

MODERN SLAVERY STATEMENT



LOWE **AUSTRALIAN ICON SINCE 1898**

MANAGING DIRECTOR	Mrs Linda Penn
DIRECTOR	Mr Jeffrey Muelle
SENIOR LEADERSHIP	
MANAGING DIRECTOR / CEO	MRS LINDA PEN
Chief Advisor	Lucy Gibson
Chief Advisor	Sarann Ryan
Chief Financial Officer	Jim Kondonis
Head of People	Jason Heap
Head of Merchandise	Michael Manios
Head of Property	David Johnston
LOWES PANEL FOR MODERN	
SLAVERY COMPLIANCE	

Chief Advisor Sarann Ryan Head of School-wear Head of People Head of Merchandise Michael Manios

CONTINUOUS IMPROVEMENT COMMITTEE

Team Leader Tim Zhu Sarann Ryan **Timothy Bryant** Don Phrachanh Rebecca Burger

Timothy Bryant

Jason Heap

Chief Advisor Head of School-wear Buyer Menswear Buyer School-wear

This Document is approved by the principal governing body of the entity Mrs Linda Penn set out in the Modern Slavery 2018 (the Act) as per section 31(2).

> MRS LINDA PENN **CEO/ MANAGING DIRECTOR**

Linda Denn

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Describe what actions the reporting entity is taking to assess and address the risks of modern slavery practices occurring

Describe the risks of modern slavery practices in the operations and supply chains

The reporting entity consulted on its statement with any entities it owns or controls

Include information that you think is relevant, but that is not covered by the other six mandatory criteria

ANNEXURE

Lowes whistle-blower policy 40

Identify the reporting entity

Describe the structure, operations and supply chains

4 | Lowes Manhattan Pty Ltd Modern Slavery Report 2022



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Slavery statement

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school uniforms

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Gateway process

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LOWES MODERN SLAVERY STATEMENT

As a leader in the retail industry, Lowes takes its ethical and social responsibilities seriously. We are committed to upholding human rights and fair working conditions and ensure that our suppliers adhere to our legal, moral and ethical standards that are governed by the 2018 Modern Slavery Act.

We ensure that all products we purchase come from ethical sources and that we, by association or otherwise, are not party to any illegal or unethical manufacturing practices.

We have a range of measures in place that form our responsible sourcing guidelines. All employees of Lowes, or agents working for Lowes, must always comply with these guidelines. They must ensure that any supplier, either local or offshore, must always fully comply.

The following represents the minimum requirements Lowes requires in regards to all our suppliers.

All suppliers, either local or offshore, must comply with all laws, regulations, building codes, and industrial regulations of the country or countries in which they operate, always.

Every factory that produces garments for Lowes must provide Lowes or its agents with their annual compliance certificate.

Work conducted for Lowes cannot be subcontracted to another supplier. To ensure this every production run is checked both during manufacturing and at the time of shipping to ensure compliance as part of our quality assurance process. Lowes staff members conduct inspections of the facilities and working conditions for all suppliers in the countries we source from.

Additional to this, Lowes has engaged third party provider 'Intertek' whom is a globally recognised leader in governance and assurance to conduct Audits of our factories and validation on previously obtained aduit assessments.

Lowes will not accept, under any circumstances, any of the following practices from the suppliers we deal with:

- Child labour
- Unsafe working conditions
- Illegal conduct
- Corruption
- Excessive work hours
- Discrimination
- Forced labour of any kind
- Denial of the right of freedom of association and of collective bargaining.
- Inhumane treatment

Lowes' goal is to only engage suppliers who operate under acceptable human rights conditions and protect workers' human rights. To monitor this, every supplier is subject to an independent audit on an annual basis. Audits conducted under the Business Social Compliance initiative (BSCI) which is an initiative of the Foreign Trade Association (FTA) are an example.

The audit covers the following areas.

- Producer's background
- Management practice
- Health and social facilities
- Occupational Health and Safety
- Dormitories (if applicable)
- Environment
- Documentation
- Working hours
- Compensation
- Child labour
- Young Workers
- Forced labour
- Disciplinary measures
- Prison labour
- Freedom of association
- Collective bargaining
- Discrimination/harassment and abuse
- Working conditions.

Lowes will not source from a manufacturer who fails one of these annual audits.

Lowes seeks to form close, long-term relationships with its providers to better enable us to ensure that these guidelines are enacted.

This statement is made pursuant to section 11 (2) of the Modern Slavery Act 2018 and constitutes the Lowes – Manhattan Pty Ltd's slavery and human trafficking statement for the financial year ending 2021and was approved by the CEO on 30th of November 2021.

SIGNED: MRS LINDA PENN

Linda Denn



REPORTING ENTITY

ENTITY: LOWES - MANHATTAN PTY LTD

ABN: 31 000 307 666

Lowes is a leading Australian menswear, young menswear and schoolwear retail chain offering well-made clothing at affordable prices.

As a family-owned business, Lowes is part of a small but elite group of companies, which have been in business for 123 years and still 100% Australian owned.

For over a century, the company has been built on integrity, forward planning and financial success. Today, with 190 stores nationwide, it continues to expand steadily as it has for many years.

In a brand conscious society, while many outfitters have paid dearly to charge more for a somewhat pretentious, upmarket image, Lowes have maintained a simple, down to earth integrity in the way they have conducted business for over a century. Since it was founded in 1898, it has grown from a traditional "value for money" menswear store to become a wellknown Australian icon in its own right.

HEAD OFFICE

HEAD OFFICE: State Office OLD State Office VIC State Office WA

240 Princes Highway Arncliffe 2205 Unit 2/56-58 Burchill St Loganhome 4129 Unit 29/350 Settlement Rd Thomastown 3074 Unit 3/3 Brennan way Belmont West 6104

Today, Lowes continues to offer the public a range of well-made clothing at affordable prices. Lowes has expanded from its traditional offering of menswear and business wear to offer a full range of school wear, menswear, sportswear, active wear, footwear and work wear.

Lowes Annual turnover ranges between 260 Million and 240 million with on average six million transactions per year.

Anual turnover \$258,090,000.00

Transactions 5,800,000

OUR STRUCTURE

7

727

2

435

56

93

20

47

67

6

1

219

24

QUICK STATS

EMPLOYEES: 1219 SENIOR LEADERSHIP

EXECUTIVE EMPLOYEES 51 STORE EMPLOYEES 1161

STORES 190 NSW 518 QLD 268 VIC 122 62 WA 38 SA TAS

9 26 15

SCHOOLS:

ACT

NT

ONLINE ONLY
NSW
ACT
QLD
SA
WA
VIC
TAS
NT

SUPPLIERS: See pg

SUPPLYCHAIN | FREIGHT

3PL's	1
ROAD FREIGHT	3
FREIGHT FORWARD	1
CALL CENTRE	1

school network.

SURE CONTROL	PI
NOT	

Lowes has a combination of employees comprising of store staff both permanent, part- time and casual and head office support.

The head office support has two separate divisions Menswear and Schoolwear. With field support comprising of Area and State Managers for the store network and Account Managers for the

Lowes is a 100% Australian family owned company and has always had a family feel to its culture, this is shown in how many of its staff have been employed for 10, 20, 30 or 52 and counting years. But it's also shown in how our staff view Lowes as an employer. Lowes has won "Retail Employer of the Year" in the large employer category for 3 years running. This award is voted on by the employees of Lowes. Lowes values its employees and works hard to ensure that we are an employer of choice with fairness at the heart of everything we do.



Lowes "Retail employer of the Year" **3 consecutive years!**



MENSWEAR FINANCE COMPANY (MFC)

ZERO | EZYWAY **MENSWEAR FINANCE COMPANY (MFC)** ABN: 21002677778

MFC is a wholly owned entity that provides an in-store finance card for customers of Lowes menswear operating under the business name "Lowes Zero". Its operates out of Lowes Menswear Arncliffe Head office and provides services solely for Lowes Menswear.

ACTIVE USERS: 142,534 AVERAGE APPLICATIONS PER YEAR: 19,069

Established in the early 1950's by Hans Mueller as one of the first credit providers in Australia, his mantra 'pay as you wear' was an instant success, it was relaunched in 2016 under the new product 'ZERO' managed by ezyway.



The Lowes credit facility is highly compliant and governed by responsible lending criteria, Lowes adheres to the strict NCCP legislation to maintain its credit lending license.

The Zero card represents 9% of **Lowes sales**

PAY AS YOU WEAR

Flatten your expense curve by paying off your Lowes purchases over 12 months with your Zero card.

Plus EXTRA 5% OFF your purchases

Click here to find out more about our Zero card >

SUPPLY CHAINS OUTSOURCED LOGISTICS

5.5 MILLION UNITS PER ANNUM SERVICING **SCHOOLWEAR** & MENSWEAR **FROM IWS MINTO** LOCATION **TO OUR STORE NETWORK**

3PL



INDEPENDENT WAREHOUSE SOLUTIONS LOCATION: SYDNEY, AUSTRALIA ABN: 51 611 960 297

IWS is a Sydney-based third-party logistics (3PL) services company committed to consistent and continuous improvement within the warehousing and distribution operations industry.

Extensive range of value-add services at 3 Western Sydney facilities with over 21,000 sqm, Wetherill Park, Kemps creek, and a dedicated site exclusive for Lowes, located at Minto consitising of 11, 000 Sqm.

Implementing best practices throughout supply chain, state of the art technological EDI solutions and system integration promotes efficiency and accuracy and reduces manual handling and cost.

Employing 40 permanent employees and 70 casual staff. All non exceutive employees are coveded by the Australian award scheme.

Two Lowes employees are permanently situated at the Minto facility working in collaboration with the IWS team.

our 3PL Minto I W



SUPPLY CHAINS **OUTSOURCED LOGISTICS**

FRIEGHT **DEAN WORLD CARGO 4PL** LOCATION: PORT MELBOURNE ABN: 794 399 118 49



TOLL

DEAN World Cargo consists of 24 staff located in our head office in Port Melbourne, we handle all operational and customer functions Australia wide from a centralised office (we have just hired a full time senior customer service executive in Sydney, hence we will be officially branding as another branch in Sydney in 2022)

DEAN World Cargo is a proudly 100% Australian owned business that has been operating for almost 40 years ,established in 1983. Some of our key values consist of respect, integrity and a commitment to the community locally and abroad hence we take our responsibilities on ensuring that our supply chain via our strategic partners abroad do not condone or support in anyway modern slavery.

