

2025 Modern Slavery Statement



About this Statement

This Statement covers the activities of Winning Appliances Pty Limited (ABN 94 002 193 688), a company incorporated in Australia, and each of its related entities, including Appliances Online Pty Limited (ABN 19 151 833 546), Winning Services Pty Limited (ABN 34 152 213 039), Home Clearance Pty Limited (ABN 55 615 069 095), Andoo Pty Limited (ABN 49 115 622 172), Spence & Lyda Pty Limited (ABN 43 094 430 574) and ORA Restaurant Pty Limited (ABN 42 649 181 340) (collectively, the Winning Group) for the financial year commencing 1 July 2024 and ending 30 June 2025 (FY25 Statement Period).

This Statement sets our commitment to assisting in the prevention, response, and remediation of modern slavery in all business activities and within our supply chains. It outlines the steps we have taken to ensure compliance with the Modern Slavery Act 2018 (Cth) (MSA).

Speak-Up Hotline

Winning Group values the vigilance and feedback of our stakeholders to uphold our commitment to high standards of conduct and behaviour. If you have concerns about modern slavery or potential human rights issues in our operations or supply chain, we encourage you to reach out to us through our partner, Core Integrity. Your voice is important, and we are here to listen. You can contact us using the information below and can choose to remain anonymous when communicating with us.

Channel	Details
Web and Online	https://www.clearviewconnects.com/#/
Email	speakup@coreintegrity.com.au
Phone	1800 324 775
Mail	Speak Up, P.O. Box 730 Milsons Point NSW 1565



For more detail refer to our Whistleblower Policy which can be found www.winninggroup.com.au/speak-up-policy



Acknowledgment of Country

In the spirit of reconciliation, the Winning Group acknowledges the Traditional Custodians of Country throughout Australia and their connections to land, sea and community. We pay our respect to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today.

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A Message from our CEO

At Winning Group, our mission is to create the best experiences in the world, for the world - for our customers, our people, our communities, and the planet. Achieving our mission requires a deep commitment to understanding and addressing how our business and supply chains impact the people who make our work possible. That is why responsible sourcing and mitigating modern slavery risks remain a key pillar of our Sustainability Strategy.

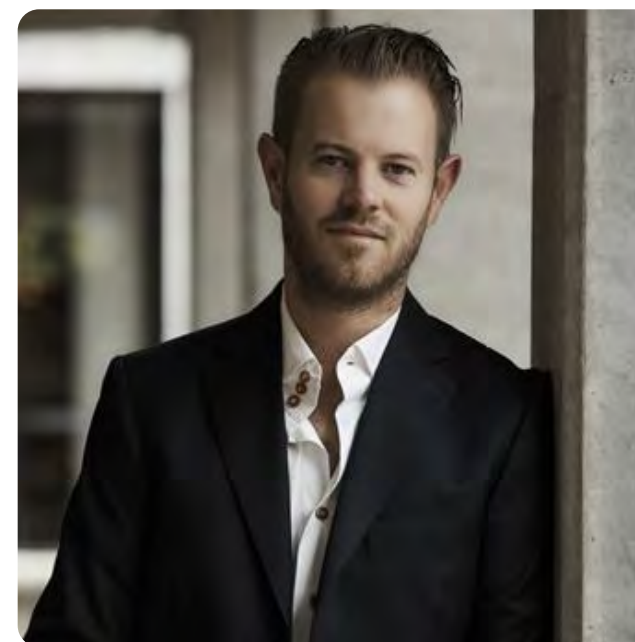
Our Modern Slavery Statement is more than just a reporting requirement under the Modern Slavery Act. We view it as a valuable opportunity to educate, inspire, and drive enduring impact. We welcome the Australian Anti-Slavery Commissioner's incoming recommendations to strengthen human rights due diligence and drive meaningful action.

During the period, we re-conducted our human rights and modern slavery risk assessment, reaffirming the crucial role our business and industry play in addressing these risks and protecting workers, particularly within our inherently high-risk electronics, bathware, and furniture supply chains.

In the past year, we have gained greater transparency into our own-brand supply chains by conducting independent third-party audits of our Tier 2 own-brand Rogerseller suppliers and are actively remediating any non-conformances. Guided by our risk assessment, we focused on engaging with our suppliers who source from our highest-risk geographies to ensure adequate due diligence measures were in place and undertaking capacity building where needed. We also continued to assess our new and existing suppliers through our Modern Slavery Self-Assessment Questionnaire (MSSAQ) and are pleased to have assessed 96% (by spend).

Equipping our team members, suppliers, and customers with knowledge is crucial for further embedding our responsible sourcing actions, mitigating risk, and driving impact. This year, we re-conducted training with our buying team to deepen their understanding of modern slavery risks and the importance of effective due diligence as we entered a phase of increased new supplier on-boarding. This correlated with a focus on capacity building with new SME suppliers, to ensure these suppliers had the knowledge and processes in place to manage the risks of modern slavery and sub-standard working conditions in their supply chains.

Winning Group remains committed to the highest standards of ethical and environmental responsibility. Together with our teams and supply partners, we will continue to strengthen our impact and use our business as a force for good.



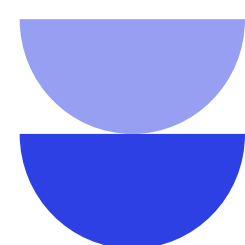
John Winning
CEO, Winning Group

Summary of Key FY25 Actions



Risk Management and Due Diligence

- Conducted an updated human rights risk assessment on trade and non-trade supply chain.
- Re-engaged with our suppliers sourcing from our highest risk geographies for forced labour.
- 100% of Tier 1 and Tier 2 high-risk own-brand suppliers have been independently audited.
- 96% of in-scope trade suppliers assessed against the MSSAQ.



Governance, Systems and Processes

- Monitored adherence to internal responsible sourcing policies and processes.
- Responded to our updated human rights assessment.



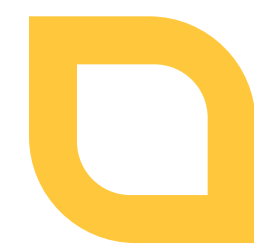
Continuous Improvement and Innovation

- 36% increase in sales of products featured in our 'Most Efficient Row' highlighting more water and/or energy-efficient product choices to customers, whilst incentivising suppliers to achieve a 'progress beyond general compliance score' in their MSSAQ.
- Increased opportunity for communication and promotion of sustainable attributes of brands and suppliers.



Training, Awareness and Education

- Delivered 1:1 capacity building with our SME suppliers.
- Customised training developed and conducted with buying, commercial and retail.



Monitoring and Reporting

- Published compliant FY25 Modern Slavery Statement.

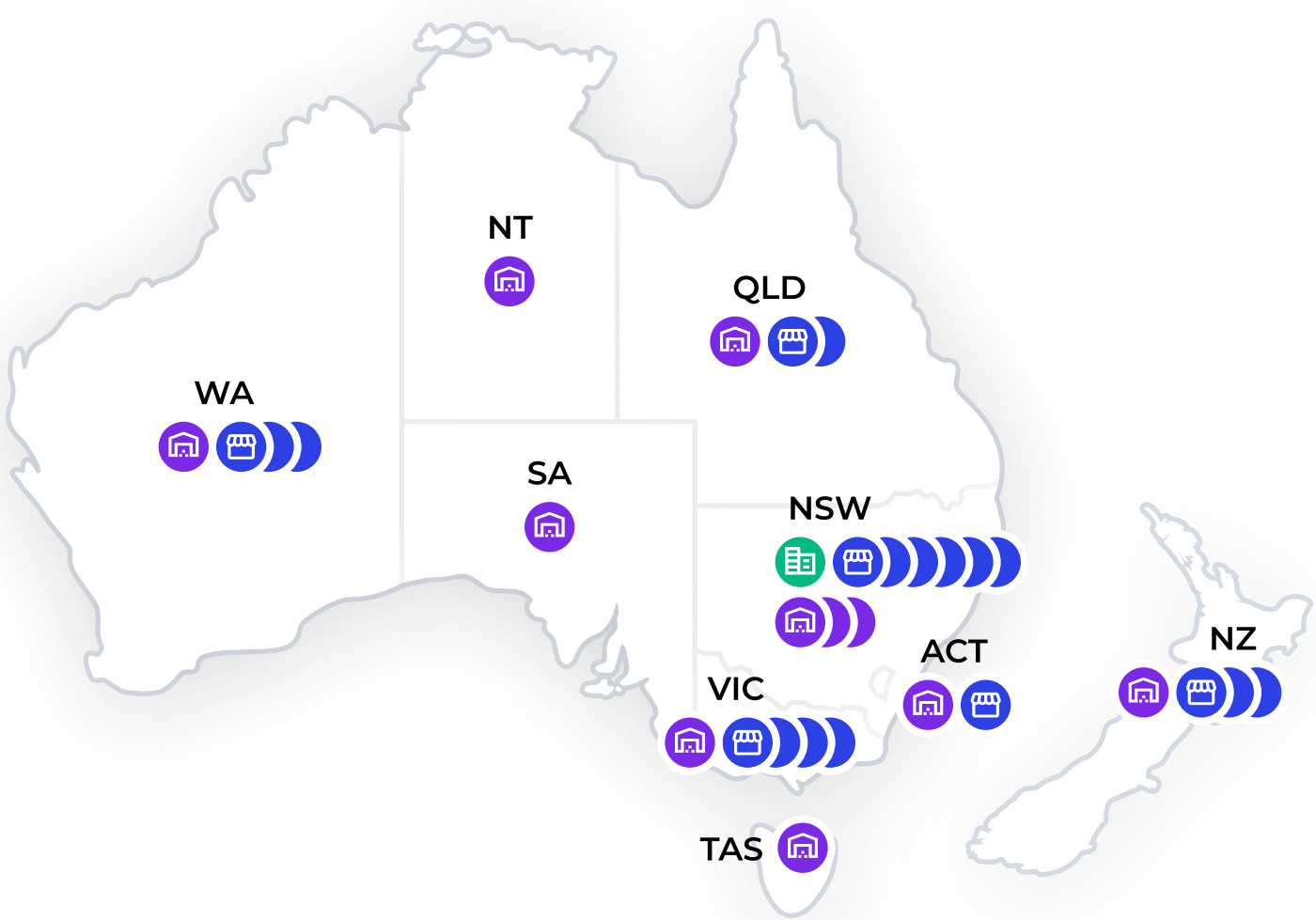
Our Structure, Operations and Supply Chains

The Winning Group is a family-owned Australian experience company, driven by people, science, and our mandate to leave the world a better place. Through its portfolio of retail and service brands, the Group sources, distributes, and sells household appliances, furniture, lighting, soft furnishings, bathroom fixtures, and homewares. Our brands operate through both physical retail showrooms and leading e-commerce platforms, supported by in-house logistics, warehousing, installation and customer care across Australia and New Zealand.

