complexity of our supply chain network, there is a potential exposure of human rights and modern slavery risks.

We recognise modern slavery cannot be addressed in isolation, and appreciate that as supply chains evolve our modern slavery risk profile may change. As a result, our ethical sourcing program and supporting governance practices are adaptable to meet challenges and changing conditions. We assess our modern slavery risks in our operations and supply chain using a variety of references and tools, and consider a number of factors to identify and assess areas of focus and priorities.

We monitor modern slavery risks through ongoing assessments including third party audits, engagement with industry peers, supplier questionnaire, grievances or enquiries raised, industry trends, media reports and through collaboration efforts.

Our internal business units and departments continually monitor relevant risks in order to maintain a risk profile, prioritise efforts and to validate existing controls. Our buying, ethical sourcing and procurement teams work closely to monitor new and existing suppliers to ensure the risk profile is maintained or reduced.

Ongoing risk assessments allow us to better understand areas of focus and priorities. These assessments consider the relevant changes both internally and externally, accounting for the nature of the relationship with the supplier and its network, the type and spend of goods or services, the geographic location, the level of human rights protection and vulnerability, reliance on low-skilled labour or migrant/temporary workers and the ongoing monitoring of reputable media reports. They review not only possible modern slavery risks but also general human rights issues and assess the adequacy of controls. In the reporting period, we did not have any instances of modern slavery within our operations or supply chain reported.

All countries in which private brand manufacturing takes place have undergone a risk assessment and been approved by our risk framework. No new sourcing country can be used without a prior risk assessment completed. This country risk profile is based on a number of social and economic indicators such as ILO Rights and Protection Index, OECD, Corruption Index etc. which considers geographic risk factors such as where there is a weak rule of law, large migrant worker populations or weak workplace laws.

Our risk assessment identified the key risks to our operations and supply chain, and areas of focus

Forced labour

Where a person is forced or coerced to work against their will and restricted in movement under threat or punishment, for no or very little pay.

There is a risk that forced labour could exist in our extended supply chain in manufacturing and raw materials

Child labour

Where a child is exploited for personal or commercial gain, and exposed and required to work in hazardous conditions or the work is harmful to the child's physical and mental development.

There is a risk that child labour could exist in our extended supply chain in manufacturing, inputs production and raw materials

Bonded labour

Where a person is required to pay debts (such as from recruitment fees) to their employer or recruiter. Workers are often bound to the employer until the debt has been paid and in most instances such debts are extremely difficult to pay off.

There is a risk that bonded labour could exist where subcontracting occurs or in areas where low skilled or migrant workers are employed. Migrant workers are generally at higher risk of exploitation due to lack of knowledge of local laws, reluctance to raise concerns or questions for fear of losing their job or facing deportation and possible better condition compared to their home country or area

Deceptive recruitment

Where a person is enticed to work using false or deceptive practices about the details and working condition of a job, and is later left in a vulnerable position once employment has commenced.

There is a risk that deceptive recruitment could occur where third parties use to recruit workers, particularly vulnerable workers such as migrant workers, undocumented workers or workers from areas with high unemployment or poverty

Our risk assessment identified risk areas that modern slavery may exist across operations and supply chains



Manufacturing

Factory workers may be forced to work excessive hours without pay, work in poor conditions impacting their health and unable to leave the premises



Raw Materials

Forced labour and child labour could be present in the production or harvesting of raw materials such as cotton, timber and minerals



Non-Trade Services

Migrant workers engaged may not understand their rights and have their identity documents or passports confiscated and be subject to forced or exploited labour through deceptive recruitment or debt bondage

