2026

Modern Slavery Statement

colesgroup

colesgroup

Coles has a long-standing commitment to respecting human rights.

Our aim is to have a positive impact on our team members, customers, the communities we serve and workers in our supply chain. Respecting others is at the heart of our core values and underpins how we make decisions and conduct our business.

By evolving our practices, engaging with stakeholders and sharing what we learn, we aim to strengthen our efforts to protect the rights of workers in our supply chain and help build collective momentum for positive change.

Pictured: cover – Coles team member Gwendoline with Daniel from Koala Cherries in Victoria.

Reporting concerns

If you have concerns about modern slavery or broader human rights issues relating to our operations or supply chain, we have processes in place to allow you to safely voice your concerns. You can remain anonymous.

Visit our website to learn more:
colesgroup.com.au

Contact STOPline on
1300 304 550 or send an email to
coles@stopline.com.au

Approach to reporting

This statement is provided by Coles Group Limited (ACN 004 089 936) under the Australian *Modern Slavery Act 2018* (Cth) (Modern Slavery Act) for the period 30 June 2025 to 28 June 2026 (referred to as 'the reporting period', 'this year' or 'FY26').

It is a joint statement that covers Coles Group Limited and the following three reporting entities:

1. Coles Supermarkets Australia Pty Ltd (ACN 004 189 708)
2. Liquorland (Australia) Pty Ltd (ACN 007 512 414)
3. Coles Supply Services Pty Ltd (ACN 664 431 510)

Coles' entities take a consolidated, whole-of-group approach to ethical sourcing. As such, this statement addresses the actions taken by all reporting entities within Coles Group.

Unless otherwise indicated in this statement, the terms 'Coles', 'Coles Group', 'our business', 'we', 'us' and 'our' refer to Coles Group Limited and its controlled entities collectively (including all reporting entities). A list of Coles' subsidiaries is published in Coles' 2026 Annual Report. This statement has been approved by the Board of Coles Group Limited (the Board or Coles Board) and the Boards of each other reporting entity.

The statement has been signed by the Chairman and Managing Director and Chief Executive Officer (MD & CEO) of Coles Group Limited, and has also been signed by the MD & CEO in her capacity as a director of each of the reporting entities. Further detail about how this statement complies with the Modern Slavery Act is included in Appendix 1.

Forward-looking statements

This report contains forward-looking statements, including statements regarding the Group's intent, belief, goals, objectives, opinions, initiatives, plans, commitments or current expectations which may relate to the Group's business, market and financial conditions, results of operations and risk management practices. Forward-looking statements can generally be identified by the use of words such as 'forecast', 'will', 'anticipate', 'may', 'believe', 'should', 'expect', 'intend', 'outlook', 'guidance', 'likely', 'aim', 'aspire' and other similar expressions. The report also includes and relies upon various management judgements and estimates.

Any forward-looking statements, management judgements and estimates are based on the Group's current knowledge, assumptions and intent as at the date of this report. These forward-looking statements, judgements and estimates involve known and unknown risks, uncertainties and assumptions, many of which are beyond the control of the Group. The Group does not give any assurance that the assumptions will be correct and the actual results or outcomes may differ materially from the implication made in such statements, judgements or estimates.

Forward-looking statements are not guarantees or predictions of future performance or outcomes.

Risks that may also affect the reliability of the forward-looking statements include legal and regulatory change and enforcement approach; industry competition; changes to consumer behaviour; the development and adoption of new technologies and related implementation risks; macro-economic and geopolitical factors, including global market conditions; and the physical impacts of climate change such as climate variability and the occurrence of natural disasters.

Forward-looking statements, management judgements and estimates should be considered together with the risks, uncertainties and assumptions associated with the relevant statements particularly given the inherent unpredictability of future policy, market conditions, and technological developments. Except as required by applicable laws or regulations, the Group does not undertake to publicly update, review or revise any of the forward-looking statements in this report or to advise of any change in assumptions on which any such statement is based or changes to management judgements or estimates.

Other notices

Past performance cannot be relied on as a guide for future performance.

This document may contain statements that have been prepared by Coles on the basis of information from publicly available sources, and other third-party sources. While Coles believes that each of these third-party sources is credible and that third-party information relied upon has been prepared by a reputable source, this information has not been verified by the Group and the Group cannot guarantee the currency, accuracy, or completeness of such information in this report. There may be differences in the way third parties calculate or report data compared to Coles, which means third-party data may not be comparable to Coles' data.