Modern slavery and child labor are crimes and violations of fundamental human rights. They take various forms, such as slavery, servitude, forced and compulsory labor and human trafficking.

DEAN World Cargo and our partners have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings protecting those most vulnerable in the global supply chain.

Providing services for over 300 clients, Handling freight to and from 6 continents across over 100 ports globally, our largest trade lanes are that of China, South East Asia, Sub continent and the USA. With the main ports shipped from being in mainland China Shanghai, Qingdao, Ningbo to name a few with Ho Chi Minh, Jakarta and Port Klang being major trade ports in South East Asia. Chittagong and Nhava Sheva in Bangladesh and India respectively are growing tradelanes.

Servicing approx 20,000 TEU per annum handling 500 TEU for Lowes

TOLL

See Tolls Modern Slavery statement

https://www.tollgroup.com/about/policies-procedures/ modern-slavery-act-statement



See Australia Post Modern Slavery statement

https://auspost.com.au/content/dam/auspost_corp/media/ documents/publications/2019-australia-post-annual-report.pdf

CALL CENTRE

LOCATION: FIJI ABN 68 601 293 403

14 agents

BDE GROUP

83,198 inbound calls from Australia per Annually

140,969 outbound calls from Fiji Annually

BDE supply telephone system, IT Development, Applications software, Provide Australian support and management of outsourcing to Greymouse in Fiji.

to ensure working conditions and standards.

15% above award.

home after their shift or a taxi is provided.

A Security guard stands watch after 6.00pm every day and monitors all activity.

year as well as 4 weeks annual leave.

Greymouse is an equal opportunity employer and employs indigenous Fijians, Fijian Indians and other nationalities.





- The call center assist in taking calls for the ZERO card, customer care for our online division and service our head office switch.
- Lowes staff inspect the working conditions in Fiji 4 times per year
- BDE has star rating in Fiji with their employees getting paid 10-
- The call center also has a drop off policy where all staff are driven
- All staff have a Rostered Day off and have the 10 day sick leave per
- BDE have escalation procedures to raise any workplace issues.

* image of our fijian call centre in Suva, Viti levu.

OUR STORE LOCATIONS

Airport West Albury Armadale WA Armidale Arndale SA **Ballarat** Central Ballina Bankstown Bateau Bay Batemans Bay Bathurst Beenleigh Belconnen Belmont Belmont WA Bendigo Lansell Square Bendigo Marketplace Blacktown Booval Brimbank Brisbane Broadmeadows **Browns Plains** Bundaberg Burwood Plaza **Cairns** Central Cairns Earlville **Cairns Smithfield** Caloundra Campbelltown Campsie Capalaba Park Carindale Carlingford Castle Plaza **Castle Towers** Castletown Centenary Cessnock Charlestown Chermside **Clifford Gardens** Coffs Harbour Colonnades Coomera Corio

Cranbourne Park Dalby Dapto Darwin Dubbo East Hills Girls High School On Campus Elanora Elizabeth Ellenbrook Erina Fairfield Figtree Forster Fountain Gate Glendale Glenorchy Gosford Goulburn Grafton Grand Central Green Hills Griffith Gungahlin Gympie Head Office Helensvale Hervey Bay Highpoint Hornsby Horsham Hurstville Inala Plaza Ingle Farm Jesmond Joondalup Kardinya Park Karingal Hub Kawana Kingaroy Kippa-Ring Kirwan Knox Kotara Lake Haven Leichhardt

Lilydale Lismore Lithgow Liverpool Loganholme Macarthur Macdonalds Jamison Mackay Macquarie Maddington Maitland Mandurah Maroochydore Marrickville Maryborough Melton

Menai

11



6

3

81



2

2

28

Merrylands Midland Gate Mildura Minto Miranda Mirrabooka Morayfield Morwell Mt Druitt Mt Gambier Mt Gravatt Mt Pleasant Murray Bridge Muswellbrook Narellan Newcastle Noosa Normanhurst Campus Shop North Lakes Northland Nowra Oakleigh Ocean Keys Orange Pagewood Palmerston Parabanks Parramatta Penrith Perth Modern School On Campus Plenty Valley Port Macquarie Queanbeyan **Raymond Terrace** Redbank Richmond Riverlink Robina Rockdale Rockhampton Rockingham Roselands Rosny Park Rouse Hill Runaway Bay

Salamander Bay Savvy Tuggeranong Seven Hills Shellharbour Shepparton Singleton Southport Springfield St Joseph's On Campus Shop St Marys Stafford Strathpine Taigum Tamworth Taree Tea Tree Toombul Toormina Top Ryde Townsville Tuggerah Tuggeranong Tweed City Victoria Point Wagga Wagga Warrawong Warriewood Warringah Mall Warrnambool Warwick Waverley Gardens Werribee West Lakes Wetherill Park School Uniforms Wollongong Woodcrest State college Woodridge Woy Woy Wynnum Yeppoon

OUR BRANDS

Lowes Lowes Kidswear **Baby** @ Lowes Pets @Lowes DBK **COUGARS** Elliott's Gumarra Traders Prodigy Manhattan **Iconic Soul Beare & Ley Botany Bay Traders Robert Huntley Riley Adams Outer Peak Anglers Edge** Traders 308 Perizzi Maxsport

Street

OUR CATEGORIES

Big Mens

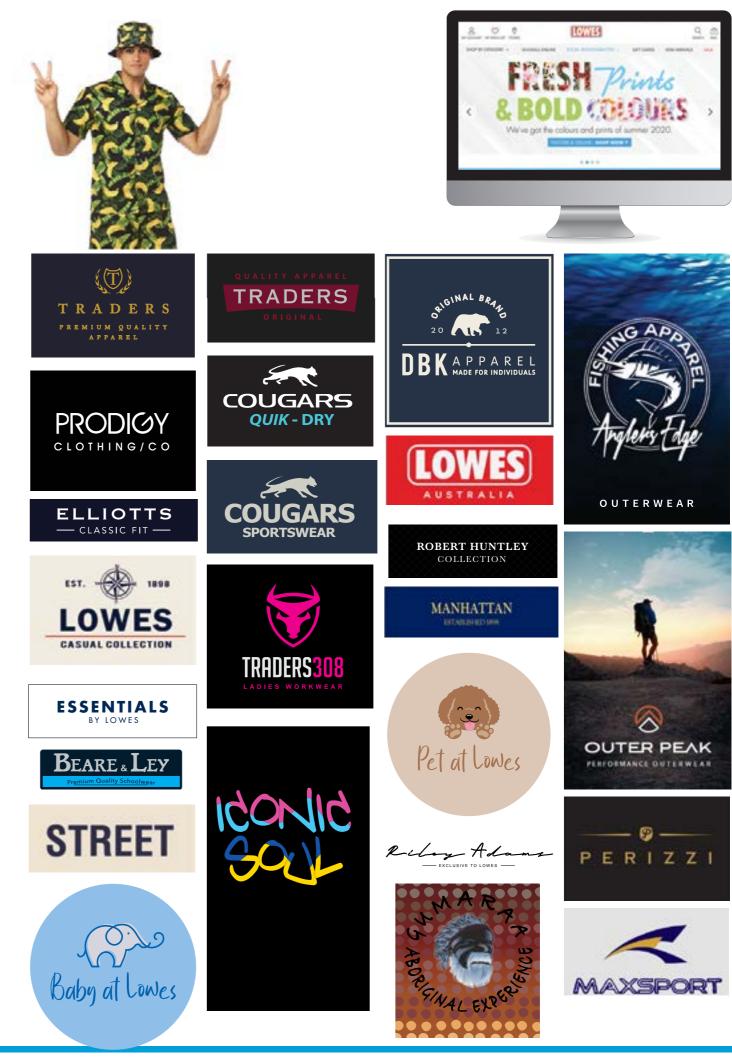
Work-wear Unisex Hawaiian Outdoor-wear Formal Wear School-wear Sportswear Swimwear Matchy Matchy **Business Wear** Underwear Socks & PJ's Shoes & Accessories Baby-wear Dog Wear

Home & Gifts

Shirts Tops T-Shirts Tanks Polos Vests Blazers Shorts Trousers Jeans Chinos Overalls Suits Work Boots Training Shoes Socks Jackets Jumpers Hats Business shirts Underwear Socks & PJ's Rashies Swimwear Towels Tunics Skorts Blouses Womens Business Skirts Sports Representive Leavers bespoke tshirts / jersey

APPAREL TYPES







"LOWES PROVIDING A PREMIUM CONVENIENCE TO LOCAL SCHOOL COMMUNITIES ALL OVER AUSTRALIA, SELLING TO SCHOOLS FOR OVER 100 YEARS!"



LOWES SCHOOLS

Lowes Schoolwear is the largest provider of school uniforms around Australia. As part of the process in securing and retaining business Lowes participates in Tenders for schools and request for Tenders with procurement departments, including various religious archdiocese and state governments around Australia. Lowes submissions are required to satisfy criteria as set out in the tender documentation with past performance taken into consideration. Successful candidates must provide evidence and satisfy contractual terms and conditions during tenure. Terms and conditions are established to not only serve community expectations, but to satisfy requirements with applicable regulations or regulatory frameworks.

Lowes is and has been in contact with schools facilitating the supply of uniforms for over half a century. In recent times the move to centralise procurement for various groups has resulted in supplier qualifying under overreaching arrangements to ensure adherence and compliance with but not limited to, practices regarding, labour regulations, ethical employment practices, environmental impacts and Workplace health and safety. Lowes Schoolwear has qualified under these arrangements based on our experience and performance with initiatives in place to ensure compliance and continual improvement, with the following governing bodies.

Queensland Government DETSOA 78764 Standing Offer of Arrangement for provision of school uniforms and accessories

Western Australian Government ED19088 Supply of School Uniforms and Specialty School Apparel – Panel

Catholic Education Department, Parramatta Archdiocese -Uniform Supply panel of preferred suppliers

Catholic Education Department, Wollongong Uniform Supply panel of preferred suppliers

Sydney Catholic Schools -Uniform Supply panel of preferred suppliers

Note: Lowes at present have submitted applications Requesting for Tender with ACT and SA Government.

Additionally, Lowes is currently tenured with various schools under Department of Education NSW, ACT, Victoria And Tasmania contracts.