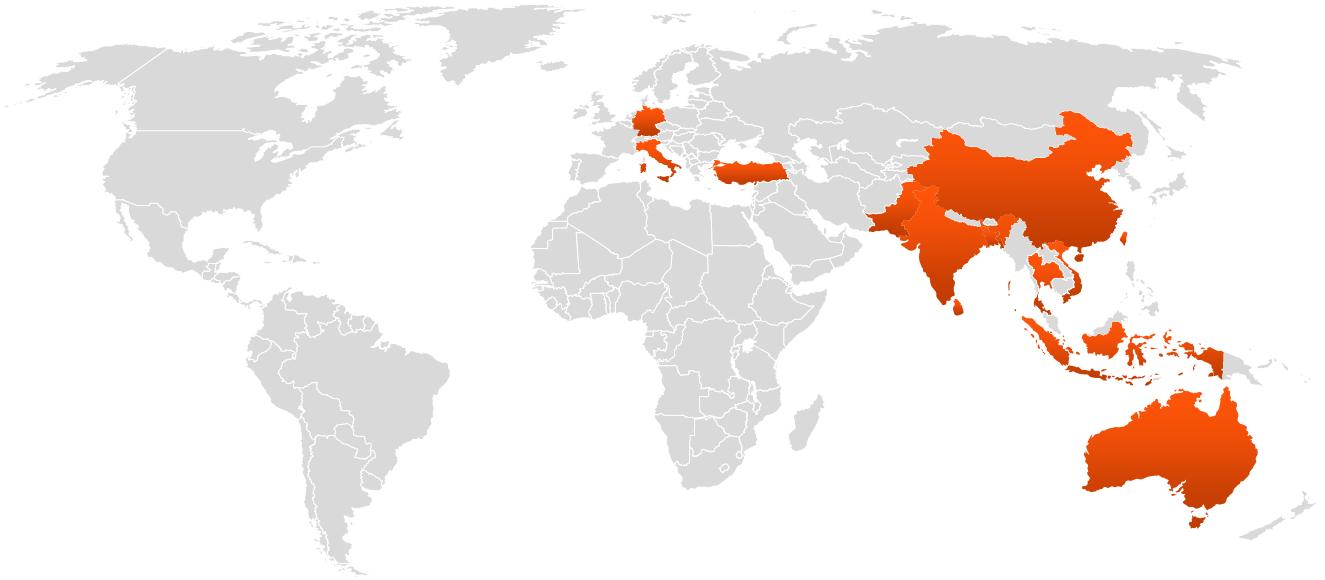
Given the varying merchandise groups we have and to ensure ongoing transparency of our operations, we review our suppliers modern slavery statements as they provide information that may assist us in better understanding possible modern slavery risks and actions taken by the supplier to manage the risks.

Private Brand suppliers

Myer currently engages 245 private brand textile and manufacturing suppliers in over 350 factories across 15 sourcing countries. Private Brand suppliers are suppliers that present the greatest risk as the product is manufactured directly for Myer, providing increased leverage and influence to identify and remediate non-conformances. During the reporting period, our supplier base continues to be consolidated to a smaller number of countries and suppliers in order to provide greater influence and importance of each of our suppliers and their factories. This also includes ensuring that Myer's requirements are met and assured throughout their operations, fostering a better relationship with final production suppliers and allowing for greater information shared with regard to mills and raw materials. We are committed to continuously improving the transparency of these tier one private brand suppliers, as we recognise this is an important component of our ethical sourcing program.

Visibility and transparency into operations beyond tier one can present challenges. Myer continues to work closely with our private brand suppliers to maintain and expand visibility beyond tier one of our supply chain. While we have started mapping areas of our supply chain beyond tier one, we are working to further build our understanding of potential modern slavery risk areas deeper into our supply chain.

Products were sourced from 15 countries, with our concentration of tier one sourcing locations as below



Top 4 countries (based on spend)

China	India	Bangladesh	Vietnam
79.7 % of purchases	10.6 % of purchases	3.7 % of purchases	2.1 % of purchases
Active factories - 250	Active factories - 45	Active factories - 8	Active factories - 10
Key merchandise - Apparel	Key merchandise - Home	Key merchandise - Apparel	Key merchandise - Home

Whilst we have a clear understanding of the final stage of our production (tier one), currently audits are not common for raw materials and inputs (ie. mills) suppliers. In such instance, we utilise the supplier questionnaire and through discussions seek to understand their operations and processes to ensure compliance with our requirements. Contractual arrangements are generally between final stage production and Myer. Additional diligence and validation processes are consistently being explored to ensure transparency and supply chain is free from modern slavery.



