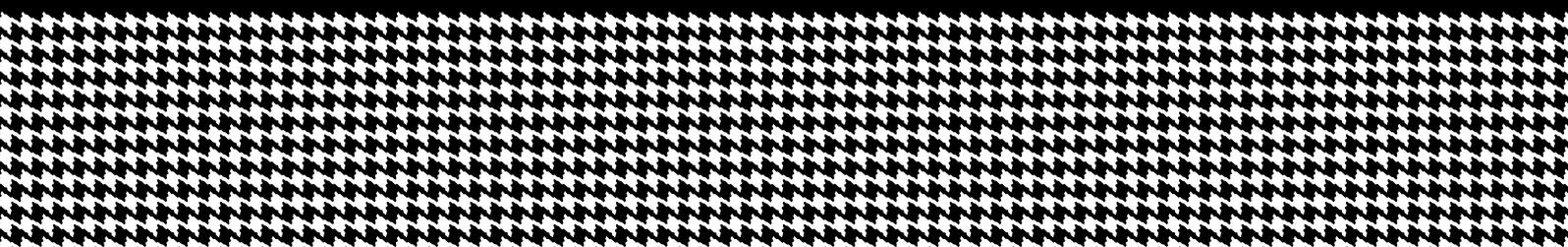


DAVID JONES

FY20

Modern Slavery Statement



Contents

Executive Summary	3
--------------------------	----------

David Jones' Structure, Operations and Supply Chains	6
Our Structure	6
Our Operations	6
Our Suppliers and Supply Chain	7
Our Products	7
Concession	8
Own-buy Vendors	8
David Jones Private Label	8
David Jones Fashion and General Merchandise	8
David Jones Food	9
Our Footprint – Private Label	10
Non-trade Procurement	10

Modern Slavery Risks in David Jones' Supply Chain and Operations	11
Modern Slavery Risks	11
Modern Slavery Risks in our Operations	13

Assessing and Addressing the Risks of Modern Slavery	14
Assessing the Risks of Modern Slavery	14
Risk Assessment Process	14
Risk Calculation	14
Due diligence	15
Risk Assessment – Supply Chain	17
Detailed Risk – Cotton	18
Detailed Risk – Food	19
Risk Assessment – Operations	19
Traceability	19

Addressing the Risks of Modern Slavery	20
Leverage and Long-term Relationships	20
Tailoring an Approach to Modern Slavery	20
Supplier Segmentation Matrix	20
Operations	21
Grievance Mechanisms	21
Utilising Pre-existing Policies and Processes	23
Human Rights Framework	23
Code and Policies	23
Establishment of a Dedicated Team	24
Our Modern Slavery Cross- Functional Team	25
Continual Monitoring and Adapting as Required	25
Training, Capacity-building and Collaboration	26
Stakeholders and Partners	27

Measuring Effectiveness	28
--------------------------------	-----------

Process of Consultation	29
--------------------------------	-----------

Appendices	30
-------------------	-----------

Executive Summary

David Jones is the oldest continuously operating department store in the world still trading under its original name.

In 1838, Mr. Jones' mission was to sell "the best and most exclusive goods" and to carry "stock that embraces the everyday wants of mankind at large". Today this mission remains, and we believe the stock that embraces customers' "everyday wants" is free from any form of modern slavery.

David Jones is a signatory to the United Nations Global Compact, through which we support the 10 principles on human rights, labour, environment and anti-corruption, and are committed to implementing the United Nations Guiding Principles on Business and Human Rights (UNGPs).

Our Good Business Journey encompasses the international and domestic issues that matter most to our colleagues, customers, shareholders and other stakeholders. This strategy consists of eight focus areas that underpin how we responsibly approach business in both our operations and supply chains to address material issues, including respecting human rights.

Annually we report on our progress against our Good Business Journey Strategy, which is integrated into our annual reporting suite and can be found on our WHL corporate website in our [2020 WHL Good Business Journey Report](#).

This includes actions in our operations and ethical sourcing in our supply chain and has been the foundation of the work we have completed to date in assessing and addressing modern slavery and broader human rights risks.

David Jones is proud to support the actions of the Australian government in the implementation of the Modern Slavery Act 2018 (Cth) (MSA) and its efforts toward advancing business' respect for human rights. In April 2017 we made a submission¹ supporting the Senate inquiry into modern slavery which led to the creation of the MSA. We recognise and congratulate all involved in the achievement of this legislation, acknowledging that meaningful implementation will be key.

This statement is published by David Jones Pty Ltd on behalf of all wholly owned subsidiaries and its parent companies, Vela Investments Pty Ltd and Osiris Holdings Pty Ltd, which are also reporting entities (together referred to as David Jones). This is our first modern slavery statement under any global legislation. This statement has been developed by our ethical sourcing and legal departments, with input from a cross-functional team including risk, sourcing, procurement, sustainability, corporate communications and our people team. In compliance with the MSA, this statement is a summary of the specific work executed during the 2020 financial year from July 1, 2019 to June 30, 2020 to assess and address modern slavery risks in our operations and supply chains, as well as our ongoing actions to respect human rights throughout our broader business activities and relationships. In preparing this statement, we have consulted our owned and controlled entities and their governing bodies, and all responsible members and entities have agreed on the actions we take against modern slavery.

In this first year of reporting, this statement outlines the actions we have taken in line with the requirements set out in the MSA. We looked at the over-arching risks of modern slavery in our operations and supply chains and took further due diligence actions in high-risk areas within our supply chain.

Throughout the year we have worked on enhancing our human rights actions and engaged with an expert third-party organisation, ELEVATE, to support us in identification of our modern slavery risks, the strategic approach to segmenting our risks, prioritisation of



¹Submission 88 – Inquiry into establishing a Modern Slavery Act
https://www.aph.gov.au/Parliamentary_Business/Committees/Joint/Foreign_Affairs_Defence_and_Trade/ModernSlavery/Submissions?main_0_content_1_RadGrid1ChangePage=5_20



actions and analysing any gaps in our programs.

This risk assessment will take us forward over the coming years and influence the way we evolve. Management of risks across our operations and supply chain will enable us to tailor our approach to tackling modern slavery.

FY20 milestones include:

Modern slavery cross-functional team brought into effect

Completed a third-party human rights and modern slavery risk assessment covering:

1. Supply chain (fashion, general merchandise and food)
2. Non-trade procurement
3. Operations, policies and protocols

Signed the Turkmenistan Cotton Pledge against forced labour in the cotton sector

David Jones, like the vast majority of businesses globally, was disrupted this year as we felt the effects of the COVID-19 pandemic in various ways; from our offshore supply chain, where impacts were felt early, to the challenging and ongoing situation we face in Australia and New Zealand with travel restrictions, border closures and government-directed lockdowns of both our stores and our head office. As a department store, both our operating business and the businesses of the brands we stock and partner with have been heavily affected. We have addressed the impacts and actions COVID-19 has had on our efforts in assessing and addressing modern slavery further in this report.

We are pleased with the actions we have taken to date to help combat modern slavery and we acknowledge there is a long road ahead for all. We are committed to this cause and our responsibility to respect all internationally recognised human rights, as articulated by the UNGPs.

We continue to adapt our approach and actions in assessing and addressing modern slavery risks.

The board of directors of David Jones Pty Ltd, Vela Investments Pty Ltd and Osiris Holdings Pty Ltd, have formally acknowledged and approved this statement and its contents on 30th March 2021.

Scott Fyfe
Director and Chief Executive Officer



*‘We are committed to
this cause and our
responsibility to respect
all internationally
recognised human rights’*

David Jones' Structure, Operations and Supply Chains

Our Structure

David Jones Pty Ltd is an Australian company (ACN 000 074 573) headquartered in Melbourne, Victoria.

David Jones' Australian business is made up of 23 companies in a hierarchical corporate entity structure, through which non-customer-facing subsidiaries of David Jones are involved in operations such as property.

David Jones' parent company is Woolworths Holdings Limited (WHL), a South African business listed on the JSE.

For clarity, Country Road Group Pty Ltd (Country Road Group) and its associated entities, which are also subsidiaries of Woolworths Holdings Limited, will report separately via its own modern slavery statement. There is a degree of similarity between the modern slavery statements of Country Road Group and David Jones due to the centralised actions and processes undertaken by both businesses, largely via a shared head office in Melbourne, Victoria.

Our Operations

David Jones' main operations involve the management of 47 physical stores across Australia and New Zealand, including department stores and stand-alone food stores, employing over 6,500 retail employees in Australia and over 200 in New Zealand. David Jones sells womenswear, menswear, childrenswear, apparel, footwear, accessories, homewares, beauty, gifts, electrical products and food under various trading arrangements described in this statement. These goods may be sold under the David Jones brand or by third-party brands with whom we partner.