This diagram outlines the Group's key operating entities and their core activities during the FY25 Statement period:



Our Locations



- 1 head office
- 16 stores
- 847 employees. Full-time: 732, Part-time: 62, Casual: 53. Male: 538, Female: 309
- 2 country locations (Australia and New Zealand)
- 6 distribution centers and 5 hubs
- 189 contractors

Suppliers

- 1 Products we buy to resell
- 2 Products we buy to operate our business
- 3 Services we procure to operate our business

Operations

- 1 Head office
- 2 Retail stores
- 3 Distribution centres
- 4 Workforce

Customers

- 1 Retail customers
- 2 Commercial business customers

Supply Chain Mapping

In FY25, we had direct relationships with 230 active trade suppliers and procured goods not for resale and services from 1283 suppliers. Our trade supply chain accounted for 82.86% of our overall spend, and the services we procured accounted for 17.14%.

Trade Supply Chain

Our trade supply chain encompasses products sourced from suppliers for resale to customers. This includes a wide range of local and international brands, primarily in key categories such as appliances, consumer electronics, fitness equipment, furniture, and bathware. Our trade supply chain accounted for approximately 82.86% of our total FY25 spend. We can further segment our trade supply chain into wholesale and branded suppliers, versus own-brand and direct import supply chain arrangements.



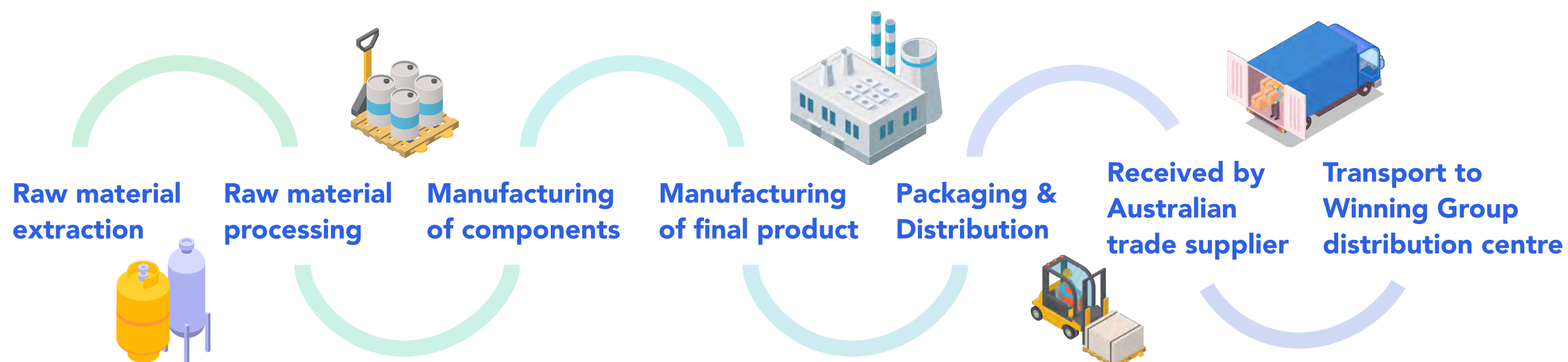
Wholesale and Branded Suppliers

99.65% of trade supply chain spend
226 suppliers



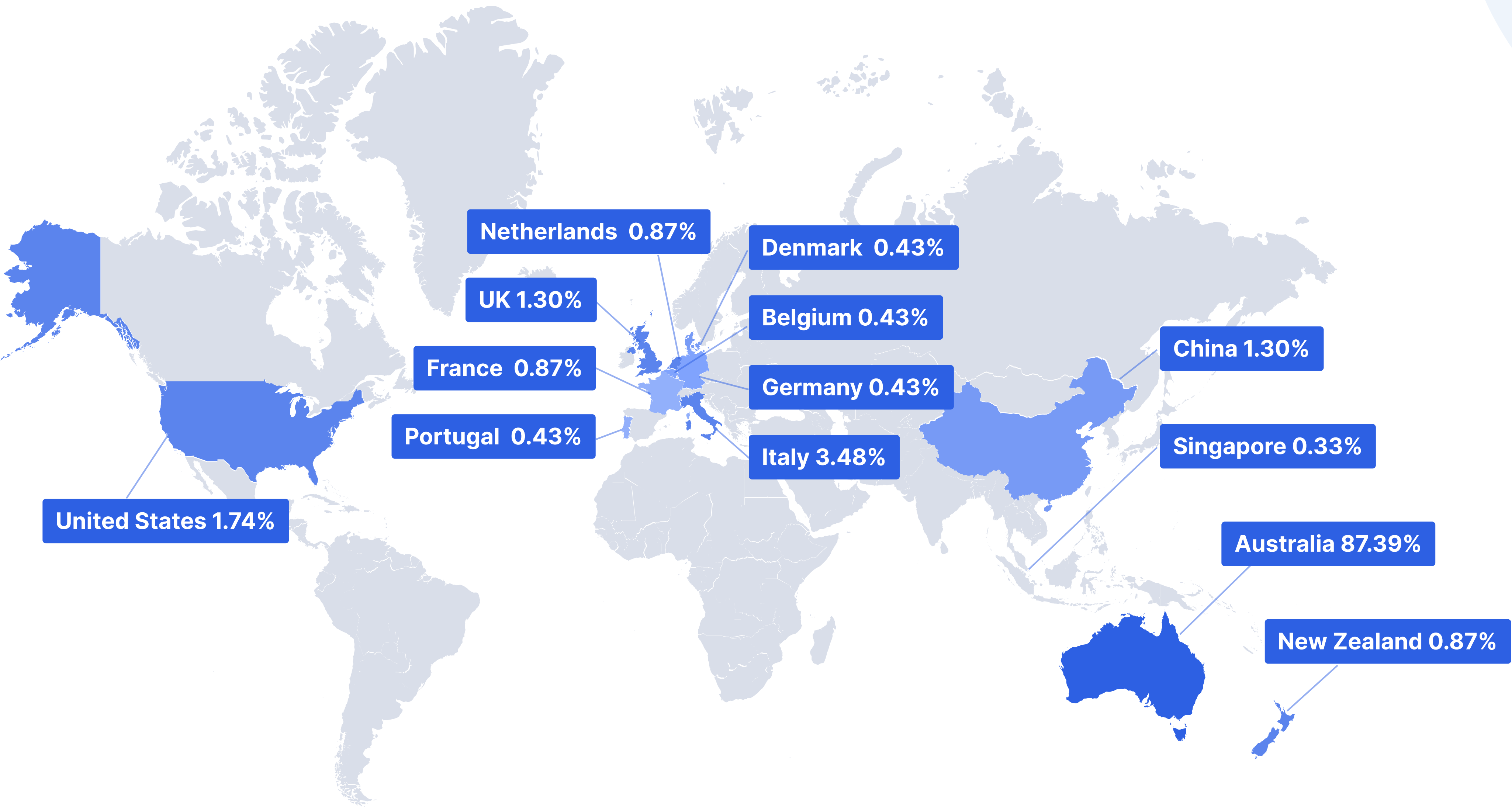
Own-Brand and Direct Import

0.35% of trade supply chain spend
4 suppliers

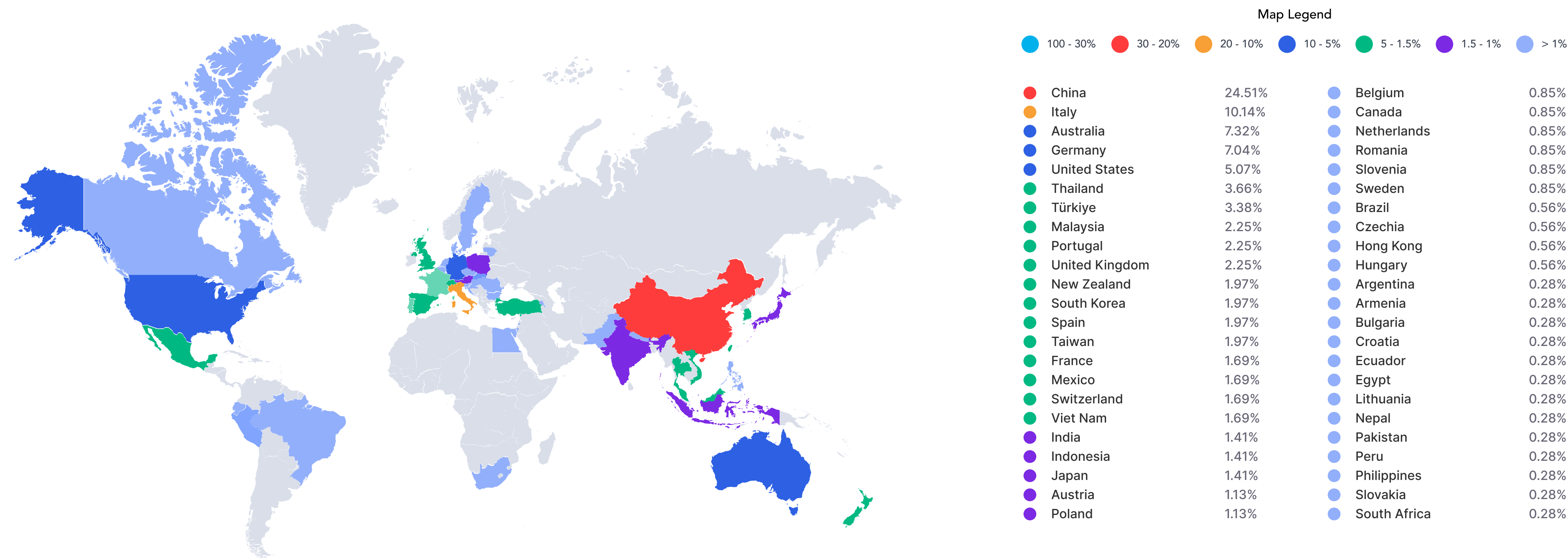


Tier 1 Supplier Locations

Winning Group contracts directly with suppliers located in:



Tier 2-4 Suppliers Locations



Non-Trade Suppliers

Our non-trade supply chain encompasses the goods and services purchased from suppliers that are necessary for operating our business but are not intended for resale. Our non-trade supply chain accounted for approximately 17.14% of our total FY25 spend.

1283 non-stock suppliers

Key Locations: Australia, United States, United Kingdom, Ireland, Netherlands, Spain

- Technology (hardware, software and cloud services)
- Property rental
- Financial Services
- Delivery and Install contractors
- Energy and Utilities
- Insurance
- Waste and recycling service providers
- Cleaning service providers
- Construction
- Office consumables
- Professional service and consulting
- Customer service repair agents
- Forklift and equipment hire

Our Modern Slavery Risks

Winning Group recognises that our businesses’ operations and supply chains are exposed to human rights and modern slavery risks that we may have caused, contributed to or may be directly linked to. We are firmly committed to conducting business in an ethical, legal and sustainable way.

The MSA is aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs), which have become the global standard for addressing and preventing human rights impacts associated with business activity.

The UNGPs set out three separate concepts, cause, contribute, and directly linked, which form guiding principles to assist companies in assessing their connection to a negative impact and subsequent duty to provide a remedy.

Cause

A business may cause modern slavery (or other human rights harm) where its actions or operations directly result in modern slavery practices.

We could cause modern slavery in a limited range of circumstances; for example, if we required young workers to engage in hazardous work or perform overtime hours.

We have internal human resources procedures and controls to ensure all Winning Group employees are subject to relevant awards or industrial instruments and subject to the National Employment Standards under the Fair Work Act 2009 (Cth). Wages and benefits meet or exceed all legal requirements.

Contribute

A business may contribute where its actions or omissions facilitate or incentivise modern slavery.

We could contribute to modern slavery if we placed unrealistic cost requirements or delivery timeframes on our services or goods suppliers, which would likely encourage the use of modern slavery practices, or if we knowingly ignored evidence that a supplier is engaging in modern slavery.

Our businesses regularly engage with our suppliers and maintain strong relationships. These relationships are pivotal to ensuring a continuous dialogue where practical expectations can be properly understood and addressed.

Directly Linked

A business may be directly linked to modern slavery through its services, products or operations. This includes situations where modern slavery may occur in a business’s extended supply chain.

The greatest risk of modern slavery for Winning Group sits with our extended supply chain. For example, the Winning Group could be directly linked to modern slavery if we were to purchase goods from a supplier with a manufacturing site that exploits its workers.

Aligned to the UNGP’s, we leverage our due diligence frameworks and supplier relationships to understand, influence and improve the actions taken by our suppliers to manage and mitigate modern slavery risks.

Risk Assessment Methodology

In FY25, our internal Sustainability Team re-conducted a human rights and modern slavery risk assessment across our operations and supply chain. The assessment followed the same core logic as our FY21 review, using a Social Life Cycle Assessment (S-LCA) aligned method to identify and evaluate inherent risks to people based on authoritative external datasets and internal procurement data.

Each category was evaluated against several dimensions:

- **Country risk:** using indices such as the Global Slavery Index, ITUC Global Rights Index, and UNICEF Child Labour Database to determine prevalence and governance context.
- **Sector and commodity risk:** assessing the likelihood of modern slavery by industry type and material input, informed by the NSW Anti-Slavery Commissioner's Inherent Risk Identification Tool 2.0 and other global datasets.
- **Business relationship profile:** assessing our proximity and leverage within the relationship and the degree of visibility and control we hold over procurement or contracting decisions.
- **Spend and scale:** weighting results by supplier spend and strategic importance to help prioritise engagement and due-diligence activities.

Quantitative data sets were supported by a literature review and qualitative insights from engagement with key suppliers, enabling cross-validation of results and improved visibility beyond our Tier 1 supply chain.

The FY25 assessment found that the overall risk profile of the Group remained broadly consistent with FY21, reflecting minimal changes in product range and supplier base. Persistent high inherent risk within key product categories, particularly electronics, furniture, and bathware, continues to reflect the complexity of extended global supply chains and the reliance on workforces in higher-risk geographies.

The results have been used to focus attention on areas where the severity and likelihood of harm to people are greatest, informing the design of due-diligence, supplier-engagement, and capacity-building activities.

Operational Risks

Winning Group maintains a low risk of modern slavery within its direct operations during FY25. Our workforce is predominantly based in Australia and New Zealand, where we uphold robust recruitment and onboarding processes. These processes are diligently implemented by our dedicated teams, ensuring compliance with all relevant laws and alignment with our company values and culture. By managing recruitment in-house, we can directly monitor, control, and govern the entire process. Furthermore, our expectations are reinforced through policies such as the Employee Code of Conduct, Equal Employment Opportunity, Recruitment Policy, and Speak Up/Whistleblower Policy.

While the risk of causing modern slavery in our directly controlled operations is low, we recognise a potential link to human rights issues within our operations due to subcontracted services. This covers services such as transport, logistics, and cleaning, including those that may be outsourced internationally. Such issues could encompass underpayment, indentured workers, and the exploitation of migrants in both contracted and subcontracted services, particularly in transport and logistics.

Supply Chain Risks

Our FY25 risk assessment highlighted that the greatest potential for modern slavery risk lies within the Group's trade supply chain, which accounts for approximately 99.65% of total spend. The assessment confirmed persistently high inherent risk across several product categories linked to global manufacturing and raw material extraction, where complex, multi-tiered supply chains and limited transparency can increase exposure to exploitative labour practices. The following tables summarise the key categories and the nature of the risks identified.

Supply Chain Risks

Our FY25 risk assessment highlighted that the greatest potential for modern slavery risk lies within the Group’s trade supply chain, which accounts for approximately 99.65% of total spend. The assessment confirmed persistently high inherent risk across several product categories linked to global manufacturing and raw material extraction, where complex, multi-tiered supply chains and limited transparency can increase exposure to exploitative labour practices. The following tables summarise the key categories and the nature of the risks identified.