Our actions and response

Myer's Ethical Sourcing Program is in line with global best practice, and standardises our approach to responsible sourcing, ethical business practices and workplace safety. Ethical sourcing is a core element of our development process for private brand merchandise.

Throughout the year, we have worked to improve our program and implemented a number of actions to manage our modern slavery risks. We continue to further refine our response to risks identified specifically to trace the supplier network beyond tier one. Our ethical sourcing program is designed to assess supplier compliance with our ethical sourcing policy by applying additional due diligence and monitoring activities in high risk areas of our supplier chain where we have the greatest influence.

Our Policies

Our governance structure and policies provide the foundation for our response to modern slavery as they establish clear responsibilities for managing modern slavery risks across our business and assists us in taking a consistent and coordinated approach.

All team members including executive management and Directors are expected to demonstrate high standards of business conduct as outlined in our code of conduct. All team members must undertake mandatory periodic online refresher training on the Code of Conduct. Our suppliers must adhere to our Ethical Sourcing Policy, which was developed in line with internationally recognised labour standards such as the Ethical Trade Initiative (ETI) and best practice guidance.

Our Ethical Sourcing Policy is applicable and communicated to both merchandise and service suppliers prior to onboarding, and alongside our Whistleblower Policy and Supplier Code of Conduct is available in English and Chinese where the majority of our private brand manufacturing occurs. This Policy articulates our expectations for our suppliers in relation to ethical practices including modern slavery, labour rights and broader human rights. It also outlines a number of key labour indicators such as wages and benefits, working hours and discrimination, and our zero tolerance stance on forced and child labour, bribery, and effects on the environment.

Our current trading term agreements for both merchandise and procurement functions contain modern slavery specific provisions in the contract precedent, and requires all suppliers to agree and adhere to the sourcing policy, and comply with all modern slavery laws and regulations and have appropriate controls in place to identify and manage slavery practices. We require all suppliers to ensure that the standards outlined in the policy is integrated into contracts and applied to approved subcontractors and their supplier network engaged within their own supply chain.

We aim to work collaboratively with suppliers to assist them to comply with our Ethical Sourcing Policy. Where breaches of the Policy are identified for an example through audits, Myer will engage with the supplier to understand the cause of the issue and the actions being taken to remedy the breach. Myer reserves the right to suspend orders or terminate the relationship if a breach of our policy is identified and the supplier is unwilling or unable to take appropriate action to remedy the breach.

Audit and remediation

Our diligence process ensures that prior to onboarding or awarding of a contract, all Private Brand suppliers are assessed against our risk framework, as well as those suppliers seeking renewal. Suppliers are required to provide a valid third party social compliance or ethical audit report for each factory that will be manufacturing Private Brand products. These due diligence checks include a factory audit assessment of working conditions, wages and working hours, building safety and business practices and operations. Suppliers located in extreme risk countries, as rated against Myer's country risk profiling, require an audit

every 12 months, and those of lower risk every two years. Myer understands the operational and financial impacts of the audit process, and therefore offer mutual recognition of audits.

Tier one Private Brand suppliers remain a key focus of our social compliance audit program, as these suppliers manufacture directly for Myer, which allows for greater leverage to influence and remediate non-conformances.

Myer assesses factories against a set of principles utilising the key criteria's of the Ethical Trade Initiative (ETI), which ensures at a minimum, that all Private Brand suppliers have management systems in place covering all factories. It also includes a requirement to recognise the rights of all workers and to treat them with dignity and respect, providing them an environment that is free from discrimination, abuse and harassment, and is considered in line by international community standards. In addition all workers must be protected against forced or child labour, be compensated fairly for their work, and be allowed freedom of association and the right to collectively bargain.