Feedback

We welcome feedback on this report. For more information or to provide comments, please contact us at:
ethicalsourcing@coles.com.au

Acknowledgement of Country

Coles Group acknowledges the Traditional Owners of Country throughout Australia.

We recognise their strength and resilience and pay our respects to Elders past and present.

We recognise their ongoing connection to the lands, waters and skies.

This report is interactive

Click on the contents list and use the navigation bar (repeated on every page after contents page) to jump to relevant sections.

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Pictured: Coles Online delivery vans fitted with electric refrigeration units at the Wetherill Park Customer Fulfilment Centre, NSW.

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Our 2026 reporting suite

Our corporate reporting suite contains detailed information on Coles' strategy, financial and non-financial performance, risk management and governance frameworks.

The suite also includes our progress against our sustainability and human rights commitments. We continually evolve our reporting suite in response to shareholder and stakeholder feedback, and to align with legislation, disclosure frameworks and leading practices.

To view these reports, visit **colesgroup.com.au**

2026 Annual Report

2026 Corporate Governance Statement

2026 Sustainability Supplement

2026 Modern Slavery Statement

2026 Economic Contribution Report

Message from our Chairman and CEO
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Message from our Chairman and CEO

"At Coles, we believe every person in our supply chain deserves to be treated with dignity, fairness and respect. This is fundamental to building resilient supply chains, maintaining customer trust and creating sustainable long-term value for all stakeholders."

Leah Weckert

As cost-of-living pressures continue to impact communities in Australia and globally, we remain focused on delivering value and affordability for our customers, while upholding our commitment to human rights across our operations and extended supply chain.

This is fundamental to who we are and how we operate and underpins our continued focus on addressing modern slavery. No one should be subjected to forced labour, servitude or other forms of exploitation, regardless of the economic environment.

Our Modern Slavery Statement this year reflects the continued evolution of our program. We strengthened our approach through deeper analysis of higher-risk supply chains and worker cohorts, including temporary migrant workers in Australia supporting our horticulture and meat sectors, alongside focused deep dives into seafood and high-risk service providers. We also enhanced our due diligence approach enabling more dynamic monitoring and targeted prevention mechanisms.

A continuously maturing program does not mean incidents will not arise. Rather it means we are better positioned to respond effectively, learn from experience, ask better questions, identify emerging patterns and continually strengthen our approach for the future.

This progress is also reflected in increasing external recognition of our efforts. Coles' strong performance in the World Benchmarking Alliance Corporate Human Rights Benchmark and KnowTheChain Benchmark strengthens our credibility and supports our contribution to influence broader industry progress.

As a business of scale, we have an opportunity, and a responsibility, to use our influence to drive better practices and stronger protections for workers in our supply chain. Aligned with this, in FY26 we joined the Consumer Goods Forum Human Rights Coalition, recognising that collective action can accelerate meaningful positive change. We also see effective regulation as an important driver of a level playing field and higher, more consistent standards across the market domestically and overseas.

While we are proud of the progress made, we know there is more to do. Labour rights concerns and grievances continue to arise across sectors of our supply chain, and these experiences are an important source of learning as we strengthen our approach. We remain committed to strengthening our systems, deepening our partnerships and helping build resilient, ethical supply chains that create long-term value for all stakeholders.

Peter Allen
Chairman, Coles Group Limited

Leah Weckert
Managing Director and Chief Executive Officer, Coles Group Limited

Helping Australians eat and live better every day

Our structure

Coles is a national retailer providing everyday products such as fresh food, groceries, general merchandise and liquor, as well as financial and retail media services.

We provide an omnichannel offering through in-store and online services to customers, households and businesses through our supermarkets and liquor stores. We also operate a range of digital platforms, including websites, across areas such as general merchandise, meal solutions, gift cards and our retail offering.

Our brands are outlined on the left and are supported by our central support operations, including functions such as buying, warehousing, delivery, meat and milk processing, manufacturing, and marketing. We are a public company listed on the Australian Securities Exchange (ASX: COL) and are headquartered in Melbourne, Victoria.

Our brands

- coles
- coles local
- LIQUORLAND
- coles Credit Cards
- coles insurance
- coles mobile
- coles collect
- QuiteLike
- coles 360

COLES GROUP LIMITED

ACN 004 089 936

The ultimate parent of the Group is Coles Group Limited

Coles Supermarkets Australia Pty Ltd

ACN 004 189 708

Our Supermarket business operates 870 stores across Australia. It procures, produces and retails fresh food, groceries and general merchandise to Australian consumers and includes our Coles Online eCommerce business and Coles Financial Services.