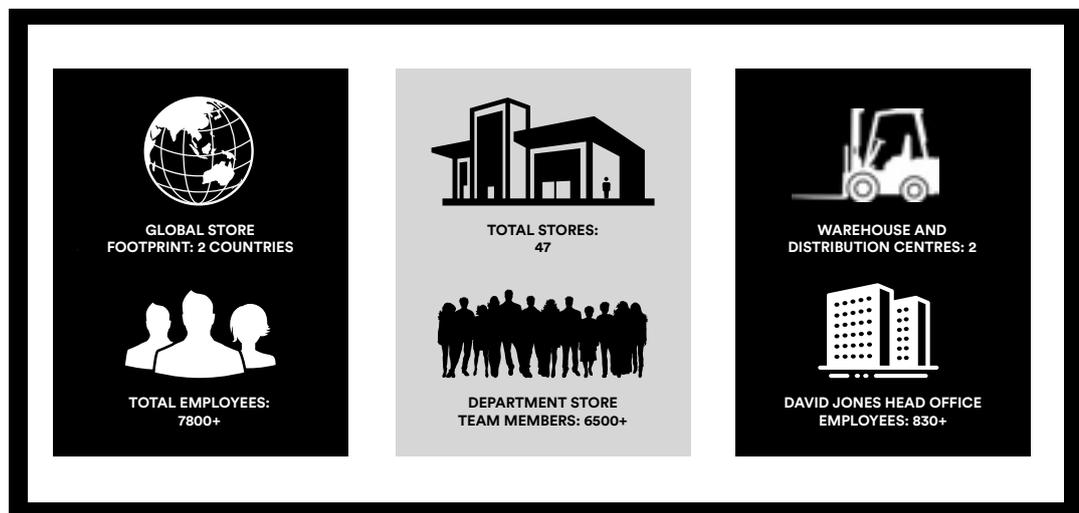
David Jones engages and partners with international and domestic brands and suppliers to provide goods to David Jones. Our operations range from buying and planning through to selling our products through our department stores and online.

David Jones does not manufacture goods directly.

Our warehousing and distribution arrangements include one corporate run facility, which employs a total of 270 people, which predominately services our online channel, and a second third-party logistics (3PL) warehouse engaged to service bulk stock for our department stores.

Our head office is located in Melbourne, Victoria where we employ over 830 team members on full-time, part-time and casual agreements across our buying, planning, marketing and shared services teams.

We have a partnership with BP to supply David Jones-branded food products to various locations across the BP store network. More on this partnership and locations can be found [here](#).





Our Suppliers and Supply Chain

As a department store, we have various trading arrangements in place with the companies we work with to design, develop and deliver clothing, general merchandise and food into our stores, and to supply non-trade procurement goods and services to David Jones.

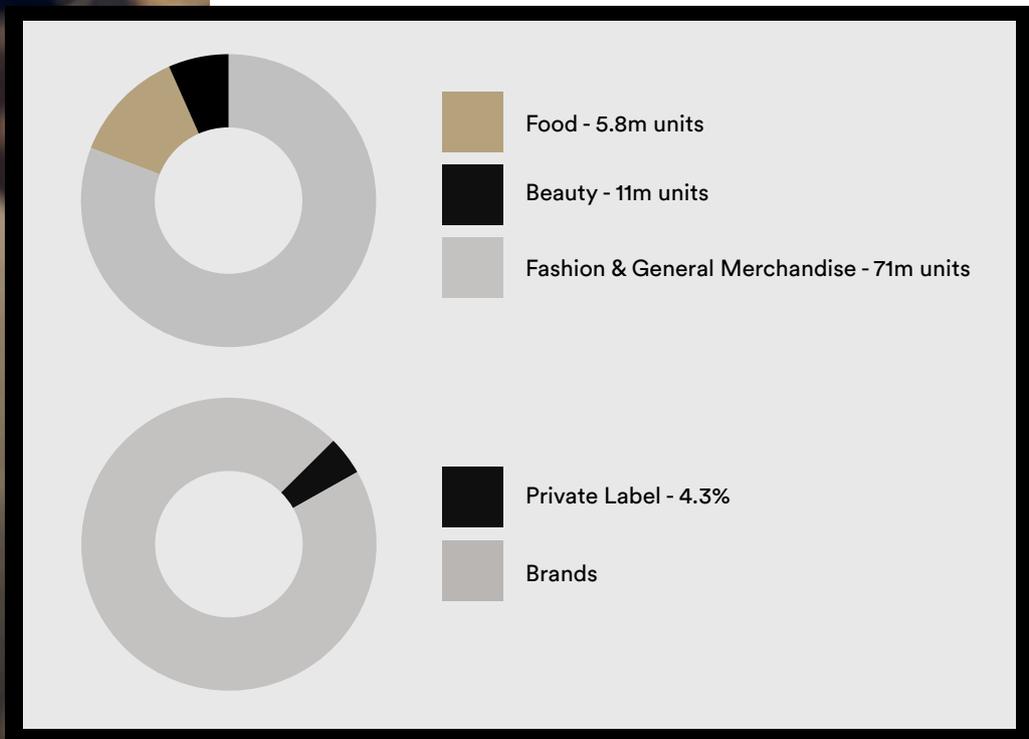
Our supply chain trading arrangements with our suppliers and brand partners primarily operate in four distinct ways:

1. Concessions – where third-party brands operate their own 'shop-in-shop' area within David Jones stores
2. Own-buy vendors – typically a wholesale arrangement through which we sell our business partners' brands
3. Private label – products we develop under our proprietary brand names, but which are manufactured by third parties
4. Non-trade procurement (NTP) – where goods and services that we do not sell are supplied to David Jones to support the operation of our businesses, including ITC, logistics, packaging, marketing and cleaning services.

The above definitions of our trading arrangements with suppliers, brands and concessions are managed through our business, each with their own set of agreements and procedures. Suppliers who provide goods we sell are managed through buying teams in collaboration with oversight from our legal and ethical sourcing teams. Suppliers engaged in NTP activities are managed by our head office NTP team.

Further in this statement we will discuss each of these trading arrangements and how we understand the potential modern slavery risks associated with them.

Our Products (FY20 received units)





Concession

David Jones collaborates with some of the most well-known fashion brands both domestically and internationally to bring our customers a tailored luxury fashion offer. David Jones acts as a small-format space provider to these brands to provide a premium department store retail channel environment. During FY20, 130 concession brands were represented within our fashion and general merchandise, including food and beauty departments.

Own-buy Vendors

David Jones searches the globe to procure a range of brands to sell in our stores. We stock over 2000 third-party brands ranging from small boutique brands to larger internationally known brands across our fashion, general merchandise and food businesses.

We purchase ranges and products from these brands in a number of wholesale-type agreements.

We engage with these brands on modern slavery and broader human rights issues, both directly through our trading arrangements, as well as in pre-competitive spaces through various forums and peer groups.

David Jones Private Label

In line with the UNGPs, we understand that we may cause, contribute or be directly linked to modern slavery. As such, we have assessed that we are more likely to cause or contribute to modern slavery and broader human rights risks in our private label business where our actions may have more impact.

Therefore, in this reporting period we have focused our work on assessing and addressing modern slavery risks in our private label business, as described within this statement.

David Jones Fashion and General Merchandise

The products sold in David Jones stores under the various David Jones private labels listed in [Appendix 3](#) are developed and sourced via a range of methods, either by David Jones directly contracting with factories to manufacture products or via sourcing agents or trading companies who subcontract to factories authorised by David Jones to make products specifically for our brand labels.

Depending on the product type, each supply chain might be different in the volume of supply chain actors involved in the manufacture of the item, and the timing of when these suppliers are involved in the process.

Some product supply chains are short, and others can be much longer and more complex.