During the reporting period, Myer reviewed audits from 201 suppliers across 326 factories. Our review identified no zero tolerance issues and 64 high risk issues, which primarily related to excessive overtime hours and working conditions. Myer continues to support factories and suppliers to address any non-conformances as our preference is continued business and an ongoing relationship with suppliers to ensure labour and worker rights are met. Alternative sources of supply will only be sought where it is evident a supplier is unwilling or unable to adequately remediate concerns. Suppliers with high risk issues have co-operated with remediation actions.

A breakdown of audit review of our top four sourcing countries:

China	India	Vietnam	Bangladesh
Social compliance audits reviewed for 250 factories employing 55,928 workers	Social compliance audits reviewed for 45 factories employing 14,194 workers	Social compliance audits reviewed for 10 factories employing 4,590 workers	Social compliance audits reviewed for 8 factories employing 20,316 workers
Primary issue is excessive overtime	Primary issue is working conditions	Primary issue is working conditions	Primary issue is working conditions

Suppliers must close non-conformances rated as high within the timeframe they have agreed with the auditor. The supplier must be able to demonstrate that appropriate corrective actions have been implemented. Where a supplier has not complied with the requirements, Myer will work with the supplier to understand the reason remediation was not achieved and the suppliers action to address the issue. If the supplier does not address the issue in line with the timeline agreed and after successive notices, orders from the supplier may be suspended or the supply arrangement terminated.

Independent ethical audits include private and confidential worker interviews. These interviews include questions explore labour risk areas such as recruitment fees, holding of personal identity and passport documents, housing arrangements, freedom of movement, right to grievance or complaints process and deductions of wages and benefits. Auditors also assess other potential modern slavery indicators through document reviews and site tours.

Wages and benefits

We support and are committed to working towards living wages, freedom of association and collective bargaining, which includes promoting worker opportunities to receive a fair wage. As part of our commitment, we continue to work on improving our purchasing practices and ethical sourcing standards to assist suppliers towards paying a living wage for factory workers and create long-term and sustainable relationships.

A key pillar of our program focuses on promoting and encouraging worker empowerment. Myer has and will always encourage factories to pay at the outset the minimum wages governed by local or national laws and regulations of the country of operation, and adequate wage for the work that is being done in compliance. This includes being paid correctly in line with entitlements and fair in relation to their position within the organisation.

We understand that our purchasing practices can have a direct impact on the wages earned by our suppliers' worker. As a result, we provide training to our buying teams so that they incorporate ethical sourcing and sustainability criteria's into their business decisions. We commit to supporting our factories by providing training on the importance of paying fair living wages and what it means for their workers. Our audit program also assesses and asks factories to establish a living wage calculation.

In the reporting period, we undertook a wage gap analysis to understand the disparity current worker wages and a living wage for where we manufacture with the view to work with our suppliers to assist them towards paying a living wage and help mitigate some of challenges associated with paying a living wage.

Myer acknowledges that the payment of wages and the continued improvement of wages and working conditions cannot be achieved in isolation, and places a strong emphasis on working with other retailers and non-government organisations to enact change, for an example the development of a consistent and agreed benchmark to determine a living wage. Myer is open to NGOs lobbying with respective governments to ensure that base wages are fair, in line with the work being conducted.

Remediation

In line with our Ethical Sourcing Program, Myer supports and monitors factories to ensure that the required corrective action plans have been put in place to address non-conformances. It is our preference to work with the supplier to address these issues to foster a positive and ongoing relationship with suppliers; with alternative sources of supply only sought where it is evident a supplier is unwilling or unable to adequately remediate concerns.

Where issues such as forced or child labour are found through our audit program, Myer has stringent remediation processes in place. The process sets a minimum action plan (phased approach), with additional actions required as determined by the nature of the case. In all instances the interest of the victim is paramount and tailored to the specific needs of the victim. Child services and local authorities may be consulted to complement Myer's framework. The remediation process includes immediate actions such as removal of the victim from all work and ensure victim is in a safe place with basic needs such as food, accommodation and payment of stipend is in place. Contact and open dialogue with the victims' parent or caregiver is essential, particularly to ensure that the victim is aware of what is happening.