LIST OF SCHOOLS

Georges River College St Mary Mackillop College Perth Modern High School St Clare's College St Patricks College Sutherland Wollondilly Anglican College Y Patrician Bros Fairfield Cardijn College Mccarthy College Tamworth Arthur Phillip High School Waverley Christian College John Therry Catholic High Cherrybrook Technology H/S Marist Sisters College Woolwic Lilydale High School Emmaus College St. Patrick's Marist College D Ryde Secondary College Aquinas College Cronulla High School St. John's High Nowra Epping Secondary College Endeavour Sports High School Hume Central Secondary Collage Woodcrest State College Saint John Paul li College Maronite College Blakehurst High School La Salle College Bankstown Oran Park Public Mount St Joseph Secondary Scho St Marys College Ipswich Kildare Catholic College Kalamunda Senior High School Richard Johnson Anglican Yrs 1 St Francis Xavier College Illawarra Sports High School Lavalla Catholic Colleg Phoenix College St Joseph College

Marist College - Kogarah Carlingford High School Freeman Catholic College Ellenbrook Secondary Casimir College Years 7-1 Strathfield Girls High Magdalene Catholic High Nowra High School East Hills Girls High Scho Karabar High Campbelltown Performin Port Hacking High Schoo Telopea Park School John The Baptist Ps Normanhurst Boys High Tomaree High School Gladstone Park Secondar Sydney Technical High Figtree High School **Burwood Girls** Oxley High Tamworth St John Bosco High Colle Camden High School Xavier High School Murrumbidgee Regional Kirwan State High Schoo Mernda Primary All Saints College Holy Family Primary Men Hornsby Girls High Schoo Keira High Macquarie Fields High Sc Callaghan Waratah Camp Jubliee Primary School Singleton High School Wamberal Public **Bossley Park High Schoo** Tlsc - Tumbi Umbi Campu De La Salle Revesby Kotara High School

'THE GREATEST RISK OF WASTE IS TRANSITIONING UNIFORMS, OUR CONTRACTS UPHOLD A BI-LATERAL WASTE MANAGEMENT AGREEMENT THAT SHARES EQUAL RESPONSIBILITY BETWEEN RETAILER AND THE SCHOOL'

ı	Masada College
	Homebush Boys High
je	St Aloysius
	Pascoe Vale Girls College
10	Glenala State High School
	Oran Park High School
h School	Caroline Chisholm Glenmore Par
	Mackay North State High School
pol	Henry Kendall High
	North Sydney Girls High School
ng Arts	Springfield Central State Scho
ol Junio	Asquith Boys High Yr 7- 8
	Hunter Sports Hs Gateshea
	Gympie High School
School	Hunter River High
	Lisarow High School
ry Colle	Terrigal High School
	St. Pauls High School - Yrs 7-
	Tamworth High
	Harrison School
	Good Shepherd Plumpton
ege Eng	Champagnat Catholic College
	Tempe High School
	Oak Flats High School
l High Sch	Rosehill Secondary College
bl	Mary Immaculate Ps Boss Park
	Lara Secondary College
	Bethlehem College
nai	Amaroo School
ol	Rutherford Public School
	Wagga Wagga Christian College
chool	St Justins Primary
pus	Coburg High
	Manning Valley Ac Yrs 3-6
	Jerrabomberra Public School
	Crusoe College
	St Catherine Of Siena Preston
us	Ambarvale High School
	St. Therese's Primary New Lamb
	Randwick Boys High School

Blue Haven Public St Marys Primary Ipswich Holy Spirit Primary Nicholls Mount Stromlo High School Rose Bay High School White Friars Catholic School St Keiran Catholic Primary De La Salle Boys College Ashfi Springfield Lakes State School Spring Farm Public School Glendale High The Hills Sports Snr Albury High School De La Salle College Caringbah Asquith Girls' High School Sacred Heart Ps Booval Canterbury Girls High Immaculate Heart College Our Lady Of The Rosary F'field Camden South Public Wheelers Hill Secondary College St Thereses Ps Bentley Pk Ashfield Boys High Bethany Primary - Glenmore Par Dapto Public School Kooringal High St Andrews Christian College Blacktown Boys High Belconnen High School Good Shepherd Primary Amaroo Thornton Public School Sarah Redfern High School West Wallsend High Canberra High School Wyong High School St Gregorys Primary De La Salle Senior College Cro **Ballarat High School** Mother Teresa Primary School

CREATE YOURS NOW!!

Al Zahra College Aveley North Public Kingsgrove High School Kogarah High School Erina High School St Therese Ps Mascot Northern Beaches State High School Irrawang High School Gold Creek School Emmaus Christian School St Pius Primary School, Banyo St. Mary's Ps Warners Bay Tlsc - The Entrance Campus Stella Maris Catholic Primary St Josephs Moorebank Thuringowa State High Salisbury High School Maitland Christian School **Carlton Public** Richard Johnson Anglican Yrs 7 Putney Public School Marrickville High School

All Saints Ps Seaford St Carthage's School Lismore St Mary & Josephne Primary Sch St Mary's Primary Sch Casino All Saints Senior Catholic Hig Kincumber High School Strathfield South High Gungahlin College Aveley Primary School Peel High School Tamworth Yarra Hills Secondary College Tamworth Public School Merrylands High School North Bundaberg State High Sch Mount Annan High St Joseph East Maitland Heatley Secondary College Wagga Wagga Lutheran School James Fallon High School Warnervale Public School Our Lady Of Rosary Ps Kensing

Grandis Primary School St Paul's Camden Primary Mary Immaculate Ps Eaglevale St John's Catholic Primary Sch Griffith North Public School Melba Copland Secondary Sch Red Cliff Secondary College Holy Cross Ps Trinity Park Saint Helena's Catholic Primar St Michaels Nelson Bay Surveyors Creek Public School Kurnai College Helensvale State School West Lakes Shore School R-7 Coorparoo Secondary College Thomas Reddall High Kingaroy State High School Dubbo Public Hamilton South Public Good Shepherd Catholic School Orara High Coffs Harbour St Marys Star Of The Sea Hurst Singleton Public School Our Lady Of Mercy College Burr **Glenroy** College Camira State School

St Thomas Ps Willoughby Queanbeyan High School St Francis Of Assisi Primary Coolamon Central School Picnic Point Hs

St Michaels Ps Tralalgon Woolooware High School St Josephs Merewether Bellingen High School Heathcote High School St Joseph's Ps Warrnambool Orange High School St. Aidan's Primary Rooty Hill St Anthony's Ps Wanniassa Lake Gwelup Primary School St. Michaels Nowra Belmore Boys High Clontarf Beach State School St Patricks Primary Griffith Malvern Springs Primary School Kanwal Public St Martha's Primary Strathfiel

ool

LEAVERS

loxton Pk

Sacred Heart Primary Cabramatt Neville Bonner Primary School St. Patricks Ps Blacktown Lismore High School Secret Harbour Primary School Beverly Hills North Public Sch St Marys Primary Dubbo St Ann's School St Mary's Primary Rydalmere All Saints Ps Liverpool Runcorn Heights State School Arbor Grove Primary Ellen Stirling Primary School Chifley College - Bidwill St Johns Primary Dubbo Howrah Primary School Upper Yarra Secondary College St. Therese Ps West Wollongong St Josephs Primary Tweed Heads Pearsall Primary School Border Christian College **Richmond River High Minchinbury Public**

SELLING TO OVER 900 SCHOOLS NATION WIDE! **CLASS OF**

Lowes Manhattan Pty Ltd Modern Slavery | 21

Thurgoona Public School St. John's Ps Campbelltown Our Lady Of The Rosary St Mary St. Benedict's Primary Edgewor St Patrick's Parish Ps Albury Hillarys Primary School **Edney Primary School Butler Primary School** Nazareth Catholic Primary Matraville Sports High Jones Hill State Primary Schoo Mount Clear College St Pauls Ps Gateshead Canterbury Boys High Ramsgate Public School Heritage Christian School K-5 Melrose High School St Josephs Ps Bulli Queen Of Apostles Primary Scho St. Thomas More School Pioneer State High School St Brendan's Ps Bankstown St Mary's Catholic School Kanahooka High School Werrington County Public Schoo Holy Family Primary School St.luke's Ps Revesby Anne Hamersley Primary School Our Lady Of Mt Carmel Primary **Beaconsfield State School** St Patricks Primary Wallsend Woongarah Public School St. Francis Xavier Ps Arncliff **Oxley Vale Primary School** Moorefield Girls High School J J Cahill High School Palmerston Chrstian College West Tamworth Public Playford College St Joseph's Kingswood Keilor Primary School Eleebana Public School Metella Road Public School Anna Bay Public Chifley College - Mt Druitt Ca St.patricks Primary Kogarah St Michaels Primary Meadowbank Townsville State High School Wedge Park Primary School St Kevins Eastwood Our Lady Help Of Christians St Anthony's Ps Kingscliff **Cobbitty Public School**

St Mary's Ps Warwick Currajong State School Horsham West & Haven Primary Arkana College Kingsgrove St Anne's Ps Nth Albury Nambucca Heads High School Elermore Vale Public School James Cook Boys Technology Hig Unanderra Public St. Nicholas Primary Tamworth St James Primary Our Lady Help Of Christian Ear Mortdale Public School Mary Help Of Christians Toormi Holy Family Catholic Ingleburn Delacombe Primary School Brandon Park Primary Canobolas Rural Techology Hig Great Lakes College St Gertrudes Smithfield Gooseberry Hill Ps Trinity Ps Kemps Creek Belmont High Campsie Public School Westdale Public School New Town Primary School Mackillop College Bathurst St Francis Xavier Ps Ashbury Colyton Public School St Brigid's College Bohlevale State School Holy Spirit Carnes Hill St Thomas Aquinas Primary Lindisfarne Primary School St. Patrick's College Mackay Warwick West State School Pleasant Heights Public Emmaus Catholic Primary School Our Lady Of Annunciation Ps Our Lady Help Of Christian Ros St Clare Of Assisi Primary Weetangera Primary School Hassall Grove Public School John Calvin Christian School Armidale Secondary Our Lady Of Dolours Chatswood St John The Apostle Ps C Beach Holy Cross Ps Kincumber Fort Street Public School Tamworth South Public St Mary Mackillop Ps Sth Pnrth Assumption College