	SOURCING CATEGORY	RELATIONSHIP	KEY RISK FACTORS
VERY HIGH RISK	<div>Folder icon</div> Seafood	DIRECTLY LINKED	The fishing industry is often characterised by isolated work environments where workers are reliant on their employer for a broad range of needs including shelter, food, security, and return transport to their home port. These contexts heighten risks such as limitations on freedom of movement, poor working conditions, and isolation from family and support structures. Deceptive recruitment practices are common, which can lead to debt bondage and forced labour, particularly in contexts where workers are trafficked across borders. The transient nature of fishing vessels and limited oversight increase vulnerability to excessive working hours, physical and mental abuse, and the denial of basic rights.
	<div>Folder icon</div> Soft furnishings & mattresses	DIRECTLY LINKED	The textile and furnishings sector presents elevated modern slavery risk due to limited visibility over fibre origins and processing stages, particularly for cotton and leather, sourced from higher-risk regions. Complex supply chains and informal subcontracting can reduce oversight of working conditions and increase the likelihood of exploitative labour practices. The sector also relies on low-wage and migrant workforces, including women and younger workers, who may face poor working conditions or underpayment where labour standards are weak or enforcement is limited.
	<div>Folder icon</div> Furniture & bathroom furniture <div>Folder icon</div> Tapware, washbasins & bathtubs	DIRECTLY LINKED	The manufacturing and extraction industries for timber, metal, plastic, ceramic, and leather products involve complex global supply chains, often situated in regions with comparatively lax labour laws and weak regulatory oversight. This creates risks such as child labour, poor working conditions, and health and safety violations. Workers may face deceptive recruitment practices, debt bondage, and forced labour, particularly in lower-tier suppliers where oversight is minimal. Additionally, the use of excessive overtime in meeting high production demands is a common issue, exacerbated by weak enforcement of labour rights.
HIGH RISK	<div>Folder icon</div> Appliances, consumer electronics & lighting	DIRECTLY LINKED	Risks in this category relate to the extraction and processing of raw minerals, and the manufacturing of electronic components and metal goods in regions with weaker labour protections. These supply chains can involve hazardous working conditions, limited oversight of recruitment practices, and the use of vulnerable or migrant workers. The upstream production of metals and minerals may also occur in conflict-affected areas, where limited regulation increases the likelihood of forced or child labour. High production pressures and complex subcontracting arrangements can contribute to excessive working hours and poor health and safety outcomes in electronics manufacturing hubs.
	<div>Folder icon</div> Cleaning	DIRECTLY LINKED	The cleaning sector is characterised by competitive pricing and extensive use of subcontracting and labour-hire arrangements, which can make it difficult for businesses to maintain visibility over employment practices. The workforce often includes temporary migrant workers and international students, some of whom may have limited awareness of workplace rights. Multi-tier contracting structures can reduce transparency and oversight of pay, conditions, and safety, increasing the potential for non-compliance with labour standards.
MEDIUM RISK	<div>Folder icon</div> Construction	CONTRIBUTE	Risks in this category relate to the use of temporary and migrant labour in Australia’s construction sector, where subcontracting and labour-hire models are common. These structures can limit visibility of employment terms and worker welfare. Contributing factors include language barriers, limited awareness of workplace rights, and restricted access to support services. Informal and cash-in-hand employment, underpayment, and excessive work hours remain persistent concerns, particularly in lower tiers of subcontracting. Complex material supply chains further increase exposure to modern slavery risk.
	<div>Folder icon</div> Equipment hire	DIRECTLY LINKED	Risks in this category primarily relate to the sourcing and maintenance of machinery and equipment supplied through third-party hire providers. While the hire activity itself occurs in Australia under regulated labour conditions, upstream manufacturing of plant and equipment may take place in countries with weaker labour protections and limited visibility of working conditions. The hire and servicing of equipment can also involve subcontracted maintenance, transport, and cleaning functions, where lower-skilled or temporary workers may be engaged through labour-hire arrangements.
	<div>Folder icon</div> Fuel & Energy	DIRECTLY LINKED	Risks in this category relate to the upstream extraction, refining, and distribution of fuels and other energy sources, as well as the construction and maintenance of related infrastructure. These activities often take place in countries or sectors where labour rights and safety standards are inconsistently enforced and where migrant or temporary workforces are common. While Winning Group's direct relationships are with Australian energy and fuel suppliers, the Group may be indirectly linked to these upstream risks through its supply contracts and service providers involved in fuel transport and infrastructure maintenance.
LOW RISK	<div>Folder icon</div> Delivery and install contractors	DIRECTLY LINKED	The logistics and transport sectors, often relying on migrant and unskilled labour, are exposed to risks of underpayment, indentured servitude, and exploitation, particularly in cases where migrants lack bargaining power or legal protections. Workers are vulnerable to being trapped in exploitative conditions, with limited access to redress or safe working environments, due to the informal nature of labour contracting in this industry.
	<div>Folder icon</div> Temporary staff and labour hire	CAUSECONTRIBUTE	In the subcontracted financial, administrative, and business services sector, risks arise particularly in offshored professional services such as IT, customer service, and finance. These services are often outsourced to countries where labour rights are poorly enforced, leading to risks of wage theft, deceptive contracts, and poor working conditions. The lack of direct oversight in offshore services increases vulnerability to exploitation.
	<div>Folder icon</div> Property	DIRECTLY LINKED	
	<div>Folder icon</div> Advertising	DIRECTLY LINKED	

SPOTLIGHT

Human Rights Risks in the Green Transition

As Winning Group progresses its decarbonisation strategy, we recognise that efforts to reduce emissions across our value chain may also reshape the nature and location of human rights risks. Investments in renewable energy infrastructure, low-carbon technologies, and sustainable materials within our supply chain are increasing global demand for critical minerals such as lithium, cobalt, nickel, and graphite, and for components like solar panels, batteries, and energy-efficient appliances.

Many of these inputs are produced in regions where governance and labour protections are limited, and where risks of forced labour, unsafe working conditions, and deceptive recruitment practices are well documented. This means that, as the Group and our suppliers adopt low-carbon solutions, we must remain alert to the potential for new or shifting modern slavery risks embedded in these emerging supply chains.

In future years, our decarbonisation governance processes, including supplier engagement, responsible sourcing requirements, and Board oversight of climate targets will increasingly need to consider these intersections between climate action and human rights. Integrating human rights risk assessment into climate-related procurement and investment decisions will help ensure that our transition to a low-carbon economy supports both environmental and social outcomes.





How we Assess and Address our Modern Slavery Risks

Over the past four years, we have improved our capability and capacity to assess and address modern slavery risks associated with our operations and supply chains, embedding policies and processes as business-as-usual within key functions of our organisation.

During the reporting period, we focused on onboarding new suppliers through our established process, deepening our understanding and improving mitigation activities taken by our suppliers sourcing from with the highest inherent risk based on FY25 assessment, increasing visibility of our Tier 2 own-brand supply chains, and continuing to prioritise capacity building and training of our team members and direct suppliers.

Our established and multi-layered governance structure ensures there is accountability across key functions within our business. This structure defines clear roles, responsibilities, and decision-making authority, aligning actions with strategic objectives.

Governance

Our established and multi-layered governance structure ensures there is accountability across key functions within our business. This structure defines clear roles, responsibilities, and decision-making authority, aligning actions with strategic objectives.

Our Board provides overall oversight and accountability for modern slavery governance, ensuring alignment with corporate values and regulatory compliance.

Our ESG Committee consists of representatives from our Executive Leadership Team, including our Chief of Staff, Legal, HR, Procurement, Strategy, Commercial and General Managers of each key business unit. The Committee oversees the development and execution of specific policies and initiatives to address modern slavery risks within the supply chain.

Our Head of Sustainability leads the company’s sustainability and ethical practices, ensuring modern slavery risks are managed as part of the broader corporate responsibility agenda.

Our Sustainability Specialist provides expert guidance and supports day-to-day implementation of ethical sourcing policies, with a focus on identifying and mitigating modern slavery risks in the supply chain.

Specific Teams such as Commercial, Procurement, HR, Facilities Management and Transport are responsible for complying with established ethical sourcing policies and supplier onboarding and assessment processes specifically developed to manage and mitigate the risk associated with their functions within the business.

Our Team Members are responsible for identifying and reporting potential modern slavery risks, complying with ethical sourcing policies, undergoing training as required and using grievance mechanisms to raise concerns about exploitation.





Policies and Processes

The following policies and processes are essential to ensuring that the controls we have implemented to identify, manage, and mitigate the risk of modern slavery and substandard working conditions in our operations and supply chains are embedded into our business.

TITLE	LINK TO MODERN SLAVERY	POLICY IMPLEMENTATION
Responsible Sourcing Roadmap	Our Responsible Sourcing Roadmap covers policy and governance, engagement and training, due diligence measures, and grievance mechanisms. It also provides us with a framework to continually deepen our capacity to assess and address modern slavery risks.	Updated annually by the Sustainability Team with key actions, KPIs and outcomes which are discussed and governed by the Modern Slavery and Responsible Sourcing Committee. Details can be found in 'How we assess the effectiveness of actions'.
Supplier Code of Conduct	The Supplier Code of Conduct covers minimum expectations and standards in relation to labour, health and safety, environment, and ethics, and outlines our zero-tolerance position on all forms of modern slavery.	Referenced in supplier contracts and trading terms and applies to all suppliers of the Winning Group. The policy has also been made public through our group and brand websites such as Winnings and Appliances Online. In FY25, 75% of suppliers have either signed our policy or confirmed they have an equivalent policy in place. We engage with those who don't return a signed policy until an equivalent policy is developed.
Modern Slavery Self-Assessment Questionnaire (MSSAQ)	The MSSAQ is issued to assess modern slavery risks across our entire supplier base and produces risk ratings that help us identify suppliers where further investigation or support is required.	Managed by the Sustainability Team in conjunction with Buying Team members.

TITLE	LINK TO MODERN SLAVERY	POLICY IMPLEMENTATION
New Supplier Onboarding Process	Robust process that reviews suppliers' governance processes, quality management, labour conditions, environmental impacts, and supply chain due diligence with additional audit requirements for high-risk suppliers.	Executed by the Sustainability Team in conjunction with Buying Team members.
Speak Up / Whistleblower Policy	Encourages the reporting of any actual or suspected wrongdoing or any other issues that may affect a team member's well-being at work or that may be affecting the Group, its customers or suppliers.	Accessible on the company intranet via our Policy Handbook and communicated to new team members during the onboarding process.
Human Rights and Modern Slavery Policy	Supports our actions to prevent and limit human rights violations and modern slavery in our business and supply chain.	Accessible on the intranet via our Policy Handbook and communicated to new team members during the onboarding process.
Modern Slavery Remediation Plan	To ensure each instance of suspected or actual case of modern slavery is investigated and appropriately addressed by the Group.	Accessible on the intranet via our Policy Handbook and communicated to new team members during the onboarding process.
Workplace Health and Safety	This policy and the various WHS procedures that exist are designed to ensure that workplace participants are not exposed to risks to their health or safety.	Accessible on the intranet via our Policy Handbook and communicated to new team members during the onboarding process.
Recruitment Policy and Onboarding Processes	The Recruitment Policy guides the selection of candidates complying with all relevant laws, while the onboarding process manages the integration of new team members, fostering a strong workforce aligned with our values and culture.	Available upon request from the Team Experience department.
Employment Contracts	Ensures that existing and prospective employees are aware of the terms of their employment and the rights as an employee prior to entering into employment with Winning Group.	<p>Provided to prospective employees prior to entering into employment.</p> <p>Generic contract available upon request from the Team Experience department.</p>
Employee Code of Conduct	Outlines our expectations of team members and our company values to deter wrongdoing and promote honest and ethical conduct.	Accessible on the intranet via our Policy Handbook and communicated to new team members during the onboarding process.

Awareness, Training and Capacity Building

Increasing awareness and building capacity among our stakeholders remained a key focus during this reporting period. We created and delivered customised modern slavery education and training sessions for various internal and external stakeholders. We believe that empowering our team members, suppliers, and customers with knowledge is crucial for further embedding our responsible sourcing actions, mitigating risk, and driving impact.



