

1. Purpose and Commitment

This purpose of this policy is to outline the Ethical Sourcing and Labour Standards we promote, the expectations of our suppliers and contractors as part of our supply chain and our ongoing commitment to eliminate the risk of modern slavery.

At Toys “R” Us ANZ Limited we strive to engage in ethical and sustainable relationships with all people, whether they are our direct employees, or as part of our supply chain, including suppliers, contractors, customers, the community and stakeholders we engage with.

2. Scope of Policy

This policy applies to all divisions of Toys “R” Us ANZ Limited, including directors, management, employees, individuals, contractors, visitors and those engaged as part of Toys “R” Us ANZ Limited’s supply chain, including suppliers.

3. Policy Objective

Our Ethical Sourcing and Labour Standards are designed in accordance with our company values and legal obligations under Federal and State laws. The policy objectives are focused on demonstrating our beliefs in upholding human rights, being a respected leader in our industry and communicating the same expectations of our suppliers and their supply chains.

4. Definitions

Modern Slavery: The term modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. The *Modern Slavery Act 2018* (Cth) defines modern slavery as including eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour, and deceptive recruiting for labour or services.

Supplier: A person or organisation that provides something needed such as a product or service. This includes third party labour providers, and companies that supply us with various goods and services on either ongoing or short-term basis.

Contractor: An individual or company that runs their own business and contracts with the company to provide material or services. This is different from Labour Hire Agency Staff.

5. Ethical Sourcing

We are committed to managing the economic, environmental and social challenges across our supply chain. We believe a responsible supply chain is one that:

- Respects people, their safety and individual human rights
- Produces and manufactures safe product
- Respects the welfare of wildlife and the preservation of the environment
- Actively support the responsible management and improvement of bee and water resources
- Reduces environmental impact whilst conserving scarce resources

We achieve this by committing to the following:

- We employ innovative approaches to conserve resources and reduce impacts to help preserve, improve and protect the environment.
- We promote responsible manufacturing practices.
- We are committed to safeguarding the quality and integrity of the products we market.
- We respect people and human rights by treating our employees with dignity and respect and providing safe, secure and healthy work environments, and expect the same from our supply partners.
- We question suppliers and partners on their practices via use of an ethical sourcing questionnaire.

6. Commitment to Human Rights

Our commitment as a company, to ensure our people are safeguarded, treated fairly and with dignity, include:

- Maintaining clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation;
- Examining our supply chains and being clear regarding our expectations and standards;
- Leading by example and conducting appropriate checks on all employees and suppliers;
- Providing clarity on our hiring, disciplinary and termination practices;
- Training Managers to remain alert and respond appropriately to indicators of slavery, listening and being approachable to employees, and raising awareness;
- A clear grievance process which outlines whistleblower protections; and
- Reviewing our Labour Standards annually (or as required) to ensure compliance with relevant Federal and State laws.

We all have a responsibility under this policy. If you suspect someone is being exploited, ill-treated, controlled or forced by someone else to work or provide services, you need to report breaches or concerns by following our grievance procedure.

7. Ethical Sourcing and Labour Standards

Our Ethical Sourcing and Labour Standards include:


- Child Labour
- Equal Employment
- Bullying and Harassment
- Forced Labour
- Freedom of Association and Right to Enterprise Bargaining
- Grievance Mechanisms
- Health and Safety
- Hiring, Disciplinary and Termination Practices
- Legal Compliance
- Management Systems
- Non-Discrimination
- Overseas and Foreign Migrant Workers
- Subcontracting and Homeworkers
- Wages and Benefits
- Working Hours

8. Reference material / other related policies:

Modern Slavery Act 2018 (Cth)

- Modern Slavery Act 2018: Draft guidance for reporting entities
- Responsible Sourcing Standards, Woolworths Group
- Supplier Audit Requirements, Toys “R” Us ANZ Limited
- Contractor and Labour Hire Undertakings Contractor Agreement
- Contractor Management – Safety Manual, Section 9
- Contractor Selection Checklist – Safety Manual, Appendix 9.1
- Toys “R” Us ANZ Limited COCP001 – Code of Conduct
- Toys “R” Us ANZ Limited RP001 – Recruitment Policy
- Toys “R” Us ANZ Limited I&DP001 – Inclusion and Diversity Policy
- Toys “R” Us ANZ Limited WFTP001 – Workplace Fair Treatment Policy
- Toys “R” Us ANZ Limited EEOP001 – EEO, Anti-Discrimination, Harassment and Bullying Policy
- Toys “R” Us ANZ Limited WP001 – Whistleblower Policy
- Toys “R” Us ANZ Limited E&SP001 – Environment and Sustainability Policy
- Toys “R” Us ANZ Limited HS&WP001 – OHS Policy
- Toys “R” Us ANZ Limited HS&WP001 Policy Statement

9. Authorisation and Approval:

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Approval Signature	
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