Metcash

WINNING WITH INDEPENDENTS

# MODERN SLAVERY STATEMENT 2026

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## REPORTING SUITE



Annual Report



ESG Report



Modern Slavery Statement



Corporate Governance Statement



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# INTRODUCTION

## YOUR VOICE MATTERS

If you have concerns about modern slavery, potential human rights issues or unethical behaviour in our operations or supply chains, we encourage you to contact us. Your feedback is valued, and you can choose to remain anonymous.

**Metcash Team Members and Direct Suppliers:**

Phone: 1800 295 233 (Australia)
0800 527 500 (New Zealand)

Address: 1 Thomas Holt Drive,
Macquarie Park NSW 2113 (Australia)

**Metcash Supply Chain Worker Voice Platform hosted by EthicsPoint:**

http://metcash.ethicspoint.com/

## ACKNOWLEDGEMENT OF COUNTRY

Metcash acknowledges the Traditional Custodians of the lands on which we live and operate, and we pay our respects to Elders past, present and emerging.

# CONSULTATION PROCESS AND BOARD APPROVAL

This Statement was developed through consultation across Metcash Group, including through the relevant business pillars. Our owned and controlled entities operate within Metcash's overarching governance structure, policy framework and systems. Consultation was coordinated through the Metcash ESG Council and included structured engagement with operational leads across our business units and controlled entities. This process involved targeted data requests and risk validation meetings designed to enable the perspectives and operations of each controlled entity to be adequately represented.

Oversight of this Statement was provided by the Metcash Executive Leadership Team and its ESG Council, a cross-functional governance body comprising Group Leadership Team members to verify consistency, alignment and representation of entity-specific insights throughout its development.

While Metcash shares modern slavery guidance and tools with our independently owned and operated retail partners, these businesses are not owned or controlled entities and were not part of this formal consultation process. These partners remain responsible for their own compliance with the Modern Slavery Act, to the extent that they are a reporting entity.

This Statement has been reviewed and approved by the Metcash Board on 29 October 2026 in its capacity as the principal governing body of Metcash Limited, which is also the ultimate holding company for each of the reporting entities covered by this Statement.



**Doug Jones**
Group CEO and Executive Director

# ABOUT THIS STATEMENT

This Statement is submitted in accordance with section 14 of the *Modern Slavery Act 2018* (Cth) (Act) and is a joint statement by Metcash Limited and the reporting entities listed in the Appendix. For the purposes of this Statement, 'reporting entities' refers to those entities within the Metcash Group that meet the reporting requirements of the Act in their own right. The Statement covers the period 1 May 2025 to 30 April 2026 (FY26).

Unless otherwise stated, references to 'Metcash', 'the Group', 'our', 'we' and 'us' refer to Metcash Limited and its controlled entities collectively, including the reporting entities listed in the Appendix. References to 'reporting entities' refer specifically to the entities identified in the Appendix that are required to report under the Act.

| Criterion | Mandatory requirement | Section | Page |
|---|---|---|---|
| 1 | Identify the reporting entity. | About this Statement | 1 |
| 2 | Describe structure, operations and supply chains. | About Metcash | 4 |
| 3 | Describe modern slavery risks in operations and supply chains, including owned/controlled entities. | Modern Slavery Risks | 12 |
| 4 | Describe actions taken to assess and address risks, including due diligence and remediation. | Actions to Address Risks | 18 |
| 5 | Describe how effectiveness of actions is assessed. | Assessing Effectiveness | 36 |
| 6 | Describe consultation with reporting and owned/controlled entities. | Consultation Process and Board Approval | 1 |
| 7 | Any other relevant information. | Challenges, External Collaboration and Looking Ahead | 38, 39 |

# MESSAGE FROM GROUP CEO

I am pleased to present Metcash's Modern Slavery Statement for FY26, which outlines the steps we have taken to strengthen our approach to identifying, assessing and addressing modern slavery and broader human rights risks across our operations and supply chains.



During the reporting period, we continued to build the foundations of our ethical sourcing approach and strengthen the way human rights risks are considered across the Group. We enhanced supplier standards and contractual requirements, introduced more data-driven risk segmentation, increased independent social audit coverage and continued to improve visibility across higher-risk areas of our supply chain. We also undertook targeted due diligence within newly acquired operations, including a modern slavery and labour conditions review.

Building awareness and capability across our business also remained an important focus. During the year we expanded modern slavery training beyond procurement and merchandising teams to include sales, business development, logistics and People and Culture roles, with more than 1,400 team members having now completed modern slavery awareness training. Targeted training was also provided to functions with greater exposure to labour-hire and other workforce-related risks.

Our progress was recognised through Metcash achieving an 'A' rating for the first time in Monash University's 2025 analysis of Modern Slavery Statements, improving from a 'B' rating in the previous assessment.

While this is encouraging, we recognise that important challenges remain, particularly in improving visibility beyond our direct suppliers, strengthening worker voice and grievance mechanisms, improving the consistency of supplier data, and demonstrating the effectiveness of our actions through measurable outcomes.

These areas will continue to shape our priorities as we strengthen our risk-based approach to supplier due diligence and traceability and further embed human rights considerations into procurement, risk management and business decision making.

**Doug Jones**
Group CEO

# FY26 HIGHLIGHTS

## IMPROVED CONSISTENCY

For the first time, SEDEX is being used across all Metcash business pillars, providing a more consistent approach to assessing modern slavery risk and improving visibility of supplier sites and practices by providing all pillars access to the Radar Risk Assessment feature.

## UNDERTOOK A DOUBLE MATERIALITY ASSESSMENT

Metcash undertook a double materiality assessment evaluating material modern slavery risk exposure; combining data on modern slavery risk from our risk assessments tools and overlaying spend levels, to determine Metcash's most material impacts.

## STRENGTHENED CORRECTIVE ACTION AND SUPPLIER ACCOUNTABILITY

Improvement actions were agreed with all 32 Food supplier sites identified as having significant actual or potential social impacts. More than half of the identified matters were resolved by year-end, with outstanding actions continuing to be monitored.

## STRENGTHENED EXPECTATIONS OF SUPPLIERS AND RISK PRIORITISATION

Metcash commenced work to update its standard supplier terms and introduced more data-driven risk segmentation using inherent risk, spend, sector and geographic intelligence to support targeted due diligence. These terms are in the process of being rolled out.

## IMPROVED SUPPLY CHAIN VISIBILITY

Metcash achieved visibility over supplier sites employing more than 75,000 workers, including information on workforce composition, policies and practices and, where available, independent social audit findings.

## APPLIED TARGETED DUE DILIGENCE TO NEWLY ACQUIRED OPERATIONS

A modern slavery and labour conditions review was completed at Mooloolah River Fisheries within Superior Food Services, resulting in an action plan covering governance, procurement, labour-hire controls, training and worker awareness.

## EXPANDED MODERN SLAVERY CAPABILITY

Modern slavery awareness training was expanded beyond procurement and merchandising to include sales, business development, logistics and People and Culture roles, with targeted training also provided to higher-risk functions. More than 1,400 team members have now completed modern slavery awareness training.

## IMPROVED REPORTING TRANSPARENCY

Metcash achieved an 'A' rating for the first time in Monash University's 2025 analysis of Modern Slavery Statements, improving from a 'B' rating in the previous assessment.

## BENCHMARKING AND CONTINUOUS IMPROVEMENT

Monash University's Centre for Financial Studies runs an annual, independent assessment of Modern Slavery Statements published by Australia's largest listed companies, using an A–F disclosure quality rating that scores reporting against criteria like governance, risk identification, supplier due diligence and remediation effectiveness.

| FY20-21 | FY21-22 | FY22-23 | FY23-24 | FY24-25 |
|---|---|---|---|---|
| E | C | B | B | A |

# ABOUT METCASH

**We are Australia's leading wholesaler and service provider to independent businesses nationwide. In addition to being an integrated wholesaler and scaled logistics operator, we are a retail banner owner, a retailer, a franchisor and a retail media operator.**

## OUR PURPOSE
## WINNING WITH INDEPENDENTS

## OUR VISION
## TO BE THE #1 PARTNER POWERING AN UNSTOPPABLE NETWORK OF INDEPENDENTS

## OUR VALUES

- **Better Together**
- **Give a Damn**
- **Back Local Brilliance**
- **Results Matter**
- **Champion Customers**

## FOOD

Metcash Food is the largest supplier to independent food businesses in Australia. We supply over a thousand independent supermarkets, including IGA and Foodland stores. Retail customers benefit from our scale, buying power and supplier funding so they can compete with the major chains and offer their shoppers value. Our Foodservice and Convenience business is the largest supplier to the petrol and convenience sector.

## LIQUOR

Australian Liquor Marketers (ALM) is the largest supplier to independent retail stores and premises including pubs, clubs and bottle-shops. These stores include those operating under Independent Brands Australia (IBA) banners such as Cellarbrations, The Bottle-O, Porters Liquor, Thirsty Camel and IGA Liquor.

## HARDWARE & TOOLS

Total Tools and Hardware Group is the leading supplier to small and medium home builders in Australia and supports the national Mitre 10 and Home Hardware brands. We are also the largest professional tools franchisor, with a network of over 130 Total Tools stores nationwide.

## OUR BUSINESS FOOTPRINT

**~6,300**
bannered retail stores

**~105,000**
customers

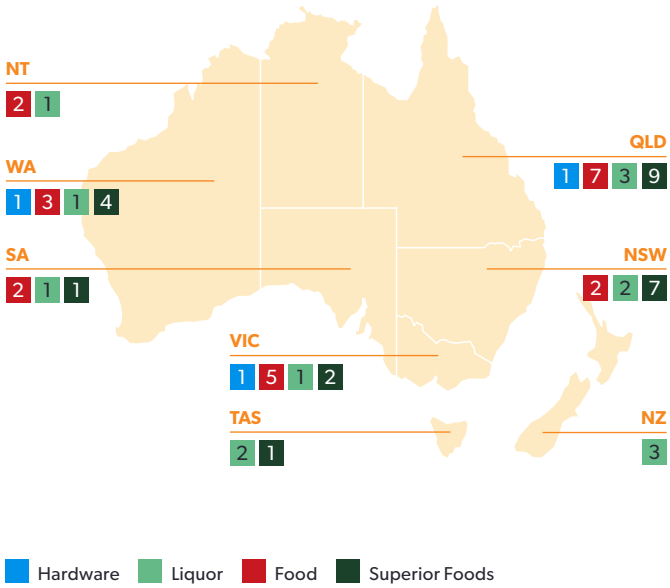
**~4,800**
contract customers/stores

**95%**
of Australians served

**~5,500**
suppliers

**62**
distribution centres

## OUR DISTRIBUTION NETWORK



# OUR COMMUNITY

Working alongside our independent retailers, suppliers, partners and team members, we seek to contribute to communities through ongoing engagement and investment. We support community partnerships, responsible sourcing practices, respect for human rights, charitable initiatives and targeted assistance during times of need.

## COMMUNITIES AND CHARITIES

Metcash's approach to communities and charities includes engagement with community stakeholders and providing support for a range of initiatives. Activities include financial contributions, sponsorships and product donations to charitable and community organisations. We collaborate with National, State and local charities on community programs and encourage employee volunteering and participation in community initiatives. Additionally, we also support independent retailers in their community engagement activities. Responsibility for community investment activities sits with management teams across the Food, Hardware and Liquor pillars, supported by guidelines to verify the process of selection of partnerships at a National or State level aligns with brand values as determined by each Pillar. The effectiveness of initiatives is monitored using various measures by each Pillar based on their objectives for the partnership. For each National or State partnership, a review is done by Metcash with feedback from partners and charities and a review is undertaken on how charity partners have allocated the funds. Processes also exist to assess future partnership opportunities.

## SUPPORTING TRADIE WELLBEING THROUGH THE 4:01 CLUB

Mitre 10 launched the 4:01 Club to provide practical support for tradies and strengthen community connections in response to research highlighting mental health challenges in the trade sector. Launched on National Tradies Day, the platform offers tools, resources and activities that promote wellbeing and encourage open conversations. To support the launch, runs were held in Sydney, Adelaide and Melbourne to promote physical activity, build connections and create opportunities for discussion around mental health. The initiative is also supported through in-store activations and partnerships with organisations including Speak & Share and SPEAK UP! Stay ChatTY, which deliver workshops focused on wellbeing and peer support.

## THE IGA COMMUNITY CHEST

The IGA Community Chest program distributed $3.97 million during 2025, to beneficiaries across Australia including

**$1.42 million**

to IGA's national charity partners and

**$2.55 million**

to local charities and community organisations nominated by IGA stores.



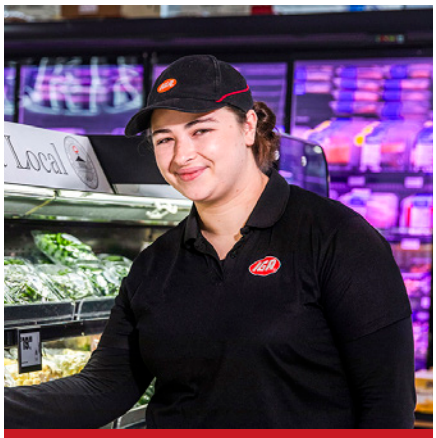
# OUR OPERATIONS

## METCASH LIMITED (CORPORATE)

Metcash Limited is the parent company of Metcash. Metcash provides strategic guidance, operational support and centralised services across our three internal pillars.

## METCASH PILLARS

Our pillars supply and support a network of independent retailers that form part of our bannered network and non-bannered businesses.