	EDUCATION TYPE	CONTENT AND LINK TO MODERN SLAVERY	OUTCOME
INTERNAL	In-house developed Modern Slavery Learning Module and Quiz built into our Learning Management System (LMS)	<p>An induction module that defines modern slavery, provides relevant indicators and examples for our operations and supply chains, and details how Winning Group works to address these risks.</p> <p>For our warehouse and logistics teams this is delivered as a ToolBox Talk.</p>	44% of team members completed the module. Completion rates were temporarily affected by transition to a new LMS; rollout to remaining team members and new starters is now underway.
	1:1 new team member training	In-depth review of the Winning Group's approach to sustainability and modern slavery due diligence as part of their onboarding process for new team members in buying, procurement or commercial teams.	Delivered to 4 new team members (1 hour each)
	Buying Team Refresher Training	<p>Annual overview of our trade supply chain risks and modern slavery due diligence process facilitated by our Sustainability Team.</p> <p>These sessions ensure that our responsible sourcing process is continually embedded in our business operations and ensure our team members have the appropriate skills to identify risks of modern slavery.</p>	1 hour session delivered to 11 team members.
	Retail & Commercial Team Member Training	Outlines how our business identifies, addresses, and mitigates the risks of modern slavery; our approach to supplier engagement and due diligence, and how we can educate customers on responsible sourcing.	45 minutes training session with 94 team members and tailored education material.
	Sustainability Team Members	<p>Continuous professional development through attendance at external forums and industry roundtables on human rights and modern slavery:</p> <ul style="list-style-type: none"> Online NSW Anti-slavery Forum Sustainability Professional's Association: Modern Slavery Roundtable 	3 hours
EXTERNAL	Own Brand & SME Suppliers	Provide support across the key areas of social compliance, raw materials, and selection, and responsible sourcing. We continue to work closely with these suppliers to ensure they are progressing in these areas.	30 minutes 1:1 training and capacity session, totalling 9 suppliers.
	Green Row Initiative	Featured our 'Most Efficient Row' highlighting more water and/or energy-efficient product choices to customers, whilst incentivising suppliers to achieve a 'progress beyond general compliance score' in their MSSAQ.	36% increase in sales of eligible products.
	Public Awareness and Education	<p>Provide insights and transparency on our sustainability initiatives, including our responsible sourcing and Modern Slavery Action Plan externally at industry events:</p> <ul style="list-style-type: none"> Appliance Retailer Podcast Online Retailer Conference National Online Retail Association Podcast Inside Retail Roundtable 	5 hours

CASE STUDY

Ethical Product Selection

During the period, we were approached by a customer who was renovating their home and looking to partner with businesses that were not only focused on environmental sustainability but also human and labour rights in their supply chains.

Our customers highlighted the challenges they were having finding sufficient information on what actions appliance manufacturers were taking to manage and mitigate the risks of modern slavery in their supply chains, and approached us for assistance.

Leveraging the information we capture through our supplier assessment process and our in-depth knowledge of their due diligence activities we were able to assist our customer in assessing their existing product selection and recommending alternatives if necessary.

We took the opportunity to educate our customers on the complex nature of appliance supply chains and the key human rights risks associated with appliances such as manufacturing in high-risk geographies and conflict minerals and the journey many manufacturers were still on to increase transparency.

Working alongside one of our in-store product experts, we were able to curate a range of energy-efficient and durable products from suppliers with leading ethical sourcing initiatives. As a sustainability professional, our customer has many peers and friends in the same industry and wanted to use their home as an example and platform for positive impact.

Whilst the core purpose of our supplier due diligence is to ensure our suppliers are doing the right thing and protect workers in our supply chain, this shows the opportunity sustainability has to drive value, maintain competitive advantage and build trust with customers.



CASE STUDY

Supplier Capacity Building

As part of our ongoing commitment to preventing modern slavery in our supply chain, we identified that some of our small and medium enterprise (SME) suppliers—particularly those sourcing from higher-risk regions—faced challenges in meeting our expectations for human rights due diligence. In FY25, we conducted targeted one-on-one engagement with a new supplier sourcing products manufactured in China to strengthen their understanding of modern slavery risks and build their capacity to address them.

Through this engagement, we worked with the supplier to:

- Improve their understanding of risks associated with unfair working conditions and modern slavery in China, including excessive overtime, unsafe workplaces, and limited worker representation.
- Provide practical guidance on conducting due diligence with their manufacturers, including the use of independent third-party audits and effective follow-up processes.
- Review their most recent factory audit report, highlighting non-compliances of greatest concern and explaining how these link to potential human rights impacts.
- Request confirmation that corrective actions were underway to address issues identified, including excessive overtime, missing electrical covers, and inadequate labelling and occupational health testing.
- Explain reasonable timeframes for remediation and the importance of reviewing future audit results to confirm that issues had been resolved.

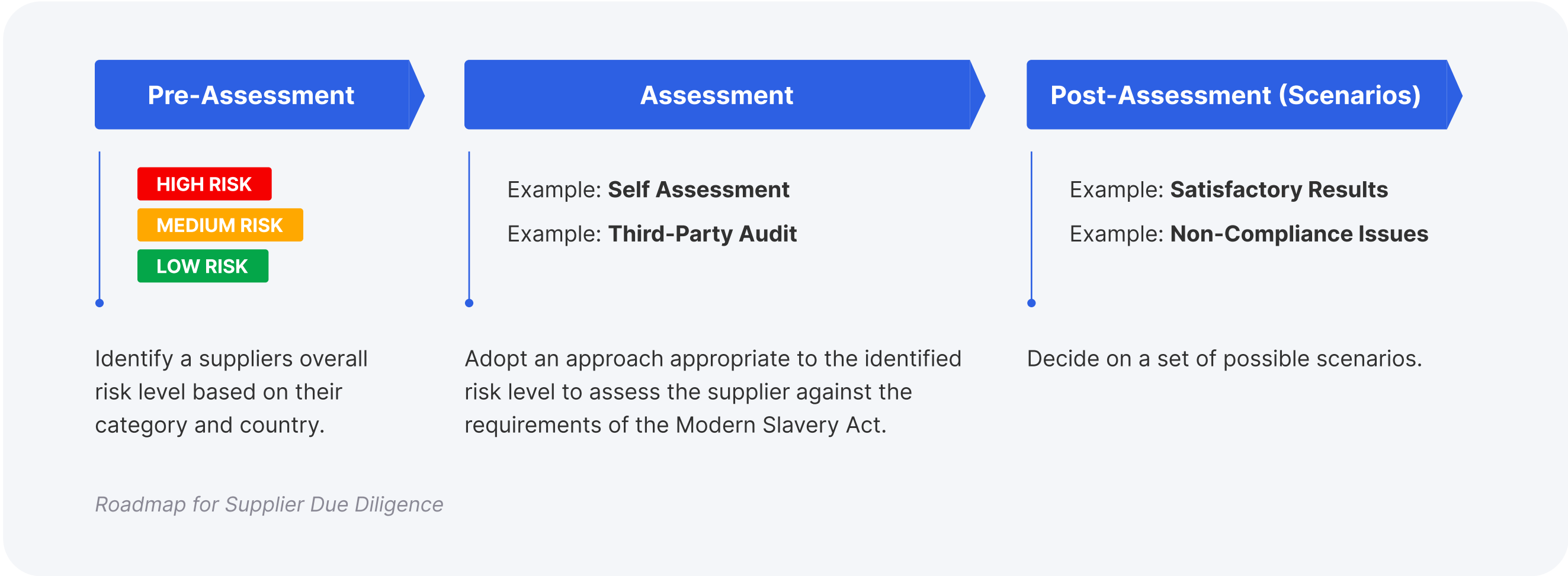
This engagement improved transparency within the supplier's extended supply chain and strengthened their ability to identify and address human rights risks independently. By continuing to provide guidance and resources to our SME partners, we aim to build more consistent and effective due diligence practices across our supplier network.



Supplier Due Diligence

Our supplier due diligence framework brings together the processes we use to identify, assess, and manage human rights and modern slavery risks across our value chain. It connects the inherent risks identified through our risk assessment with the practical tools we apply to mitigate and monitor those risks.

The framework operates across four stages, each designed to progressively build assurance and transparency.



CASE STUDY

Mitigating our Highest Inherent Geographical Risks

Utilising the insights from our FY25 risk assessment and responses collected through our MSSAQ, a key focus area for the period was understanding how our suppliers were mitigating the highest risks in the supply chains.

We requested further information on risk mitigation activities, including audits from suppliers we identified that were sourcing from Malaysia, Thailand, Mexico, Pakistan, Turkey, Poland and Indonesia.

- 53% confirmed that independent third-party audits were conducted on these high-risk suppliers
- 12% had assessed the risk associated with these suppliers to be lower than Winning Group
- 6% confirmed that the identified high-risk suppliers did not form part of the Winning Group supply chain.
- 29% are yet to respond.

Through engaging with our suppliers, we were able to confirm that appropriate actions were being taken to mitigate the potential risks of forced labour and migrant worker exploitation associated with these locations and the industries they operate in.

Where we identified a discrepancy in the level of risk associated with geographical location, we have educated suppliers further on Winning Group’s approach to risk assessment and the specific risks linked to the manufacturing location to encourage the implementation of further due diligence measures.

We will continue to engage with our supplier to ensure that they provide a response or improve their current mitigation activities to adequately respond to the level of risk.



Assessment

Our actions during FY25 focused on:

Re-engaging with our suppliers sourcing from our highest risk geographies in line with our most recent human rights risk assessment.