An example of a cotton t-shirt supply chain:

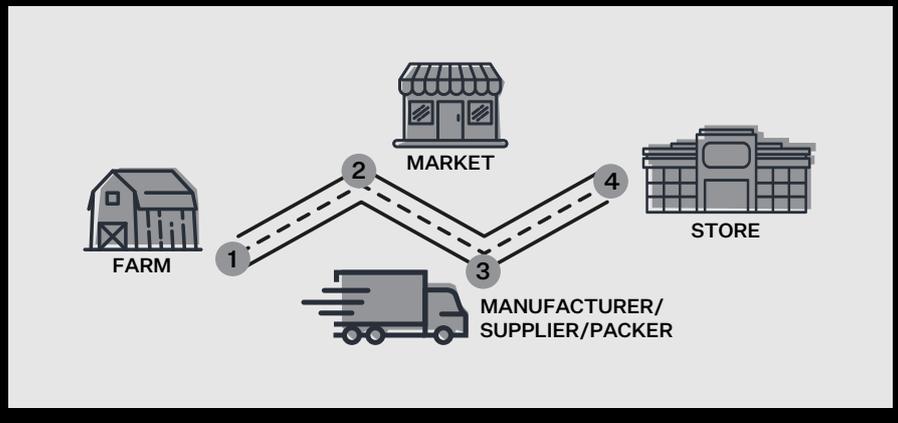


David Jones Food

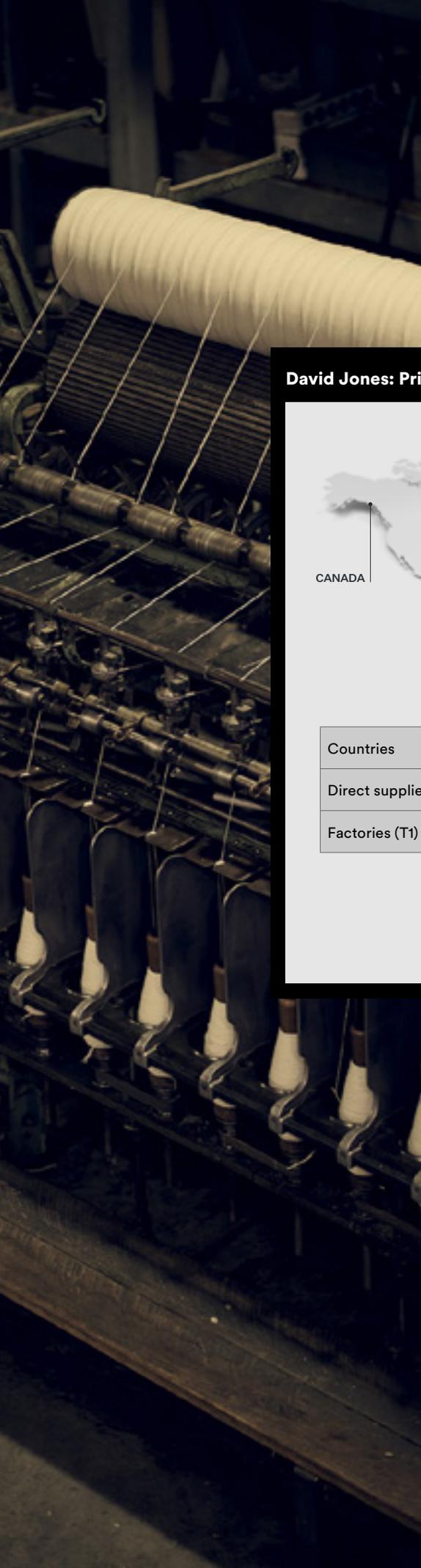
David Jones private label food comprises a diverse range of fresh and long-life foods, each with its own distinct method of manufacture and procurement. We work to source a specialised offering of food that meets our customers' high expectations of quality, availability and exclusivity.

We source our food products either directly from farms or manufacturing facilities, or from produce suppliers who engage with subcontracted factories, markets and farms to provide produce under the David Jones name. We partner with these suppliers to procure our range of fresh foods and collaborate with key manufacturers to develop a range of own brand foods across the fresh and long life categories.

Example of fresh food supply chain:



Across our private label food and fashion supply chains we have trading relationships with 189 suppliers, who may operate the finished goods facilities themselves or, with approval, subcontract to alternate sites to complete the final production.



Our Footprint – Private Label

In this reporting period, David Jones products were manufactured in 123 factories in our fashion, general merchandise and 121 sites across our food business. Due to the range of products sold under our private label brands, we engage with suppliers and factories from a number of countries worldwide who support us to develop and manufacture these products.

During this reporting period our products were sourced from 21 countries, with our concentration of sourcing locations listed on the below map.

David Jones: Private label top 10 sourcing locations



Countries	21 countries
Direct suppliers	189 suppliers
Factories (T1)	244 factories

Private label - Goods for sale by country of origin	Private label (Tier 1) factory sites
Australia	102
China	74
Italy	23
India	20
South Africa	6
Others	19

We are committed to continuing to increase levels of transparency. In 2019, we became the first Australian retailer to publish an interactive factory map of where our private label goods are manufactured. This map is updated regularly and is available on our [corporate website](#).

We see transparency as a critical part of meeting the expectation under the UNGPs that we know and show that we are respecting human rights, and as we seek greater transparency deeper into our supply chain, we understand the importance of setting a best-practice path for our supply chain partners.

Due to the extensive range of products we procure and sell under our David Jones brand names, our products come from many raw material sources and nuanced supply chains around the world. Our aim is to trace all sub-suppliers involved in the manufacturing of our private label products to continue to assess and address human rights.

Non-trade Procurement

Our NTP team supports the broader business with managing contracts for suppliers who supply goods and services which support the operations of our head office and department stores, but which we do not sell. These goods and services may include office supplies, contractors, ITC equipment, marketing materials, cleaning services, packaging, instore fixtures and logistics.

Modern Slavery Risks in David Jones' Supply Chain and Operations

We know slavery did not end with abolition in the 19th century and now it is amongst the world's largest and most complex human rights issues.

The Global Slavery Index³ estimates there are approximately 40.3 million people in some form of slavery globally. Of these, 24.9 million are in forced labour, which includes 16 million in the private sector. Further to this, we know modern slavery can occur in any location and any situation, in organisations' operations and supply chains. In Australia there are an estimated 15,000 people living in modern slavery conditions. We recognise that modern slavery risks exist in all businesses, including David Jones.

We understand that freedom from modern slavery is an internationally recognised human right. We also know that modern slavery does not occur in isolation, and that these impacts are often connected to other human rights breaches, especially those regarding decent work. Addressing modern slavery must not stand alone in our commitment to operating our business responsibly, and so we integrate our assessments, actions and responses to modern slavery within our broader ethical sourcing and human rights program across both our operations and supply chain activities.

We recognise our responsibility to respect human rights in all our business activities and relationships under the UNGPs.

We recognise and apply the Australian government's definition of modern slavery, including the eight types of slavery practices included in the MSA. Each of these types of modern slavery have clear legal definitions in Australian and international law and are explained in further detail in [Appendix 2](#).

Modern Slavery Risks

In 2019, during this reporting period, we enhanced our assessment methods by drawing on expertise from independent data driven business risk and sustainability solutions provider, ELEVATE, to support us in undertaking a gap analysis and broader human rights and modern slavery risk assessment across our operations, and our supply chains for David Jones' private label goods.

This project assessed our policies and protocols in our supply chains, considered how we take preventative actions and highlighted any gaps in our approach to respecting human rights and modern slavery.

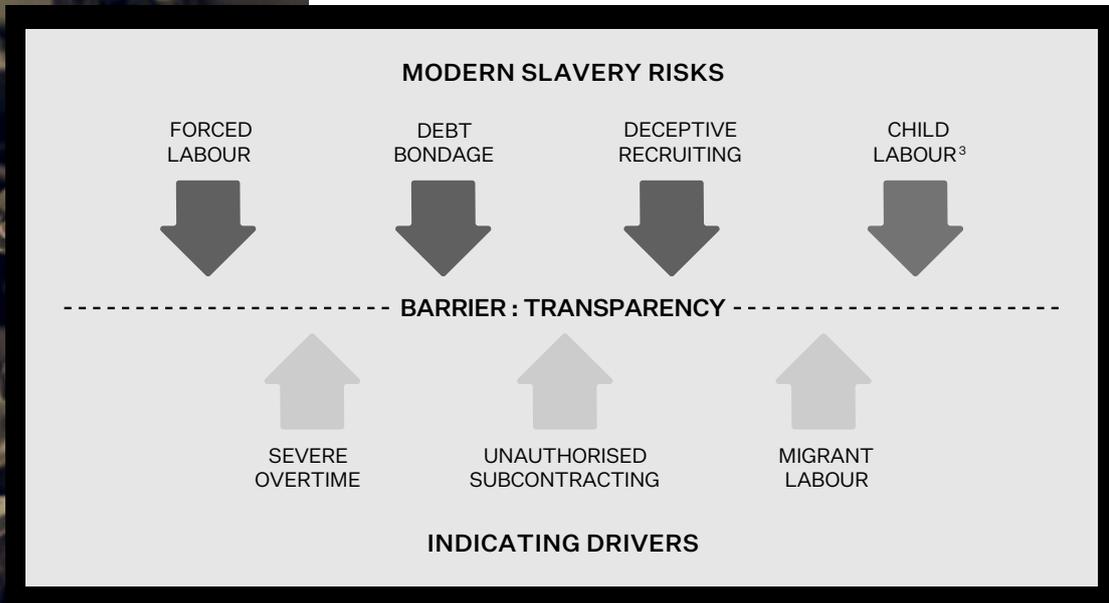
Our operations are concentrated in Australia and New Zealand, and with established policies and protocols in place we undertook a high-level assessment of our operations.