### FOOD

**Our bannered stores**

FOODLAND · IGA · Campbells · SUPA VALU · IGA LOCAL GROCER · Village Grocer · FRIENDLY GROCER · Superior



### LIQUOR

**Our bannered stores**

Cellarbrations · IGA LIQUOR · the Bottle-O · THIRSTY CAMEL · PORTERS LIQUOR



### HARDWARE & TOOLS

**Our bannered stores**

MIGHTY HELPFUL MITRE 10 · HOME Hardware · Hardings · TRUE VALUE · THRIFTY-LINK HARDWARE · TOTAL TOOLS · design 10

## Our Operations (continued)

Metcash employs a mix of ~14,000 full-time, part-time and casual team members across Australia and New Zealand. The Metcash workforce spans corporate and professional roles, retail team members and operational roles supporting distribution activities. Certain parts of this workforce may have characteristics associated with greater vulnerability to labour exploitation, including casual and younger workers and agency, temporary or migrant workers where these forms of labour are engaged. Metcash is Australia's leading wholesaler and service provider to independent businesses nationwide, supporting approximately 6,300 bannered retail stores and approximately 105,000 customers through our vast distribution networks located in major cities and smaller regional centres.

| Service | Description | Key Data Points |
|---|---|---|
| **CORPORATE** | Metcash Limited is headquartered in Macquarie Park, New South Wales. We provide essential functions that underpin our business operations, including strategic guidance, operational support and centralised services such as procurement, logistics and marketing. This structure seeks to foster efficiency and collaboration throughout the organisation | **1** Corporate head office |
| **FOOD** | The Metcash Food pillar supports a network of independent supermarkets across Australia as well as the Foodservice and Convenience business, which includes; Campbells and Convenience and Superior Foods warehouse sites as well as a meat processing facility and a seafood processing and distribution facility.<br><br>The diverse range of stores in the network are tailored to meet the unique needs of local communities by providing fresh food, groceries and general merchandise, such as household essentials. By offering the convenience of a local store while tapping into the advantages of a national network, independent retailers can provide quality products at competitive prices. Our Food pillar serves several large customers known as Multiple Store Owners (MSOs). These customers own and/or operate more than one independent retail store, and in some cases can own and/or operate many stores. Examples include Ritchies Stores Pty Ltd (Ritchies), and Romeo Retail Group.<br><br>Additionally, our Food pillar is a supplier to several contract customers, one of which is Australian United Retailers (AUR), who operate the Foodworks bannered network. Superior Food Services operates 24 branches across 23 locations nationally and has distribution centres across all Australian States (excluding NT), offering a broad and diverse range of product categories. | **2,410** Supermarkets |
| **LIQUOR** | Australian Liquor Marketers (ALM) is the largest supplier to independent retail stores and premises including pubs, clubs and bottle shops. Independent Brands Australia (IBA) supports independent liquor retailers through leading national retail brands including Cellarbrations, The Bottle-O, IGA Liquor, Porters Liquor and Thirsty Camel. Metcash Liquor services retail and on-premise customers across Australia and New Zealand through its national wholesale network, comprising five mega distribution centres and six satellite warehouses, delivering approximately 60 million cases annually to over 12,000 customers. | **3,123** Liquor Retail Outlets |
| **HARDWARE & TOOLS** | The Metcash Hardware pillar includes the Total Tools & Hardware Group. This incorporates the Hardware business and the Total Tools business. Our Hardware business is the largest independent hardware wholesaler in Australia and the owner and operator of many retail stores. With flagship brands such as Mitre 10 and Home Hardware, Hardware caters to Trade and DIY customers. Total Tools Holdings is the franchisor to the Total Tools retail network which is the largest professional tools retailer in Australia. Metcash owns Total Tools Holdings and has a controlling interest in around half of the retail network, mostly through joint venture arrangements. | **732** Hardware Retail Stores |

# OUR SUPPLY CHAIN

Metcash is a leading wholesale distributor across the Food, Liquor and Hardware sectors, supported by a complex global supply chain spanning a broad range of products, services, sourcing regions and supplier relationships. Our supply chain extends from direct Tier 1 suppliers through to upstream manufacturers, raw material providers and subcontractors across multiple geographies, creating varying levels of visibility, influence and exposure to modern slavery and human rights risks.

Metcash's supply chain includes direct Tier 1 suppliers as well as suppliers further upstream where Metcash generally has no direct contractual relationship.

- Tier 1 suppliers are direct contractual counterparties, including manufacturers, distributors, importers, vendors, traders and service providers. A single Tier 1 supplier may operate across multiple sites or countries.
- Tier 2 and beyond includes upstream manufacturers, raw material providers, subcontractors and other service providers. Visibility commonly decreases further upstream, making targeted traceability and due diligence particularly important in higher-risk supply chains.

The diagram below illustrates how selected products can extend through multiple supply chain tiers, with modern slavery risks extending beyond our direct suppliers.

**Private Label Milk Supply Chain: From Farm to Store.**



**FARM LEVEL**

The dairy production begins with producing feed – both homegrown and purchased feed from other farmers.

**MILKING OPERATIONS**

Dairy cows are housed, fed and milked on dairy farms across the country.

**COLLECTION AND TRANSPORT**

Milk collection via tankers and transport to processing facilities.

**PROCESSING AND PACKAGING**

Milk is processed, involving quality testing, safety checks, pasteurisation and homogenisation.

**TRANSPORT**

Transport to our distribution centres and collation for stores.

**WHOLESALE DISTRIBUTION**

Finished milk products are processed at our distribution centres.



# OUR SUPPLY CHAIN: RAW MATERIALS VISIBILITY

Our greatest visibility and leverage sit with our direct Tier 1 suppliers, but some of the most significant modern slavery risks in our supply chain are more likely to arise at the raw material level. Many products we buy from Australian-based suppliers rely on agricultural, fishing and forestry inputs that are globally recognised as carrying elevated risks. These inputs often pass through several layers of traders, processors and manufacturers before reaching our suppliers, and are frequently blended or aggregated along the way, which makes their origins harder to trace.

Understanding where these risks sit helps us focus due diligence and traceability efforts where they matter most for workers. Improving visibility of raw material origins for these commodities is a key focus of our draft Group Traceability Strategy, prioritising the supply chains with the greatest potential for harm to workers, where our leverage is greatest, such as our private label goods.

## HOW RISK BUILDS UPSTREAM

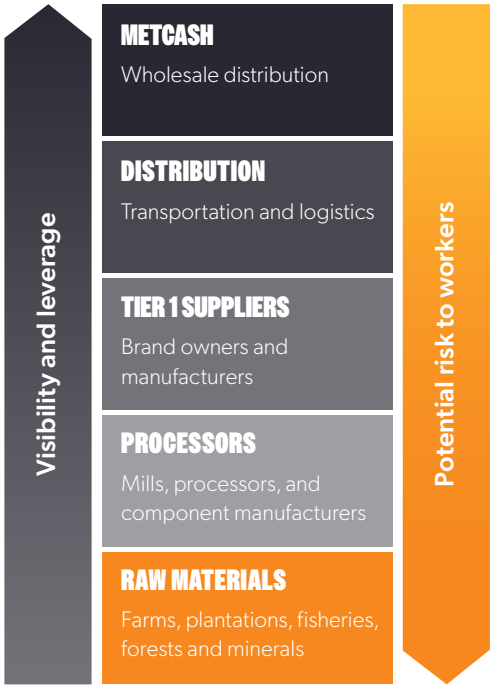
Our supply chains vary significantly across product categories, but most follow a similar pattern. The simplified diagram below shows the key tiers a product may pass through before reaching Metcash. Our visibility and influence are strongest with our direct Tier 1 suppliers and become more limited further upstream, where processors, transport providers and raw material producers may operate across multiple countries and supply chains.

*Visibility and leverage are greatest at Metcash and Tier 1, while risk to workers increases further upstream towards raw material production.*

## CRITICAL RAW MATERIALS

While most of these products reach us through Australian-based suppliers, the raw materials they contain are often grown, harvested or caught in regions where forced and child labour risks are well documented. The table below identifies priority raw materials, the Metcash categories they feed into, and the key modern slavery risks associated with their production. These risks reflect global industry conditions and do not indicate that modern slavery has been identified in Metcash's supply chain.

**Risk builds upstream**




**Priority raw materials**

**TOBACCO LEAF**
**Tobacco products**
Child labour and hazardous work on smallholder farms.

**COFFEE & TEA**
**Beverages**
Underpayment, child labour and debt bondage on estates and farms.

**COCOA**
**Confectionery**
Child and forced labour on smallholder farms.

**SEAFOOD**
**Fresh, frozen, and canned seafood**
Forced labour and debt bondage on fishing vessels.

**SUGAR**
**Confectionery, beverages, grocery**
Bonded and seasonal labour in cane harvesting.

**TIMBER**
**Timber and wood products**
Forced labour linked to illegal logging and informal forestry work.

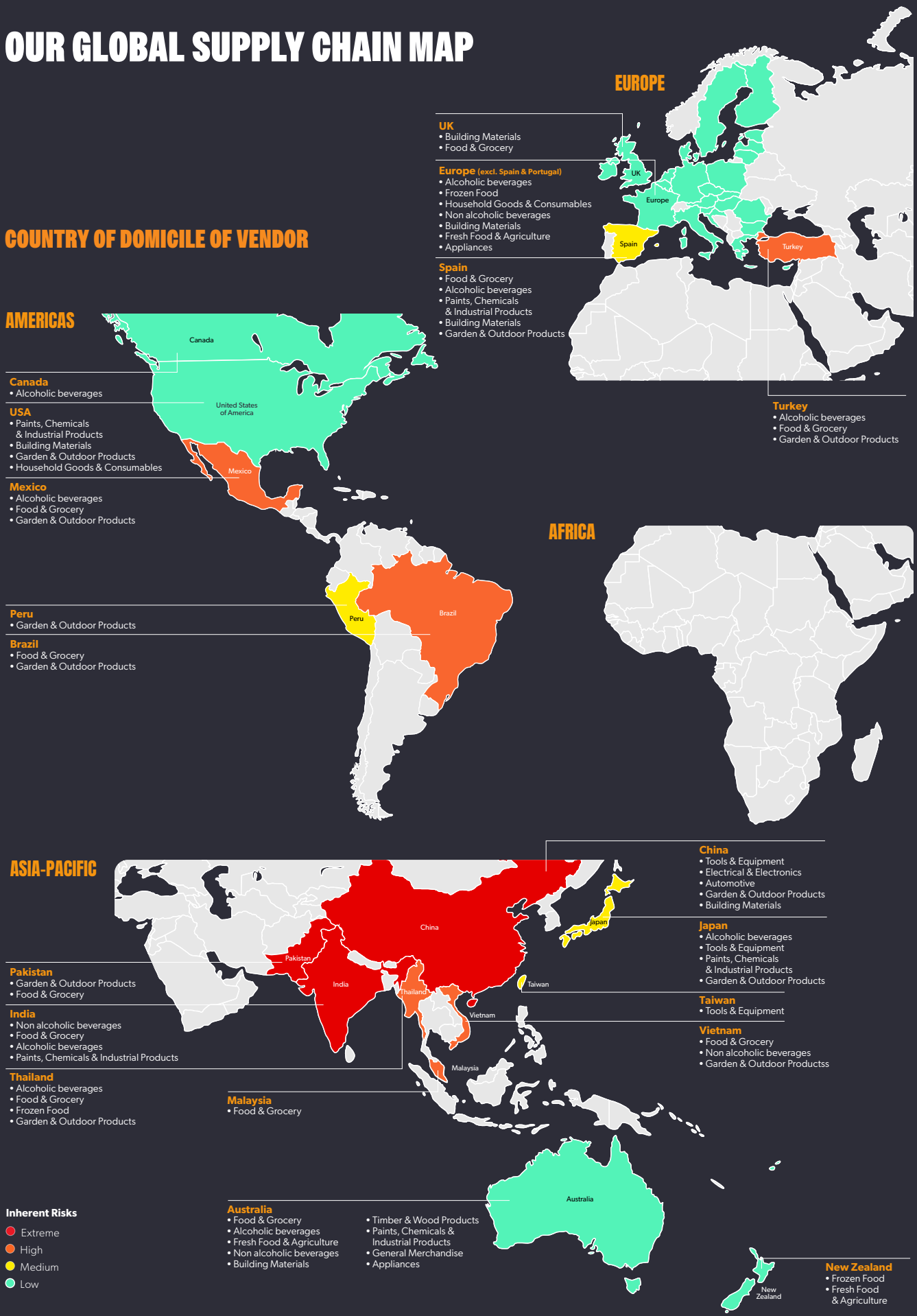
### Minerals in hardware and electronic products

Minerals such as tin, tantalum, tungsten, gold and cobalt are used in many hardware, electrical and electronic products, including power tools, batteries, appliances and IT equipment. A significant share of global supply of some of these minerals comes from regions where mining has been linked to forced labour, child labour and the financing of armed conflict, particularly in artisanal and small-scale mining. These risks typically sit many tiers removed from businesses selling finished products, as minerals pass through traders, smelters, refiners and component manufacturers before reaching a final product. Metcash recognises this as an ongoing concern and an issue within the supply chain of most electronic products, which can only be addressed via collaboration between government, business and consumers as well as other stakeholders.

## ABOUT METCASH continued

# OUR GLOBAL SUPPLY CHAIN MAP

## COUNTRY OF DOMICILE OF VENDOR



# OUR PROCUREMENT PRACTICES

## GOODS FOR RESALE

At Metcash, trade sourcing refers to goods and services that contribute directly to our business' core operations and generation of revenue. In FY26, we worked with ~4,700 suppliers across our Food, Liquor and Hardware pillars. These relationships span both private label products (those manufactured under contract specifically for Metcash Own Brands) and proprietary branded products (developed and marketed by branded business partners under a registered trade name).

Metcash's supply chain is organised around its core business units, each sourcing a distinct range of products from suppliers in Australia and overseas. The table below sets out the key product categories sourced by each business unit, which form the basis of our modern slavery risk assessment. Understanding what each part of the business buys, and where it comes from, helps us identify where inherent risks are likely to be concentrated and where due diligence should be prioritised.

| Metcash | |
|---|---|
| Alcoholic beverages | General Merchandise |
| Appliances | Household Goods & Consumables |
| Automotive | Non-alcoholic beverages |
| Building Materials | Paints, Chemicals & Industrial Products |
| Electrical & Electronics | Services & Store Operations |
| Food & Grocery | Textiles, Clothing & PPE |
| Fresh Food & Agriculture | Timber & Wood Products |
| Frozen Food | Tobacco Products |
| Garden & Outdoor Products | Tools & Equipment |

## GOODS AND SERVICES NOT FOR RESALE

At Metcash, non-trade sourcing refers to goods and services that support our business operations but are not intended for resale. These are commonly referred to as 'goods not for resale'. We engage with ~2,700 suppliers across our corporate functions and business pillars to purchase items such as personal protective equipment, information technology equipment and marketing materials. We also work directly with domestic suppliers for services such as security, facilities management, employee assistance and office cleaning. Several corporate services such as accounting and IT support are outsourced to international providers. Freight contracts exceeding $5 million per annum are managed by logistics with assistance from Corporate Non-Trade Procurement (NTP); while smaller providers are handled at the site or State level. Non-trade categories such as uniform supply and related services are typically sourced through indirect Tier 2 suppliers. In some instances, these services have been engaged directly by individual business units, outside the Corporate NTP process. While this approach offers flexibility, it may limit visibility over formal contracting arrangements. Although this represents a relatively small component of our procurement activities, it remains an area of focus going forward.