Issuing the MSSAQ and Supplier Code of Conduct to key existing and new suppliers.

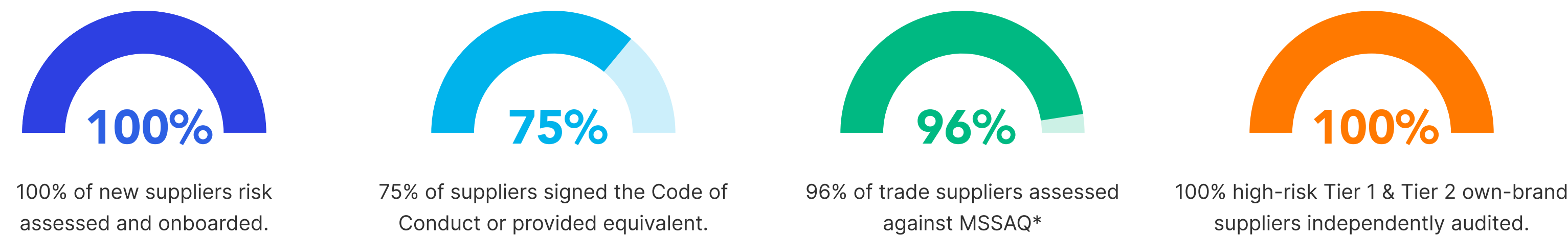
Collecting the completed MSSAQ from key existing and new suppliers.

Reviewing results from MSSAQs to determine if inherent risks are being sufficiently mitigated by our suppliers or if further due diligence is required.

Requesting factory audit reports and summaries of audit findings from our own brand and select wholesale suppliers.

Key Results

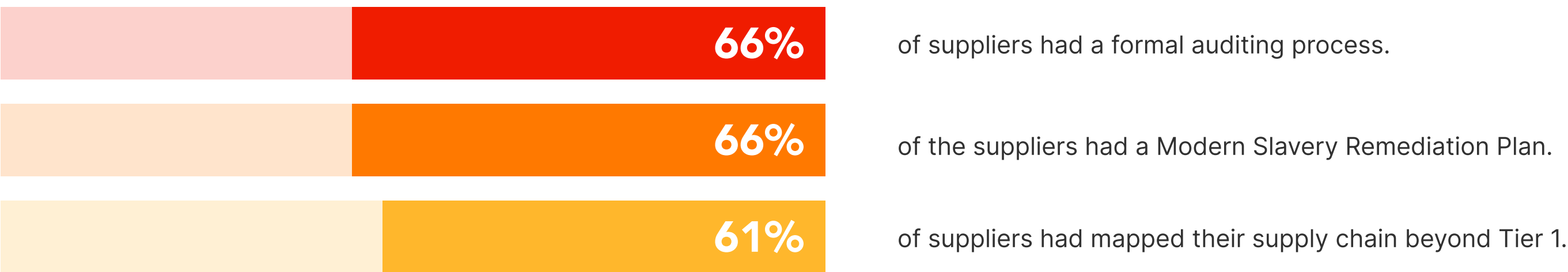
Throughout the FY25 reporting period we completed the assessment of:



Areas of Good Performance*



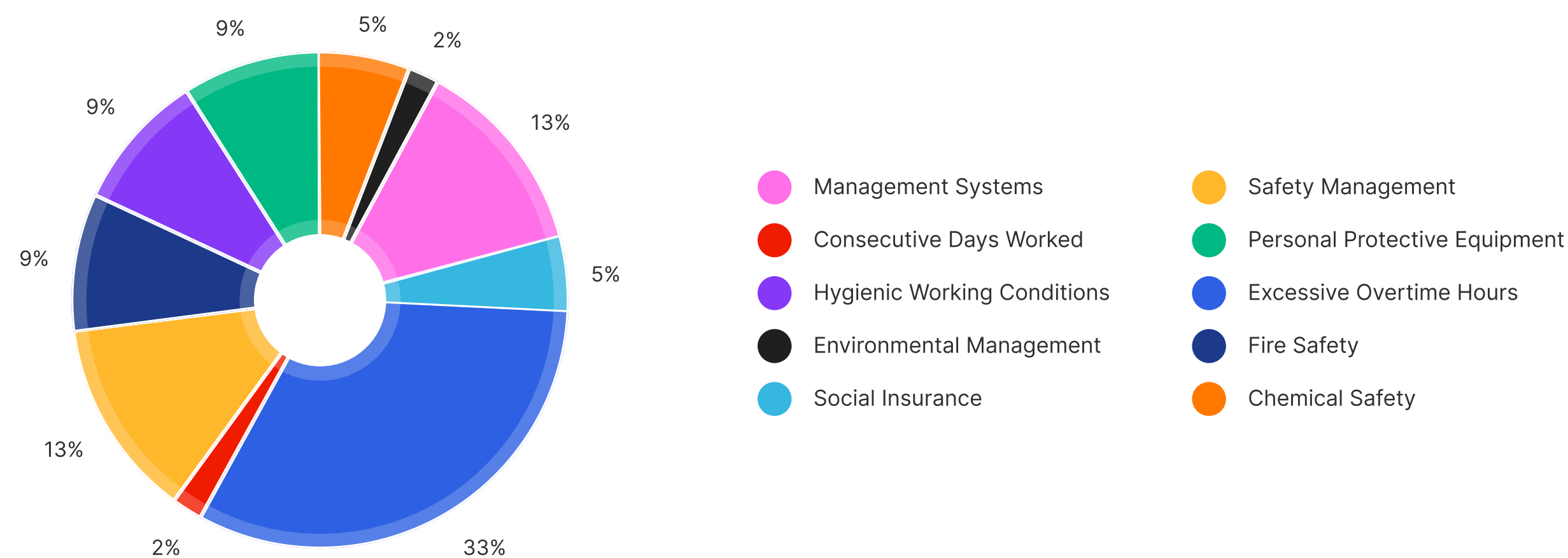
Areas of Improvement*



**All statistics by spend and include aggregated results from previous years due diligence that remains valid.*

Off-Shore Tier 1 and 2 Supplier Non-Conformances

Through the review of audit reports and certifications such as SMETA 4 Pillar, SMETA 2 Pillar, Amifori BSCI, SA8000 and Responsible Business Alliance Validated Assessment Program, we identified the following non-conformances predominately relating to new supplier on-boarding and own-brand supply chains:



Those suppliers who have progressed with implementing ethical sourcing programs may not have provided copies of their audit reports to Winning Group but have made disclosures in their own Sustainability or Modern Slavery Statements detailing the number of audits conducted over a specified period, the types of non-compliances identified and their remediation status. These have not been included in the above figures; however, we would like to take this opportunity to acknowledge the increased level of transparency that has been provided within their own reports, demonstrating an increasing maturity of responsible sourcing actions amongst our suppliers.

Actions Taken in Response to Non-conformances Identified

Where non-conformances were categorised as minor, we found that suppliers either:

- had already remediated these prior to Winning Group requesting an audit report, or;
- committed to remediate the non-conformance within the period stipulated by the auditor in the audit report.

Where non-conformances were categorised as major or critical, particularly those relating to labour rights, Winning Group took a more active approach by:

- educating the supplier on the need to remediate the non-conformance;
- understanding the root-cause of the non-conformance; and
- ensuring any remediation action plan was adhered to.