Jurien Bay District College

Craigie Heights Primary School Holy Spirit Ps Lavington **Rainbow Street Public School** Sarah Redfern Public Highfields Prep & Kindy School Sacred Heart Primary School St.josephs Primary Oatley Our Lady Of The Way Ps Emu Pla William Ross State High School **Bathurst Public School Belair Public School** Merewether Heights Public The Hills Sports H/S Jnr Moana Primary School Calvary Lutheran School Taree High School Cronulla Public School Rosetta Primary School Grahamstown Public School St Vincent De Paul Ps Durack State School Figtree Heights Public School Maida Vale Primary School Horsham Primary School Mildura West Primary School St. Declans Primary Cambridge Park High Kingsgrove Public School St Joseph's School, Nundah St Anthonys Primary Clovelly Hughes Primary Granville South Creative & Per Serviceton South State School St. Christophers Primary Panan Avondale Primary School St. Marys Primary Georges Hall Our Lady Queen Of Peace Irrawang Public School Churchill State School Mountview High Cessnock Antonio Catholic School Waraburra State School **Torrens Primary School** Wanniassa School K-10 St Andrews Christian Community Swansea High Westport Primary School Majella Primary School Kahibah Public School Lake Illawarra High School Seven Hills High School Hillston Central School Emu Plains Public

Dallas Brooks Community Primar Gwynneville Public St Josephs Primary Kilaben Bay St Laurence's Dubbo Gymea Technology High School **Canley Vale Public** Lake Albert Public School St. Anthonys Primary Marsfield **Turner Primary School** St.pius X School Unanderra Merriwa Primary St. Cecilia's Ps Wyong Fitzgerald State School St Edward's Primary Tamworth Pitt Town Public Woodmans Hill Campus St Gerard's Primary School Golden Square Primary School Yale Primary School Hendon Primary School St Peters Primary Stockton Mount Austin High School Leda Primary School Vincentia Public Kingsford Smith School St Margaret Mary's Primary Sch Palmerston Primary School St. Joachim Ps Lidcombe **Bucasia State School** Mundingburra State School St Brigids Primary Gwynneville Queanbeyan West Primary School Nareena Hills Public School St. John Vianney Doonside Grafton Public School Queanbeyan South Primary Sch Quinns Rocks Primary School Bethel Christian School Mt Dru Arncliffe Public School The Entrance Public School Kirwan State School **Glengarry Primary School** St. Therese Primary Sadlier Lavington Public School Toormina Public Leonay Public School Gundagai High School Melton West Primary Ben Venue Public Armidale St Nicholas Of Myra Primary Our Lady Help Of Christian Hen Our Lady Of Rosary Ps Wyoming

Our Lady Sacred Heart Merbein

Aranda Primary School Our Lady Of The Rosary Waitara Woori Yallock Primary School Calare Public School Eaglehawk North Primary St Matthew's Primary School St Benedict's Primary School Sir Joseph Banks East Hills Boys Galilee Catholic Fairview Heights State School Findon Primary School St Dominics Ps Broadmeadows Barraba Central School Chifley College - Dunheved Cam Ngunnawal Primary School Aberdeen Public School Aldridge State High School St John Vianney Ps Morisset Orange Public School Keilor Heights Primary Rasmussen State School Moonee Ponds West Primary Sch St. Therese's Ps Denistone Ipswich East State School Penola College Buy Back Richard Johnson Anglican Schoo Sans Souci Public Maddington East Ps Chatham High Golden Square Primary Kennington Primary School Quarry Hill Primary Nulkaba Public School Penola Catholic College Albury Public School Murray High School Tomaree Public School Goodna State School St Michael's Primary School Namadgi School Weir State School St.john The Apostle Narraweena Canterbury South Public Yarrilee State School St. Paul Of The Cross Ps Enmor St Philomenas Primary St Patricks Ps Port Kembla St Joseph's Primary Wagga Wagg Rosewood High School St Joseph Primary Bileola Holy Family Primary Luddenham Monash Primary School

Wyoming Public School Wyrallah Road Public West Goulburn Public School Lyneham Primary School Meadows Primary School Nanango State High School Our Lady Of The Assumption, En Holy Trinity Primary Wagga Kelso Public St Mels Primary Campsie **Catherine Mcauley** East Griffith Public Corpus Christi Ps St Ives Balga Primary School Kooringal Public School St Vincent's Primary School Mcauley Primary School Southern Montessori School Taree West Public School Townsville Central State Schoo Blair State School St Marys District School St John The Apostle Primary St Mary Magdalene's School St Josephs Rockdale Branyan Road State School St. John's Ps Lambton Queanbeyan East Primary **Richmond Primary School** St. Felix Ps Bankstown Red Hill Public School North Parmelia Primary School St. Raphaels Primary Mabel Park State School Holy Family Emerton Raglan Public Bambara Primary School Heatley State School Caroll College Nursery State Special School St Joseph's Primary School Queens Park Primary School St Brendan's Primary School Fadden Primary Oakey State High School St Patricks School Bundaberg Our Lady Of Victories Ps Woodport Public School **Riverview State School** Fairfield Heights Primary Scho Campbelltown North Public Scho Maryborough State High Our Lady Queen Of Peace Glades

Blessed Sacrament Primary Scho St. Fiacres Ps Leichhardt Villa Maria Primary School Verity Christian College Forest Street Primary Cessnock West Public School Annandale State School **Osborne Primary School** Fraser Primary School Bletchington Primary St. Columba's Ps Leichhardt Nt St. Bernadettes Dundas Valley Sandgate State School Cundletown Public School Kangaroo Flat Primary Marcellin Technical College Broadmeadows Valley Primary Sc Wagga Wagga Public School St John The Baptist Freshwater Northview State School Redbank State School Fern Bay Public School Charlestown South Public Schoo Kingswood High Warriapendi Primary School St. Michaels Stanmore **Holgate Primary** Hawker Primary School Woodridge North State School Calwell Primary School Turvey Park Public School Huntly Primary School Mount Rowan Campus St Mary's School Bellingen Medina Primary School Tuggerah Primary St. Joan Of Arc Primary Haberf Lilydale Primary School Sacred Heart Primary Morwell Jewells Public Cronulla South Public School **Carrington Public** St Anne's Primary Strathfield St Christophers Holsworthy St Thomas The Apostle Primary **Big Hill Primary School** Padbury Primary School Mackay State School Muswellbrook South Public Scho St John's Primary Riverstone Coomealla High School

Preston North East Ps Abermain Public East Goulburn Public St Francis Assisi Ps Warrawong St Monica's Primary School East Maitland Public School Holy Family Elc St Joseph's Primary Tamworth St Pius Dubbo Muswellbrook Public St Mary's School Wellington Ashtonfield Public School Callaghan - Jesmond Senior Cam Morwell Park Primary Kurri Kurri Public School Maddington Primary P&C Assoc. Byford John Calvin School St. Oliver's Harris Park New Lambton South Public Schoo St Annes K-10 Temora **Ballina Primary School Rosary Primary School** St Michaels Thirroul Ipswich North State School Florey Primary School **Charles Conder Primary School Evatt Primary School** Lightning Reef Primary Western Suburbs Special Sch Orange Grove Primary School St. Agnes Matraville Kelso State School St Thomas More's Primary Sch Sturt Public School St. Paul's Primary Rutherford Hill Top Public School Eaglehawk Primary School Cathedral Primary Bathurst Mount Austin Public School **Kitchener Public** Queanbeyan Primary School Rockingham John Calvin School **Ourimbah Public School** Armidale City Public Albury North Wagga Wagga North Prim. Oakey State School Raymond Terrace Public School St.francis Xavier Belmont Redcliffe Special School Hillvue Public School

Gowrie State School Tallangatta Primary School Timbumburri Public School Theodore Primary School Goodna Special School St Mary's Catholic Ps Armidale **Toukley Public** Macgregor Primary School St John The Baptist Ps Maitlan Black Mountain School St Brendans Primary Annandale Aitkenvale State School Broadmeadows Primary School St Monicas Primary Footscray Table Top Public School Wondai State School Sacred Heart Primary School Inala State School Walkerston Primary School Oonoonba State School Chifley College - Shalvey High Hendra State School Ipswich East State School Learn Achieve Celebrate Lalor East Primary Campbell Primary School **Curtin Primary** Sacred Heart Primary Villawood Jennings Street School Lavington East Public Karangi Public School St John Vianney Primary School **Caves Beach Public** St Therese's Primary Lakemba **Chapman Primary Caladonian Primary** Lanyon High School Padstow Park Public School **Riverlands Montessori School** St Kieran Catholic Primary Sunshine Bay Public School Wilsonton State School Wooroloo Primary School Yoogali Public School Latham Primary School Lilydale West Primary School St Patrick's School Allora



RISK

IDENTIFYING, MITIGATING & REMEDIATING RISK OF MODERN SLAVERY

Risks of modern slavery in any international retail supply chains are dynamic and complex. We are constantly reviewing risks to prioritise our efforts where there is greatest impact to people in our operations and supply chain.

Since 2019, we have conducted risk assessments designed together with our advisor partner Intertek, a compliance and sustainability solutions provider. These assessments are informing our Responsible Sourcing Program and areas of focus. This year, we focused on supply chains. These assessments focused on the inherent risks of exploitation involved in producing the products in our supply chains.

Lowes Menswear acknowledges the following modern slavery risks as most salient in our supply chains.

The types included, forced labour, debt bondage, deceptive recruiting for labour, forms of child labour, restrictions of movement, intimidation, threats and human trafficking.

We do not directly employ any staff overseas so this lowers modern slavery risks within our direct team. Therefore, our operational risk assessment focused on the only areas of the business that use contracted labour or service providers whose workforce engaged with us in overseas locations. We have less direct visibility and control over these workers and their employment terms. We have visited these locations and undertaken assessments of the work environments to ensure they comply with local legal conditions and do not provide conditions for potential risks for modern slavery conditions. We are working on improving auditing in this area as it is new operational environment.

The products we sell in our stores and online are sourced from 9 countries. Each of these products and sourcing countries presents a different set of human rights challenges, including risks of modern slavery. We source products from suppliers that are both vendor and non-vendor branded. With our own branded products we are more directly connected to these products because suppliers are producing and packing products directly for our business, which means we have greater connection to the workers and influence to remediate breaches.

Generic, wholesale or non regular suppliers will be subject to further risk assessment. Similarly where our suppliers themselves source their supplies from, such as cotton, provides additional levels of risk.

This risk assessment will allow us to "segment" suppliers into three groups: priority, moderate and minimum. Each segment will have different due diligence requirements based on associated risks. We are still developing our supplier segmentation methodology. Mitigating and remediating risks of modern slavery is a high priority and we are developing new Policy frameworks to build upon our long standing practices of strict supplier agreements and regular 3rd party audits in the country of origin for our products.