# MODERN SLAVERY RISKS

Modern slavery is defined in section 4 of the Modern Slavery Act and includes serious forms of exploitation where a person cannot refuse or leave because of threats, coercion, deception or abuse of power. It can include forced labour, debt bondage, human trafficking, forced marriage, and the worst forms of child labour. Operating across retail, wholesale, food, liquor, hardware and distribution networks, Metcash recognises that modern slavery risks can arise at different points across its operations and supply chains. These risks are often hidden within complex labour arrangements and global supply chains, making it important to understand where workers may be vulnerable to exploitation and where the business may be directly linked to adverse human rights impacts. Understanding where and how modern slavery risks may arise is critical to Metcash's ability to identify, prevent, mitigate, and respond to potential harm. Our FY26 risk assessment distinguishes between risks within our own operations and risks within our supply chain, and considers higher-risk worker groups, products, services, sourcing countries, industries, and business relationships. This approach enables Metcash to prioritise resources, focus due diligence activities and strengthen risk management measures in areas of greatest potential exposure.

## INHERENT RISKS

Metcash's modern slavery exposure arises from the scale and complexity of its operations and multi-tiered supply chain. Inherent risk may be elevated where work is labour-intensive, outsourced or subcontracted, where migrant or temporary workers are used, or where legal protections and enforcement mechanisms are weaker. These conditions can increase worker vulnerability to deceptive recruitment practices, recruitment fees, debt bondage, forced labour, excessive working hours, underpayment, unsafe working conditions and restrictions on worker voice. Modern slavery risks may also become more difficult to identify further upstream in the supply chain, where multiple tiers of suppliers, labour intermediaries, and complex sourcing pathways can reduce visibility and leverage. These factors are reflected in how Metcash assesses inherent risk.

As part of our modern slavery risk program, Metcash undertakes inherent risk reviews to identify areas of highest potential modern slavery exposure across its operations and supply chains. These assessments consider factors such as sector, geography, product category, spend, and workforce arrangements. They focus on areas where workers may face heightened vulnerability and where additional due diligence, supplier engagement or oversight may be required.

To support this, Metcash uses SEDEX Radar, a risk assessment tool that combines country and sector risk data with site-level information provided by suppliers through the SEDEX Self-Assessment Questionnaire. This helps us identify higher-risk supplier sites and prioritise them for further due diligence, such as social audits and supplier engagement.

The following sections outline Metcash's risk assessment methodology and the key modern slavery risks identified across our operations and supply chains during FY26.

## ASSESSING RISK

As a leading wholesale distribution and retail services business operating across the food, liquor and hardware sectors, Metcash sources products from a diverse network of suppliers across Australia and international markets. As a result, Metcash's supply chain extends across a range of industries, including agriculture, food production, manufacturing, construction materials, consumer goods, electronics, textiles and timber products. Metcash recognises that modern slavery risks are often most prevalent in labour-intensive industries and may be heightened in countries with elevated modern slavery prevalence, weaker labour protections, or complex supply chain structures. Risks may also increase further upstream where production relies on subcontracting arrangements, seasonal or migrant workers, or multiple tiers of suppliers.

Metcash's risk assessment process identifies and prioritises areas of inherent modern slavery risk across its operations and supply chains, where it has the most leverage, focusing on our private label suppliers, where our relationships and influence are strongest. The assessment considers both country and sector risk factors, recognising that the intersection of geography, industry and workforce vulnerabilities can increase the likelihood of modern slavery risks occurring. As a business operating across the wholesale, retail, liquor and hardware sectors, Metcash sources products through a wide network of suppliers located in Australia, New Zealand, North America, Europe, Asia and Africa.

The assessment identified elevated inherent risks within certain sourcing countries and product categories, particularly those associated with agricultural production, food processing, manufacturing, electronics, textiles, timber products and other labour-intensive supply chains. Higher-risk sourcing locations include China, Bangladesh, India, Pakistan, Thailand, Vietnam, Turkey, Brazil and Mexico, where factors such as weaker labour protections, higher levels of informal employment, exploitation of migrant workers, recruitment-related risks and known forced labour concerns may increase worker vulnerability. While many products are sourced from lower-risk jurisdictions such as Australia, New Zealand, Canada, the United States and Western Europe, Metcash recognises that modern slavery risks can exist in any country and that suppliers in lower risk jurisdictions have their own supply chains that may be exposed to modern slavery risk. Accordingly, the assessment considers both country and sector risk indicators rather than relying solely on geographic location.

The assessment found that the greatest inherent risks are concentrated within fresh food and agricultural products, food manufacturing, consumer goods manufacturing, textiles, electronics, timber products and industrial goods. These sectors are a significant part of the supply chains for our goods for resale. The assessment has resulted in us prioritising enhanced supplier due diligence within these high risk sectors, supplier engagement and ongoing monitoring to strengthen risk management and improve supply chain transparency.

## RISK ASSESSMENT – METHODOLOGY

### Step 1 Sector and Jurisdiction Risk Assessment

Metcash transitioned its inherent risk assessment from LRQA's EiQ platform to the SEDEX Radar Risk Assessment tool. SEDEX Radar integrates directly with the supplier Self-Assessment Questionnaire and audit data already held on SEDEX, allowing inherent and site-level risk information to be viewed in one place. The tool is used to identify and prioritise inherent modern slavery risks across our supply chain. The methodology assesses risk by combining country-level and sector-level risk indicators to identify suppliers, sourcing locations and product categories that may be exposed to a higher likelihood of labour rights and human rights impacts. It draws on a range of internationally recognised data sources and evaluates risk across key labour rights topics, including forced labour, child labour, wages, working hours, freedom of association, discrimination and regular employment. These indicators are supplemented by broader governance, health and safety, and business ethics considerations to provide a holistic assessment of supply chain risk.

### Step 2 Supplier Level Risk Review Prioritisation

Once risks have been identified, we prioritise where further due diligence and engagement are likely to have the greatest impact. Our prioritisation of suppliers considers:

- **Human rights impact:** the potential severity, scale, and likelihood of harm to workers.
- **Risk prevalence:** whether particular countries, sectors, products, or workforce arrangements have a higher prevalence of modern slavery risk.
- **Opportunity for engagement and leverage:** the extent to which Metcash can obtain further information, engage with affected stakeholders or suppliers, and influence improvements. Our closer relationship with our private label suppliers provides a greater opportunity to engage and influence those suppliers.

Audit findings also inform this prioritisation. Non-conformances are graded according to severity, with zero-tolerance findings receiving additional focus and follow-up.

### Step 3 Determine how Metcash may be connected to risk

We are conscious that Metcash may be connected to potential harm. Consistent with the United Nations Guiding Principles, Metcash may cause, contribute to, or be directly linked to harm. Where a modern slavery risk is identified, Metcash may assess how it is connected to the potential harm, as outlined below.

| Relationship to harm | What this means for Metcash | Example scenario |
|---|---|---|
| **Cause** | Metcash own actions or operational practices directly result in an adverse impact on workers. | Directly employs workers and fails to provide legally required wages, resulting in workers being underpaid. |
| **Contribute** | Metcash actions or omissions facilitate, incentivise or worsen an adverse impact caused by another party. | Unrealistic delivery timeframes/pressure are placed on a supplier, contributing to excessive overtime or other poor labour practices at the supplier site. |
| **Directly linked** | Harm occurs through a supplier, contractor or other business relationship connected to Metcash products, services or operations, but Metcash has not itself caused or contributed to the harm. | A third-party supplier in a higher-risk sourcing country is found to be using exploited migrant workers in the manufacture of products. The impact is directly linked to Metcash through the supplier relationship. |

# RISKS IN OUR OPERATIONS

As described above, our workforce includes team members in a wide variety of roles, including entry-level and casual roles in warehousing, distribution and retail. Some workers may be more vulnerable to exploitation, such as those engaged through labour hire, temporary visa holders and people with disability. We manage risks to these workers through the following controls:

- Pay: all team members are paid at or above the applicable minimum wage under the relevant modern award or enterprise agreement
- Right to work: we require all workers to have the legal right to work in Australia or New Zealand
- Labour hire requirements: Metcash expects labour hire providers to verify workers' legal right to work and pay in accordance with the relevant industrial instrument that underpins labour hire workers' engagement

Together, these controls mean we consider the risk of modern slavery within our directly employed workforce to be low. We recognise that risk can be higher for workers engaged through labour hire and third-party service providers, and at newly acquired sites where practices may not yet be fully aligned with Group standards.

Modern slavery risk within our directly controlled workforce is considered lower than in parts of our supply chain; the table below outlines the workforce categories where vulnerability may be greater. These factors do not, by themselves, indicate that modern slavery is occurring. How we are managing these risks is detailed on page 24 of this Statement.

| Workforce | Who may be affected | Key risk factors and modern slavery indicators |
|---|---|---|
| **Company-owned retail stores** | Retail team members, including casual, younger and other vulnerable workers | Variable casual rosters, award compliance complexity across store formats, and younger workers who may be less aware of their rights.<br><br>**Indicators:** Wages, working hours, regular employment. |
| **Labour hire, recruitment and contractors** | Agency and migrant workers | Reliance on third-party recruiters and intermediaries can expose workers to recruitment fees, deceptive recruitment and debt bondage, and fear of losing work can discourage workers from reporting concerns.<br><br>**Indicators:** Forced labour, recruitment practices, wages, working hours, freedom of movement. |
| **Temporary visa holders** | Team members on student, working holiday or sponsored visas | Visa conditions, such as work-hour limits or dependence on an employer for sponsorship, may make workers reluctant to raise concerns. Language barriers can also limit their understanding of workplace rights.<br><br>**Indicators:** Recruitment practices, wages, working hours, freedom of movement. |
| **Freight, logistics and couriers** | Owner-drivers, subcontracted drivers, and couriers attending Metcash sites | Long working hours, unrealistic delivery schedules, fatigue, and unstable contracting arrangements. Complex subcontracting and owner-driver models can reduce oversight and increase financial pressure on workers.<br><br>**Indicators:** Working hours, wages, health and safety, regular employment. |
| **Facilities services (cleaning, waste, security, pest control)** | Subcontracted cleaning, security and waste workers, including migrant workers attending Metcash sites | Services are commonly delivered through subcontracting arrangements, reducing visibility over workforce practices. Migrant workers may face language barriers or dependency on their employer, and sham contracting can occur.<br><br>**Indicators:** Wages, working hours, regular employment, recruitment practices. |

The actions Metcash takes to address these risks are outlined on the following pages.

# RISKS IN OUR SUPPLY CHAIN

The table below outlines the product categories we have assessed as presenting the highest inherent modern slavery risk within Metcash's supply chain, the vendor domicile, and the associated risk factors and indicators. These do not indicate that modern slavery is occurring within our supply chain, but represent areas where enhanced due diligence, supplier engagement and monitoring are prioritised. How we are managing these risks is detailed on page 28 of this Statement.

| High risk categories | Sub-categories | Country of origin | Key risk factors and modern slavery indicators |
|---|---|---|---|
| **Food & Grocery** | Food, fruit, vegetables, seafood, meat, dairy, confectionery, snacks, beverages, desserts, ready meals, pies & pastries | India, Turkey, Thailand, China, Mexico, Pakistan, Brazil, Vietnam, Malaysia. Beyond these countries, agriculture is high risk in most jurisdictions, including Australia. | Agricultural production, seafood harvesting, food processing and manufacturing often rely on large workforces, seasonal and migrant workers, labour hire and subcontracting arrangements. These conditions can increase the risk of forced labour, debt bondage, recruitment fee exploitation, restricted worker mobility, underpayment, excessive working hours, child labour and exploitative working conditions. Visibility is often limited beyond Tier 1 suppliers, particularly further upstream in agriculture and seafood supply chains.<br><br>**Indicators:** Forced labour, child labour, debt bondage, wages, working hours. |
| **Electrical & Electronics** | Lighting, home media, electrical products, batteries, solar cells, telecommunications | China | Complex multi-tier supply chains, raw material extraction, component manufacturing, contract labour, and limited transparency deep within supply chains. IT hardware carries higher risk through electronics manufacturing and the mining of minerals such as cobalt, tin and tantalum.<br><br>**Indicators:** Forced labour, child labour, working hours. |
| **Tools & Equipment** | Tools, ladders, power tools | China | Metal processing, manufacturing, temporary labour arrangements, subcontracting and limited visibility into component suppliers.<br><br>**Indicators:** Forced labour, working hours, freedom of association. |
| **Garden & Outdoor Products** | Garden tools, maintenance, outdoor products | Pakistan, India, Turkey, Vietnam, China, Thailand, Mexico | Reliance on manufacturing, metal products, timber inputs and labour-intensive assembly activities may create risks of forced labour and exploitative labour practices.<br><br>**Indicators:** Working hours, freedom of association. |

## MODERN SLAVERY RISKS continued

| High risk categories | Sub-categories | Country of origin | Key risk factors and modern slavery indicators |
|---|---|---|---|
| **Textiles, Clothing & PPE** | Apparel, PPE, uniforms, clothing, shoes | China | Textile, garment and rubber glove industries have acknowledged high modern slavery risk. Cotton production in some regions has been linked to state-imposed forced labour, and glove manufacturing to debt bondage among migrant workers. Garment manufacturing is also known for modern slavery risk.<br><br>**Indicators:** Forced labour, child labour, working hours, wages. |
| **Timber & Wood Products** | Joinery, timber panels, woodcare | Australia | Forestry operations, illegal logging, migrant labour exploitation, informal work arrangements and limited traceability to source forests.<br><br>**Indicators:** Irregular employment. |
| **Paints, Chemicals & Industrial Products** | Paint, brushes, floor polish | India, China | Labour-intensive manufacturing environments, complex chemical supply chains and lower visibility into raw material sourcing.<br><br>**Indicators:** Working hours, health and safety, wages. |
| **Alcoholic Beverages** | Beer, wine, spirits, cider | Turkey, Mexico, China, India, Thailand | Upstream agricultural commodities such as grapes, sugarcane, grain and other crops where vulnerable workers can be concentrated.<br><br>**Indicators:** Working hours, wages. |

# EMERGING RISK AWARENESS

## RAW MATERIAL ORIGIN IN PROCESSED FOODS

Recent investigations have highlighted concerns that products marketed as originating from lower-risk countries may, in some cases, contain raw materials sourced from higher-risk regions. In 2024, a BBC investigation found evidence that some tomato purées sold as `Italian' in European supermarkets may have contained tomatoes from China's Xinjiang region, a region identified by governments, international organisations and human rights groups as presenting heightened risks of State-imposed forced labour affecting Uyghur and other ethnic minority populations. The issue has since been examined in Australia, including by ABC's Four Corners program. This case highlights a broader supply chain challenge: country-of-origin labelling and direct supplier relationships may not always reveal where raw materials originate. Products perceived as low risk can still be exposed to modern slavery risks where ingredients, components or processing occur further upstream. For food and grocery businesses, this reinforces the importance of risk-based due diligence beyond Tier 1 suppliers, particularly for agricultural commodities with complex international supply chains.