A responsible person is assigned to ensure the remediation plan is tailored to the requirements of the case, the required stakeholders are involved with clear roles and responsibilities and overall management of the case. The responsible person also manages the investigation into the specific circumstances of the case, the safe return of the victim to their home and ongoing follow-up and monitoring of the victim to ensure the welfare of the individual. In the case of child labour, the ongoing monitoring of the child's progress at school until the child reaches working age. Depending on the nature of the case (with all actions needing to be proportionate the case and issue), remediation plans are developed in consultation with relevant stakeholders such as local authorities, protection specialists, relevant reputable local NGOs and with the victim and/or their parent or caregiver. The remediation plan incorporates requirements and best practice from industry guidance on operations practice and indicators of forced labour, UN toolkit to combat trafficking on people, ETI base code guidance, and many other relevant resources.

Team Member training

We provide training to our team members to support our work to manage modern slavery risk. Training remains a key focus, as we recognise the importance of equipping our employees with the tools and knowledge to identify and mitigate modern slavery risks across the supply chain. This year, our sourcing team conducted targeted team member training to those groups classified as of a higher risk of encountering modern slavery, and considered critical in our response. Training was also provided to our sourcing office team members, with the requirement for them to train and coach private brand suppliers and their factory management and workers.

The key outcomes of this training were:

- Defining modern slavery and its forms
- Explanation of the Modern Slavery Act
- Myer's modern slavery risks and focuses
- Due diligence and actions taken by Myer to mitigate these risks
- Employees role in achieving the roadmap
- Signs and red flags of modern slavery
- Practical advice on what to do if modern slavery is suspected

Targeted training

In order to address the risks outlined in our risk assessment, employees with a higher degree of responsibility as to our areas of risk were prioritised for target modern slavery training, this was in addition to general Modern Slavery training. During the reporting period, we trained our priority team members from our merchandise buying, procurement, and supply chain and recruitment departments.

Merchandise training centered on the role buyer's play in ensuring their sourcing and purchasing practices are in line with business expectations, which includes ensuring that critical paths consider the impacts on suppliers, safeguard on time delivery and minimise pressure on factories. In addition, training explored common human rights issues affecting the manufacturing industry today, including case studies on modern slavery in developed economies, and cotton production in Xinjiang, Uzbekistan and Turkmenistan. In addition, a copy of our purchasing and sourcing practices and requirements including modern slavery risks is available on our internal online merchandise hub.

Training for those within procurement, supply chain and recruitment roles focused on risks associated with complex supply chains in both Australia and overseas, subcontracting, and the exploitation of migrant workers in Australia in industries typically associated with these departments such as cleaning, security etc.

Tracing & transparency

We continue work to gain greater visibility of our extended supply chain, including inputs, processing and raw materials suppliers. Whilst we have coverage of our final production tier (tier 1), or those we deal with directly, we continue work to gain improve transparency of our supply chain beyond tier one. During the reporting period, we made significant progress in key commodity areas such as cotton, and we continue to evolve our approach based on findings.

Myer acknowledges the challenges heightened risk of sourcing locations of a number of raw materials, particularly cotton, which is an industry with well-known human rights abuses in the farming harvest of stages of production.

Cotton is one of Myer's primary raw materials, and as such presents a high risk of exposure to modern slavery risks in the supply chain. We are exploring avenues to gain a greater understanding of the complex cotton supply chains that exist in our operations, in order to improve our understanding of the sourcing location of cotton used in Myer products.

We prohibit the sourcing of cotton from where there are known or reported human rights abuses such as Uzbekistan, Turkmenistan and the Xinjiang province in China. Our modern slavery questionnaire validates this prohibition, and directly calls out these regions to identify if our suppliers or any of their suppliers, including contractors, employ workers from these regions. In addition, we ask suppliers how they ensure that raw materials sourced and used are from the specified region declared to Myer, to ensure that cotton being used in our products is not coming from prohibited regions.