We are enhancing our set of policies and procedures that articulate our values, ways of working and expectations of our suppliers that will be reviewed regularly. This policy framework will ensure that our suppliers clearly understand our expectations.

Strengthening supplier contracts is one of the key ways in which we articulate our human rights expectations and control the potential risk of modern slavery arising in our global supply chain is through our contracting process with our direct suppliers. Building on existing Responsible Sourcing provisions, modern slavery specific provisions have been incorporated in our many of our trade procurement contracts and Vendor Trading Terms. We intend to have these provisions in all agreements by 2021.

In the future, we intend to use a Slavery Compliance Statement, which is a supplier modern slavery compliance confirmation. We request the supplier to sign and provide this statement to Lowes on the commencement date of an agreement and on each anniversary of the commencement date during the agreement term.

"STRENGTHENING SUPPLIER CONTRACTS IS ONE OF THE KEY WAYS IN WHICH WE ARTICULATE OUR HUMAN RIGHTS EXPECTATIONS AND CONTROL THE POTENTIAL RISK OF MODERN SLAVERY" Lowes recognises that it may contribute to a greater risk of slavery in our supply chain by placing pressure on suppliers by such means as asking for reduced costs or better quality. We will be factoring this into our future risk asessment profiles for suppliers

We recognise the importance of building greater understanding of modern slavery risks and our requirements with the team members who are responsible for supplier relationships and oversight so that they are equipped to provide guidance to our partners to comply. We have and will continue to raise awareness via training for all team members in this area.

CONSULTATION WITH CONTROLLED ENTITIES.

Where Lowes held a "controlling interest" in an entity (MFC) we met with the entire team to educate, raise awareness and set our expectations in mitigating modern slavery risks. We provided documentation outlining our expectations and will provide a copy of this document upon its completion. Lowes does not have a controlling or any other equitable interest in any other entity.

Lowes undertakes that if we do in the future look to taking a controlling interest in another entity, a full risk assessment and audit for risk of modern slavery will form of our assessment before we take control and based on that we will undertake the appropriate actions.





LIST OF OUR SUPPLIERS | ASSESSMENT OF RISK

CHINA

Afw Pty Ltd Shiny Pty Ltd Jiangxi Handsome Garments Ningbo Hongli Group Co. Ltd. Yichang Mingshen Garments.,Co Zhejiang Willing Foreign Tradi Ningbo United Group Imp & Exp Hong Ho Precision Textiles Co Beijing Textiles Imp&Exp Corp. Smartex International Beijing Chengfangjie Garment Beijing Yuxi Costome Co Ltd. Qingdao Yijia E.t.i. Sunny Jet Textiles Time Develop Co.

Risk assessment : HIGH*

Shaoxing Dengao Garment Co Ltd Shaoxing Daxin Better International Jiangxi Ningbo Lianyi Imp & Exp Yong Ri (China Adv) Ningbo Yinzhou Karuisi Textile Quzhou Municipal Senior Trade Jiangxi Boruang Anhui Garment Imp & Exp Co.ltd Shantou Zhongyuan (Tunnyfish) Ningbo Yinzhou Yida Knitted Jiangxi Textile Group Imp&Exp Jiangxi Ruizhi Garments Imp&Ex

Jiangxi Huyan Industrial Sunshine Industry (Hk) Ltd Shaoxing Guyue Clothing Co.ltd Excellent Promos Co.limited Reason Imp. & Exp. Co. Ltd Shanghai Shimei Garments Co.l Suzhou Peifa Arts&Crafts Co.lt Jinyu (Fujian) Dress Weaving Beijing Garments Imp & Exp Hubei Bbh International Trade Jiangxi Angmai Industrial Co., Nanchang Giant-Tex Industry Co High Hope Int'l Group Ningbo Huazhong Dress Co,Ltd

TAIWAN

Solid Textile Co Ltd

Risk assessment : LOW* Boyd International Pty Ltd

SINGAPORE

Jagger Pte Ltd

Risk assessment : LOW*

BANGLADESH

J Mm Fashion (Boydtex) Tamshna Fashion Wear Ltd. Tung Hai Sweaters Ltd Rifa Knitwear And Designer Sisal Apparel Ltd Mactex Industries Limited Majumder Garments Limited

Risk assessment: HIGH*

* REF: GLOBAL SLAVERY INDEX, INDEPENDENT PRIVATELY FUNDED INTERNATIONAL HUMAN RIGHTS ORGANISATION FUNDED IN PERTH, AUSTRALIA BY ANDREW FORRESTOR

C & S Marketing Co Pty Ltd

Mdr Global Trading P/L (Usd)

Capital Link Imports Pty Ltd

Koala Clothing Australia P/L

Risk assessment: MEDIUM*

HONGKONG

Mel Enterprises Uking Industrial Co.,Limited Krayons Sourcing Limited

Risk assessment : MEDIUM*

First Choice Distributors P/L Licensing Essentials Brand Collective Pty Ltd Isidor's Pty Ltd Top Shoe International Pty Ltd

ADDRESSING MODERN SLAVERY

"MITIGATING AND REMEDIATING RISKS OF MODERN SLAVERY IS A HIGH PRIORITY AND WE ARE DEVELOPING NEW POLICY FRAMEWORKS TO BUILD UPON OUR LONG STANDING PRACTICES"

TIMELINE

OCT 2017	
•	QLD (SOA) standard offer arrangement formalises Lowes responsible stock management plan, this becomes the base approach for all contracts signed by all school procurement officers and business managers. *see pg16
JUNE 2018	
•	Donating to countries such as New Guinea, Fiji, Pakistan.
JUNE 2019	Commonwealth Modern Slavery Act guide is distributed to Leadership group and key heads of departments for review. All groups are to report back on what their understanding is of 'Modern Slavery' and to determine and identify high risk in the business.
DEC 2019	CEO appoints a Select Group * to establish 'Lowes Panel for Modern Slavery
FEB 2020	Compliance'. The Panel meets each Financial year quarter for 2 hours to deploy strategy for governance and outstanding actions. { *see panel p3.}
•	Lowes Panel engage Third part 'Intertek' to run 3-day workshop with all Panel members. Annual budget is set for Factory Audits and other waste management initiatives. Schedule of current audit conversions and list of factories servicing over 25% supply is deemed first to be audited using Intertek
MAR 2020	
APRIL 2020	Covid 19 Global pandemic significantly halts all WCA conversions and planned Audits until Sept 2020. Lowes submits it's Modern slavery statement for review to green team. (Green team is leadership members NOT partipating in Lowes Modern Slavery Panel known as red team)
•	Lowes whistleblower policy ^{*See Annexure.} is published and sent to all Lowes Staff. Creating an escalation pathway and providing an internal environment and a culture of safety.
MAY 2020	
•	All (SOA) standard offer arrangement now include waste minimisation plan on distinctive uniforms, including using brokers 'active international' selling direct to public in exchange for advertising trade credits.
JUN 2020	
•	Establishment of Continuous Improvement Committee. Tim Zhu prepares audit schedule for 2021. Kathy Adair onboards Manrags fashion recycle group, whose mission is to reduce the number of textiles that end up in landfill, due to massive garment overproduction and non-existent recycling.





2021 Aduit program finalises 16 factory audits complete over a 12 month program

Sign agreement with Worn Up, to contniue our sustainablty and continous

Significant disruption in Australia, Covid sweeps the nation, most states move to working from home, snap lock downs in factories systemic over Asia.

CONTINUOUS IMPROVEMENT

Early 2020 Lowes embarked on a continuous improvement approach well before any sanctioned reporting and compliance. In order to officially report and demonstrate our commitment to respecting human rights, Lowes CEO, Mrs. Linda Penn developed a 'Lowes panel' to formalise agreements with all sectors of our Supply chain and goes to market to engage 'Intertek' to set strategic benchmarks to monitor activities in accordance with the Modern Slavery Act 2018

LOWES PANEL FOR MORDERN SLAVERY COMPLIANCE

Lowes is committed to bilateral long-term outcomes that benefit suppliers, schools and our consumers. We recognise robust negotiations are inevitable in business practice and contribute to innovation, efficiency and the long-term sustainability.

Lowes policy has always been for the suppliers to provide certification of factory audits as evidence of compliance.

These were usually in the forms of various certificates:

- BSCI
- SMETA
- QIMA

The Panel consists of 4 leadership members whose areas govern Technical operations, *Sarann Ryan*, Merchandise Control, *Michael Manios*, Human Resources Jason Heap and Head of school Operations Tim Bryant.

The panel meets every quarter to initiate, forecast and remediate on all supply chains.

This consists of;

- Reviewing and aligning all international standards and policies by communicating standards and requirements to our agents and business partners.
- Evaluating by continuing to monitor compliance by conducting a pre-sourcing assessment with our agents. All buyers and Merchant controllers submit any new supplier to the panel for review.

- Capturing the performance of our factories by reviewing the outcomes of all audits conducted by Intertek
- Schedule audits for the next fiscal year.

LOWES FORMALLY ENGAGES INTERTEK TO FACILITATE ALL ACTIVITIES



The panel recognised the need to engage a third party to validate audits.

Lowes understood the need to consult with third party resources and databases, by utilising consultants and having them evaluate slavery this would broker an arrangement to remediate identified deficiencies and where necessary terminate supplier factories that refuse / fail to comply with procedures and guidelines

Intertek results yield several decision-making factors based on previous audits and how these dictate future frequency of audits. Audits are scheduled in advance with the suppliers in order to foster relationships of co-operation and trust, we only suggest unannounced audits when we suspect violations.

RECYCLE | UPCYCLE | DONATE

Our waste Management approach is complicated comparative to regular fast fashion. Our garments are bespoke distinctive wear that cannot be resold or reused based on copyright and contractual obligations.

Our continuous improvement committee join the Lowes Modern Slavery panel on request to pitch for new and improved methods to handle waste management and sustainability.

This paved way for an affiliate program monitored by our continuous improvement committee to have our textiles recycled and prevented from landfill.

UPPAREL

UPPAREL - RECYCE

ABN :626 450 815

HTTPS://UPPAREL.COM.AU/

Introducing the National Retail Association Sustainability Champion of the Year for 2020.

"As leaders within the circular economy, we believe that sustainability leads to success for everyone. We exist as change-makers, not only for our community but also for the next generation. As we continue to reduce waste in landfill and increase the lifecycle of all textiles, we encourage others to join us through continued education and convenience."