## VULNERABILITY OF TEMPORARY MIGRANT WORKERS

An emerging area of focus for Australian businesses is the treatment of temporary migrant workers engaged under labour mobility and seasonal worker programs, including the Pacific Australia Labour Mobility (PALM) scheme. Public reporting, parliamentary inquiries and advocacy groups have raised concerns that some PALM workers may be vulnerable to exploitation due to factors such as employer-sponsored visa arrangements, dependence on a single employer, limited understanding of workplace rights, language barriers, and restricted ability to change employers.

While the PALM scheme plays an important role in addressing labour shortages and providing employment opportunities for workers from Pacific Island countries, concerns have been raised regarding instances of underpayment, excessive deductions, inadequate accommodation, excessive working hours, and barriers to reporting workplace concerns. Stakeholders have noted that these vulnerabilities can increase the risk of labour exploitation and, in some cases, may align with indicators associated with forced labour or other forms of modern slavery.

The issues highlighted through recent reviews reinforce the importance of suppliers having robust oversight of labour-hire providers, ethical recruitment practices, worker voice mechanisms, and accessible grievance channels for migrant workers. They also demonstrate the need for businesses to understand the workforce arrangements used within their operations and supply chains, particularly where temporary migrant workers are engaged through third-party labour providers.

## ARTIFICIAL INTELLIGENCE

AI is rapidly changing industry dynamics, with competitors and new entrants leveraging AI to enhance capabilities across pricing, supply chain, customer engagement and corporate functions. The adoption of AI could change workforce requirements, including reducing reliance on manual processes and increasing demand for new capabilities. While these changes may improve efficiency, they may also have implications for workforce composition and employee engagement. If not effectively managed, including through workforce planning and upskilling, this may result in disruption, reduced productivity, and reputational impacts.

The use of AI also introduces governance, oversight and regulatory risks, including through reliance on third-party tools and the potential for inappropriate or unintended outcomes. If not effectively managed, these risks may adversely affect operations, compliance and reputation.

AI may also create new and evolving human rights and modern slavery risks that require ongoing monitoring. The increasing use of AI-enabled recruitment tools, workforce analytics and screening technologies has the potential to influence hiring decisions, worker management and access to employment opportunities. If not appropriately governed, these technologies may contribute to unintended bias, discrimination, or reduced transparency in recruitment and employment processes, particularly for vulnerable worker groups. Similarly, the use of biometric technologies, including facial recognition systems, may give rise to privacy, surveillance and worker rights concerns where appropriate safeguards are not in place. As AI adoption increases across global supply chains, businesses will need to consider how these technologies may affect worker welfare, ethical recruitment practices, human rights outcomes and modern slavery risk management. Metcash seeks to manage these risks and opportunities through targeted investment, disciplined prioritisation aligned to strategy, and the development of governance frameworks to support the responsible and effective adoption of AI.

**Case study**

### OUR RESPONSE TO TOMATO SUPPLY CHAIN RISKS

Metcash distributes Private Label processed tomato products sourced from Australia, China, Italy and Turkey, and tomato is also used as a minor or compound ingredient in other Private Label products. In early 2025, before the Four Corners program aired, Metcash commenced enhanced checks for certain higher-risk commodities of Chinese origin, in addition to the standard due diligence applied to Private Label products. These checks responded to elevated social compliance risks in some product categories and concerns raised in United Nations reporting on Xinjiang. For our Chinese-origin tomato paste, we reviewed available product and sourcing information and engaged with the supplier. We obtained written confirmation that the tomato paste and other ingredients did not originate from the Xinjiang Uyghur Autonomous Region, that forced or involuntary labour was not used in the supply chain, and that applicable laws were complied with.

# ACTIONS TO ADDRESS RISKS

The following sections outline the actions we took in FY26 to address identified modern slavery risks, first within our own operations and then across our supply chain. These actions form part of our broader human rights due diligence approach and are designed to strengthen our ability to identify, assess, mitigate and respond to actual or potential modern slavery risks.

We recognise that modern slavery risks are dynamic and can arise in different ways across our business and value chain. Within our own operations, risk is most closely linked to labour-hire arrangements, third-party workforce providers, and the integration of newly acquired sites, where practices may not yet be fully aligned with Group standards. Within our supply chain, risk is shaped by the scale and complexity of our supplier network. Our visibility and leverage are strongest with direct Private Label and Tier 1 suppliers, while risk becomes more difficult to identify and influence further upstream. Our response is therefore based on a risk-based, potential impact, and continuous improvement approach. This includes establishing clear expectations through policies and supplier requirements, conducting risk assessments and due diligence, monitoring supplier performance, supporting effective grievance and reporting mechanisms, investigating potential concerns, and working with suppliers and partners to address identified issues. We also recognise the importance of building internal capability and strengthening supplier awareness to support long-term risk management outcomes.

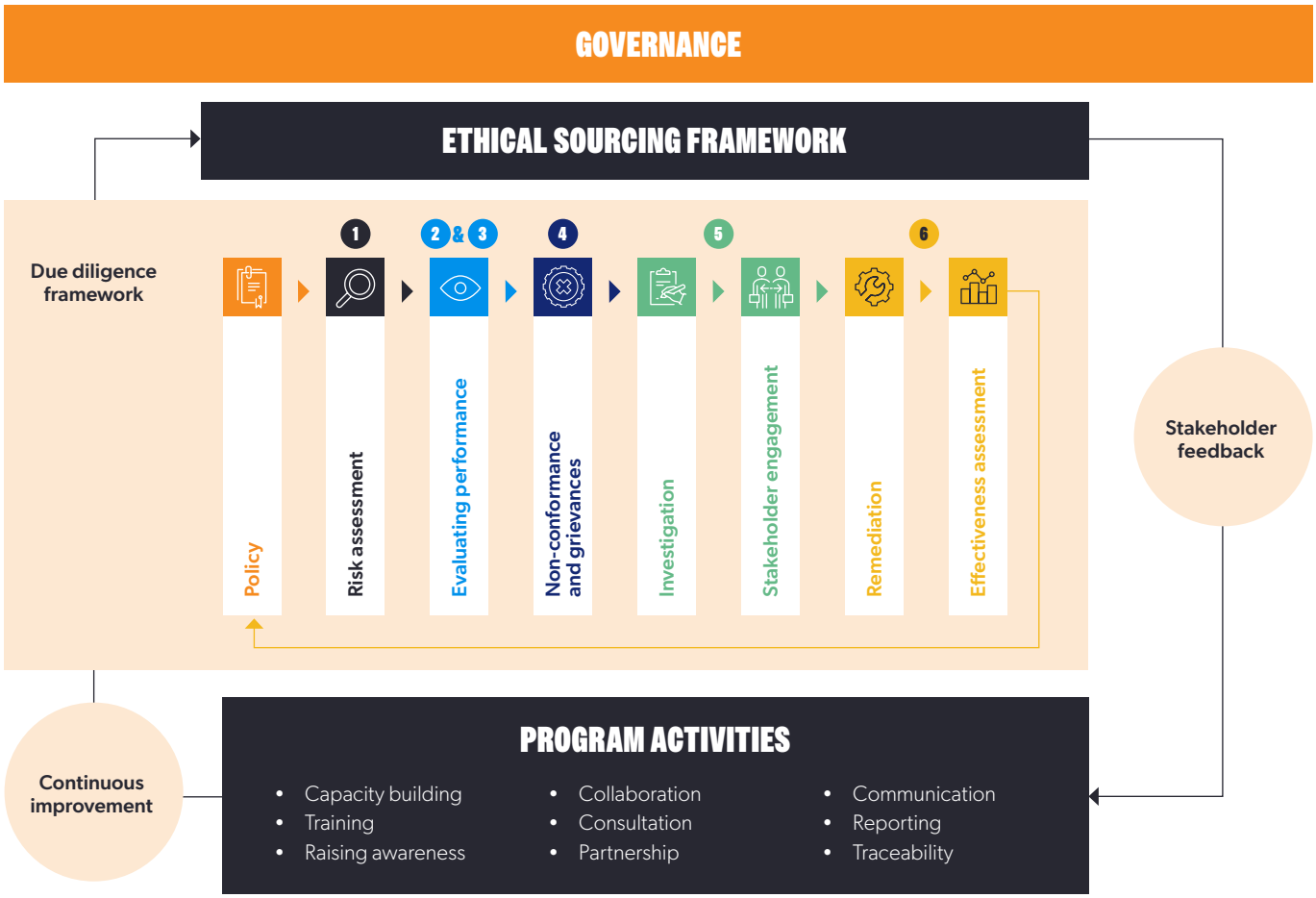
The actions outlined below are intended not only to identify and respond to instances of potential harm, but also to strengthen transparency, improve working conditions, and reduce the likelihood of modern slavery risks occurring across our operations and supply chain over time.

## GOVERNANCE AND ACCOUNTABILITY

Modern slavery governance is integrated into Metcash's existing sustainability, risk and compliance framework. The Metcash Board retains ultimate oversight, supported by the Board's Safety and Sustainability Committee, while management coordination is led through the ESG Council and cross-functional working groups. The governance framework is supported by policies and supplier standards that establish expectations for ethical conduct, human rights, escalation and remediation. Modern slavery is embedded within corporate risk processes, including integration of the modern slavery risks into the Corporate Risk Register and risk-based supplier segmentation.

Metcash has a framework through which we identify, manage and respond to modern slavery risks. As depicted below, it combines a structured due diligence framework with program activities, stakeholder feedback, and a commitment to continuous improvement.

The below table outlines the overall governance and policy framework through which Metcash manages modern slavery risks. The framework combines Board and management oversight with policies, codes of conduct, and reporting mechanisms designed to support accountability, due diligence and continuous improvement across the Group.



## OUR GOVERNANCE APPROACH TO ADDRESSING MODERN SLAVERY RISKS

Metcash addresses modern slavery risks across its operations and supply chain through governance oversight, policies, supplier requirements, due diligence processes and grievance and remediation mechanisms. The table below summarises these frameworks; the following pages outline how they address specific risks.

| Area | Policy or process | Details | Applies to |
|---|---|---|---|
| **Governance** | **Board Safety and Sustainability Committee** | Oversees sustainability strategy, policies, risks and performance, and reviews this Statement before Board approval. | Operations & Supply Chain |
| | **ESG Council and working groups** | Provide management oversight and coordinate consistent human rights and modern slavery controls across the Group. | Operations & Supply Chain |
| **Policies & standards** | **Human Rights and Anti-Slavery Policy** | Sets our approach to respecting human rights and minimising modern slavery risk, applying to employees, suppliers, agency workers, contractors and consultants. | Operations & Supply Chain |
| | **Ethical Sourcing Principles, codes of conduct and supply standards** | Set supplier expectations on forced and child labour, wages, working hours, freedom of association, safety, ethical recruitment and traceability. | Operations & Supply Chain |
| | **Employee Code of Conduct and Diversity Policy** | Set standards of ethical behaviour and support equal opportunity, inclusion and non-discrimination. | Operations |
| | **SHE Policy and SHE Management System Framework** | Protect the health, safety and wellbeing of team members, contractors and visitors. | Operations |
| **Supplier requirements and due diligence** | **Trading and services agreements** | Our supply agreements and standards include compliance with our Principles, supply chain information on request, audit cooperation and timely remediation, with termination rights for serious breaches. | Supply Chain |
| | **Supplier onboarding and SAQs** | It is our policy to screen new Private Label and own-brand suppliers in Hardware and Food for social risk before relationships are established. | Supply Chain |
| | **SEDEX and SMETA social audits** | Independently assess labour standards and health and safety at selected supplier sites, with corrective action monitoring. | Supply Chain |
| | **Private Label Brand Standards** | We seek to embed ethical sourcing due diligence early in the product lifecycle and prioritise visibility of higher-risk raw materials in Hardware and Food. | Supply Chain |
| | **Modern slavery training** | Builds capability to identify and escalate risks; more than 1,400 team members trained across procurement, logistics, sales and People and Culture. | Operations & Supply Chain |

## ACTIONS TO ADDRESS RISKS continued

| Area | Policy or process | Details | Applies to |
|---|---|---|---|
| **Grievance & remediation** | **Say Something Policy and reporting channels** | Confidential and anonymous reporting through the Say Something and Independent Retail portals and NAVEX EthicsPoint, which is available to our suppliers and their employees, with protection from detriment. | Operations & Supply Chain |
| | **Grievance Mechanisms Toolkit** | Encourages workers across the supply chain to report exploitation through anonymous channels. | Supply Chain |
| | **Remediation Framework and Guidance** | Guides our response to concerns, including safeguarding workers, corrective action and remedy where Metcash causes or contributes to harm. | Operations & Supply Chain |



# DUE DILIGENCE

The table below outlines the key stages of Metcash's supply chain due diligence framework and how each stage contributes to the identification, management and mitigation of modern slavery risks. Together, these activities help Metcash prioritise higher-risk suppliers, communicate clear expectations, monitor supplier performance and respond where actual or potential risks are identified.

| Step | Detail | How do we achieve this? |
|---|---|---|
| **Identifying Modern Slavery Risk** | This means gaining a clear understanding of the inherent risk profile of our products, sourcing regions and site compliance performance, targeting high-risk suppliers as a result. | We use a risk-based approach to assess modern slavery risks, prioritising private label suppliers, where our leverage is strongest, based on inherent factors such as high-risk product types, sourcing geographies, and site compliance data from SEDEX. Our internal teams are supported with training and practical tools, including onboarding risk flags and supplier SAQs. |
| **Alignment of Expectations** | This means promoting supplier understanding of modern slavery risks and to align with Metcash's expectations for responsible business conduct. | We promote alignment with Metcash's ethical sourcing expectations by clearly communicating our minimum standards to private label suppliers from the outset. Team members use a combination of standard onboarding requirements, contractual terms and supporting guidance to reinforce expectations on responsible business conduct, including modern slavery risk management. |
| **Evaluating Performance** | This means regularly evaluating evidence of supplier controls to monitor alignment in our business practices, including the treatment of team members. | We assess whether selected suppliers have the systems and controls in place to meet our expectations on ethical sourcing and modern slavery risk management. For private label and exclusive brand suppliers in high-risk categories, we collect information through SAQs and third-party audit reports. These insights help us understand a supplier's risk profile and operational maturity, supporting informed decisions during onboarding and contract award. Where appropriate, we engage further to clarify gaps or confirm alignment with our sourcing standards. |
| **Monitoring Performance** | This means monitoring supplier performance in their risk management capacities by sharing ethical sourcing audit results. | We maintain oversight of our prioritised higher-risk suppliers by tracking their ongoing efforts to manage modern slavery risks. Currently, suppliers of private label food products are requested to link on SEDEX where they can voluntarily share third-party ethical sourcing audit reports for Metcash to view. For Hardware private label suppliers, it is now a mandatory requirement to provide an active third-party audit report for overseas manufacturing sites involved in the supply of hardware private label products. We regularly review updated audit reports, monitoring supplier scores and red flags through SEDEX, and following up on corrective actions. Where significant incidents occur, we reassess the supplier's practices and determine whether further engagement or escalation is required. We are also tracking compliance with this requirement and have or will follow up suppliers that have not yet complied. |
| **Addressing Issues** | This means proactively addressing specific risks by escalating and assigning corrective actions when necessary. | Where modern slavery risks or serious non-conformances are identified, Metcash may apply a structured response involving investigation, corrective action and escalation as appropriate. For Private Label suppliers, critical or major audit findings may require corrective action plans, with progress monitored through supplier engagement and cross-functional oversight. Higher-risk matters may be escalated through internal governance channels. Our objective is to support meaningful remediation, reduce future risk and protect the rights of potentially affected workers. |
| **Review Progress** | This means reviewing a supplier's modern slavery risk profile and performance before awarding contracts, which helps us to maintain supplier relationships with a focus on mitigating modern slavery risks. | For new contracts we assess if there is sufficient evidence to confirm suppliers' efforts to mitigate risks, such as their completion of a SAQ or satisfactory audit results. We identify actions required from the supplier for us to maintain the business relationship, such as completing a SAQ or undergoing follow up audits. |

## ACTIONS TO ADDRESS RISKS continued

Metcash continues to enhance its due diligence framework to strengthen the identification, assessment and management of modern slavery risks across its supply chain.