We are constantly monitoring news and human rights reports to ensure the regions in which we source raw materials are not known to have human rights abuses, and we are open to any opportunities that will allow us to gain greater transparency over our cotton supply chain.

Supplier Questionnaire

Our Modern Slavery Supplier Questionnaire assists us in understanding our extended supply chain to assist in the categorisation of human rights risks. Questions focus around general policies and procedures in place, knowledge of migrant workers and global risks, as well as seeking information on raw materials used and sourcing locations.

Consistent with our risk assessment, this questionnaire was delivered to all private brand suppliers and their factories for completion. As approximately 80% of our supplier base is in China, this questionnaire is available in Chinese and English.

This questionnaire assists us in moving beyond tier one of our supply chain, as it has provided us insight into the inputs and raw materials stages of our suppliers. This has validated our prohibition on the use of cotton and or raw materials from the Xinjiang, Uzbekistan or Turkmenistan regions.

The questionnaire was incorporated into the onboarding process to capture any new suppliers, ensuring that no suppliers are brought on without adequate processes in place to mitigate modern slavery and to trace their supply chains. Where responses provided to the modern slavery or prequalification questionnaires are identified as presenting a risk, the diligence process may require further assessments and or continuous monitoring as a requirement of on boarding. We continue to work back with our suppliers to understand potential risk areas and or areas for improvement. No instances of modern slavery have been found through the Questionnaire.

Non-merchandise suppliers

In line with our risk assessment, procurement and non-merchandise suppliers were categorised as presenting a higher risk of modern slavery, due to these industries typically employing 'low skilled' workforces, typically migrant workers who are unaware of their rights and entitlements under Australian law. In addition, these industries are prone to subcontracting, which presents a risk in Australia as these suppliers remain unknown to Myer. Due to this, the Questionnaire was included as a pre-requisite to the tender process. No suppliers and their subcontractors can be on-boarded without successfully completing the Modern Slavery Questionnaire, and providing sufficient information on their policies, procedures, and appropriate knowledge of their supply chain.

This Questionnaire is in addition to the pre-existing procurement prequalification questionnaire process, which requires service providers to provide internal policies and procedures, and independent site audit reports.

Grievance Processes

We support open and transparent working relationships where concerns can be safely voiced. We encourage stakeholders to report any suspected unethical, illegal, fraudulent or undesirable conduct within our operations and supply chain, including suspected modern slavery and other adverse impacts on people, communities or the environment. We have established grievance mechanisms to enable the identification of modern slavery and other human rights harms and facilitate their appropriate remediation. These mechanisms are open to all affected persons and communities, including our team members, contractors, suppliers and workers in our supply chain. Importantly under our ethical sourcing policy we also require supplier to provide appropriate channels for worker and community grievances, including an anonymous, confidential method for all workers to raise concerns to the supplier without fear of retaliation. These channels are expected to be effectively communicated to workers, and available in local language.

We recognise the importance of providing all workers within the global supply chain the opportunity to speak up and have their concerns heard. This includes all those who are direct or contracted suppliers of Myer. Accordingly, we have a number of reporting mechanisms in place to allow workers the opportunity to raise possible modern slavery and human rights issues in their local language and with anonymity assured. We provide an alternative grievance mechanism, which allows workers to scan a QR code on their smartphone to raise an issue confidentially and if they choose, anonymously to Myer. This process utilises a process familiar to workers (e.g. WeChat in China) and allows them to report the issue when convenient to the worker i.e. a quick scan for contact later. WeChat.

This mechanism continues to be available and communicated to suppliers as part of a Supplier Code of Conduct, a summary of our Ethical Sourcing Policy and program through a poster to be displayed on the walls of the factory. This code of conduct was delivered to all private brand factories and was translated into Chinese for distribution. This poster is also available on the Myer Supplier Website.