Liquorland (Australia) Pty Ltd

ACN 007 512 414

Our Liquor business operates 988 stores nationally, as well as providing online liquor services within Australia.

Coles Supply Services Pty Ltd

ACN 664 431 510

Coles Supply Services is a business offering products and services to selected business customers.

The Coles Group includes 45 subsidiary entities

These entities undertake a range of functions in support of Coles' businesses, including property development and management, procurement, online services, and import and export of products.

All subsidiary entities are incorporated in Australia, with the exception of an entity incorporated in Singapore that supports Coles Group Insurance, and one export-related entity incorporated in Hong Kong. Further information is in our Annual Report.

Coles holds a 50% interest in two other reporting entities under the Modern Slavery Act that are not part of the Coles Group and produce their own modern slavery statements.

Loyalty Pacific Pty Ltd (Flybuys)

A joint venture between Coles Group Limited and Wesfarmers Limited, which operates the Flybuys loyalty program.

Queensland Venue Co. Pty Ltd

A joint venture between Coles Group Limited and AVC Sapphire Holdings Pty Ltd. Under this joint venture, AVC Sapphire Holdings Pty Ltd operates hotels in Queensland, WA and SA, and Coles operates the associated retail liquor outlets.

Our approach to continuous improvement

In FY26, we focused our efforts on closely examining how and where risks of modern slavery may arise in different supply chain contexts to inform targeted due diligence and strengthen prevention strategies to reduce recurrence.

We continued to review our progress against the four 'enablers' identified in our Human Rights Strategy, which include a focus on governance, due diligence, engagement and collaboration, and tracking our effectiveness. The information on the right highlights the key actions implemented over the reporting period relevant to each enabler and our current intentions around key future plans.

Our enablers

Our four enablers are the core practices that we strive for to drive continuous improvement. They are essential to achieving our human rights goals, including underpinning our response to modern slavery. These aim to strengthen our systems and processes and embed human rights considerations and risk management across the way we operate.

Strong governance

Integrating human rights within business operations – putting in place controls to support the prevention and mitigation of modern slavery risks, as well as developing policies, governance and reporting structures that support our human rights objectives.

Key FY26 activities

+ Onboarded key risk and performance monitoring reports for our Ethical Sourcing Program into online systems and continued investment in data governance.
+ Expanded assessment of internal purchasing practices to our Seafood commercial category to support the development of a responsible purchasing approach.
+ Progressively rolled out mandatory human rights training, reaching 93.6% of role-relevant team members[1] and supporting progress towards our FY27 goal of 95% completion.
+ Completion of a Group Internal Audit-led review of the Ethical Sourcing Program.

Future plans

+ Continue engagement across commercial categories to better understand buying practices and inform development of a responsible purchasing approach.
+ Expand data trends analysis functionality through investing in tools and software to support targeted Ethical Sourcing Program activities.
+ Using the insights from an internal audit review, further refine relevant governance aspects of our Ethical Sourcing Program.

Due diligence

Drive more targeted identification and effective remediation of modern slavery and wider human rights risks, across our value chain.

Key FY26 activities

+ Continued developing our living wage framework for high-risk countries in our international supply chain, by piloting a second living wage gap analysis in Vietnam.
+ Progressed our modern slavery risk review relevant to our business context.
+ Conducted deep dives into sectors with heightened worker vulnerability, including Australian horticulture, seafood and high-risk services to better understand risks to workers and strengthen mitigation practices. This included finalising our services audit methodology.

Future plans

+ Continue development of our living wage framework, with a focus on understanding living wage gaps in high-risk countries in our international supply chain.
+ Undertake a project to strengthen consistency in how recruitment fee risks are managed across our supply chain, recognising different local contexts and recruitment practices.
+ Continue deep dive activities within our Australian horticulture, seafood and services categories, including embedding our services audit into due diligence activities.

Meaningful engagement and collaboration

Partnering with internal and external stakeholders to address modern slavery risks. This includes seeking and listening to affected people's views to inform our actions and enabling our team members and suppliers to drive change.