During FY26, Metcash further strengthened its approach by enhancing risk assessment methodologies, improving data quality and increasing visibility over higher-risk sourcing areas. Insights from supplier assessments, audit findings, grievance mechanisms and stakeholder engagement activities are used to inform ongoing monitoring and prioritisation efforts.

The degree of our due diligence varies according to risk, while the nature of the supplier relationship and Metcash's available leverage influence the approach taken. Metcash's most developed controls apply to Private Label and exclusive-brand suppliers, where closer supplier relationships provide greater opportunity to obtain information and influence sourcing practices. For proprietary-branded and non-trade suppliers, Metcash applies contractual, policy, risk-screening and escalation controls where applicable, while continuing to assess opportunities to strengthen risk-based due diligence in higher-risk categories.

### WORKER VOICE AND GRIEVANCE MECHANISMS

Effective worker voice and grievance mechanisms are an important safeguard against modern slavery and other forms of labour exploitation. They provide workers with safe and accessible channels to raise concerns, seek support and report actual or potential issues before they escalate into more serious harms. Grievance mechanisms can also provide organisations with valuable insight into workplace conditions and emerging risks that may not be identified through audits or other due diligence activities alone.

Metcash provides reporting channels for team members, direct suppliers and supply chain workers, including confidential and anonymous options. These channels are intended to support the early identification, escalation and resolution of human rights, workplace conduct and modern slavery concerns. Reporting mechanisms are complemented by our Speak Up framework and broader commitment to fostering a culture where concerns can be raised without fear of retaliation.

Metcash recognises that grievance mechanisms are only effective if workers are aware of them, trust the process and feel confident that concerns will be addressed appropriately. For this reason, we continue to promote available reporting channels to workers, suppliers and their employees to raise concerns where they identify potential risks or adverse impacts.

During FY26, Metcash continued to strengthen awareness of available reporting mechanisms and sought to review, investigate and address concerns in a timely and appropriate manner. The effectiveness of these mechanisms is assessed through measures such as accessibility, worker awareness, utilisation rates, response times, closure of concerns and evidence of appropriate worker-centred outcomes. Insights from grievances and other worker feedback channels are also used to inform ongoing risk assessment, due diligence and continuous improvement activities.

The reporting channels available in FY26 did not present any confirmed instances of modern slavery. This does not mean that modern slavery risks do not exist within our operations or supply chains, or that all instances would necessarily be identified through formal reporting channels. Metcash will continue to maintain oversight of these mechanisms.

Depending on the nature of the concern, requirement for anonymity and source of the issue raised, the portals available are listed on the following page.

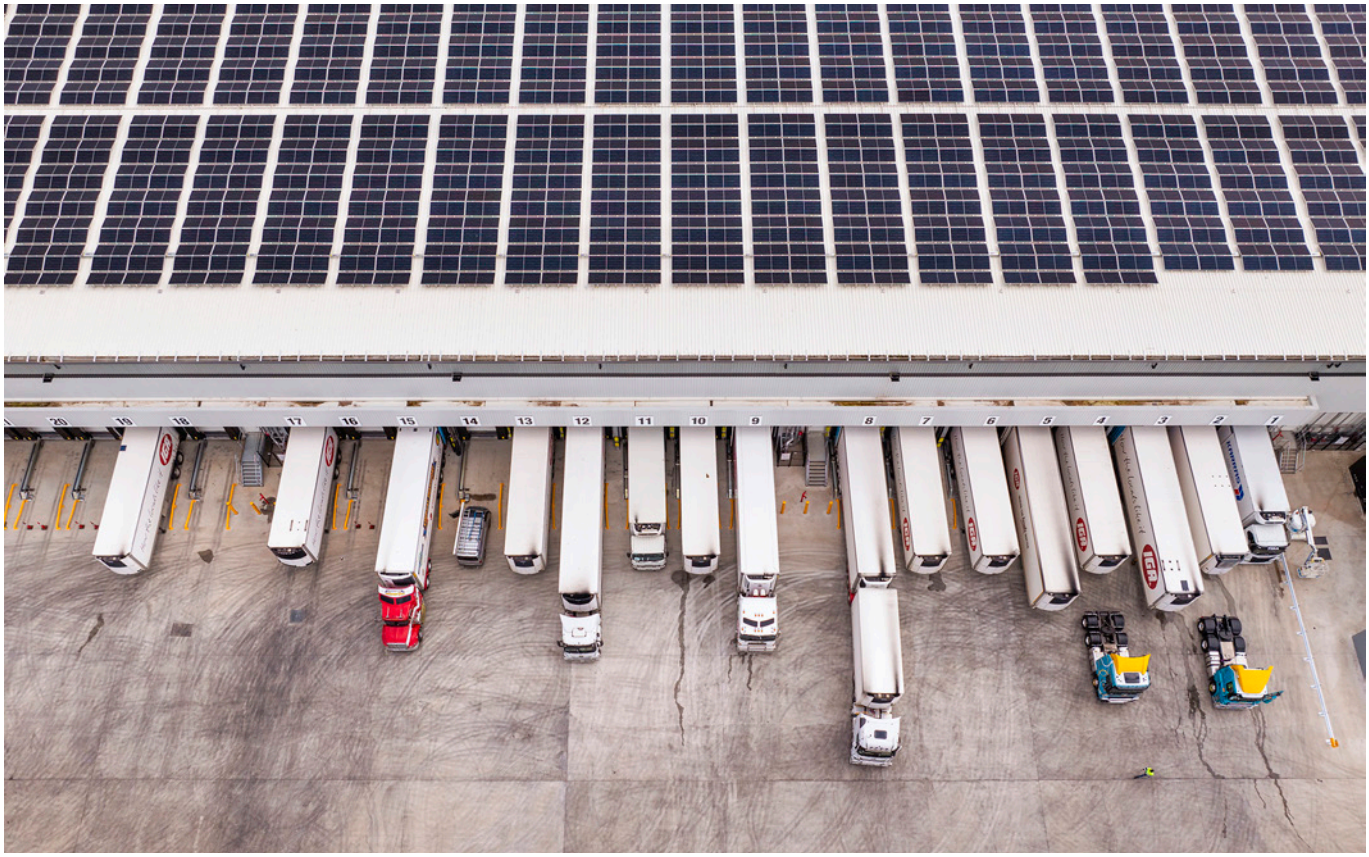
**Case study**

### STRENGTHENING DUE DILIGENCE AT SUPERIOR FOOD SERVICES

In February 2026, Metcash conducted a site-level modern slavery and labour conditions review at Superior Food Services' Mooloolah River Fisheries site to better understand workforce practices, documentation controls and modern slavery risk management within the newly acquired business. The review assessed worker records, recruitment practices, working conditions, grievance mechanisms, labour hire arrangements and training requirements. It identified existing controls and areas where processes could be strengthened and better aligned with Metcash's human rights and ethical sourcing framework. Following the review, Metcash developed a phased action plan covering governance, ethical sourcing, supplier due diligence, modern slavery contractual requirements, procurement controls, staff training, whistleblower awareness and labour hire standards. This work demonstrates how targeted site reviews can translate risk assessments into practical improvements, supporting greater consistency, accountability and integration of modern slavery controls across Metcash's operations.

## ACTIONS TO ADDRESS RISKS continued

| Portal | Detail |
|---|---|
| **Say Something Portal** | This portal is for concerns relating to personal work-related grievances and general misconduct involving Metcash employees or teams, which may include matters such as:<br>• Modern slavery concerns<br>• Bullying, harassment, discrimination<br>• Breaches of the Metcash Code of Conduct<br>• Workplace health and safety concerns<br>• Interpersonal conflict, suspension or disciplinary action<br>• Concerns about engagement, transfer or promotion |
| **Independent Retail Portal** | This portal is for concerns involving independently owned stores that operate under Metcash banner brands (e.g. IGA, Mitre 10, Total Tools, Cellarbrations), which may include matters such as:<br>• Modern slavery concerns<br>• Unsafe store conditions or product safety concerns<br>• Misconduct involving independent store employees<br>• Workplace issues inside an independent retailer<br>• Bullying, harassment or discrimination involving an independent retailer's team |
| **Whistleblower Portal (Speak Up)** | This portal is to be used if you are an `eligible whistleblower' looking to report matters that qualify as `Protected Disclosures', to enable you to receive the *Corporations Act 2001* (Cth) `whistleblower protections'. |



## ADDRESSING RISKS IN OUR OPERATIONS

The table below summarises the key modern slavery risks identified in our operations, including where work is delivered by labour hire providers, contractors and service providers, and the policies and actions through which Metcash addresses each risk.

| Risk | How it may arise | How Metcash addresses it |
|---|---|---|
| **Forced labour & debt bondage** | Workers engaged through labour hire or subcontracted services who cannot freely leave, or who owe debts to recruiters. | Our Human Rights and Anti-Slavery Policy applies to employees, agency workers and contractors. Service providers must prohibit forced, bonded and trafficked labour (cl. 6.1), and our Remediation Framework guides our response to any concerns identified. |
| **Deceptive recruitment & recruitment fees** | Migrant or temporary workers misled about job terms or charged fees by labour hire agents or intermediaries. | Our Principles expect right to work verification, oversight of labour agencies and due diligence on labour hire agents (cl. 6.9). In FY26, the Mooloolah River Fisheries review led to an action plan including labour-hire controls and worker awareness. |
| **Underpayment** | Workers in cleaning, freight, maintenance or labour hire paid below legal minimums, or engaged as contractors when they are employees. | Our Principles expect minimum wages and legally mandated benefits for all workers, including those employed by third-party service providers and labour hire agents, with transparent deductions and accurate records (cl. 6.6). |
| **Excessive working hours** | Long shifts, fatigue or unrealistic delivery schedules, particularly in logistics and facilities services. | Our Principles expect overtime to be voluntary and compensated, with accurate records of hours worked (cl. 6.7). We recognise our own purchasing practices, such as delivery timeframes, may have the ability to contribute to excessive hours. |
| **Unsafe working conditions** | Hazardous warehouse, transport, maintenance or cleaning work, particularly for contractors unfamiliar with our sites. | Our Safety, Health and Environment (SHE) Policy and SHE Management System Framework protect team members, contractors and visitors. In FY26, we developed our Lead Safe framework to strengthen frontline safety leadership, including the identification and management of physical and psychosocial hazards. We delivered psychosocial safety training, supported by our Converge Employee Assistance Program. |
| **Child labour** | Indirect exposure through goods used in our operations, such as IT hardware, uniforms and PPE. | Suppliers must prohibit child labour (cl. 6.2) and are expected to trace components back to raw materials (cl. 6.10). |
| **Worker voice & freedom of association** | Workers reluctant to raise concerns for fear of losing work or restricted from organising. | Our Say Something Policy protects confidentiality and against detriment, and the Say Something portal and Grievance Mechanisms Toolkit provide reporting channels. Our Principles include an expectation that suppliers uphold freedom of association and collective bargaining (cl. 6.3). |

Clause (cl.) and section (s.) references are to the Metcash Responsible and Ethical Sourcing Principles (updated October 2024), which are available to suppliers at www.metcash.com/sustainability/human-rights-and-ethical-sourcing.

## POLICIES AND PROCESSES

Policies, standards and processes form the foundation of Metcash's approach to managing modern slavery risks within its operations. These frameworks establish clear expectations for ethical conduct, responsible recruitment, workplace behaviour, grievance management and human rights protections, while providing employees with pathways to raise concerns and seek support. Together, the implementation of these policies assists us to respect human rights across the business and support the identification, prevention and remediation of potential modern slavery risks. They also provide guidance to leaders and team members on their responsibilities, strengthen accountability, and promote consistent management of labour-related risks across Metcash's operations. The table below outlines the key policies, frameworks and guidance materials that support Metcash's operational approach to preventing, identifying and responding to, modern slavery risks.

| Framework | Overview |
|---|---|
| **Human Rights and Anti-Slavery Policy** | The Policy sets out Metcash's approach to respecting internationally recognised human rights, avoiding involvement in human rights abuses and minimising modern slavery risks. It outlines expectations of employees, suppliers, agency workers, contractors, and consultants and establishes Metcash's expectation that organisations with which it does business take verifiable steps to comply with these standards. |
| **Employee Code of Conduct** | The Code establishes the standards of lawful, ethical and socially responsible behaviour expected of Metcash Directors, employees, contractors and consultants. It provides a common foundation for how team members are expected to act when dealing with colleagues, suppliers, retailers and the wider community and supports accountability for conduct inconsistent with Metcash's values. |
| **Say Something Policy** | The Say Something Policy provides a mechanism to raise concerns about suspected misconduct or other reportable conduct. It includes protections relating to confidentiality and protection from detriment and supports escalation of concerns that may relate to human rights, workplace practices or modern slavery. |
| **Diversity Policy** | The Diversity Policy sets out Metcash's commitment to building a diverse, equitable and inclusive workplace, guiding fair access to opportunities across recruitment, development, promotion and remuneration, and supporting progress toward the Group 40:40:20 gender representation target. It provides a common foundation for embedding inclusive practices, accountability and transparency across the organisation, from frontline teams through to the Board. |
| **Remediation Guidance** | Provides a structured approach internally and, for suppliers, step-by-step guidance on addressing and resolving instances of modern slavery requiring timely corrective actions, restitution for affected individuals, and continuous improvement in supplier practices. |

## ACTIONS TO ADDRESS RISKS continued

### Diversity, Equity and Inclusion

Metcash strives to foster a diverse, equitable and inclusive workplace where team members feel valued and able to contribute. This year we continued to strengthen inclusive practices and promote a culture of belonging across the organisation. We recognise that diverse perspectives support innovation, decision making and long-term business performance. Our Diversity, Equity and Inclusion (DEI) approach is embedded within our people and culture strategy and focuses on:

- Championing diversity at all levels.
- Embedding policies and practices that are inclusive and promote accountability, fairness and transparency.
- Building inclusive collaboration through diverse perspectives.
- External benchmarking and accreditations.