Where issues are raised and validated, we will take appropriate action, including involving external agencies where necessary. It remains imperative that the welfare of the worker is protected in all instances; as such, we will seek to understand and prioritise their individual's needs and ensure appropriate remedy is provided. To date, no instances of modern slavery have been reported through the mechanism.

In addition to this grievance mechanism, the Myer Whistleblower hotline is available to all those within our supply chains (in Australia and overseas) and is operated independently by a third party, which assures anonymity. Where issues are investigated and substantiated, we will take appropriate action, including involving external agencies where necessary for an example local government. In all instances however, we will seek to understand and prioritise the needs of the victim and ensure an appropriate remedy is provided.

Collaboration

Collaboration forms a key part of our modern slavery program, as we acknowledge that the complex goals cannot be achieved in isolation. A number of our internal business units work together to ensure our program is effective in identifying and mitigating human rights risks, including those across our procurement, merchandise, finance and ethical sourcing functions.

In addition, Myer works alongside other retailers and non-government organisations to share information, improve our knowledge and validate actions with regard to modern slavery. Over the year we continue to participate with a number of organisations such as the National Retail Association (NRA) Modern Slavery Committee and the Australian Retailers Associations Sustainability Workgroup. Open discussions in these groups centre around sharing best practice, and the development of systems to achieve mutual goals and to avoid duplication of work, particularly that which places the compliance burden on supplier.

Myer remains open to working back with retailers, non-government organisations and multi-stakeholder initiatives, which promote collaboration to achieve outcomes.

Measuring Effectiveness

We acknowledge the importance of assessing the effectiveness of our actions to manage and mitigate risks of modern slavery within our operations and supply chain. We continue to work to understand and track the effectiveness of our actions and performance through internal and external mechanisms. Our progress of key initiatives is monitored by the Assurance team and reported to the Board.

We are focused on continually strengthening our modern slavery response. In line with commitment we take a range of actions to assess the effectiveness of key aspects of our response.

ACTIVITY	MEASUREMENT
Governance	<ul style="list-style-type: none"> ▪ Board has oversight of the ethical sourcing framework ▪ Reviewed policy and procedures to evaluate that they are fit for purpose ▪ Employee code of conduct oversight ▪ Ongoing training to business employees ▪ Standard contract templates updated ▪ Supplier code of conduct delivered to all private brand suppliers ▪ Reporting and progress provided to Audit, Finance and Risk Committee and Board
Participation	<ul style="list-style-type: none"> ▪ Executive management and senior leadership engaged ▪ Acceptance of Myer contractual terms, specifically to comply with all Myer policies and standards ▪ All new and re-contracted suppliers have agreed to the Myer Ethical Sourcing Policy and Whistleblower Policy ▪ Consent from private brand suppliers to access factory sites ▪ Requirement for all private brands to complete the modern slavery questionnaire ▪ Engaged with industry stakeholders and peers - our risk management approach is validated against a broad network of stakeholders and external organisations, including other retailers, valued suppliers, investors, non-government organisations and human rights global benchmarking tools. In collaborating with a variety of external experts, our modern slavery approach was validated
Risk Management	<ul style="list-style-type: none"> ▪ Annual risk review and assessment to identify and validate risks ▪ Risk profiling and rating matrix refined ▪ over 700 employees trained ▪ Engaged high-risk suppliers, private brand and procurement suppliers. No concerns or issues were raised
Monitoring	<ul style="list-style-type: none"> ▪ Third party audits - findings from audits completed, including the number of corrective action plans or those considered to be high-risk or require immediate attention are used to establish potential indicators of modern slavery. Monitoring and benchmarking of suppliers assists to understand the extent our Ethical Sourcing Program is effective ▪ Modern Slavery Questionnaire sent to all private brand suppliers to assist in further risk identification and to validate risk assessment previously conducted ▪ Identification of at risk supplier through the supplier questionnaire, remediated through collaboration with supplier ▪ Identification of factory falsifying audit document, termination of factory ▪ Corrective action plans - 64 high risk issues were identified, most relating to excessive working hours. Detailed corrective action plans in place to address findings. We continue to work with suppliers to ensure that actions are implemented in a timely manner and are sustainable. We will terminate contractual arrangements where the supplier shows an unwillingness to remediate non-conformances identified