Through our NTP supply chain, we trade with a wide variety of suppliers who provide goods and services. We took a sector view in our risk assessment, provided further in this section, and will look to assess NTP categories in more detail in future reporting periods.

Recognising where we may cause the most impact, for this reporting period we focused on assessing our private label supply chain, where goods are contracted to suppliers to be manufactured and supplied to us for sale under "David Jones" brand labels. This work provided us a baseline assessment of the modern slavery and broader human rights risks we may cause or contribute to.

We monitor both macro risks and any specific risks that may be associated with the business engaged in our operations and supply chains. We source information on these risks from various resources including desktop research, media monitoring, industry expert advice, multi-stakeholder initiatives, non-government organisations, industry partners, peers and our suppliers. We are conscious of COVID-19 and the associated modern slavery risks heightened by the pandemic.

Using the above forms of analysis and incorporating the risk assessment across our operations and supply chains, we have identified the most common forms of modern slavery risks that may occur as:



These risks have been identified based on prevalence of occurrence when mapped against our supply chain using geographical, industry and product-type data to identify higher risk sites against these risk types.

Examples of these risks that could potentially occur within our operations and supply chains are:

- Forced labour involved in the cultivation, harvesting and processing of cotton or similar raw materials in our fashion supply chain
- Debt bondage occurring in the cleaning services sector in our NTP supply chain
- Deceptive recruiting used to coerce workers into farm work in our food supply chain
- The worst forms of child labour used in the mining of raw materials in our supply chains, such as the colour additive mica used in beauty products.

To identify modern slavery and broader human rights issues, there is often a barrier of transparency due to suppliers and their supply chains being deep and complex. Using our risk assessment, we can take more targeted actions based on these specific risks, understanding the indicators that may lead to modern slavery-like practices by examining the prevalence of these risks against our due diligence and taking further action to investigate, collaborate and mitigate these risks.

³Modern Slavery Act 2018 (Cth) defines one of the types of modern slavery as, the worst forms of child labour, however we have noted here that the Act's definition is less prevalent than general child labour risks.

In our non-trade procurement (NTP) supply chain, due to the breadth of industry categories from which we source NTP products, the risk assessment viewed risks at a macro level.

These most prevailing risks associated in our NTP supply chain can be summarised into three categories below:

Facilities management, which includes cleaning services, maintenance and repair, and security services where these services are labour intensive and subcontracting is commonly used. In Australia, migrant workers are more likely to constitute a greater percentage of the relevant workforce, where exploitation may occur.

Recruitment and temporary labour is used in both our operations and non-trade procurement areas, where recruitment agencies may be used.

Lack of transparency of the labour arrangement when using indirect recruitment methods can drive an increased level of risk.

Shipping, freight & logistics sectors straddle both the shipping of goods from international sources to our warehouses, and distribution from the warehouse to our stores and customers. These areas can rely on contract workers and temporary labour, known to carry higher risks of modern slavery.

These identified NTP categories will be a focus in our modern slavery work in the coming years and will be assessed and addressed in further detail in future reporting periods.

Modern Slavery Risks in our Operations

While we consider the greatest risk of modern slavery lies in supply chains associated with our retail trade – that is, clothing, textile, footwear, accessories, food, and homewares manufacture or non-trade procurement - we acknowledge that our entities and operations not directly related to the manufacture of our goods are not exempt from the risks of modern slavery.

David Jones employees are employed as full-time, part-time or casual employees. All employees are covered by an Enterprise Bargaining Agreement, relevant Award or Individual Employment Contract, depending on their position and work location.

Based on our assessment, the risks of modern slavery occurring in our direct operations is considered to be low.

Assessing and Addressing the Risks of Modern Slavery

Modern slavery can be challenging to find, and we use a risk-based approach to identifying inherent and changing risks in our supply chains and operations to prevent occurrences. We identify, assess and manage modern slavery and broader human rights risks in an agile and adaptive manner through our human resources, legal, risk and ethical sourcing teams where we deploy agreements, policies and procedures in addition to "on the ground" assessments that we conduct both directly and utilising third parties to prevent and mitigate these risks.

Assessing the Risks of Modern Slavery

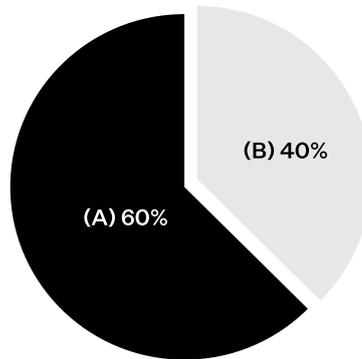
Risk Assessment Process

Engaging with our expert partners at ELEVATE, in 2019 we undertook a detailed modern slavery and human rights risk assessment across our private label and NTP supply chains.

This analysis reviewed our policies and procedures, assessed a macro industry view of our non-trade procurement supply chain, and took a deep dive to identify the prevailing risks for our suppliers and their factory sites where our goods for sale are manufactured under our various private labels.

The risk indices used in this assessment were a combination of weighted public and proprietary indices, which were applied to each site to provide their risk rating.

Risk calculation



A - PUBLIC DATA

Publicly available data comprising of inherent country risk scores (e.g Global Slavery Index, Corruption Perceptions Index, World Bank, UNICEF)

B - PROPRIETARY AUDIT DATA

Proprietary supply chain risk data aggregated from global audits consisting of sub-indices like transparency, management systems, working hours, wages, migrant workers, health & safety, labour standards and business ethics

The weighted risk algorithm used in our risk assessment blends risk indices described above from (A) and (B) into scorecards and aggregated analytics, generating risk profiles for countries, provinces and sectors based on the data combinations and organises them into four risk categories: Extreme, High, Medium and Low.

Further in this statement we describe how we use the above risk calculations and apply them into our supplier segmentation to prioritise our efforts in addressing modern slavery risks in our supply chain.



Due diligence

Global food cultivation and clothing and textile manufacturing has been largely dependent on human labour. Emerging global economies drive the supply of labour for these industries and often, there are correlations between low-skilled labour and labour-related issues occurring through the exploitation of an under-educated and vulnerable workforce.

We understand that our supply chain operates in an environment with a higher risk of potential labour-related issues due to geographical and industry risks and have a rigorous due diligence program in place to identify, prevent and mitigate any violations against human rights, including forms of modern slavery.

The aim of our risk-based approach is to take preventative measures at an early stage in the process to reduce the risks of adverse human rights impacts. This helps us to support the buying teams to pre-screen suppliers, understand their risks, and work to create long-term collaborative partnerships through leverage and continuous improvement.

Our human rights approach, which includes preventing and addressing modern slavery, is based on and aligned to the concept of human rights due diligence in the UNGPs, and includes:

1. Identifying and assessing actual and potential human rights risks (i.e. in our supply chain through third-party factory site audits)
2. Acting on these findings by collaborating to remedy issues (i.e. corrective action plans based on audit non-compliance findings)
3. Tracking and continuously monitoring results and progress (i.e. SEDEX⁶ (Supplier Ethical Data Exchange) online monitoring tool and risk reports)
4. Communicating our actions (i.e. WHL sustainability report, industry reports and via our websites, as well as moving forward through this statement).

Our Approved Factory Program (AFP) is our due diligence process for private label suppliers to provide ongoing assessment of the factory sites that produce our goods. This program is part of our broader ethical sourcing requirements which are nuanced for each of the trading arrangements described earlier in this statement.

Suppliers working across our private label supply chains (fashion and general merchandise) must have their Tier 1 factory sites audited both prior to working with us and within our AFP cycle to assess the actual and potential risks of modern slavery at specific sites of manufacture.

In our private label food business, our suppliers' factory sites undergo both technical assessments and social assessments through our AFP via self-assessment questionnaires or audits to identify any potential risks in their business. We continue to develop this process with our food suppliers as we mature our food business and the supply chains that work with us.

⁶60,000 member organisations from over 180 countries use the Sedex platform to exchange data, manage business risk, meet compliance and drive positive impact on people.