DEI is overseen by senior leadership and supported by governance frameworks, policies and regular reporting. Key frameworks include the Board's People, Culture and Nomination Committee Charter, Code of Conduct and Diversity Policy. These are supported by appropriate training and reporting mechanisms. Policies are reviewed periodically to maintain alignment with regulatory requirements and leading practice. Progress is monitored through workforce data, employee feedback and the performance of targeted initiatives, helping identify opportunities for improvement and inform future priorities.

Our Workplace Gender Equality Agency (WGEA) assessment reported a median gender pay gap of 2.7% for the most recent reporting period. This outcome falls within WGEA's target range and is considered neutral. Metcash's commitment to gender equity has also been recognised by Equileap. In its 2026 Report, Metcash was recognised as one of six global organisations who stood out for impressive transparency and performance in closing the gender pay gap. Employee feedback further reinforces these results, demonstrating continued progress in fostering an inclusive workplace and advancing gender equity. Together, these outcomes reflect our ongoing focus on inclusive leadership, equitable practices and accountability and contribute to our long-term success.



## GENDER EQUITY

Metcash is committed to providing a safe, respectful and inclusive workplace where all employees can have equitable access to opportunities. We continue to progress towards our 40:40:20 gender representation target.

**Female Representation at Metcash**

**32%**
across the Group

**43%**
across the Board

**50%**
among non-executive Directors

**45%**
among total salaried population

**56%**
across Group Leadership Team



## 2026 EMPLOYEE ENGAGEMENT SURVEY

**89%**
agree that gender-based and sexual harassment are not tolerated

**85%**
agree that their manager genuinely supports gender equality

**85%**
agree that leaders support success and progress of all genders

### Health, Safety and Wellbeing

The health, safety and wellbeing of our people, contractors and partners remains a core priority for Metcash. In FY26, we continued to strengthen our safety culture, recognising that safe and healthy workplaces are fundamental to operational performance and employee engagement. Metcash adopts a proactive approach to health, safety and wellbeing, underpinned by risk management, continuous improvement and ISO 45001 principles across our operations. This approach aligns with regulatory requirements and industry standards. Our focus areas include:

- Identifying, assessing and mitigating workplace hazards.
- Promoting shared accountability and leadership commitment.
- Supporting mental health, resilience and employee wellbeing.

### Employee Wellbeing and Support

Metcash provides team members and their immediate family members with access to Converge International, an independent Employee Assistance Program (EAP) that offers confidential counselling, coaching, and wellbeing support services. The program supports employees across a range of personal and work-related matters, including mental health, financial wellbeing, family and relationship challenges, workplace concerns, and critical incidents.

Access to confidential support services forms an important part of Metcash's broader approach to worker wellbeing and psychosocial safety. By providing employees with access to independent advice and support, Converge helps strengthen worker resilience, encourage early intervention and create additional pathways for individuals experiencing personal or workplace difficulties to seek assistance.

Supporting worker wellbeing also contributes to the management of modern slavery risks by helping to reduce factors that can increase worker vulnerability. Financial stress, social isolation, mental health challenges, and fear of speaking up can make workers less likely to seek help or raise concerns about inappropriate workplace practices. Accessible and confidential support services can help workers access assistance early and build confidence to raise issues where required.

While modern slavery risks within Metcash's direct workforce are considered low, the business recognises the importance of maintaining a workplace environment where employees feel safe, respected and supported. Independent support services such as Converge complement existing grievance and reporting mechanisms by providing an additional avenue through which employees can seek guidance, discuss concerns and access professional assistance.

Metcash continues to promote awareness of Converge and other wellbeing resources as part of its commitment to maintaining a safe, inclusive and supportive workplace. Together with training, employee engagement initiatives and grievance mechanisms, these services help strengthen worker voice, support employee wellbeing and contribute to a culture where concerns can be raised and addressed appropriately.

**Case study**

## TRANSPORT SAFETY MANAGEMENT

During the year, we implemented several initiatives to strengthen transport safety compliance, driver capability and operational controls. These included updated Chain of Responsibility and driver eLearning programs covering fatigue management, fitness for work, safe driving and incident response, as well as updates to our Safe Site Delivery Standard. We participated in National Road Safety Week and introduced digital vehicle pre-start inspections through Evotix to improve fleet oversight and maintenance visibility. Traffic management controls were also enhanced at Food and Liquor mega distribution centres through the installation of A-Safe polymer safety barriers, improving separation between pedestrians and mobile plant and reducing interaction risks.



## ADDRESSING MODERN SLAVERY RISKS IN OUR SUPPLY CHAIN

The table below summarises the key modern slavery and labour rights risks identified in our supply chain and how Metcash addresses each risk through our Responsible and Ethical Sourcing Principles, supplier agreements, due diligence and remediation processes.

| Risk | How it may arise | How Metcash addresses it |
|---|---|---|
| **Forced labour & debt bondage** | Upstream agriculture, fishing, manufacturing and raw material extraction, particularly in higher-risk countries. | Our Principles expect suppliers to prohibit forced, bonded, prison and trafficked labour throughout their supply chain (cl. 6.1). SEDEX SAQs and SMETA audits of select suppliers assess forced labour indicators, including withholding of documents. |
| **Child labour** | Agricultural commodities, textiles and component manufacturing in higher-risk sourcing regions. | Our Principles expect suppliers to prohibit child labour and protect workers under 18 from hazardous work (cl. 6.2). Child labour is assessed through SAQs and social audits, and Private Label suppliers with critical findings must submit corrective action plans reviewed by our ethical sourcing team. |
| **Deceptive recruitment & recruitment fees** | Migrant workers in food processing, seafood, agriculture and manufacturing recruited through intermediaries. | Our Principles expect right to work verification and due diligence on labour agents (cl. 6.9), and SMETA audits cover recruitment practices. |
| **Wages & regular employment** | Low wages, unlawful deductions and informal or irregular employment in labour-intensive sectors. | Our Principles expect suppliers to pay at least the minimum wage and legally mandated benefits, with transparent deductions, and should progress towards a living wage (cl. 6.6). Wages and employment contracts are assessed through SAQs and audits. |
| **Excessive working hours** | Peak production periods, piece-rate work and tight lead times in manufacturing and food processing. | Our Principles expect overtime to be voluntary and compensated, with accurate records (cl. 6.7). Working hours are assessed through SMETA audits, with non-conformances tracked through corrective action monitoring. |
| **Health & safety** | Hazardous manufacturing, chemical handling and inadequate worker accommodation. | Suppliers are expected to provide safe and healthy workplaces (cl. 6.8). SMETA assesses health and safety, including accommodation. In FY26, critical and major findings at an Australian supplier were addressed through a structured corrective action process. |
| **Freedom of association** | Restrictions on organising or collective bargaining in some sourcing jurisdictions. | Suppliers should uphold workers' right to organise and bargain collectively (cl. 6.3), which is assessed through SAQs and social audits. Workers in our supply chains can raise concerns anonymously through NAVEX EthicsPoint (s. 9). |
| **Limited upstream visibility** | Risks hidden beyond Tier 1 suppliers, at processors and raw material production. | Suppliers are expected to trace products from raw materials to finished goods and provide supply chain information on request (cl. 6.10). Our draft Group Traceability Strategy and strengthened Private Label Brand Standards prioritise higher-risk commodities. |

Clause (cl.) and section (s.) references are to the Metcash Responsible and Ethical Sourcing Principles (updated October 2024).

Metcash has made significant progress in improving product traceability and supply chain transparency through a substantial uplift in the collection, validation and maintenance of manufacturing site data across our private label supply chains. Historically, many of our systems and supplier records were designed primarily to capture the legal `pay-to' entity and commercial address used for procurement and invoicing purposes, rather than the physical production facility where goods are manufactured. As a result, visibility of manufacturing sites, factory addresses and upstream supply chain locations was often incomplete.

During FY26, we undertook a targeted program to collect and validate manufacturing site information, including factory locations, legal entity names and production facility addresses, enabling a much greater proportion of products to be mapped to the location where they are actually produced. This enhanced dataset has strengthened our ability to assess both inherent risk, such as country, commodity and sector-related modern slavery risks, and site-specific risk through our traceability and risk assessment tools. It has also improved the quality of supplier screening, risk analysis, and due diligence activities, while highlighting areas where visibility remains limited, particularly where trading companies sit between Metcash and manufacturing facilities. These efforts are helping to establish a stronger foundation for supply chain transparency and enabling progressively more detailed risk-based assessments of our product supply chains.

## DUE DILIGENCE

Metcash applies a risk-based due diligence framework to identify, assess, monitor and address modern slavery risks within its Private Label supply chain. The framework is designed to strengthen transparency, support responsible sourcing and verify modern slavery considerations are embedded throughout the supplier lifecycle, from onboarding and contract award through to ongoing monitoring and contract renewal.

The framework recognises that modern slavery risks may evolve over time and that effective risk management requires more than a single assessment or audit. Instead, Metcash's approach combines supplier engagement, risk assessment, audit oversight, performance monitoring and remediation processes to support ongoing improvement and strengthen supplier accountability.




**Case study**

### TTHG (HARDWARE) – EMBEDDING SOCIAL RISK SCREENING INTO SUPPLIER ONBOARDING

TTHG has strengthened its approach to preventing modern slavery and broader social risks by embedding social screening, including modern slavery risk, into the onboarding of new private label suppliers. New private label suppliers were screened against social criteria in FY26, helping identify potential risks before supplier relationships are established. TTHG assessed 89 supplier sites for social impacts, comprising 63 finished goods manufacturing sites and 26 vendor sites. These assessments support earlier identification of higher-risk suppliers and provide a stronger basis for determining where further due diligence, audit evidence or corrective action may be required.

This approach demonstrates how Metcash's supplier expectations are being translated into practical controls within the Hardware pillar, shifting the focus from responding to issues after they arise to identifying and managing risk earlier in the supplier lifecycle.

## SUPPLIER AUDIT COVERAGE AND RISK-BASED DUE DILIGENCE

In the Food and Hardware pillars, all Private Label suppliers are now required to register with SEDEX or an equivalent platform, complete self-assessment questionnaires, and provide Metcash with third-party assessments upon request. This has helped us to strengthen governance and enhance supplier risk visibility.

During the year, 199 of 302 Private Label supplier sites (66%) had a registered third-party social audit. This increased visibility provides a stronger basis for risk assessment, supplier engagement and remediation. Similar activity continued across other pillars. Hardware mapped Private Label production sites and collected audit reports from approximately 45% of overseas suppliers, while Liquor mapped its supply base and commenced third-party audit collection, reaching approximately 33% coverage. Metcash's approach is to progressively increase audit coverage of high-risk suppliers.

## POLICIES AND PROCESSES

Metcash's approach to managing modern slavery risks within its supply chain is supported by a suite of policies, standards and supplier-facing processes that set clear expectations for ethical sourcing, responsible business conduct and respect for human rights. Together, these frameworks help establish a consistent approach to supplier engagement, risk management and accountability across the Group's supplier network. These policies and processes provide the foundation for Metcash's supply chain due diligence activities by outlining supplier obligations, supporting risk identification and assessment, and establishing mechanisms for raising, investigating and addressing concerns. They also help communicate Metcash's expectations regarding labour rights, ethical recruitment, worker welfare, transparency and responsible sourcing practices.

The table below outlines the key policies, supplier standards and engagement processes that support Metcash's efforts to prevent, identify and respond to modern slavery risks throughout its supply chain.

| Framework | Overview |
|---|---|
| **Human Rights and Anti-Slavery Policy** | The Policy sets out Metcash's approach to respecting internationally recognised human rights, avoiding involvement in human rights abuses and minimising modern slavery risks. It applies expectations across employees, suppliers, agency workers, contractors and consultants and establishes Metcash's expectation that organisations with which it does business take verifiable steps to comply with these standards. |
| **Code of Conduct and Supply Standards** | The Supplier Code sets out responsible business and labour practice expectations for suppliers and encourages those expectations to extend through their own supply chains. It supports supplier due diligence and risk assessment and provides a basis for Metcash to engage with suppliers on identified issues and agree corrective actions where improvement is required. |
| **Say Something Policy** | The Say Something Policy provides a mechanism for eligible individuals to raise concerns about suspected misconduct or other reportable conduct. It includes protections relating to confidentiality and protection from detriment and supports escalation of concerns that may relate to human rights, workplace practices or modern slavery. |
| **Responsible and Ethical Sourcing Principles** | These Principles establish Metcash's core expectations for ethical sourcing and supplier conduct, including the prohibition of forced and child labour, freedom of association, non-discrimination, fair wages and working hours, safe workplaces, ethical recruitment and improved traceability and transparency. They provide a common foundation for supplier engagement, due diligence, assessment and remediation across Metcash's supply chains. |
| **Supplier Engagement Terms** | Communicates expectations for fair treatment and respect for human rights across our supply chain. |
| **Supplier Onboarding Procedures** | Requires private label food suppliers to complete a SAQ aligned with our ethical sourcing expectations. |

## SEDEX COMPLIANCE AND SMETA AUDITS

SEDEX is a global non-profit organisation that supports responsible sourcing through supplier data-sharing, risk assessment, and social auditing tools. Metcash utilises the SEDEX platform as a key component of its ethical sourcing approach, with private label suppliers required to sign up to and, where applicable, undergo a SEDEX Members Ethical Trade Audit (SMETA).

The three steps to SEDEX compliance are:

1. **Join SEDEX**. Suppliers register their business and each relevant manufacturing site on the SEDEX platform.
2. **Link with Metcash**. Suppliers connect their SEDEX account to Metcash, giving us access to site details, self-assessment responses, and any social audit reports.
3. **Complete the Self-Assessment Questionnaire (SAQ)**. Suppliers complete the SEDEX SAQ for each site, covering labour rights, health and safety, environmental management and business ethics.