Lowes has been in collaboration with Upparel formerly known as Manrags for over two years commit-ting to continuous bilateral waste management, making sure our school uniforms and basic apparel is not wasted and purposely managed through a sustainable mindful program.

LOWES TOTAL TEXITLE DIVERTED FROM LANDFILL: 4.3 TONE LOWES TOTAL GAS PREVENSION: 17.4 TONE

IT TAKES 12 YEARS TO RECYCLE WHAT THE FAST FASHION INDUSTRY CREATES IN 48 HOURS.

1b meaner

Date: 1/11/2020 Company: Lowes

Congratulations Lowe

Between 01/10/2020 — 31/10/2020 you prevented 395kg of textiles from being sent to landfill. This has also resulted in the prevention of 1,580kgs of greenhouse gases from polluting our

1,500kgs of greenhouse gases from policiting of atmosphere. Thank you again for joining our fight against textile waste

textile waste.

We are so pleased that we were able to join forces to create a better planet and a brighte future for the next generation! From the UPPAREL team.



Impact Statement



Ub meaner

Date: 24/02/2021 Company: Lowes

Congratulations Lowe

Between 20/11/2020 — 20/2/2021 you prevented 296.00kg of textiles from being sent to landfill.

This has also resulted in the prevention of 1,184.00kgs of greenhouse gases from polluting our atmosphere.

Thank you again for joining our fight against textile waste.

We are so pleased that we were able to join forces to create a better planet and a brighter future for the next generation!

From the UPPAREL team.



Impact Statement



296.00 kg



Impact Statement



Date: 19/10/2021 Company: Lowes

Congratulations I com

Between 01/07/2021— 30/09/2021 you prevented textiles from being sent to landfill.

This has also resulted in the prevention of greenhouse gases from polluting our atmosphere. Thank you again for joining our fight against

We are so pleased that we were able to join forces to create a better planet and a brighter future for the post forces.

From the UPPAREL team.





WORN ÛP

WORN UP - UPCYCLING ABN: 87 610 520 619 HTTPS://WORNUP.COM/

Worn up grew out of Sustainable Schoolwear. Worn up which had been making school and corporate uniforms since 2016 decided to take back the uniforms they made so they didn't go to landfill. Worn up no longer produces uniforms but now exclusively collaborates with rag traders and big retailers to identify products that can be reconstituted into newer products, these products are categorized as " up-cycled" as they can be broken down and repurposed many times.

Worn Up and the Textile Rescue Program work with Schools, corporates, Councils and sports associations to keep as many uniforms out of landfill as possible and turn them into a raw material for new products.

Worn up and Lowes began collaborating July 2020 and was the first major retail school supplier to commit to a 30 carton per month minimum to reduce and donate fabric for the upcycle program.

Worn up as a collective have achived the following to date.

DIVERTED FROM LANDFILL: 50 TONNES M3 SAVED: 500 CUBIC METRES OF LAND SAVED ROUGH CO2 KG/ DIVERTED: 3,750 CO2/KG EQUIVALENT

DONATION - REUSE

SRI-LANKA-2021

During the pandemic Lowes gathered information to send inventory to the most neglected groups globally. The continous improvement commitee secured referrals from a series of countrys and based on supply distruption choose to ship to ophanages in Sri Lanka.

Louis Marie childrens home Koslanda Road, Beragala - Sri Lanka

Paynters Home Gamini Mawatha, Nuwaraeliya



"We are very grateful to Lowes for the generosity and kindness which put a big smile to these underprivilege children" -Blessings thank you! Roger Perera



LOWES GATEWAY PROCESS

MENSWEAR & SCHOOLWEAR PRODUCTION AND DEVELOPMENT TRAINING AND INTERNAL ACCOUNTABILITY

Our commitment to upholding global standards require that all areas liaising with external suppliers/ agents must adhere to company sanctioned policy. All staff at head office are required when onboarded into the company to review our core policies. Lowes has an extensive learning management system regulated by HR called the Lowes Academy.

INTERNAL TRAINING

Lowes Academy is for all 1206 staff and is sectioned into core areas managed by our internal intranet called the Lowedown.

All staff here have individual user profiles that monitor the training modules and the timeframe for completion.

These modules include all work health and safety modules, compliance and ethics training, our company may take disciplinary action against any worker who violates our policy.

WHISTLEBLOWER

We have a whistle-blower hotline accessible on the Lowedown that is available to all staff and this has now been extended to agents and factories.

GATE PROCESS

Lowes developed The "Gate Process" which is a project management technique to keep all buyers, product developers and planners accountable in the developing, sourcing and purchasing phases. The gateway is reinforced at the leadership level, it unpacks the process to make sustainability and waste management a key performance indicator for all personnel involved.

The Gate way is divided over a few stages.

These stages are separated by 'gates'. Each stage is the decision point for whether or not to proceed to the next stage. This decision is made by a manager or steering committee. The quality of the idea, finances, timeframe and succession rate is all assessed at each of the gates. After each gate, one of the following decisions can be made:



	(internal)
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- Go Concept is good enough to proceed to the next stage
- Kill Concept is not good enough to develop further and is therefore shut down
- Hold Concept is not good enough to continue with development at this time but has enough merit to not be shut down. It will be put on hold to possibly be resumed at a later date.

The Gate Process consists of several stages, which are connected to each other by gates. Each stage is designed to collect specific information:

- Stage 1: Scoping/Range Justification/ Feasibility
- Stage 2: Design
- Stage 3: Development & Wear Trial
- Stage 4: Final Sign Off/Launch

Gate 1: Scoping/ Range Justification/ Feasibility

- Concept Describe idea and identify where it fits in core range/ our fashion demographic
- Design consideration specify styles, colours, sizing, fit, features
- Proposed deletions suggest any existing styles/ SKUs for deletion (e.g., style it will replace or styles that are not selling)
- Rationale specify/justify reason(s) for launching and how it will grow the business (sales, profits etc.)
- Competitor analysis present any competitor styles that have similar products already in their range.
- Competitive advantages list the point of differences between our product and competitor's product (e.g., features and benefits, price point etc.)
- Target financials target price per unit, proposed volume (per colour), proposed budget
- Agreed timing to be discussed during Gate 1 (e.g. launched at the best time of year to ensure peak sales).
- Sign off

Gate 2: Design

- Design present to team: research, initial design sketches, fabric options, colour options and costings.
- Sign off

Gate 3: Development & Wear Trial

- Create specifications
- Arrange 1st development samples of the design in selected fabrics (jump size set)
- Conduct fit and wear trials (on numerous body shapes and sizes)
- Assess fit and wear trial feedback
- Revise specifications and organise 2nd development samples (if required)
- Present to team
- Sign Off

Gate 4: Final Sign Off/Launch

- Confirm styles, colours and order quantity
- Sign Off: price per unit, volume (per colour), total cost of order, GP%
- Issue final QC report to supplier
- Garment Set Up
- Raise Purchase order
- Lock in Ex/factory date

APPAREL DEVELOPMENT PROCESS

2

3

4

5

6

RECEIVE SAMPLE REQUEST

Account Manager \rightarrow Product Team

This is the brief. It includes everything from identifying the school, outlining their request and needs in detail, desired timeline, price point and size range. This can be accompanied by samples for reference to colour, fabrics and embroidery.

DEVELOP TECH PACK & REQUEST SAMPL

Spec Technician \rightarrow Product Team

The tech pack is the blueprint for each piece of apparel. It has details ranging from the style's description, trims, fabrics, size range, placement of logos, packaging and manufacturing details. The tech pack is sent to the supplier and the first sample is requested.

GARMENT SET UP

Product \rightarrow Spec Tech \rightarrow Data Integrity Admin

Garment request forms are completed. Final quality control comments are issued to the supplier and costings are confirmed. The style is set up in pronto and a 5-digit number is created.

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PRODUCTION & SHIPMENT

Spec Technician -> Production Co-ordinator

Fabric is made. Pre-Production sample is sent for quality control and approval. Bulk production is completed and a shipment sample is sent for final sign off. The order is shipped to warehouse and delivered to stores.



CREATE ARTWORK

Product Team → **Graphics** → **Account Manager**

The concept is almost ready to come to life! This is the phase where sketches become interpreted. Storyboards are drawn up to show the design of the garment, trims, fabric, colours and logo details. This helps the school see the indent style or uniform range. Before the sampling stage begins, this is the time to make any design changes and get the schools tick of approval.

RECEIVE SAMPLE & OBTAIN APPROVAL

Product Team → Account Manager

Sample arrives and the QA/Spec Technician checks the sample against the tech pack, ensuring the product is made as initially requested. Sample is presented to the school and approval/sign off is acquired. Worst case scenario, the school rejects the sample. Repeat steps 3 & 4 until approval is obtained and the product is perfected.

FORECASTING & ORDERING

Planners -> Stock Control Team

The style is quantified and units per size are determined. An official purchase order is raised and sent to the supplier. Bulk production is now underway.