The AFP involves suppliers being assessed against nine key pillars of our Supplier Code of Conduct, which is aligned to the [ETI Base Code](#). Assessments are carried out through a range of methods including self-assessment questionnaires and audits that identify and assess actual and potential human rights risks. The nine key pillars include modern slavery, as well as broader labour exploitation indicators and are summarised as follows:

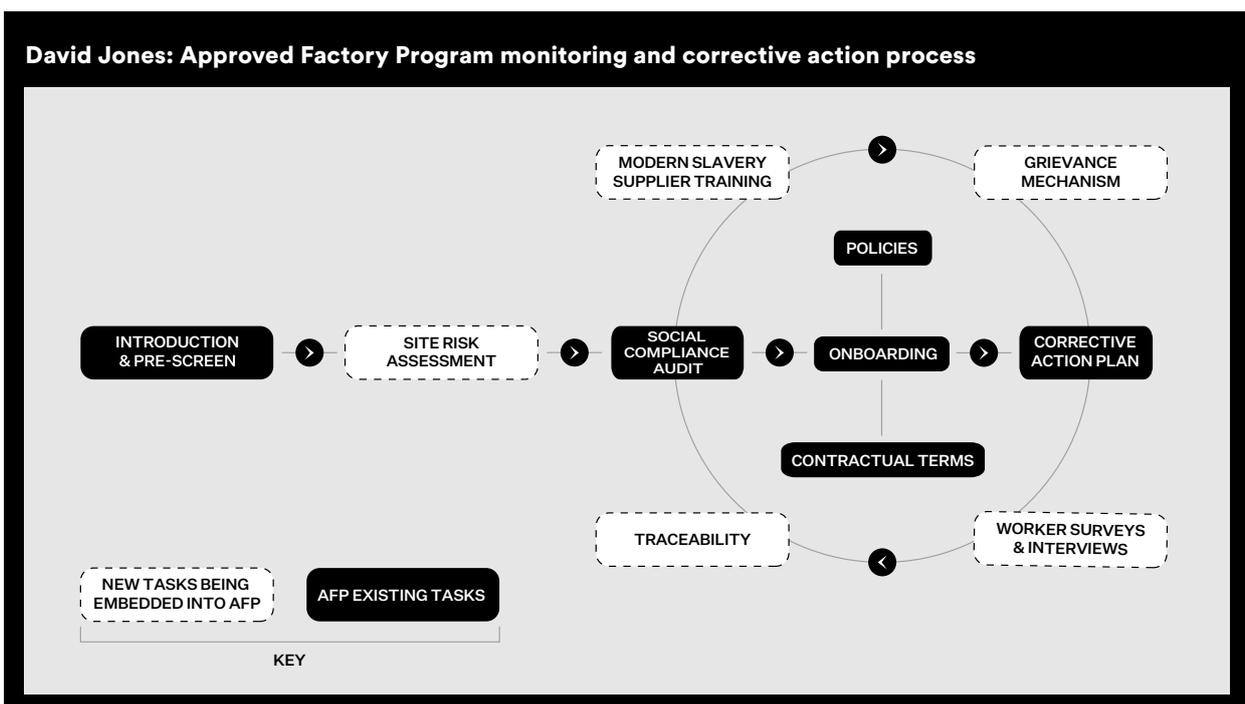
1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practiced
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed.

We monitor our private label factories' auditing and corrective actions using both manual processes and a web-based platform SEDEX. Information on this system is freely shared between factories, suppliers, auditors and brands to assess risks, manage compliance timeframes and drive corrective actions where required.

As part of the assessments, our business, suppliers and factories are provided with clear corrective action plans (CAP) where issues exist in factories to address any gaps identified.

These assessments are administrated and monitored by our ethical sourcing team as part of its dedicated role within our business, and the findings from these assessments are recorded, monitored and reported on in both regular and ad-hoc reporting periods.

The most critical issues, where immediate intervention is required, are escalated to relevant stakeholders and our executive level for awareness, consultation and approval of actions to remediate issues, which may include termination of supplier relationships if required.





Summary of Approved Factory Program (AFP) audits in FY20

Audits completed	33
CAP rectification	Total critical non-compliances: 3
Issue areas	Overtime, lack of safety measures on machinery, lack of social insurance, incidents of workers not wearing PPE.

There were no instances of modern slavery found in the audits conducted during the reporting period ending June 30, 2020.

We continue to explore processes and systems to strengthen our controls as part of our initial onboarding and continuous monitoring of our suppliers and their factories, and we are committed to addressing any adverse human rights issues we may cause, contribute or be directly linked to.

Risk Assessment – Supply Chain

Where we have assessed our risks relative to the business undertakings to utilise a service or purchase goods, we have determined that our more direct trading arrangements provide us with the greatest ability to identify and address any potential or actual adverse human rights impacts. Even where we do not cause or contribute to harm in these situations, these relationships may provide us with the greatest leverage to exercise influence over impacts to which we may be directly linked. These areas may not be the largest parts of our business, however we recognise the importance of not focusing on spend in driving our actions but on concentrating on the severity of impacts and our potential involvement. In line with this view, we have prioritised assessing our private label arrangements across our business for modern slavery risk management, which includes clothing, general merchandise and our food business.

In our supply chain risk assessment undertaken in this reporting period, we have taken two analytical approaches to assessing the risks of modern slavery across our Tier 1 private label suppliers in our fashion, general merchandise and food supply chains.

1. Relative site risks based on geographical, industry and product risks
2. Adjusting these risk calculations by factoring in due diligence actions already in place to provide a more accurate assessment of these risks.

Based on the risk assessment completed, we have no Tier 1 suppliers categorised as extreme risk.

Conclusions drawn from this risk assessment can be summarised as:

- High-risk sites exist across our supply chain due to their locations across south and east Asia where fashion and general merchandise products are manufactured, including China, India and Thailand
- Prevailing risks of modern slavery exist in raw materials and agricultural sectors including the cultivation and harvesting of cotton
- High risks of broader human rights impacts exist due to business ethics, lack of transparency and prevalence of subcontracting in these geographical regions and industries.

Further down the value chain, risks heighten as the use of informal labour increases, the supply chain becomes more opaque and governments' protection of workers reduces.

As we identify these sub-suppliers and increase our traceability of the inputs and labour sources that process our products, we will continue to assess and address these risks and take the appropriate actions to remedy them.



Detailed Risk – Cotton

Identified in our parent company's corporate sustainability report [WHL Good Business Journey Report](#), ethical sourcing is considered a key materiality risk in our supply chain, including both the manufacturers who make our finished goods and the production and processing of raw materials.

Globally, cotton is one of these material risks, with long-established labour rights and slavery issues in the farming and cultivation of cotton for centuries.

Well-known risks or allegations of forced labour and child labour exist in the cotton-growing regions of Uzbekistan, Turkmenistan, India and in the Xinjiang Uyghur Autonomous Region (XUAR) of China.

David Jones has signed pledges against forced labour in the cotton sector in both Uzbekistan⁶ and Turkmenistan⁷.

We continue to work with multi-stakeholder initiatives such as the Better Cotton Initiative (BCI) to source cotton from more sustainable and ethically aligned programs that support decent work, and conduct due diligence against broader human rights and modern slavery issues.

Forced labour in the XUAR

There continues to be growing documentation on the reported human rights abuses against Uyghur and other minority groups, particularly in the XUAR of China.

Whilst David Jones has no direct relationships with suppliers or factories in this region, we acknowledge the reports and publicly documented investigations, and continue to monitor our supply chain to assess modern slavery and broader human rights risks.

Whenever we need to better understand allegations relating to a particular location or type of good or service, we build on our existing human rights framework and modern slavery risk management activity to better understand the local context and related risks. This includes:

- Monitoring information from international experts in human rights and social compliance auditing to identify risks to auditors in the region
- Consulting with human rights experts on how to address any potential human rights risks
- Requesting information from key bodies including the United Nations and government agencies
- Collaborating with international retail brands to share learnings and actions
- Learning from guidance from international organisations
- Engaging with multi stakeholder initiatives. For example, David Jones partners with a multi-stakeholder initiative called Better Cotton Initiative (BCI) which aims to transform the cotton sector making it better for the people and the planet. In 2020, BCI suspended the licensing of cotton grown in the XUAR and no longer operates in the XUAR due to the ongoing risks associated with that region.

⁶<https://www.sourcingnetwork.org/uzbek-cotton-pledge>

⁷<https://www.sourcingnetwork.org/turkmen-cotton-pledge>

Detailed Risk – Food

We source a specialised food offering with a supply chain that is predominantly concentrated within Australia. Considerations also made were that from a country level landscape, Australia is considered a ‘low’ risk region based on modern slavery indices, however risks do still exist. Due to the nature of the food industry and the products we source we specifically looked at migrant and forced labour metrics in our food business, owing to the common use of migrant labour and short-contract labour used in the harvesting and picking of seasonal crops.

These types of labour practices have a higher risk of labour violations occurring and may lead to modern slavery practices. We actively manage these risks through our AFP, with a particular focus on industries exposed to seasonal labour.

Throughout FY20 we added four suppliers and four factories to our food product supply chain. These supply chain actors have not been included in our overall risk assessment listed above. These new sites however, have been assessed using our risk metrics and we have completed due diligence on these risks through our AFP.

Risk Assessment – Operations

The risk assessment completed in this reporting period assessed the controls, policies and procedures we have in place within our operations to reduce the risk of modern slavery and broader human rights impacts. Assessing the coverage of these mechanisms and the location of our operations in Australia, the assessment has classified the risks of modern slavery occurring in our operations as low.