CASE STUDY

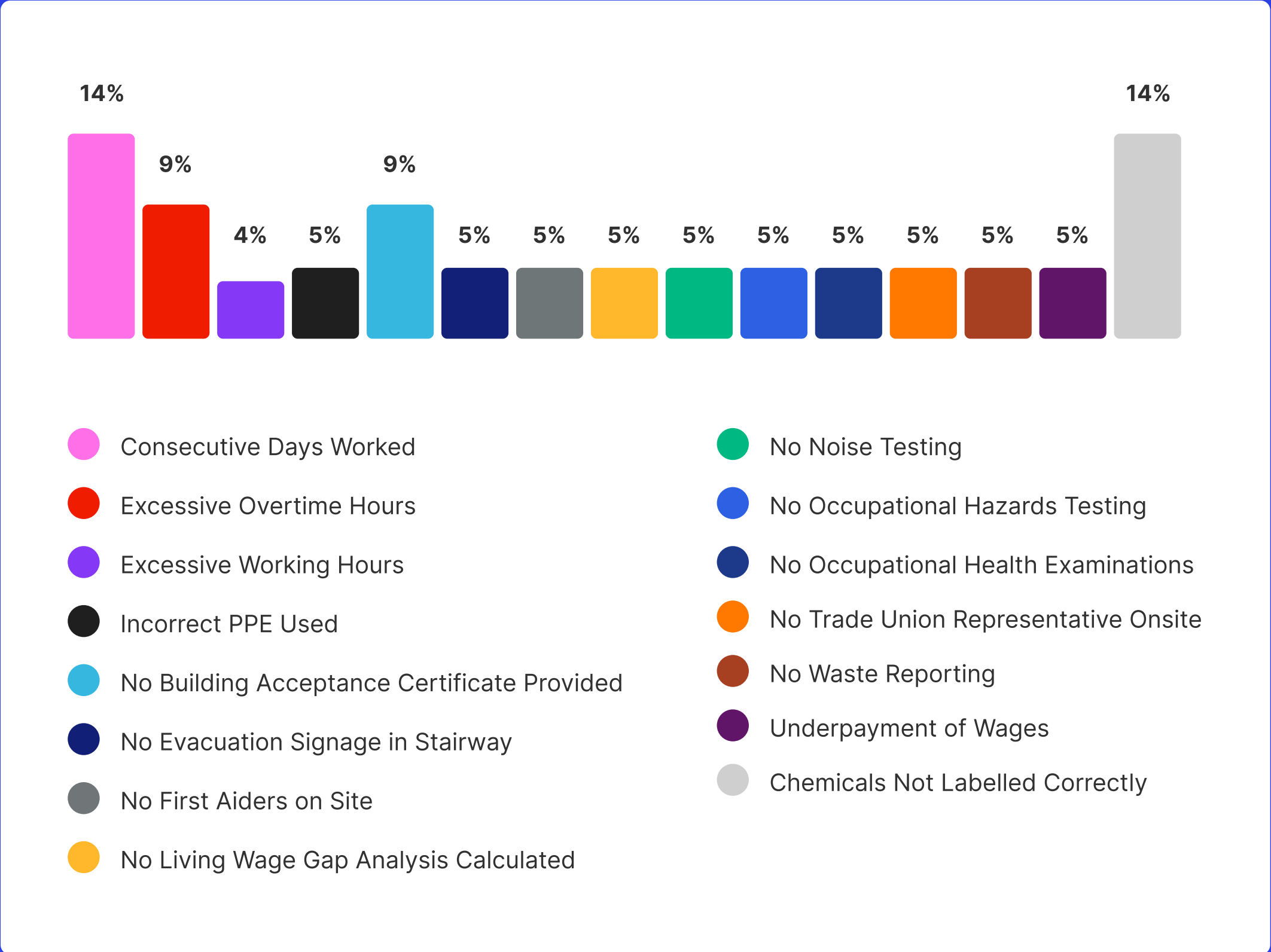
High-Risk Own-Brand Supplier Audits

A key focus of FY25 was gaining further insight into the working conditions in our own-brand supply chains. Whilst the majority of our own-brand products are manufactured in Australia, we know that select components and final products are manufactured in China, where there is a higher risk of worker exploitation and modern slavery.

Our direct Tier 1 supplier based in China has been undergoing SMETA 4 Pillar audits for the past 4 years, which we review on a bi-annual basis, with our key focus on reducing excessive overtime hours.

In the reporting period, we had SMETA 4 Pillar audits conducted on our high-risk Tier 2 suppliers based in China to help gain further insight into the working conditions in our supply chains and ensure workers' health, safety and rights are protected.

We are currently in the process of remediating non-conformances identified in the audit in line with our corrective action plans. As both suppliers have less than 20 workers on site, we acknowledge that capacity is limited and are therefore taking a staged and educational approach to ensure there is an understanding of why these issues need to be resolved and how they can be resolved to ensure lasting impact in the future.



With one of our suppliers, we focused on addressing the three most critical non-compliances, before moving onto remediating major-minor non compliances.

- **Weekend Penalty Rate:** Our supplier was not aware of the requirement to pay a higher rate on Saturdays. Upon discussing and bringing the non-conformance to the supplier's attention they immediately took steps to ensure that workers receive the appropriate rate for Saturday work moving forward. Evidence was uploaded to SEDEX for auditor review.
- **First Aider Training:** Training was promptly organised for 3 employees following the audit to ensure that there were an adequate number of employees on site to handle. Evidence was uploaded to SEDEX for auditor review.
- **Evacuation Signage in Fire Stairs:** As our supplier rents a floor within a large building, the fire stairs fall into the responsibility of the industry park management. Our supplier is engaging with the industry park management to have the appropriate evacuation signs installed in the fire stairs.

We were also pleased to find that our suppliers also had good examples reported in their audits, including:

- A factory provided all workers with social insurance.
- A factory provided meal subsidies for the workers.
- A factory offered all employees an additional one-week paid leave in February 2025.
- A factory has been providing regular living allowances to two former employees who are facing financial difficulties.





Grievance Mechanisms and Remediation

The Winning Group understands that effective grievance mechanisms and remediation are key to identifying and responding to modern slavery issues. Over the past three years, we have strengthened and matured our capacity through our Speak Up Policy, responding to audit reports, and developing a Remediation Plan.

Whistleblower Policy

Winning Group maintains a formal Speak Up (Whistleblower) Policy that applies to all employees, contractors, and suppliers, including subsidiaries. The Policy encourages anyone who becomes aware of suspected wrongdoing, misconduct, or other issues affecting wellbeing at work, the Group, its customers, or suppliers to report their concerns safely and confidentially.

Reports can be made to eligible senior officers within the Group or through our external and independent Speak Up Hotline, operated by Core Integrity, which provides multiple confidential channels (web, phone, email, or mail) and allows for anonymous reporting. The hotline is accessible to workers across our value chain, with additional visibility in areas where labour-hire or contracting is common, such as logistics and cleaning.

All reports are treated confidentially and assessed by our designated Speak Up Investigation Officer (SUIO), who determines whether investigation or further action is required. Those who speak up in good faith are protected from retaliation under both the Corporations Act and our internal policy, and have access to support from the Speak Up Protection Officer (SUPO) and the Employee Assistance Program.

No reports were received in FY25. We continue to monitor awareness and accessibility of the mechanism and will report any substantiated issues and outcomes in future statements.

Modern Slavery Remediation Plan

Winning Group has a Modern Slavery Remediation Plan that outlines how potential or confirmed cases of modern slavery or related exploitation are to be managed and resolved. The Plan is accessible to all team members through our intranet and forms part of our broader risk and incident management framework.

The Plan defines clear responsibilities for escalation, investigation, and decision-making, ensuring that concerns are addressed promptly and that affected individuals are prioritised.

- Where a risk or case is identified, our response may include:
- Immediate steps to ensure the safety and wellbeing of affected individuals;
 - Internal investigation or referral to appropriate authorities;
 - Engagement with the supplier to agree on corrective actions, timelines, and verification; and
 - Consideration of termination or suspension where remediation is not possible or adequate action is not taken.

Our approach follows the principles of the UN Guiding Principles on Business and Human Rights, recognising that appropriate remediation will depend on the nature of the case and the Group’s relationship to it. Where we are directly linked to a harm through our business relationships, we work with partners and competent organisations to ensure remedy is victim-centred, proportionate, and sustainable.

One case of Modern Slavery requiring remediation was identified in FY25 and is detailed below.

Our remediation framework remains an important part of our due diligence system and is reviewed to ensure it remains fit for purpose.



CASE STUDY

Alleged Forced Labour in Tier 3 Plastics Supply Chain

In the reporting period, allegations of forced labour emerged at a Tier 3 manufacturing site in Malaysia used by two of our wholesale suppliers. The allegations related to Bangladeshi migrant workers who had their passports and wages withheld, experienced deceptive recruitment practices, excessive recruitment fees, unsuitable living conditions and intimidation, violating both Malaysian Law and international standards.

In line with our Modern Slavery Remediation plan, once Winning Group became aware of these allegations, we contacted our suppliers to investigate the matter further and communicate our position on modern slavery practices. Both suppliers shared that they were investigating the matter themselves and formulating an approach to remediation.



Over many months, we continued to engage with our suppliers to ensure that a victim-centred approach to remediation was taken, and that workers not only received financial restitution but also welfare support. It was confirmed that:

- Whilst a court order was made for the manufacturer to repay unpaid wages for RM3 million in December 2024, only an initial instalment of RM250,000 has been paid to date.
- Following multi-stakeholder dialogue, the Responsible Business Alliance provided workers with financial aid from the suppliers; however, there were challenges with workers receiving payments 5 months later.
- During this period, the majority had found new employment and accommodation in Malaysia, with a small portion returning to Bangladesh.
- Following the continued failure of the manufacturer to repay the outstanding instalments of the court order, one of our suppliers provided significant financial assistance to the affected workers again in June 2025.
- In September 2025, a significant settlement was reached between one of our suppliers and the workers to remove outstanding debts covering their salaries, recruitment fees, as well as additional compensation for suffering.

Both of our suppliers eventually ceased business with the manufacturer.

Whilst the remediation process was lengthy, we acknowledge that the level of financial support provided by our suppliers is beyond what is often provided in similar circumstances.

This highlights the importance of partnering with suppliers that not only monitor the working conditions and recruitment practices in their supply chains through social audit and worker voice initiatives but are committed to remediating these instances once identified.

Equally, this instance highlights the broader risks of sourcing from countries with weaker rules of law that commonly employ vulnerable migrant workers.



How we Assess the Effectiveness of our Actions

We assess the effectiveness of our actions by reviewing expected outcomes and, where possible, key performance indicators of our Responsible Sourcing Roadmap covering policy and governance, engagement and training, due diligence measures, and grievance mechanisms. This is key in driving continuous improvement in our approach to identifying, managing, and mitigating modern slavery risks.

Our ESG Committee governs the progress against our Roadmap within our business quarterly and conducts annual evaluations of the outcomes achieved. We will incorporate learnings into actions for the following years, to ensure that we are continuously improving and that our actions have a measurable impact.

In addition, we continue to engage specialist external consultants to review our reporting mechanism, including metrics and data to ensure our approach is always improving in line with mandatory reporting criteria and industry best practice.