Key FY26 activities

+ Delivered targeted 'Spotting the Signs' training to relevant team members to build awareness of modern slavery indicators and support early identification and escalation of potential concerns.
+ Joined the Consumer Goods Forum (CGF)[2] Human Rights Coalition and engaged with global industry peers.
+ Partnered with The Mission to Seafarers (MtS)[3] to visit shipping vessels and engage with seafarers to understand their lived experiences.
+ Events with our Ethical Retail Supply Chain Accord (ERSCA) partners.[4]

Future plans

+ Continue targeted engagement with various external stakeholders to help support our efforts to identify, assess and address our salient risks.
+ Further assess and identify human rights risks and opportunities relating to a Just Transition[5] and our climate transition activities.

Effectiveness

Effectiveness, as one of our enablers, underpins our program. This approach enables continuous improvement through ongoing monitoring, reflection and course correcting. It also supports transparent communications and balanced disclosure of our work.

Key FY26 activities

+ Applied our feedback loop approach to assess effectiveness of projects, recalibrating our actions and implementing targeted improvements to internal engagement, training and supplier oversight.
+ Initiated a worker-centric approach, including reviewing supplier-disclosed demographic data to better understand the workforce in our extended supply chain.
+ Contributed to strong outcomes in key human rights benchmark assessments, including ranking #1 food retailer and #6 globally in the 2026 World Benchmarking Alliance (WBA) for the Corporate Human Rights Benchmark (CHRB)[6] and #2 in the 2026 KnowTheChain (KTC) Food and Beverage Benchmark.[7] Received a NSW Anti-Slavery Commissioner commendation.

Future plans

+ Continue to enhance systems and data analytics to deepen insights into our supply chain, to enable more targeted interventions, improved supplier performance monitoring, and more effective decision-making.
+ Assess the effectiveness of our Ethical Sourcing Program review in supporting prioritisation of high-risk areas within our supply chain and more targeted supplier due diligence.
+ Continue the embedding of 'evaluating effectiveness' as a core step when developing, implementing and reviewing Ethical Sourcing Program initiatives.

1. This forms part of the progressive rollout of the module, supporting our target of 95% completion by end FY27. We plan to continue rolling out the training to role relevant team members.
2. The CGF is a CEO-led global membership organisation that brings together consumer goods retailers, manufacturers and key stakeholders to drive positive change in the consumer goods industry. More information is available at: www.theconsumergoodsforum.com.
3. The MtS is an international organisation that supports the welfare of workers at sea. More information is available at: www.mts.org.au/.
4. Our ERSCA partners include the Shop, Distributive and Allied Employees Association, the Transport Workers Union and the Australian Workers Union.
5. The United Nations (UN) Global Compact states that a Just Transition ensures that environmentally sustainable economies are promoted in a way that is as fair and inclusive as possible to everyone concerned, creating decent work opportunities and leaving no one behind. For further information, see: https://unglobalcompact.org/take-action/think-labs/just-transition.
6. Out of 105 companies assessed by WBA in the CHRB.
7. Out of 45 companies assessed by KTC in the 2026 Food and Beverage Benchmark.

Our operations and our team

Operating an omnichannel retail business entails a variety of tasks requiring a diverse range of skills. We employ over 115,000 team members in communities across Australia. We have two team member cohorts – operational team members and store support team members in corporate roles. We employ team members directly and use labour hire when required.

Our operational cohort includes:

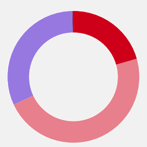
- store team members who serve customers, replenish shelves, bake the goods we sell, collect trolleys and clean stores.
- team members in our Customer Fulfilment Centres (CFCs) and delivery hubs who receive stock, pack online orders or deliver products to customers.
- team members in our distribution centres who pick and pack goods for delivery to our stores, and in our manufacturing facilities who convert raw materials into customer ready products.

Store support team members have corporate roles in our store support centres, ranging from operational support, legal and safety, finance, IT, property, sustainability, human resources, buying of goods and services, and marketing. In addition, we engage suppliers who provide services for our operations, such as specialised cleaning, security, transport, installation and store fit-out. We consider these suppliers and their workers to be part of our extended supply chain (refer to the *What we source* section on page 13).

Team members
115,000+

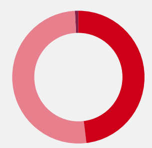
Team members[2] that identify as being part of the LGBTQI+ community
8.4%

Employment type[1]



20.7% Permanent full-time
47.5% Permanent part-time
31.7% Casual
0.1% Fixed term

Our team members[1] identify as



48.2% Female
51.0% Male
0.8% Gender diverse or choose not to nominate

Team members[2] that identify as Aboriginal or Torres Strait Islander
3.4%

Team members[2] that identify as having a disability
7%

Team members that are covered by an Enterprise Agreement
84.6%
and 27% of our team members are union members[3]

1. As at week ended 28 June 2026.
2. Based on results of our May 2026 *mysay* team member engagement survey (67% participation).
3. Approximation based on instances where union fees are paid directly out of a workers' wages.