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SCHEDULE OF AUDITS

2021						
LOWES SUPPLIER	PRODUCTS	FACTORY NAME	FACTORY LOCATION	RECENT AUDIT REPORT	PASS AUDIT DATE	INTERTEK WCA SCORE
Sunshine	Apparel/Garments	Ningbo Chenhong Garment CO., Ltd	YinZhou District, Ningbo, ZheJiang, China	BSCI	07/09/21	91
Elegant	Apparel/Knitwear	Elegant Knitting International LTD	Biyagama, Malwana, Sri Lanka	Sedex	21/06/21	100
AFW Pty Ltd.	Apparel/Garments	Yangzhou Yiju GARMENTS Co.,Ltd	Audit report received and Ineterk verification is under progress	SGS	11/11/21	-
Georges	Apparel/Garments	PT. Dan Liris	Indonesia	SMETA	12/08/20	99
Apparel	Apparel/Garments	The Ning Bo Blossom Knitting	Fenghua Development Zone Ningbo, China	WRAP	18/05/21	98
Shiny	Apparel/Garments	Xiamen PJD garment CO.,Ltd	Jimei Area, Xiamen, China	BSCI	11/11/20	91
AZD	Apparel/Garments	Hongze Sainty Fortune Garment	Hongze County Huai'an, Jiangsu, China	BSCI	11/06/21	94
	Socks	Zhejiang FENLI Hoses Industry Co., Ltd	Beiyuan Industrial Zone, Yiwu, Zhejiang, China	BSCI	09/12/20	91
Mitch Dowd	Socks	Zhejiang Greenwood Knit Co., Ltd	Fotang Town, Yiwu, Zhejiang, China	BSCI	06/05/21	91
UMS	Apparel/Garments	Uniform Management Services	Delayed due to COVID p closure, expect for Dec 2		and factory	-
Noone	Accessories (ties)	PT Trisco Tailoired Apparel Manufacturing	Katapang, SOREANG, Bandung, Indonesia	BSCI	13/03/20	93
	Apparel/Garments	PT. Dan Liris	Indonesia	SMETA	12/08/20	99
Midford	Apparel/Garments	The Ning Bo Blossom Knitting	Fenghua Development Zone Ningbo, China	WRAP	18/05/21	98
Mackahat	Hats	Jiangsu Holly Manufacturing Co., Ltd	Dongxing Town, Jiangjiang Jiangsu, China	BSCI	11/05/21	89
Calcoup	Knitwear	Calcoup knitwear (Fiji) Ptd Ltd	Namaka Industrial Sub-division, Nadi, Fiji	SMETA	16/03/21	87
OnTrack Sportswear	Sportswear	N/A (Under NDA)	GuangDong Province, China	Intertek	29/03/21	95
Epicentre	Accessories (hats)	Yangzhou Hengtong Cap & Glove CO.,Ltd	Bali Town, Economy and developing Area, Yangzhou	BSCI	04/12/20	81
Spartan	Bags/Hats/ Accessories	N/A (Under NDA)	DongGuan, GuangDong, China	SMETA	19/10/20	93
AGS	Apparel/Garments	Ningbo Qikai Texttiles Co.,Itd	Gulin town, haishu district, Ningbo, Zhejiang, China	SMETA	24/11/20	96
PNW (Bocini)	Apparel/Garments	Quanzhou Pengtai Garments Co.,Ltd	Jinshang Town, Shishi Area, Quanzhou city, Fujian China	SMETA	18/12/20	96

2022 COMMITMENTS

2021 REPORT						
LOWES SUPPLIER	PRODUCTS	FACTORY NAME	FACTORY LOCATION	RECENT AUDIT REPORT	EXPIRED & FOLLOW UP DATE	INTERTEK WCA SCORE
Sunshine	Apparel/Garments	Ningbo Chenhong Garment CO., Ltd	YinZhou District, Ningbo, ZheJiang, China	BSCI	2022 SEPT	
Elegant	Apparel/Knitwear	Elegant Knitting International LTD	Biyagama, Malwana, Sri Lanka	Sedex	2022 JUNE	
AFW Pty Ltd.	Apparel/Garments	Yangzhou Yiju GARMENTS Co.,Ltd	Audit report received and Ineterk verification is under progress	SGS	2022 NOV	
Georges Apparel	Apparel/Garments	PT. Dan Liris	Indonesia	SMETA	2022 AUG	
	Apparel/Garments	The Ning Bo Blossom Knitting	Fenghua Development Zone Ningbo, China	WRAP	2022 MAY	
Shiny	Apparel/Garments	Xiamen PJD garment CO.,Ltd	Jimei Area, Xiamen, China	BSCI	2022 NOV	
AZD	Apparel/Garments	Hongze Sainty Fortune Garment	Hongze County Huai'an, Jiangsu, China	BSCI	2022 JUNE	
Mitch Dowd	Socks	Zhejiang FENLI Hoses Industry Co., Ltd	Beiyuan Industrial Zone, Yiwu, Zhejiang, China	BSCI	2021 DEC	
	Socks	Zhejiang Greenwood Knit Co., Ltd	Fotang Town, Yiwu, Zhejiang, China	BSCI	2022 MAY	
UMS	Apparel/Garments	Uniform Management Services	Delayed due to COVID pandenmic and factory closure, expect for Dec 2021			
Noone	Accessories (ties)	PT Trisco Tailoired Apparel Manufacturing	Katapang, SOREANG, Bandung, Indonesia	BSCI	2022 MAR	
	Apparel/Garments	PT. Dan Liris	Indonesia	SMETA	2022 AUG	
Midford	Apparel/Garments	The Ning Bo Blossom Knitting	Fenghua Development Zone Ningbo, China	WRAP	2022 MAY	
Mackahat	Hats	Jiangsu Holly Manufacturing Co., Ltd	Dongxing Town, Jiangjiang Jiangsu, China	BSCI	2022 MAY	
Calcoup	Knitwear	Calcoup knitwear (Fiji) Ptd Ltd	Namaka Industrial Sub-division, Nadi, Fiji	SMETA	2022 MAR	
OnTrack Sportswear	Sportswear	N/A (Under NDA)	GuangDong Province, China	Intertek	2022 MAR	
Epicentre	Accessories (hats)	Yangzhou Hengtong Cap & Glove CO.,Ltd	Bali Town, Economy and developing Area, Yangzhou	BSCI	2021 DEC	
Spartan	Bags/Hats/ Accessories	N/A (Under NDA)	DongGuan, GuangDong, China	SMETA	2021 NOV	
AGS	Apparel/Garments	Ningbo Qikai Texttiles Co.,Itd	Gulin town, haishu district, Ningbo, Zhejiang, China	SMETA	2021 NOV	
PNW (Bocini)	Apparel/Garments	Quanzhou Pengtai Garments Co.,Ltd	Jinshang Town, Shishi Area, Quanzhou city, Fujian China	SMETA	2021 DEC	



ANNEXURE

Overview

Lowes Manhattan Pty Ltd is guided by its company values. These values are the foundation of how we conduct ourselves and interact with each other, our clients, customers, employees, suppliers, directors and other stakeholders. The Company is committed to ensuring corporate compliance and promoting ethical corporate culture by observing the highest standards of fair dealings, honesty and integrity in all of our business activities.

This policy applies to all directors, executives, all staff, contractors and consultants at Lowes Manhattan Pty Ltd. This policy also extends to customers, clients and suppliers. This Whistleblower Policy will be widely disseminated to and easily accessible by all within and outside the business. For internal use, this will be made available on the company's intranet and training via the Learning Management System. For external use, the policy can be accessed by selecting the link on Lowes Manhattan Pty Ltd website.

Purpose

The purpose of this policy is to provide all employees, former employees, contractors, associates, trustees, relatives of or dependants of aforementioned to safely and securely report any wrongdoing such as policy breaches, illegal, unethical or undesirable behaviour involving the business. This policy protects individuals who make a confidential disclosure to the officers. Employees who wish to report other issues such as grievances i.e personal work-related grievances should refer to the Policy, Guideline and Procedures Manual and/or the Employment Guidelines and Procedures Manual.

Examples of Grievances that include Personal Work-Related Grievances:

- Interpersonal conflict between colleagues;
- $\succ~$ A matter that does not involve a breach of workplace laws;
- > Decisions about internal promotions or external recruitment; and
- Disciplinary actions, suspension or termination of an individual.

Definitions

Terms used in this policy are:

Whistleblower/ Whistleblowing	A person who anonymously discloses information to an officer or higher authority about any wrongdoing within a business. A person who is a witness of actual or suspected wrongdoing		
	Conduct and/or behaviour that includes but is not limited to:		
Wrongdoing	 Illegal or dishonest behaviour; 		
	 Unethical or undesirable behaviour; 		
	 Is an unethical breach of the Code of Conduct of Lowes Manhattan Pty Ltd 		
	 Has financial or non-financial loss detrimental to the interest of Lowes 		
	Manhattan Pty Ltd;		
	 Repeated breaches of administrative procedures; 		
	 Unreasonably endangers the health and safety or the environment; 		
	 Is dishonest or fraudulent; 		
	- Is an offence against any other law of the Commonwealth is punishable by		
	imprisonment for a period of 12 months or more;		

	 Breaches legislation, regulations or local government by-laws or is otherwise illegal (including whistleblower laws, corporations law, theft, drug sale, use, violence or threatened violence or criminal damage against property).
Ethical	Rules and standards for right conduct and practices in business.
Suspecting	The Whistleblower making the report has reasonable grounds for suspecting the reportable wrongdoing.
Whistleblower	
Protections	Provides support and protection to the Whistleblower.
Officer	
Whistleblower	The person that will receive whistleblower disclosures of wrongdoing and oversee
Governance	a resolution.
Officer	

Policy Statement

Lowes Manhattan Pty LTD is committed to the highest standards of conduct and ethical behaviour to support and promote a culture of honesty and ethical behaviour, corporate compliance and good corporate governance. People who have a working relationship with Lowes Manhattan Pty Ltd are often the first to realise that there may be something seriously wrong. However, they may not wish to speak up for fear of appearing disloyal or may be concerned about being victimised or subject to reprisals for reporting wrongdoing.

Lowes Manhattan Pty Ltd ("The Company") encourages the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving Lowes Manhattan Pty Ltd and provides protections and measures so that those persons who make a report may do so confidentially, safely and without fear of intimidation, disadvantage or reprisal.

When an aforementioned person makes a disclosure in confidence:

- > Their identity must remain confidential according to their wishes;
- They will be protected from reprisal, discrimination, harassment or victimisation for making the disclosure;
- An independent internal inquiry or investigation will be conducted or if appropriate an external investigator may be approved;
- Issues identified from the inquiry/investigation will be resolved and/or rectified:
- They will be informed about the investigation and outcomes;
- The disclosure can still qualify for protection even if their disclosure turns out to be incorrect;

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Any retaliation for having made the disclosure will be treated as serious wrongdoing under this Policy.

Further, the purpose of this policy (where applicable):

- Encourages disclosures to report wrongdoing;
- Ensure disclosures are dealt with appropriately and on a timely basis;
- Provide transparency around Lowes Manhattan Pty Ltd framework for receiving, handling and investigating disclosures:
- Ensure individuals and/or groups who make a disclosure of wrongdoing can do so securely, and safely with confidence that they will be protected and supported throughout the entire process;
- > To support Lowes Manhattan Pty Ltd values and code of conduct;
- > To support Lowes Manhattan Pty Ltd long-term reputation and sustainability; and
- Meets Lowes Manhattan Pty Ltd legal and regulatory obligations.