We continue to review our policies and mechanisms to ensure they are adequate to avoid causing or contributing to human rights impacts.

Traceability

By completing our supplier risk assessment, we have a clearer understanding of where our geographical and product risks are inherently higher. Layering this with our due diligence auditing procedures within our AFP, we have found no indication of actual instances of modern slavery occurring in our supply chain.

We understand that modern slavery is often hidden deep in the supply chain, where more informal types of work occur and where governance of states and businesses reduces. This complexity heightens the risk of modern slavery violations and continues to be a barrier to uncover potential or actual occurrences of modern slavery.

Whilst the focus of our risk assessment has been our Tier 1 supply chain in this first year of reporting, we have made progress to trace suppliers beyond Tier 1.

We will continue to trace back through our supply chain to establish greater visibility of the actors involved in the growing, processing and manufacturing of our goods using various layers of information to assess and address modern slavery and broader human rights issues.

Addressing the Risks of Modern Slavery

Leverage and Long-term Relationships

To make sustainable change on addressing modern slavery, partnerships from governments, peers, industry and suppliers must be formed. Leverage, whether our individual relationship leverage, or greater industry leverage, plays an important role in driving global change to prevent, mitigate and remediate human rights risks. In line with the UNGPs we seek to increase our leverage where we can to influence more responsible behaviour including by our suppliers.

We consider our leverage being one or a combination of the following:

- Spend value (including rising/falling spend)
- Years of relationship
- Type of relationship (agent, trading company, direct supplier)⁸.

As a business we aim to have open, collaborative and functional working relationships with all suppliers that move beyond a buying and selling model. By using leverage we can have a strategic and influential role in ensuring respect for human rights in our supply chain.

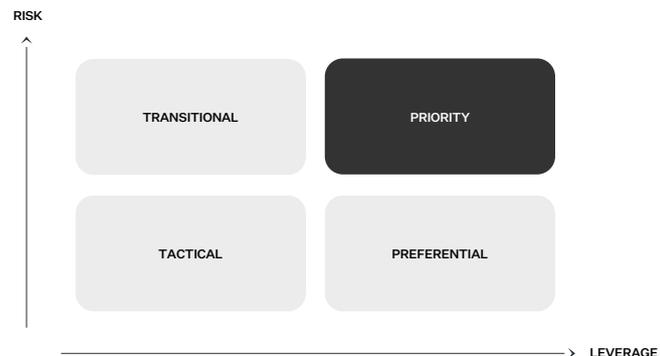
If we were to find modern slavery instances in our supply chain, our primary approach would be to work with suppliers to build leverage and exercise influence to enable equitable remedy for the affected person/s. If collaboration to remedy the issue was not employed by the supply chain actors, we would seek to terminate the relationship if required.

Tailoring an Approach to Modern Slavery

Integrated into our risk assessment work completed in early 2020, we have segmented our factories (see **Supplier Segmentation Matrix**) to identify groups of suppliers through which we can further prioritise our modern slavery work.

This segmentation graph is calculated by identifying our higher risk factories, and where we have greater leverage to enable prioritisation of work to support effectiveness in addressing modern slavery risks.

Supplier Segmentation Matrix



⁸An Agent works on behalf of the buyer (David Jones) where the factory and agent relationship operate in tandem. A Trading Company is a direct relationship between David Jones and the trading company, where the trading company does not own any factories that produce goods and which subcontracts to an approved factory. A Direct Supplier owns or controls a factory that manufactures our goods. The relationship where David Jones has the most oversight and leverage is a Direct Supplier relationship.



This type of matrix assessment helps us build a tailored approach to addressing modern slavery in a more segmented and effective way. Whilst this segmentation helps to prioritise our work, we understand that action may be required even where we do not have leverage due to the nature of the risks.

We have commenced developing actions for these segments, improving our due diligence and auditing procedures and listening to workers, and will take these actions in the coming years.

Operations

Within our operations, our human resources and legal teams review and ensure that employment contracts are in place with all employees to ensure we respect human rights.

We address the risks of modern slavery in our operations by ensuring these policies and procedures are in place and are regularly reviewed and updated, as well as raising awareness through engagement across our business. Accessibility to these policies enables awareness for employees to understand their rights, and enables them to raise concerns including any potential human rights issues such as modern slavery.

More detail on the policies and protocols used in our operations are detailed further in this statement.

Grievance Mechanisms

David Jones has established internal and external grievance channels through which employees and workers in our supply chain have the opportunity to raise concerns.

Grievances relating to modern slavery or broader human rights risks such as the 'physical conditions of work' can be raised directly with our human resources team as outlined in our Grievance and Dispute Resolution Policy. Further, David Jones has an ethics hotline via which issues can be raised and investigated confidentially and anonymously.

Within our supply chain, grievances can be raised via our ethical sourcing email address listed in our Supplier Code of Conduct and are assessed and managed by our legal and ethical sourcing teams to ensure outcomes and remedies are settled in accordance with internationally recognised human rights.

To add to our efforts to protect vulnerable workers in our supply chain we believe that worker voice plays a critical part in effectively assessing and addressing modern slavery and broader human rights risks. We are in the process of developing a digital grievance mechanism pilot project through which workers in our supply chain have the ability to directly raise any concerns with David Jones. This digital mechanism aims to enable workers to use local language to communicate directly with David Jones to raise concerns anonymously.

We will report on the implementation of this pilot project in future reporting periods.

Case study – Labour hire grievance

In late 2019, our Ethical Sourcing team received a grievance through our ethical sourcing team inbox from a former employee of a food supplier to David Jones private label.

The former employee was hired through a temporary labour agency and their grievance related to allegations surrounding practices of the labour hire agency. The allegations related to:

- Exceeding visa-constrained work hours
- Being denied the right to make workers' compensation claims
- Refusal of overtime or penalty rate payments.

Once the grievance was received, internal ethical sourcing and legal teams engaged individually with the former employee and supplier to investigate the allegations.

Whilst the supplier conducted their own investigation of the labour hire agency, David Jones took action to investigate by implementing third-party audits of two supplier sites to assess labour standards, health and safety, business ethics and environmental practices including any practices pertaining to the raised grievance.

During the audit process, a member of our ethical sourcing team shadowed one of the site audits to gain further insight into the supplier, and to ensure David Jones' expectations in relation to our Supplier Code of Conduct were re-iterated to the supplier management team.

The results of the audit and worker interviews found historic issues relating to contracts, visa-holder management, awards and overtime calculations relating to a labour-hire worker. Whilst modern slavery was not found in this audit, without the identification or remediation of these issues, this issue could have had the potential to further evolve and lay the foundations for modern slavery to occur.

Through the remediation process post-audit, the ethical sourcing team required the supplier to complete a corrective action plan focusing on key measures which included:

- Ensuring workers were backpaid for any discrepancies found
- Reviewing all employee award classifications to ensure each employee's award was in line with industry regulations
- Ensuring all employees' contracts were correct and in line with their tenure at the business
- Creating a policy for work with labour-hire agencies
- Engaging with local government authorities who manage health and safety and labour-related issues to conduct their own assessment of the supplier's policies and management procedures.

As a result of the remediation process developed between all parties, the supplier decided to move away from this specific labour-hire company and adopt controls for a direct labour force.

The supplier was also required to undertake a follow-up audit to assess the key issues and process improvements to ensure all employees were protected and respected at work.

Due to the COVID-19 global pandemic this follow-up audit was postponed to 2021, however our ethical sourcing team has remained in contact with the supplier throughout the pandemic supporting where necessary with adjusted payment terms.

This case highlights the importance of worker voice as an integral element in the ability to identify potential modern slavery risks.

Utilising Pre-existing Policies and Processes

David Jones has a number of policies and processes dating from before the enactment of the MSA, which support the prevention of modern slavery.

Human Rights Framework

David Jones has robust due diligence measures in place to respect human rights in our operations and supply chains.

In 2015, the WHL Group's corporate social responsibility strategy, referred to as our Good Business Journey, was extended to its Australian subsidiaries including David Jones.

Our Good Business Journey encompasses the international and domestic issues that matter most to our colleagues, customers, shareholders and other stakeholders.

This strategy consists of eight focus areas that underpin how we responsibly approach business in both our operations and supply chain to address material issues. This includes our actions in supplier due diligence, risk assessment and the actions we take in respecting human rights across our business activities and the ethical sourcing of our products.

We report annually on our Good Business Journey, which includes our ethical sourcing program that works to protect and address human rights risks. This report is integrated into our annual reporting suite and can be found on our WHL corporate website in our 2020 WHL Good Business Journey Report.