Retail outlets

At the end of FY26, our retail network had more than 1,800 stores across Australia, including Coles Supermarkets, Coles Local and Liquorland. We also have two CFCs (in Victoria and NSW).

Distribution network

Our operations are serviced by a network of 27 Coles-operated and third-party distribution centres in Australia, including two Automated Distribution Centres (ADCs) (in Queensland and NSW).[4]

Processing and meal solutions

We operate six manufacturing facilities in Australia (in NSW and Victoria) that focus on meat processing, milk processing, ready-made meals and meal kits.

Store support

Store support functions, including buying, marketing and safety, support our operations. We also develop, construct and refurbish stores in partnership with third parties. We operate an integrated supply chain to support our operations.

Financial services

Through Coles Financial Services, we offer credit cards and insurance. We also offer mobile phone plans through Coles Mobile.

Transport

We offer Coles Collect, a service, which provides a national transport network moving products for a range of suppliers.

Digital services

We service both retail and business customers through online channels. We provide same day delivery through third parties and next day delivery through our fleet of over 1,000 Coles Online vehicles.[5] We also operate Coles 360, which offers retail media services, including market insights and support, and QuiteLike, a meal subscription service.

Export

We export packaged meat globally, including to Asia, the Pacific and North America.

Business-to-business

We provide products and services to certain business customers.

4. In FY26, we completed construction of the Victorian ADC and commenced the automation fit-out.
5. From our home delivery stores and CFCs.

Our governance

As a large retailer operating at scale with a national store footprint, multiple business functions and diverse supply chains, strong and clearly defined governance processes are essential to an effective response to modern slavery risks.

The decentralised nature of buying decisions, coupled with supplier turnover and varied business processes, requires a consistent approach to oversight and accountability.

Defined governance structures, active oversight and continuous review also help support a consistent and coordinated response, including integration of ethical sourcing and modern slavery considerations into organisational risk management, commercial decision-making, supplier engagement and operational practices.

As our Ethical Sourcing Program matures and our work to address modern slavery risks evolves, including through deep dive reviews that require tailored responses, we continue to refine our governance and associated processes to ensure consistent decision-making, oversight and accountability.

Our governance structure is summarised below. More information can be found at **colesgroup.com.au**

Coles Group Board

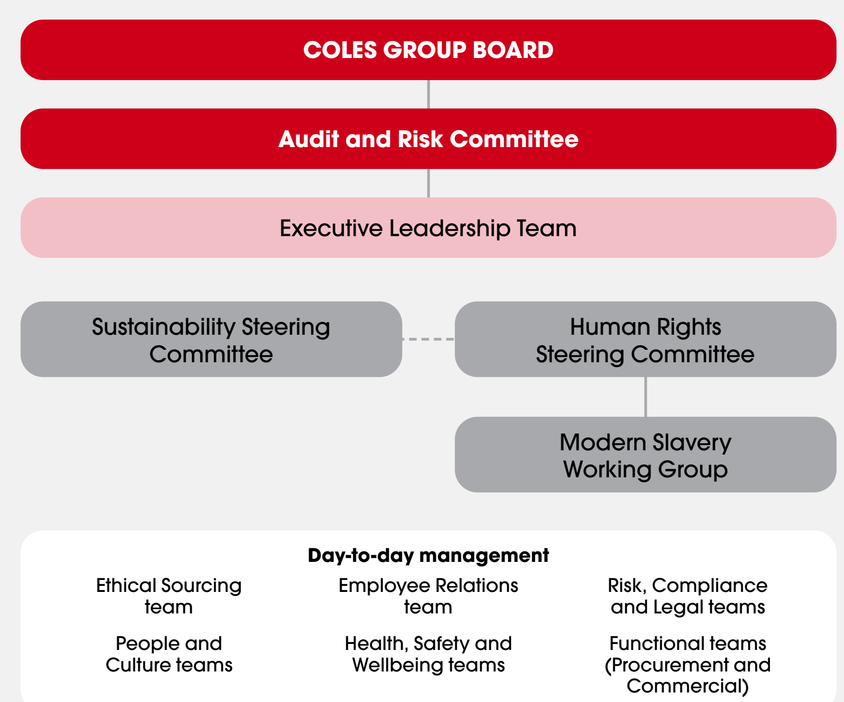
Responsible for overseeing our Human Rights Strategy, Modern Slavery Statement and Ethical Sourcing Program. This includes approving our Modern Slavery Statement, key policies and standards and receiving quarterly updates on human rights and modern slavery.