The SAQ provides insight into supplier policies, management systems and workforce practices, while SMETA audits offer an independent assessment of working conditions and compliance against recognised ethical trade standards. Together, these mechanisms help Metcash to better understand supplier performance, identify areas of elevated risk and prioritise follow-up activities where concerns are identified. SEDEX also enables Metcash to maintain oversight of supplier corrective actions and monitor progress in addressing identified issues.

Through the SAQ and SMETA audit process, Metcash obtains information across three key pillars that support the identification and assessment of modern slavery risks. The table below outlines the focus of each pillar and how the information gathered contributes to our broader due diligence and ethical sourcing activities.

## ACTIONS TO ADDRESS RISKS continued

| Pillar | What it covers | Relevance to modern slavery |
|---|---|---|
| **Labour standards** | Working hours, wages and benefits, employment contracts, freedom of association, discrimination, disciplinary practices, child labour, forced labour, recruitment practices and worker rights. | Directly identifies indicators of forced labour, debt bondage, exploitation, excessive overtime, withholding of documents and other labour rights violations. |
| **Health & safety** | Workplace safety, emergency preparedness, worker accommodation, hazard management, training, welfare facilities and occupational health. | Helps identify unsafe working conditions that may indicate worker exploitation or poor treatment of vulnerable workers. |
| **Business Ethics** | Anti-bribery, corruption, conflicts of interest, responsible sourcing and ethical business practices. | Strengthens governance and transparency, helping businesses identify and manage risks that may contribute to unethical labour practices within supply chains. |

Importantly, SEDEX serves as both a risk identification and continuous improvement tool. Audit outcomes, supplier responses and corrective action trends help inform broader risk assessments, supplier engagement activities and future due diligence priorities. Insights generated through the platform also support Metcash's efforts to monitor emerging risks, identify recurring themes across supplier groups and focus resources on areas where workers may be at greater risk of exploitation.

While audits alone cannot eliminate modern slavery risks, the combination of supplier self-assessments, independent audits, corrective action monitoring and ongoing supplier engagement provides an important mechanism for strengthening transparency, promoting responsible labour practices and supporting the identification and management of modern slavery risks throughout the supply chain.

## USING SUPPLIER AUDITS TO IDENTIFY GOOD PRACTICE

Supplier audits and due diligence activities are an important tool for identifying potential modern slavery risks, but they can also provide valuable insight into practices that support worker wellbeing and contribute to positive labour outcomes. In addition to highlighting areas requiring corrective action, audits can identify examples of good practice that demonstrate a supplier's commitment to worker welfare, inclusion and responsible employment practices. These insights support a more balanced understanding of supplier performance and help inform constructive engagement, continuous improvement and the sharing of positive approaches across the supply chain.

The examples below highlight how supplier due diligence can provide visibility of initiatives that support workforce participation, improve worker wellbeing and contribute to safer and more inclusive workplaces, particularly within higher-risk sourcing regions.

**Case study**

### RECOGNISING GOOD PRACTICE AT A PACKAGING SUPPLIER IN BANGLADESH

Metcash identified examples of suppliers operating in higher-risk sourcing regions that had implemented initiatives designed to support workforce wellbeing and participation. These included access to onsite childcare facilities, healthcare services, training programs and employee welfare initiatives aimed at supporting workers both within and outside the workplace.

The audit process also identified a significant level of female workforce participation and measures intended to support the recruitment, retention, and development of women. Initiatives such as childcare support can help reduce barriers to employment and create more inclusive working environments, particularly in industries and regions where workforce participation may be constrained by caring responsibilities.

While positive practices do not eliminate the need for ongoing due diligence, they provide important indicators of supplier commitment to worker welfare and responsible employment practices. Identifying and sharing examples of good practice allows Metcash to recognise positive outcomes alongside areas requiring improvement and supports constructive engagement with suppliers to strengthen labour standards across the supply chain.

**Case study**

## STRENGTHENING ETHICAL RECRUITMENT FOR MIGRANT WORKERS IN THAILAND

One of our suppliers in Thailand participates in a collaborative program aimed at strengthening ethical recruitment practices and labour protections for migrant workers. We recognise this as an example of good practice in a region where migrant workers can face heightened risks of exploitation.

The initiative focused on enhancing management systems and recruitment practices to better identify and address risks of labour exploitation. This included training on ethical recruitment, fair labour standards and measures to improve oversight of recruitment and employment practices, with a particular focus on migrant workers.

Migrant workers can face heightened vulnerability to deceptive recruitment practices, recruitment fees, debt bondage and forced labour. Effective controls around recruitment, employment conditions and worker protections are therefore an important component of modern slavery risk management and align closely with Metcash's expectations regarding ethical recruitment and responsible labour practices.

Metcash views this type of supplier-led capability building as a positive example of proactive action to strengthen worker protections and reduce the risk of exploitation. At the same time, positive initiatives do not remove the need for ongoing due diligence. Metcash continues to assess supplier performance through risk assessments, audits and supplier engagement activities to understand whether appropriate controls are operating effectively and whether further action is required.

## SUPPLIER STANDARDS

In FY26, Metcash continued to strengthen supplier accountability and reinforce expectations regarding responsible business conduct, human rights and ethical sourcing practices. Recognising that suppliers play a critical role in preventing and addressing modern slavery risks, Metcash focused on embedding clear requirements within supplier tenders, agreements, policies and engagement processes. This process is ongoing.

Metcash strengthened its Human Rights and Anti-Slavery Policy and commenced work to strengthen modern slavery requirements in its standard supplier contractual terms, including expectations relating to policy compliance, audit cooperation, remediation and termination rights. The updated requirements support greater transparency and accountability by requiring suppliers to provide supply chain information on request, cooperate with audits and risk assessments, and address identified non-compliances in a timely manner. The agreements also preserve Metcash's right to take appropriate action, including termination of the relationship, where serious or unresolved breaches are identified.

Metcash also continued supplier awareness of our Ten Ethical Sourcing Principles through the MetPlanet supplier portal and ongoing supplier engagement activities. These principles establish minimum expectations relating to labour rights, workplace conditions, ethical recruitment and supply chain transparency, providing suppliers with a clear understanding of the standards expected throughout the supply chain.

By strengthening contractual requirements, communicating clear standards and engaging suppliers on ethical sourcing expectations, Metcash seeks to drive continuous improvement in supplier practices and encourage greater ownership of human rights risks within supplier operations. These activities also support stronger due diligence outcomes by providing a clear framework against which supplier performance can be assessed and monitored.

Metcash's Ethical Sourcing Principles:

1. Prohibition of forced or bonded labour.
2. No child labour.
3. Freedom of association and collective bargaining.
4. No discrimination.
5. Humane treatment and safe workplaces.
6. Fair wages and benefits.
7. Working hours and voluntary overtime.
8. Workplace health and safety.
9. Legal right to work and ethical recruitment.
10. Traceability and transparency.

## PRIVATE LABEL BRAND STANDARDS FOR SUPPLY

Within the Food pillar, Metcash also strengthened its Private Label Brand Standards for Supply, reinforcing expectations that suppliers identify and monitor human rights and social risks across their upstream supply chains. The updated standards move sustainability and ethical sourcing considerations earlier in the product lifecycle, including before tenders, supplier selection and product approval, and strengthen supplier, ingredient and certification data requirements within MetSafe, Metcash's Private Label quality assurance process.

## SUPPLY CHAIN VISIBILITY

Understanding where products are sourced, manufactured and processed is critical to identifying and managing modern slavery risks. As a wholesaler operating across a diverse supplier network, Metcash recognises that visibility can vary significantly across different tiers of the supply chain. Metcash has the greatest visibility, leverage and ability to influence outcomes within its direct supplier relationships, particularly where it sources Private Label products. However, modern slavery risks can become more difficult to identify further upstream, where production may involve multiple tiers of suppliers, subcontracting arrangements, labour intermediaries, raw material processors and complex international sourcing networks. To strengthen supply chain visibility, Metcash adopts a risk-based approach that prioritises higher-risk product categories, sourcing countries and supplier relationships. This includes collecting supplier information, conducting risk assessments, reviewing manufacturing locations, utilising supplier self-assessments and audits, and engaging directly with selected suppliers to better understand the origin of products and the workforce arrangements used throughout production.

## MAPPING PRODUCTS TO WHERE THEY ARE MADE

Visibility is not only about understanding who our suppliers are, but where products are made and by whom. Historically, many of our systems and supplier records were designed to capture the legal `pay-to' entity and commercial address used for procurement and invoicing, rather than the physical facility where goods are produced. As a result, visibility of manufacturing sites and upstream supply chain locations was often incomplete. During FY26, Metcash undertook a targeted program to collect and validate manufacturing site information across our Private Label supply chains, including factory locations, legal entity names and production facility addresses. This has enabled a much greater proportion of products to be mapped to the location where they are actually produced.

## GREATER PARTICIPATION ON SEDEX

Greater supplier participation on SEDEX has also further strengthened visibility in FY26.

When suppliers link with Metcash on SEDEX and complete the Self-Assessment Questionnaire, Metcash gains site-level information on where products are manufactured, workforce composition (including the use of agency, temporary, and migrant workers), and the policies and management systems in place at each site.

Where modern slavery risks or serious non-conformances are identified, Metcash may apply a structured response involving investigation, corrective action and escalation as appropriate. For Private Label suppliers, critical or major audit findings may require corrective action plans, with progress monitored through supplier engagement and cross-functional oversight. Higher-risk matters may be escalated through internal governance channels. Our objective is to support meaningful remediation, reduce future risk and protect the rights of potentially affected workers.

## STRENGTHENING RISK ASSESSMENT AND DUE DILIGENCE

Together, these improvements have strengthened our ability to assess both inherent risk, such as country, commodity and sector-related modern slavery risks, and site-specific risk through our traceability and risk assessment tools. They have also improved the quality of supplier screening and risk analysis, helped target due diligence where it is most needed, and support the tracking of corrective actions over time. This work has also highlighted where visibility remains limited, particularly where trading companies sit between Metcash and manufacturing facilities. As supply chains continue to evolve, Metcash remains focused on improving traceability and strengthening supplier engagement to better understand risks beyond Tier 1 suppliers, building a stronger foundation for a more resilient, responsible and transparent supply chain.

## ACTIONS TO ADDRESS RISKS continued

### FY26 UPDATE ON TRACEABILITY INITIATIVES

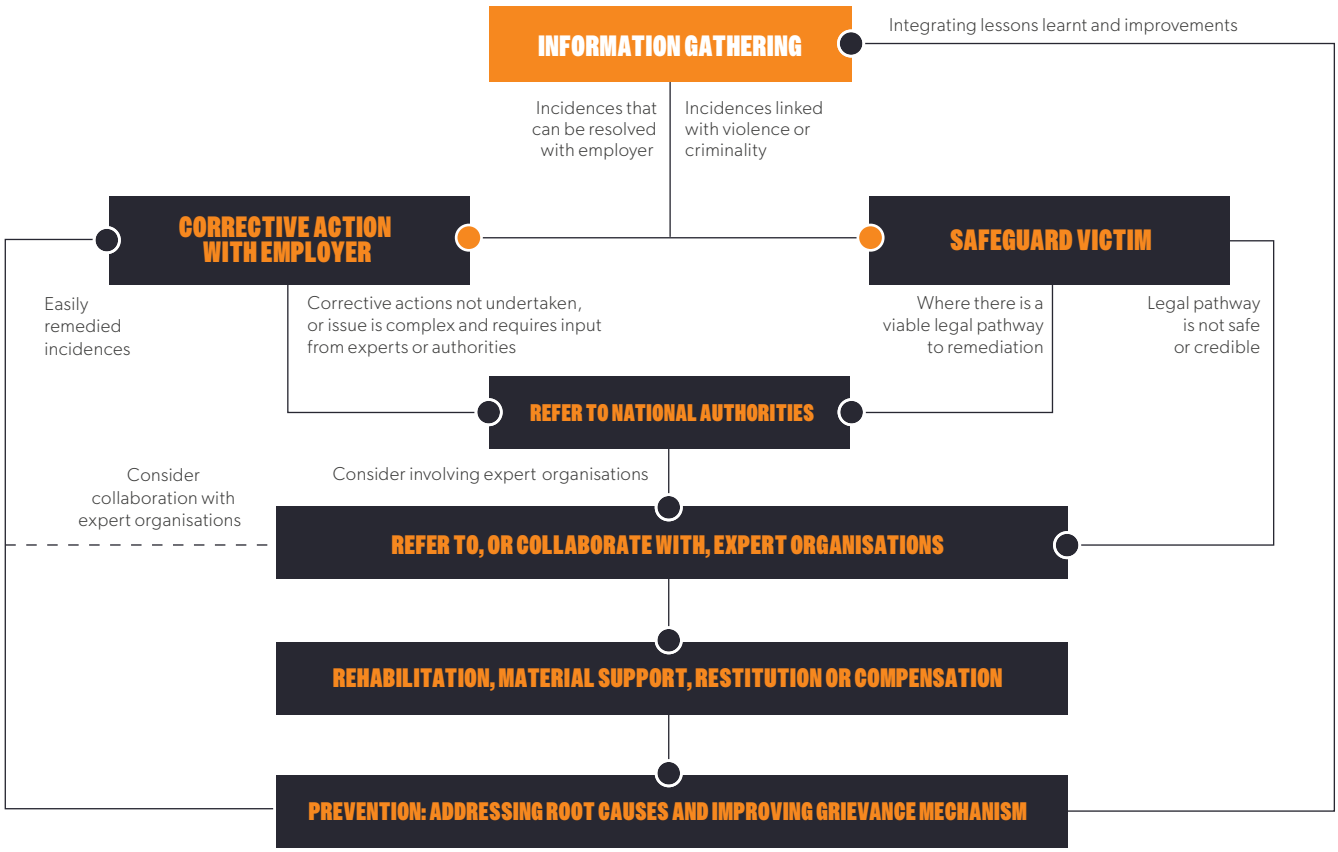
Development of a Group Traceability Strategy progressed during FY26 through collaboration across business pillars and ESG governance forums. The strategy aims to adopt a risk-based approach focused on supply chains with higher potential social and environmental impacts. We also continued participating in industry and government initiatives. For example, we collaborated with AgTrace Australia regarding test cases for the Australian Agriculture Traceability Protocol (AATP) digital traceability framework and discussed common data standards and data-sharing interoperability. This year the Hardware business completed a review of timber sourcing practices in line with the Responsible Timber Sourcing Policy. Where certification information was not publicly available, we engaged directly with suppliers to better understand sourcing methods and policies, as well as certification status, including FSC, PEFC and equivalent schemes.