ACTIVITY	MEASUREMENT
	<ul style="list-style-type: none"> ▪ Site visits – supplier and factory onsite visits allows us to review processes and validate audit results and corrective action plans. Due to the pandemic, limited site visits were conducted in the reporting period ▪ Compare audit findings to assess trends to determined areas of focus ▪ Worker voices and engagement – no reported incidents of modern slavery or modern slavery like practices ▪ Remediation and management reporting of non-conformances identified through audit program or grievance mechanisms including confidential hotlines
Training	<ul style="list-style-type: none"> ▪ Regular training and capacity building for team members ▪ Targeted training delivered to key decision making and monitoring team members – providing insight into key modern slavery risks, how to identify red flags and how to mitigate these risks ▪ Sought feedback from participants to identify remaining knowledge gaps
Grievance mechanism	<ul style="list-style-type: none"> ▪ Worker voices are heard through our confidential and anonymous Whistleblower hotline. No reports of modern slavery or modern slavery indicators reported ▪ Additional grievance (contact) mechanism added, no reports of modern slavery or modern slavery indicators have been identified through the mechanism

Our FY23 plans

Myer is committed to continuous improvement of our ethical sourcing program and the actions we take to assess and address modern slavery risks with our own operations and supply chain. Over the next year we will continue to strengthen our approach to identifying, mitigating and remediating risks.

Our FY23 priorities are

- Continue to expand our human rights due diligence, particularly in non-merchandise and inherent risk areas such as cotton
- Undertake a detailed modern slavery risk management program review to assess effectiveness of actions and due diligence programs
- Continue to build capability through training and guidance material to raise awareness and to assist with identification of modern slavery risks and high risk areas, and how to approach those risks effectively
- Review remediation framework to ensure currency and effectiveness
- Review and enhance escalation pathways in relation to reporting modern slavery complaints and/or concerns
- Review and ensure that modern slavery risks continues to be integrated into enterprise risk framework
- Ongoing review and improvement of policies and procedures to increase effectiveness in managing modern slavery risks and to identify any gaps
- Strengthening partnerships through increased collaboration and continue to be an active member of industry networks and working groups
- Investigate opportunities to enhance worker voice approach and mechanisms
- Continue tracing and supply chain mapping beyond tier 1

Consultation

We take a coordinated approach to managing modern slavery risks across our business, including through consultation and collaboration.

All brands reporting into Myer Holdings Limited operate under a common and consistent governance framework to build expectations, raise awareness and approach in assessing and addressing modern slavery risks in our operations and supply chain. All brands share the same executive management team and have contributed to the framework and assisted in the drafting of this Statement.

This statement was reviewed and approved by the Myer Board

John King

Managing Director and Chief Executive Officer

Modern Slavery Act Reporting Criteria

This statement was prepared in accordance with the criteria set out in the Modern Slavery Act 2018 (Cth). The following table outlines where information related to each mandatory r

CRITERIA	RELEVANT SECTION IN STATEMENT
Identify the reporting entity	About this statement, About Myer, Our business & supply chain
Describe the structure, operations and supply chains of the reporting entity	Our business & supply chain
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Our modern slavery risks
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	Our actions and response
Describe how the reporting entity assess the effectiveness of such actions	Measuring effectiveness
Describe the process of consultation with any entities that the reporting entity owns or controls	Consultation
Provide any other information that the reporting entity, or the entity giving the statement, considers relevant	Our FY23 plans

MYER

MY STORE

Myer Holdings Limited
ABN 14 119 085 602
Level 7, 1000 La Trobe Street
Docklands Victoria 3008