Code and Policies

We have a clear set of policies and procedures our people and suppliers are required to adhere to in order to help us effectively manage human rights risks in our operations and supply chains. These documents set clear obligations for our employees and suppliers, as well educating them on mechanisms to raise complaints if any of these policies are breached.

The key documents relating to the prevention and remediation of modern slavery and broader human rights issues, as referenced above, can be summarised as follows:

Operations	Supply chain
Employment Contracts	Supplier Agreements
Employee Code of Conduct	Supplier Code of Conduct
Workplace Behaviour and EEO Policy	Approved Factory Program
Grievance & Dispute Resolution Policy	Whistleblower Policy

These core documents are accessible to team members and suppliers, within contracts and agreements or on our company intranet or public website.

In our supply chain, David Jones has clearly set out our expectations of suppliers in our publicly available [Supplier Code of Conduct](#), and through contractual arrangements. These requirements extend beyond our direct suppliers to sub-tiered suppliers where these standards are expected to be promoted and managed. The Supplier Code of Conduct is mandatory for all suppliers, including all trading arrangements described earlier in this statement.

All concession, own-buy, private label and non-trade procurement suppliers are required to adhere to the Code or their brand's own equivalent code.



Our Supplier Code of Conduct, and the Supplier Agreement which prescribes adherence to the Code, require suppliers to commit to prohibiting the use of slavery-like practices, including forced labour and child labour. It also contains expectations around other issues that may lay the foundations for modern slavery such as discrimination, freedom of employment, working hours and health and safety issues.

Compliance with the Code and Supplier Agreements is preventatively monitored through self-assessment questionnaires and independent third-party social compliance auditing against the framework of these codes where critical breaches of key issues are considered to be modern slavery indicators. Non-compliances identified in these audits result in implementation of a corrective action plan and are followed up to ensure all issues are rectified. Additional information is found further in this statement and addressed in our Approved Factory Program.

Our contractual controls help us prevent adverse human rights impacts by creating responsible boundaries within which our suppliers can operate.

In our private label supply chain, suppliers have additional contractual obligations which include:

- Agreement to be governed by our Supplier Code of Conduct
- No unauthorised subcontracting is allowed
- All factories sites are to be disclosed to David Jones and are required to undertake social auditing procedures within our AFP
- All suppliers and sub-suppliers are bound by local law or [ETI Base Code](#) as per procedures carried out in the auditing process
- Zero-tolerance clauses which deter the use of forced labour and modern slavery practices.

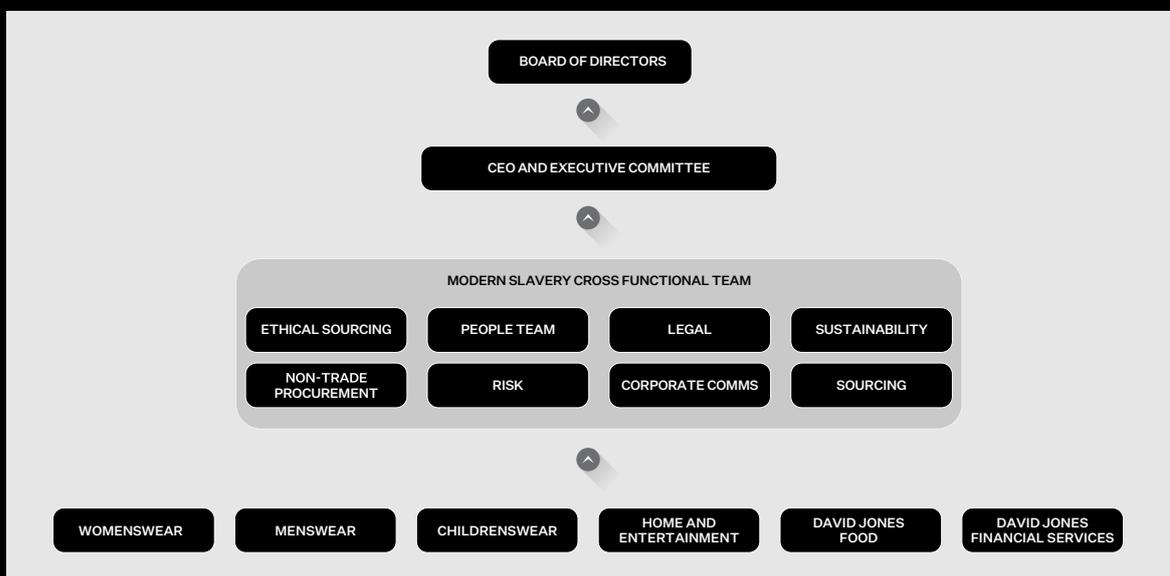
As stated in our Supplier Code of Conduct, there may be times when our expectations are not being met and we are committed to working with our supply chain partners to achieve change over time.

If a supplier is unwilling to remedy breaches, or has a zero-tolerance issue, David Jones has the right to terminate the trading arrangement if required.

Establishment of a Dedicated Team

Human rights responsibilities are managed throughout our organisational structure and responsibility rests at the highest level of our organisation.

Governance hierarchy



Our Modern Slavery Cross-Functional Team

In 2019, we brought together key stakeholders from across the business to draw on their expertise and insights. This cross-functional team consists of stakeholders involved in ethical sourcing, non-trade procurement, risk, legal, corporate communications, human resources and sustainability.

This cross-functional team works to inform and support our broader human rights and modern slavery strategy and has provided key inputs into the development of this statement as well as raise general awareness throughout the business.

The team meets on a monthly basis to discuss current and emerging modern slavery and broader human rights risks. Updates are provided to senior executives including the CEO, Company Secretary, Executive Committee, General Counsel, Global Head of Sourcing and Group Chief Operating Officer.

We have open lines of communication to ensure respect for human rights, including freedom from modern slavery, is at the forefront of our responsibility to people in our operations and supply chains, and continues to be an elevated topic on our business agenda.

Continual Monitoring and Adapting as Required

We continue to monitor risks, adjusting and adapting our actions to assess and address any potential or actual adverse human rights impacts. We continuously seek advice and information from various resources including desktop research, media reports, industry experts, multi-stakeholder initiatives, non-government organisations, industry partners, peers and our suppliers, and are conscious of COVID-19 and the associated modern slavery risks heightened by the pandemic.

COVID-19

Both our operations and supply chains have and continue to be impacted by various challenges as a result of the COVID-19 pandemic. Travel restrictions, border closures and social distancing have challenged suppliers and in turn, workers involved in the manufacture of our goods both in Australia and offshore.

These imposed restrictions have slowed the output and movement of raw materials and goods throughout the supply chain. Raw materials suppliers, inputs suppliers, quality inspectors and even auditing firms were challenged in their ability to execute normal activities and we have seen significant disruptions, as well as supplier insolvencies.

Panic buying and closure of some food production sites led to some incidences of out-of-stock in our food business, and travel restrictions exacerbated this for both local and international suppliers, possibly leading to increased pressure down the supply chain and an increased risk of human rights impacts.

Pressure on new ways to safely operate and protect our team members and customers throughout this pandemic has led to increased cleaning requirements, maintaining safe distances in our warehouses, stores and head office, and a significant increase in our online e-commerce traffic has increased labour requirements on our business and our delivery partners.

In our operations, store closures impacted our team members, with our head office in Melbourne being severely disrupted by localised government restrictions.

We adapted our policies and operational protocols to protect the health and wellbeing our team members, led by our Crisis Management Team (CMT), and we implemented these through our safety, facilities and retail operations teams.

COVID-19 (Continued)

Activities targeted to be completed in our modern slavery action plan in this reporting period were disrupted as we immediately shifted our focus to navigating COVID-19 impacts across our business. The below activities have been postponed to FY21:

- Modern slavery training
- Supplier workshops
- Pilot of direct factory-level grievance mechanism.

Whilst we were not able to undertake all planned activities, more immediate actions were required to be prioritised to support our suppliers and factories to reduce the risks and impacts of COVID-19.

Actions taken included:

- Working with suppliers to manage production and delivery dates impacted by lockdowns and delays through rephrasing of orders where possible
- Providing education and training materials in local languages to suppliers to support workers' health and safety to combat COVID-19
- Supporting brands where possible to gain access to inventory in closed stores, which supported brands to continue selling their products and remain commercially viable.

We continue to work closely with our suppliers to monitor and manage the risks and impacts of COVID-19.

Training, Capacity-building and Collaboration

To combat modern slavery, we need everyone in our business operations and supply chains to come together and collaborate to make change. Training and capacity building for both internal and external stakeholders is essential.

Soon after the MSA was passed, and prior to this reporting period, we hosted an education training workshop where leading international organisations as well as representatives from the Australian government's Modern Slavery Business Engagement Unit provided awareness training to suppliers.