Responsibilities

1.1 Whistleblowers

Protection is available to Whistleblowers who disclose wrongdoing that is made with grounds reasonable to believe it is true which include but not limited to:

- Identity protection;
- Protection from detrimental acts or omissions
- Compensation and other remedies; and
 Civil, criminal and administrative liability protection.
- To ensure that all employees are treated fairly and that resources are not wasted, protection is not

available where the disclosure is:

- Trivial or vexatious in nature with no substance. This will be treated in the same manner as a false report and may itself constitute wrongdoing.
- Unsubstantiated allegations which are found to have been made maliciously, or knowingly to be false. These will be viewed seriously and may be subject to disciplinary action that could include dismissal, termination of service or cessation of a service or client relationship.

A Whistleblower must provide information to assist any inquiry/investigation of the wrongdoing disclosed.

Making a disclosure may not protect the Whistleblower from the consequences flowing from involvement in the wrongdoing itself. A person's liability for their own conduct is not affected by their report of that conduct under this policy. However active cooperation in the investigation, admission and remorse may be taken into account when considering disciplinary or other action.

Even though a Whistleblower may be implicated in the wrongdoing they must not be subjected to any actual or threatened retaliatory action or victimisation in reprisal for making a report under this policy.

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Further, a Whistleblower may choose to remain anonymous while making their disclosure, over the course of the investigation and after the investigation is finalised. A Whistleblower if they do not want anyone to know their identity including officers may adopt a pseudonym for the purpose of their disclosure.

1.2 Whistleblower Protection Officer

If the Whistleblower wishes, the WHS/RTW Officer may be appointed to support and provide protection to the Whistleblower according to this policy.

The protection officer must have a direct reporting line to a governance officer from an area of the organisation that is independent of line management in the area that is the subject of the report of wrongdoing.

The protection officer will provide mentoring and other support deemed necessary.

The Protection Officer is responsible for keeping the Whistleblower informed of the progress and outcomes of the inquiry/investigation subject to considerations of privacy of those against whom a disclosure has been made.

1.3 Identity Protection

This will state the measures and/or mechanisms for protecting the confidentiality of a Whistleblowers identity (where applicable):

- All personal information or reference to the individual witnessing and event will be redacted;
- The discloser will be referred to in a gender-neutral context;
- Disclosures will be handled and investigated by qualified staff;
- All paper and electronic documents and other materials relating to disclosures will be stored securely;
- Access to all information relating to a discloser will be limited to those directly involved in managing and investigating the disclosure;
- Only a restricted number of people who are directly involved in handling and investigating a disclosure will be made aware of a discloser's identity (subject to the discloser's consent) or information that is likely to lead to the identification of the discloser;
- Communications and documents relating to the investigation of the disclosure will not be sent to an email address or to a printer that can be accessed by other staff; and
- Each person who is involved in handling and investigating a disclosure will be reminded about the confidentiality requirements, including that unauthorised disclosure of a discloser's identity may be a criminal offence.

1.4 Whistleblower Governance Officer

The Whistleblower Governance Officer is the Head of People. The Head of People will receive whistleblower disclosures of wrongdoing and overseeing resolution.

The Whistleblower Governance Officer must (after a reasonable preliminary inquiry):

- Protect the identity of the Whistleblower;
- If the Whistleblower agrees to appoint the WHS/RTW Officer, the WHS/RTW Officer will provide support to the whistleblower
- $\succ~$ Be satisfied that each disclosure of wrongdoing they received was appropriately inquired into or investigated

- Be satisfied that action taken in response to the inquiry/investigation is appropriate to the circumstances
- Provide governance oversight over any inquiry/investigation into retaliatory action taken against the Whistleblower

Alternatively, if the disclosure contains allegations against any Lowes Manhattan Pty Ltd executive or where the Whistleblower has a reasonable belief that the Whistleblower Governance Officers are not sufficiently independent a report may be made to the Managing Director of Lowes Manhattan Pty Ltd.

1.5 Protected Disclosures Coordinator

The Protected Disclosures Coordinator is the Head of People. The Head of People will receive all information about all whistleblower events and performs the following functions:

- Support the welfare of disclosers
- Arranges for an inquiry/investigation into the disclosures made by the Whistleblower
 Ensures appropriate government agencies are notified about Whistleblower events where required
- Maintains a Whistleblower Register for trend analysis and to identify systemic issues requiring attention

1.6 Investigator

Lowes Manhattan Pty Ltd will investigate all matters reported under this policy as soon as practicable after the matter has been reported. The Protected Disclosures Coordinator who is the Head of People will appoint either an internal or external investigator to investigate the matter. Lowes Manhattan Pty Ltd may not be able to undertake an investigation if it is not able to contact the discloser. An example is if a disclosure has refused to provide, or has not provided, a means of contacting them.

The internal investigator may be the Governance Officer and or an appropriate person as appointed by the Governance Officer.

1.7 Investigation

The investigation will be conducted in an objective and fair manner, and as is appropriate having regard to the nature of the disclosure and circumstances. Where a report and/or matter is submitted anonymously, Lowes Manhattan Pty Ltd will conduct the investigation and its enquiries based on the information provided. Further, anonymity can at times prevent the business from taking the issue further if Lowes Manhattan Pty Ltd is not able to obtain further information from the source of the report.

1.8 Managers and Line Supervisors

All managers and line supervisors who receive a disclosure about wrongdoing must notify the governance officer and provide particulars and maintain confidentiality at all times.

1.9 Protection from detrimental acts or omissions

Lowes Manhattan Pty Ltd may refer to the following measures and mechanisms for protecting disclosers from detrimental acts or omissions (where applicable):

- processes for assessing the risk of detriment against a discloser and other persons (e.g. other staff who might be suspected to have made a disclosure), which will commence as soon as possible after receiving a disclosure;
- support services (including counselling or other professional or legal services) that are available to disclosers;

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- strategies to help a discloser minimise and manage stress, time or performance impacts, or other challenges resulting from the disclosure or its investigation;
- actions for protecting a discloser from risk of detriment—for example, the business could allow the discloser to perform their duties from another location, reassign the discloser to another role at the same level, make other modifications to the discloser's workplace or the way they perform their work duties, or reassign or relocate other staff involved in the disclosable matter;

1.10 Reporting a Disclosure

Lowes Manhattan Pty Ltd will need to assess each disclosure to determine whether

Disclosures will be handled confidentially.

- Each disclosure will be assessed and may be subject of an investigation;
- When an investigation needs to be undertaken, the process will be objective, fair and independent;
- It qualifies for protection; and
- A formal, in-depth investigation is required.

(a) Internal Whistleblowers

(Current or former employees, directors, contractors or consultants)

Internal Whistleblowers are encouraged to report their concerns to the Whistleblower Governance Officer to seek an immediate response. Where the internal Whistleblower believes this is not appropriate, then an alternative reporting mechanism is to report the matter to the Whistleblower Protection Officer.

(b) External Whistleblowers

(These individuals include: clients, customers, suppliers)

Where an external Whistleblower is reluctant to report it to the Governance Officer or the Protections Officer, they can report their concerns to the Managing Director of Lowes Manhattan Pty Ltd.

(c)Anonymous Reporting

Anonymous reports of wrongdoing are accepted under this policy. Anonymous reports have significant limitations that may inhibit a proper and appropriate inquiry or investigation. These limitations include the inability to provide feedback on the outcome and/or to gather additional particulars to assist the inquiry/investigation. Specific protection mechanisms may be difficult to enforce if you choose to remain confidential.

1.11 Protection

Lowes Manhattan Pty Ltd will adopt the principle of protection of the identity of internal and external Whistleblowers.

1.12 Confidentiality

- Lowes Manhattan Pty Ltd will not disclose a whistleblower's identity unless:
 - The disclosure is required or authorised by law; and
 - It is necessary to further an investigation and the Whistleblower consents to the disclosure.

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Lowes Manhattan Pty Ltd will take reasonable precautions to store any records relating to a report of wrongdoing securely and to restrict access to authorised persons only.

1.13 Retaliation

Lowes Manhattan Pty Ltd will not tolerate any retaliatory action or threats of retaliatory action against a Whistleblower or against a Whistleblower's colleagues, employer (if a contractor, consultant or supplier) or relatives. Any retaliation in reprisal for a disclosure made under this policy will be treated as a breach of serious misconduct and will result in disciplinary action.

A Whistleblower must not be disadvantaged or victimised for having made the report by:

- > Dismissal or termination of employment, services or contracts
- Demotion of contract
- Discrimination, victimisation, bullying and harassment
- Aforementioned matters above.

1.14 Disclosure Management

Lowes Manhattan Pty Ltd recognises that individuals against whom a report is made must also be supported during the handling and investigation of the wrongdoing report. The business takes reasonable steps to treat fairly any person who is the subject of a report, particularly during the assessment and investigation process in accordance with an established support protocol which may be extended to include appointing an executive member of the leadership group to provide support.

Where a person is identified as being suspected of possible wrongdoing, but preliminary inquiries determine that the suspicion is baseless, no evidence or unfounded and that no formal investigation is warranted, then the Whistleblower will be informed of this outcome and the matter laid to rest.

Lowes Manhattan Pty Ltd will give its full support to a person who is the subject of a report where the allegations contained in the report are clearly wrong

Therefore, where an investigation does not substantiate the report, the fact that the investigation has been carried out, the results of the investigation and the identity of the person who is the subject of the report must be handled confidentially.

Further, where an investigation is conducted and the investigator finds there may be a case for an individual to respond, the Investigator must ensure that a person who is the subject of a disclosure:

- Is informed of the substance of the allegations;
- Is given a fair and reasonable opportunity to answer the allegations before the investigation is finalised;
- > Has their response set out fairly in the Investigator's report; and
- Is informed about the substance of any adverse conclusions in the investigator's report that affects them.

1.15 Failure to Comply

Any breach of this policy may result in disciplinary action that could result in severance from Lowes Manhattan Pty Ltd.

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Current Officials for this Policy							
Officers							
Whistleblower Protections Officer	WHS/RTW Officer	Joumana Jallad					
Whistleblower Governance Officer	Head of People	Jason Heap					
Protected Disclosures Coordinator	Head of People	Jason Heap					

TIM ZHU LOWES PRODUCTION MANAGER AND LEADER OF THE CONTINUOUS IMPROVEMENT COMMITTEE IS FLUENT IN CHINESE AND IS USED AS A MANDATORY REPORTER FOR ANY SUSPICIOUS ACTIVITY.

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HE COMMUNICATES FREQUENTLY WITH OUR FACTORIES IN CHINA AND LETS WORKERS KNOW DISCREETLY THAT THEY CAN ESCALATE ANY ISSUES DIRECTLY TO HIM.