GREEN

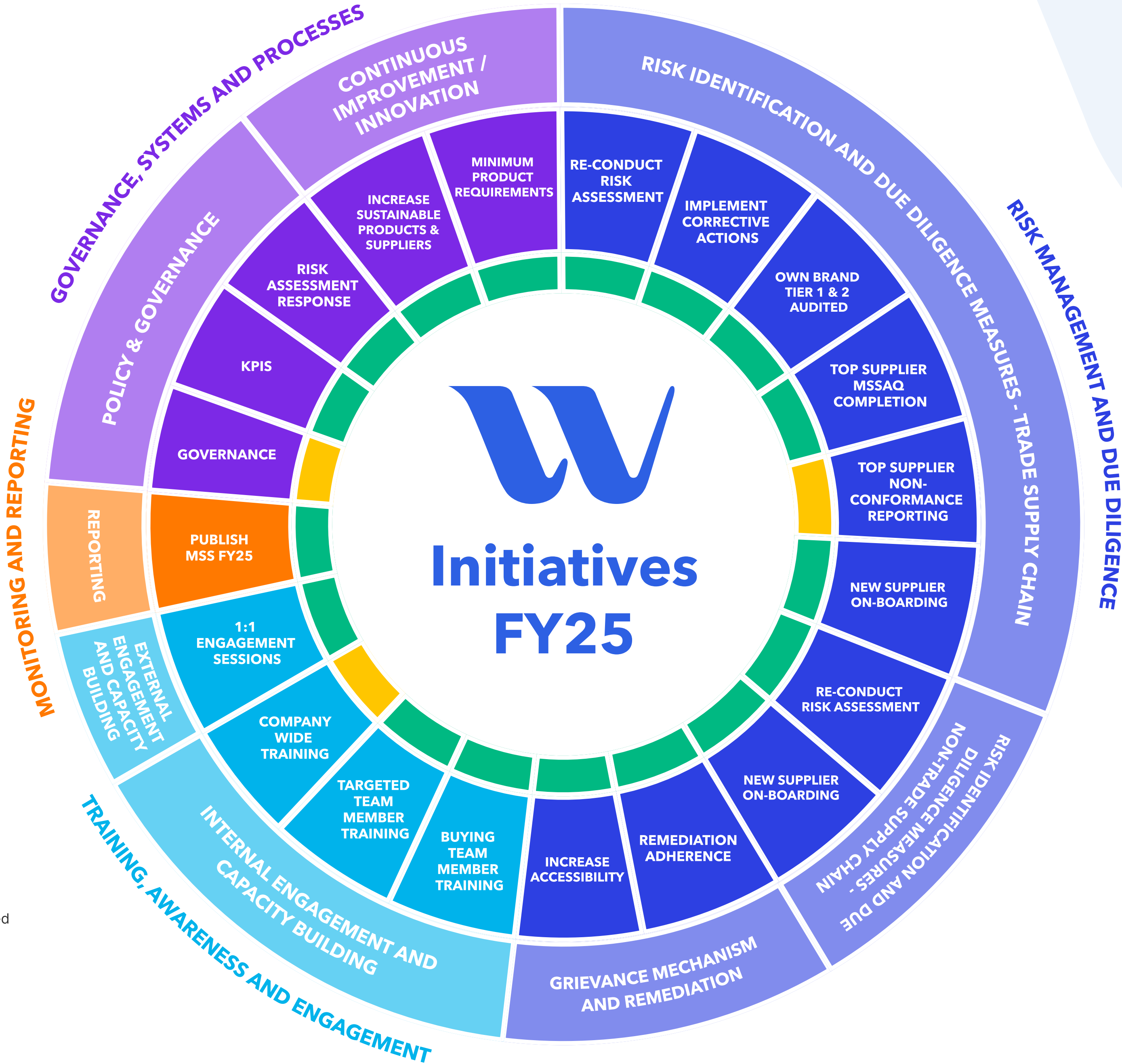
Initiatives at this level have performed as expected or better than expected, or are completed, or have met their target.

YELLOW

Initiatives at this level have performed a bit below expectations, or are partially completed, or have performed slightly below target.

RED

Initiatives at this level have performed well below expectations, or are not completed, or have performed significantly below target.



Our FY26 Commitments

Winning Group acknowledges that eradicating modern slavery requires continuous improvement and dedication from our business, our suppliers and the broader ecosystem we engage with. As our Responsible Sourcing Roadmap matures, we are implementing continuous improvement initiatives and strengthening our commitment across our key focus areas.

We thank our suppliers and partners for their engagement and collaboration to assess and mitigate modern slavery risks in our operations and supply chains.

As we move forward into FY26 and beyond, we remain committed to advancing our Responsible Sourcing Roadmap and striving to fulfil the objectives and commitments under the pillars of governance, systems and processes; risk management and due diligence; training, awareness and engagement; monitoring and reporting as detailed below:

	ROADMAP FOCUS AREAS	OBJECTIVE	FY26 KEY COMMITMENTS
GOVERNANCE, SYSTEMS, AND PROCESSES	Policy and Governance	Provide oversight of modern slavery risks and management frameworks to guide our decision-making and continuous improvement.	<div>Hold quarterly cross-functional ESG Committee meetings, including Modern Slavery.</div> <div>Review and update key responsible sourcing policies and processes to align with global best practice.</div> <div>Track sustainability, responsible sourcing, and modern slavery management against relevant KPIs and metrics.</div>
	Continuous Improvement and Innovation	Continuously identify ways to improve the response and management of sustainability and modern slavery risks and opportunities.	<div>Increase accessibility of sustainable supplier and product information available to customers.</div> <div>Increase supply chain transparency and traceability of raw materials.</div> <div>Implement preferred supplier and product guidelines.</div>
RISK MANAGEMENT AND DUE DILIGENCE	Risk and Due Diligence Measures - Trade Supply Chain	Effectively identify and address modern slavery risks in the Winning Group's trade supply chain.	<div>Review and update the existing MSSAQ and transition to an online format to improve accessibility and streamline supplier onboarding.</div> <div>Revise the assessment framework and process supplier onboarding process in line with the new MSSAQ.</div> <div>Implement corrective action and improvement plans for suppliers assessed with the MSSAQ.</div> <div>Engage with high-risk own-brand suppliers to remediate non-conformances.</div> <div>Engage with wholesale suppliers on mitigation activities for key high-risk hotspots.</div> <div>Ensure adherence to the new supplier onboarding process.</div> <div>Ensure adherence to the Modern Slavery Remediation Plan.</div>

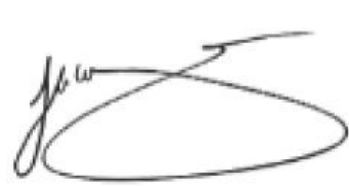
ROADMAP FOCUS AREAS	OBJECTIVE	FY26 KEY COMMITMENTS
Risk and Due Diligence Measures - Non-Trade Supply Chain	Effectively identify and address modern slavery risks in the Winning Groups's non-trade supply chain.	<p>Review and update the existing MSSAQ and transition to an online format to improve accessibility and streamline supplier onboarding.</p> <p>Revise the assessment framework and process supplier onboarding process in line with the new MSSAQ.</p>
Grievance mechanism and remediation	Ensure adequate and effective grievance mechanisms include a remediation process to manage human rights impacts.	<p>Monitor the effectiveness of grievance mechanisms.</p> <p>Ensure adherence to the Modern Slavery Remediation Plan.</p>
Internal capacity building, engagement and training	<p>Continue implementing modern slavery training to support identification and management of modern slavery risk.</p> <p>Develop specific modern slavery training for staff in key roles of responsibility as well as areas where modern slavery is more likely to occur e.g. Procurement, Legal, Sales and HR teams.</p>	<p>Review and improve training, awareness and engagement with buying team for sustainability and ethical sourcing topics.</p> <p>Continuously increase the completion rate of the employee on-boarding MS Learning Module.</p> <p>Conduct commercial team sustainability training.</p> <p>Conduct key new-starter 1:1 tailored training.</p> <p>Conduct senior leadership training.</p>
External engagement and capacity building	Increase collaboration with suppliers and other stakeholders to improve their capacity to address modern slavery risks.	<p>Host a supplier town hall.</p> <p>Develop learning materials for suppliers on key sustainability topics including modern slavery for pre- and post- onboarding.</p> <p>1:1 supplier engagement and capability building sessions as required.</p>
Reporting	Communicate our commitment to assist in the prevention, response and remediation of modern slavery and meet compliance obligations under the Modern Slavery Act.	<p>Publish compliant MSS FY26.</p> <p>Ensure changes are made to risk assessments, policies and processes in line with any updates made to the Modern Slavery Act.</p>

Process of Consultation and Approval

The related reporting entities covered by this joint statement have been consulted and informed of the reporting requirements of the MSA. The respective General Managers of each of the Winning Group businesses meet regularly to discuss and consult on their individual obligations in relation to Modern Slavery, as well as the ways in which their units feed into the larger Group operation.

As responsible sourcing is at the heart of the Winning Group's Sustainability Strategy, senior management of our Marketing, Sales, Buying, Operations, Strategy, Legal, Finance, Sustainability, Technology, Customer Service and HR units have all collectively discussed and engaged with the MSA, and the ways in which the Winning Group as a whole can make a positive impact on reducing the risk of modern slavery within our supply chains. The various training, information sessions, dissemination of MSSAQs, Supplier Code of Conduct, and collaborative supplier engagement conducted by the various entities demonstrate the consultation that has been undertaken between the relevant reporting entities.

This joint FY25 statement has been approved by the Board of Directors on behalf of itself and its reporting entities on 19 December 2025.



John R Winning
Director



John W Winning
Director



Amy E Cowper
Company Secretary

Appendix - Mandatory Reporting Criteria

The following table summarises how this statement meets the reporting obligations under the Commonwealth Modern Slavery Act 2018.

MODERN SLAVERY ACT REPORTING REQUIREMENT	ADDRESSED IN SECTION
1. Identify the reporting entity	Section 1: About this Statement Page 1
2. Describe the reporting entity’s structure, operations and supply chains	Section 2: Our Structure, Operations and Supply Chain Page 6
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Section 3: Our Modern Slavery Risks Page 10
4. 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	Section 4: How we Assess and Address our Modern Slavery Risks Page 14
5. Describe how the reporting entity assesses the effectiveness of such actions	Section 5: How we Assess the Effectiveness of our Actions Page 31
6. Describe the process of consultation with (i) any entities the reporting entity owns or controls; and (ii) for a reporting entity covered by a joint statement, the entity giving the statement	Section 6: Process of Consultation and Approval Page 34