This improved visibility of upstream sourcing activities and identified further opportunities to work with suppliers to increase PEFC or FSC certified timber. The Food business also strengthened traceability through updates to the Private Label Brand Standards for Supply, reinforcing expectations of suppliers to identify and monitor environmental and social risks across upstream supply chains. During the year, we developed a nature-risk capacity-building resource with specialist partners. Aligned with concepts from the Taskforce for Nature-related Financial Disclosures (TNFD), the resource can be tailored by supplier size, supply chain position and maturity. Following pilot testing with trading teams, we are determining a phased roll-out for suppliers linked to higher nature-risk commodities. Recognising the importance of supply chain transparency, we endeavour to strengthen traceability capabilities, improve data quality and support continuous improvement across priority supply chains.

## REMEDIATION AND ESCALATION

Metcash's Remediation Framework is designed to guide the response where actual or potential human rights or modern slavery concerns are identified. The response depends on the nature of the harm and Metcash's connection to it, and may include safeguarding affected workers, corrective action with suppliers, specialist or authority involvement, verification of closure and measures to address root causes. Where Metcash causes or contributes to harm, the framework guides Metcash on appropriate remediation for affected people.

**Metcash remediation framework**




## FROM SOCIAL AUDITS TO CORRECTIVE ACTION

During FY26, review of routine social audit information identified critical and major non-conformances across multiple sites of an Australian supplier. The findings included gaps in workplace health and safety controls, working conditions and governance systems. Metcash initiated a structured cross-functional case-management process and required the supplier to assign accountability for each non-conformance, implement corrective action plans, address immediate safety risks, strengthen relevant systems and documentation, and provide evidence of remediation. A significant number of non-conformances were closed during the period, with remaining actions continuing to be monitored and linked to future audit cycles for verification. Across the Food supplier base more broadly, Metcash agreed improvement actions with all 32 supplier sites identified as having significant actual or potential social impacts, with more than half resolved by year-end. This case demonstrates how Metcash uses audit findings to trigger escalation, supplier accountability, corrective action and ongoing verification rather than treating audit completion as the end of due diligence.

# ASSESSING EFFECTIVENESS

Metcash recognises that implementing policies, due diligence processes and supplier requirements is only one part of addressing modern slavery risks. It is equally important to assess whether these actions are operating effectively and contributing to improved outcomes for workers across our operations and supply chain. We assess the effectiveness of our approach through a combination of quantitative and qualitative measures, including risk assessment outcomes, supplier engagement activities, audit findings, corrective action completion rates, grievance data, training participation, and supplier compliance with ethical sourcing requirements. These indicators help us understand whether our controls are identifying risks as intended, whether issues are being addressed appropriately and where further attention may be required.

Within our supply chain, effectiveness is assessed through supplier participation in due diligence programs, completion of SAQs, ethical audit outcomes, closure of corrective actions, supplier responsiveness and improvements in supplier transparency over time.

Where information is available, we also examine whether serious findings recur or repeated issues persist, whether corrective actions address underlying causes, whether suppliers demonstrate sustained improvement over time, and whether responses have delivered appropriate outcomes for affected or potentially affected workers. Where recurring issues are identified, we treat this as an indication that existing controls may not be operating effectively. Moving forward our aim will be to review the relevant processes, escalate engagement with the supplier, and consider additional measures such as further verification, capacity building, or changes to our sourcing approach, to ensure risks to workers are being properly addressed.

## KEY EFFECTIVENESS INDICATORS

The below measures help inform the ongoing development of Metcash's Ethical Sourcing Program and support a focus on identifying risks earlier, strengthening supplier accountability and improving outcomes for potentially affected workers.

| Area | How effectiveness is assessed | What may determine that our actions aren't effective? | What can we do about it? |
|---|---|---|---|
| **Supplier SEDEX compliance** | The percentage of suppliers with an active SEDEX profile, linked with Metcash, with a completed SAQ | The percentage of suppliers that aren't SEDEX members, haven't linked with Metcash, or haven't completed the SAQ | Encourage suppliers to undertake SEDEX compliance requirements |
| **Supplier audits** | Supplier audits demonstrate only minor non-conformances, efficiently close detected non-conformances, and/or verify there are no reoccurrences | Audit detected non-conformances that demonstrate a breach of our Supplier Code of Conduct | Engage with the supplier to understand why the issue occurred, and to verify controls are in place to prevent reoccurrence |
| **Team training** | Team training completion and capability-building activities | The Metcash team are not aware of their roles in managing modern slavery risks, and cannot identify potential risks | Review training material, cadence, and learning material availability |
| **Grievance mechanisms** | Usage and effectiveness of grievance and reporting mechanisms | Stakeholders are not aware of the available mechanisms | Review grievance mechanism availability and training |
| **Traceability and data quality** | Improvements in supply chain visibility and supplier transparency | Visibility beyond Tier 1 is not achievable for prioritised high-risk suppliers | Engage with suppliers to verify supply chain transparency is understood and achieved |

## SEDEX COMPLIANCE AND AUDIT RESULTS

Metcash continues to strengthen supply chain transparency through its participation in SEDEX, a globally recognised platform for responsible sourcing and ethical supply chain management. Suppliers that are onboarded complete the SEDEX Self-Assessment Questionnaire (SAQ), which enables them to disclose their management systems, policies and practices relating to labour rights, health and safety, environmental management and business ethics. This information supports a risk-based approach to supplier engagement, due diligence and audit prioritisation.

SEDEX also provides the SEDEX Members Ethical Trade Audit (SMETA), an independent third-party social audit designed to identify gaps in supplier practices so they can be addressed. Identifying non-conformances is an expected and important outcome of an effective audit program. In FY26, audits at supplier sites identified 795 non-conformances across labour rights, health and safety and business ethics categories. Of these, 608 (76%) have been closed and verified by an independent third-party auditor. Critical and major findings are prioritised for corrective action, and remaining actions continue to be monitored through to closure.

The majority of findings (61%) related to safe and hygienic working conditions, reflecting the ongoing importance of workplace health and safety management in labour-intensive manufacturing and food production environments. A smaller proportion related to areas more closely associated with modern slavery risk factors, including working hours, legal wages, and responsible recruitment and entitlement to work. While these findings do not indicate the presence of modern slavery, they can represent underlying vulnerabilities that, if not effectively managed, may increase the risk of worker exploitation. They are therefore a focus of our supplier engagement and corrective action monitoring.

Increasing supplier participation in SEDEX, completion of SAQs, and supplier site audit outcomes remains an ongoing focus for Metcash, supporting enhanced supply chain visibility, more informed risk assessment and stronger management of potential modern slavery risks across our supplier base.

**Key insights**

- 75% of major and critical non-conformances detected in FY26 have been closed (483 of 645) and verified by an independent third-party auditor, with remaining actions monitored through to closure.
- No instances of child labour were identified through the SEDEX process. The 16 findings categorised under child labour related to policies or record keeping, such as the absence of a written child labour remediation policy.
- 61% of findings related to workplace health and safety, consistent with the labour-intensive manufacturing and food production environments in which audits were conducted.
- Audit results continue to inform supplier engagement, corrective action planning, and the prioritisation of higher-risk suppliers.

# CHALLENGES AND LIMITATIONS

As Metcash's modern slavery program continues to mature, FY26 provided further insight into several challenges that are widely recognised across responsible sourcing and human rights due diligence programs. These challenges are not unique to Metcash and are commonly encountered by organisations seeking to improve visibility, traceability and oversight across complex supply chains. Our FY26 activities reinforced how these broader industry challenges can present in practice and helped inform areas for ongoing enhancement across our approach.

## Visibility beyond Tier 1 remains challenging

Metcash has its greatest visibility and influence over direct suppliers, particularly within Private Label supply chains. Visibility becomes more limited further upstream, particularly where products are sourced through traders, distributors, proprietary brands or complex international supply chains. Our experience during FY26 reinforced the importance of applying a risk-based approach to traceability, the need to focus resources on higher-risk products, sourcing regions and workforce arrangements rather than seeking the same level of information across every supplier. Development of a draft Group Traceability Strategy progressed during the year on this basis.

## Consistent supplier data is important to effective oversight

Supplier, site, audit and corrective-action information is currently obtained through a number of platforms and business processes across the Group. In some areas, consolidating this information continues to require significant manual effort. Our experience has reinforced the need for clearer common data definitions, more consistent supplier information and improved centralisation of data to support risk segmentation and year-on-year measurement of effectiveness.

## Supplier and business maturity varies

Engagement during FY26 demonstrated that suppliers do not all have the same level of awareness, capability or existing due diligence systems. This was particularly evident when engaging with smaller suppliers and when integrating recently acquired operations. Our review of Mooloolah River Fisheries similarly identified opportunities to better align local governance, supplier due diligence, procurement controls, training and labour-hire practices with Metcash's broader framework. This reinforced the value of proportionate due diligence combined with practical capability building rather than relying on a single approach across all suppliers and operations.

## Audits are an important tool but are only one part of due diligence

Increased audit coverage has improved our visibility of supplier practices and supported corrective action; however, audit completion alone does not demonstrate that risks have been effectively addressed. Initiatives in FY26 reinforced the importance of following identified issues through corrective action, verification and escalation, while continuing to strengthen grievance mechanisms and worker voice so that information is not obtained solely through formal supplier processes.

## Overall

While these challenges are common across many industries and supply chains, they also provide valuable opportunities for continuous improvement. The insights gained through our FY26 activities are informing the ongoing development of Metcash's modern slavery framework, development of improved traceability, enhancing supplier engagement and capability, and further embedding a risk-based approach to due diligence. We recognise that effective management of modern slavery risks requires ongoing adaptation and improvement, particularly as supply chains, sourcing models and stakeholder expectations continue to evolve.

# LOOKING AHEAD: FY27

In FY27, Metcash will focus on strengthening the consistency, targeting and measurability of its modern slavery program. Priorities will include:

| Category | FY27 Commitments |
|---|---|
| **Governance and Policies** | • Review and update relevant policies, supplier requirements and contractual clauses to further embed human rights and modern slavery expectations across the business and supply chain. |
| **Risk-Based Due Diligence** | • Enhance due diligence processes through strengthened onboarding controls, high-risk product and sourcing assessments, supply chain mapping activities and improved follow-up of supplier corrective actions.<br>• Continue to prioritise higher-risk suppliers, geographies and categories consistent with Metcash's risk-based approach. |
| **Supplier Compliance and Standards** | • Increase supplier participation on the SEDEX platform, expand audit coverage across higher-risk supplier sites and continue to reinforce supplier accountability through ethical sourcing requirements, supplier engagement and performance monitoring processes. |
| **Supply Chain Visibility and Transparency** | • Improve visibility beyond Tier 1 suppliers through targeted traceability initiatives, enhanced supplier disclosure requirements, supply chain mapping activities and the use of external data and verification tools to support more informed risk assessments. |
| **Training, Awareness and Worker Voice** | • Further build capability through modern slavery training focused on Procurement, Operations, Logistics and People and Culture teams.<br>• Increase awareness of available grievance and whistleblower mechanisms and continue to strengthen pathways for workers and stakeholders to raise concerns. |
| **Data, Monitoring and Continuous Improvement** | • Improve supplier data collection and reporting to support more effective monitoring of audit coverage, remediation outcomes, supplier engagement activities and overall program effectiveness.<br>• Continue to refine modern slavery controls, including consideration of labour-hire due diligence processes and procurement approval requirements. |

## EXTERNAL COLLABORATION

Metcash supports independently owned and operated retailers by providing awareness training through retailer portals, guidance and tools, and Metcash-sourced products subject to our risk assessment and due diligence processes. This support is separate from Group governance and risk-management arrangements detailed in this Statement that apply to our owned or operationally controlled businesses and retail sites.

As part of our commitment to continuous improvement, Metcash continued to engage with government, industry and civil society during FY26 to strengthen its approach to modern slavery risk management. This included participation in Attorney-General's Department working groups and cross-industry forums on modern slavery reform and implementation, together with ongoing engagement with Investors Against Slavery and Trafficking Asia Pacific as well as other external stakeholders.

# APPENDIX

## REPORTING ENTITIES COVERED IN THIS STATEMENT

| Entity Name | ACN |
|---|---|
| Australian Liquor Marketers (QLD) Pty Ltd | 010 756 519 |
| Australian Liquor Marketers (WA) Pty Ltd | 009 196 614 |
| Australian Liquor Marketers Pty. Limited | 002 885 645 |
| Bianco Construction Supplies Pty Limited | 152 933 750 |
| Bianco Hardware Pty. Limited | 152 645 406 |
| Cantala Holdings Pty Ltd | 009 121 359 |
| Danks Holdings Pty Limited | 004 295 532 |
| Finlayson Timber & Hardware Pty. Ltd. | 010 536 580 |
| Hardings Hardware Pty. Ltd. | 064 548 349 |
| Home Timber & Hardware Group Pty Ltd | 004 037 049 |
| HTH Stores Pty Limited | 131 802 465 |
| IGA Distribution (WA) Pty Limited | 008 667 650 |
| Independent Hardware Group Pty Ltd | 141 010 906 |
| K&B Timber and Hardware Pty Ltd | 162 232 162 |
| Karloo Holdings Pty Ltd | 009 121 402 |
| M&B Sales Pty Ltd | 008 723 288 |
| M-C International Australia Pty Limited | 080 064 099 |
| Metcash Food & Grocery Convenience Division Pty Limited | 000 226 399 |

| Entity Name | ACN |
|---|---|
| Metcash Food & Grocery Pty Ltd | 004 391 422 |
| Metcash Limited | 112 073 480 |
| Metcash Trading Limited | 000 031 569 |
| Mitre 10 Australia Pty Ltd | 009 713 704 |
| NFD Holdings Pty Ltd | 160 029 381 |
| Rainfresh Vic Pty. Ltd. | 078 482 407 |
| Sealanes (1985) Pty Ltd | 009 121 331 |
| SFG Finance Pty Ltd | 607 436 920 |
| SFG Group Holdings Pty Ltd | 607 436 386 |
| Sunshine Hardware Pty Ltd | 129 140 085 |
| Superior Food Group Pty Ltd | 607 519 737 |
| Tasman Liquor Company Limited | A/K 828300 New Zealand |
| Tasmania Hardware Pty Ltd | 159 847 462 |
| Total Tools Holdings Pty Ltd | 138 595 525 |
| Total Tools (Importing) Pty Ltd | 084 220 342 |
| Total Tools Online Pty Ltd | 167 416 355 |
| Total Tools Stores Pty Ltd | 617 752 806 |
| Zircon (WA) Pty Ltd | 109 738 703 |