Some of our actions in the reporting period include:

- Participated in the 2019 UN Annual Forum on Business & Human Rights in Geneva, Switzerland
- Participant member and signatory to the UN Global Compact Network Australia, as well as a sub-group member of the Modern Slavery Community of Practice (MSCoP)
- Attended learning seminars both in person or via digital mediums on modern slavery and broader human rights
- Continued consultation with peers and industry experts
- Continued NGO consultation on modern slavery and actions to identify and address modern slavery risks.

Some training activities planned both internationally and domestically for early 2020 were postponed due to COVID-19, however this training will be conducted in the coming year and reported on in future statements.

We believe the most sustainable way to drive improvement is to work collaboratively, including through initiatives such as the UN Global Compact, the SEDEX platform and the (ETI) Base Code.

Further to the above, we continue to collaborate with organisations and multi-stakeholder initiatives to improve our knowledge and actions in assessing and addressing modern slavery. Each of these organisations plays an integral part in collaborating with us and the broader industry to create change.

Stakeholders and Partners

 <p>PILLAR TWO</p>	 <p>ELEVATE</p>
 <p>Sedex</p>	 <p>WE SUPPORT UN GLOBAL COMPACT</p>
 <p>APSCA™ ASSOCIATION OF PROFESSIONAL SOCIAL COMPLIANCE AUDITORS</p>	 <p>ACCORD on Fire and Building Safety Management</p>

Measuring Effectiveness

Ensuring we have meaningful ways to measure the effectiveness of our actions is an important part of creating material change and driving continuous improvement.

Our actions in respecting human rights, including freedom from modern slavery, need to be assessed both on the breadth and depth of their coverage, appropriateness of the actions, and the effectiveness these actions have on preventative and remedial change.

We believe a combination of both quantitative and qualitative measures must be utilised to allow us to understand and measure the effectiveness of our actions to prevent and address modern slavery. These measurements need to be continuously adapted as our actions mature, and the environment in which modern slavery occurs reacts to these actions and those of other actors.

In particular, we:

- Quantify the scope of our risk issues
- Assess the severity of these issues
- Assess our understanding of the issues internally and in our supply chain
- Assess the remediation of issues by our organisation or in our supply chain.

Below are the measures we utilise to assess our effectiveness:

Area	Item	Measurement or effectiveness action
Policies & Contractual Controls	<ul style="list-style-type: none"> • Ensure policies set clear expectations around preventing and addressing all forms of modern slavery 	<ul style="list-style-type: none"> • Policies reviewed on a regular basis (internal and external)
	<ul style="list-style-type: none"> • Policies to provide prevention and protection to workers against leading indicators of modern slavery 	<ul style="list-style-type: none"> • Percentage of suppliers covered by Agreement and Code of Conduct
	<ul style="list-style-type: none"> • Policies adjusted and improved to address gaps 	<ul style="list-style-type: none"> • Percentage of factories audited against policy • Employee accessibility to policies related to modern slavery • Supplier accessibility to policies related to modern slavery
Risks	<ul style="list-style-type: none"> • Understanding our exposure to risks 	<ul style="list-style-type: none"> • Number of supply chain actors traced
	<ul style="list-style-type: none"> • Management of risk profile across business 	<ul style="list-style-type: none"> • Risk assessment conducted • Percentage of supplier sites in high and extreme risk
Awareness	<ul style="list-style-type: none"> • Modern Slavery awareness training for internal employees and suppliers to ensure we improve our knowledge of issues and how to prevent them 	<ul style="list-style-type: none"> • Number of employees trained on modern slavery and broader human rights risks
		<ul style="list-style-type: none"> • Number of suppliers trained on modern slavery and broader human rights risks
Area	Item	Measurement or effectiveness action
Audits and Issue Monitoring	<ul style="list-style-type: none"> • Supply chain monitoring and assurance 	<ul style="list-style-type: none"> • Percentage of factories approved in our auditing program
	<ul style="list-style-type: none"> • Access to functional grievance mechanisms 	<ul style="list-style-type: none"> • Number of critical issues identified
	<ul style="list-style-type: none"> • Ensure quality and effectiveness of audit types 	<ul style="list-style-type: none"> • Number of grievances identified • Number of modern slavery issues identified
Remedy	<ul style="list-style-type: none"> • Audit corrective actions improved or closed 	<ul style="list-style-type: none"> • Number of audit issues remediated
	<ul style="list-style-type: none"> • Grievance remediation completed 	<ul style="list-style-type: none"> • Remediation of modern slavery issues
	<ul style="list-style-type: none"> • Required actions taken against actual modern slavery violations 	

Process of Consultation

Osiris Pty Ltd and its principal governing body represents and controls all subsidiary entities.

Senior management, executives and the directors of the reporting entities covered by the Statement (namely David Jones Pty Limited and Osiris Holdings Pty Ltd) have been consulted and informed of the actions taken throughout this reporting period, and development of this statement has occurred through face-to-face meetings with directors, via email correspondence, through consultation on actions throughout the year, and being tabled at WHL (parent company) Social and Ethics Committee meetings.

Looking forward

We recognise our business and the broader industry need to continue to take progressive steps to eradicate modern slavery. As such we have committed to the following steps in the coming year:

- Enhance our supplier onboarding process through improved evaluation and risk assessment
- Review and improve policies where required
- Conduct modern slavery and human rights workshops with our suppliers and brand partners
- Pilot our digital factory-level grievance mechanism
- Extend our traceability of private label factory sites deeper into the supply chain across a wider set of materials
- Increase training of internal employees, including senior leadership teams, through modern slavery and responsible purchasing practises
- Further develop our remediation processes.

We will continue to monitor the ongoing challenges relating to COVID-19 and the impacts it has on vulnerable workers in our operations and supply chains. We will continue our best efforts to assess and address the risks of modern slavery and broader human rights issues in our operations and supply chains

Reporting Criteria Reference Table

The below table identifies the location of David Jones' responses to each of the MSA mandatory criteria found within this statement.

Australian Modern Slavery Act mandatory reporting criteria	Section in David Jones modern slavery statement
Identify each reporting entity covered by the joint statement	Executive Summary Appendix 1
Describe the structure, operations and supply chains of each reporting entity covered by the joint statement	David Jones' Structure, Operations and Supply Chains
Describe the risks of modern slavery practices in the operations and supply chains of each reporting entity covered by the joint statement and any entities that each of those reporting entities owns or controls	Modern Slavery Risks in David Jones' Supply Chain and Operations
Describe the actions taken by each reporting entity covered by the joint statement and any entities that each of those reporting entities owns or controls to assess and address these risks, including due diligence and remediation processes	Due Diligence and Risk Assessments Addressing our Risks Governance Policies and Contractual Controls
Describe how each reporting entity covered by the joint statement assesses the effectiveness of actions being taken to assess and address modern slavery risks	Measuring Effectiveness
Describe the process of consultation with each reporting entity covered by the joint statement and with any entities that each of those reporting entities owns or controls	Process of Consultation
Any other relevant information	COVID-19 Case Study

Appendices

Appendix 1.

All reporting entities who are reporting under this joint modern slavery statement are:

Osiris Holdings Pty Ltd
Vela Investments Pty Ltd
David Jones Pty Ltd

Appendix 2.

Definitions of types of Modern Slavery⁹

Type of Exploitation	Definition
Trafficking in Persons	Describes the recruitment, harbouring and movement of a person for exploitation through modern slavery.
Slavery	Describes situations where the offender exercises powers of ownership over the victim, including the power to make a person an object of purchase and use their labour in an unrestricted way.
Servitude	Describes situations where the victim's personal freedom is significantly restricted, and they are not free to stop working or leave their place of work.
Forced Marriage	Describes situations where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.
Forced Labour	Describes situations where the victim is either not free to stop working or not free to leave their place of work.
Debt Bondage	Describes situations where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.
Deceptive Recruiting for Labour of Services	Describes situations where the victim is deceived about whether they will be exploited through a type of modern slavery.
The worst forms of child labour	Describes situations where children are: <ul style="list-style-type: none"> • exploited through slavery or similar practices, including for sexual exploitation or • engaged in hazardous work which may harm their health, safety or morals or • used to produce or traffic drugs.

Appendix 3.

List of proprietary brands David Jones owns and consider "Private Label", directly sourced and sold by David Jones.

Brand name	Product category
Alta Linea	Men's accessories
Agenda	Sunglasses
David Jones	Home
David Jones Classic Collection	Bedding, towels etc
David Jones Junior	Kidswear
Milana	Women's accessories
Organic by David Jones	Babywear
The Foundry	Homeware

⁹Definitions and descriptions based on the Australian Commonwealth's Guidance for Reporting entities https://modernslaveryregister.gov.au/resources/MSA_-_Official_Guidance_.pdf

DAVID JONES