Audit and Risk Committee

Oversees the effectiveness of Coles' risk framework, including monitoring of performance against agreed risk appetite for ethical sourcing risks.

Executive Leadership Team

Responsible for overseeing the execution of Coles Group policies and strategies. They also have oversight of functional teams, to ensure goods and services are procured in accordance with Coles Ethical Sourcing Policy.



Sustainability Steering Committee

A cross-functional committee chaired by the Chief Commercial & Sustainability Officer, which oversees Coles' sustainability performance and reviews the Group's response to, and reporting of, issues related to our Sustainability Strategy, including human rights.

Human Rights Steering Committee (HRSC)

A cross-functional management committee which, as of late FY26, is sponsored by the Chief People Officer. The HRSC guides our approach and management of human rights, including modern slavery.

Modern Slavery Working Group (MSWG)

A sub-committee of the HRSC composed of team members from different functions in the business. Accountable for supporting modern slavery risk management across our operations. Working group members include team members from ethical sourcing, procurement, commercial, risk and compliance, Own Brand, operations, legal, and sustainability.

Day-to-day management

Multiple teams in the business have day-to-day responsibility for human rights and modern slavery in our operations and supply chain, as detailed on pages 28 to 29.

Helping Australians eat and live better every day continued

Governance and risk management process

Integration in organisational risk management

Ethical sourcing risks are integrated into our group-wide organisational risk management approach and are managed in accordance with our Risk Standard. Performance of the Ethical Sourcing Program is monitored against our key risk indicators (KRIs), with an agreed risk appetite for ethical sourcing risks.

Our ethical sourcing KRIs have Board approved targets relating to the percentage of in-scope suppliers registered on third-party audit platforms, the percentage of in-scope suppliers who have completed an ethical sourcing Self-Assessment Questionnaire (SAQ) and the number of remediated and outstanding non-conformances from in-scope third-party ethical audits in our extended supply chain (refer to section on *How our Ethical Sourcing Program works* on page 30 for further information).

Performance against targets is reported by exception to the Audit and Risk Committee and quarterly to the Board. Our KRIs guide our day-to-day due diligence and monitoring efforts, including regular monitoring of supplier audits, engagement with commercial teams and suppliers to track whether our Ethical Sourcing Requirements are being met in our extended supply chain.

Due diligence in purchasing

We have processes to conduct due diligence on engagements in scope of our Ethical Sourcing Program. Externally, onboarding and ongoing due diligence requirements are communicated to suppliers through our Ethical Sourcing Program Requirements. Internally, these are communicated through our Own Brand Product Development (OBPD) process and our Third-Party Risk Management (TPRM) process for our goods not for resale (GNFR). These documents provide the compliance requirements and management actions for pre and post business award.

FY26 in focus

Data governance

In FY26, we continued to enhance the data visualisation capabilities supporting our Ethical Sourcing Program. This included enhancing dashboard and reporting capabilities relating to supplier approval status and audit data that we use to monitor compliance with our Ethical Sourcing Program Requirements. These enhancements have begun to shift how engagement is conducted with Commercial teams, with discussions starting to expand beyond compliance towards more strategic and planning conversations.

For example, we have focused on the following:

- Integrating ethical sourcing approval status into a centralised dashboard for Commercial teams, providing visibility of prospective new sites' compliance with program requirements. This supports informed decision-making, streamlines onboarding processes and reduces the risk of engaging with sites that do not demonstrate a commitment to addressing identified issues or meeting program requirements.
- Engaging with Commercial teams relating to initiating a worker-centric approach in our extended supply chain through reviewing supplier disclosed demographic data (including presence of women workers) by commercial category.

We delivered targeted training to Commercial teams to support effective use of these tools and provided feedback surveys to inform ongoing refinement of the dashboards. During the reporting period, we automated weekly reports that track compliance with some of our KRIs. This has reduced manual efforts and improved real-time risk monitoring and reporting.

Internal audit

Our Group Internal Audit function is led and overseen by management and supported by an independent third party. Group Internal Audit is responsible for providing independent assurance over Coles' governance, risk management and internal control processes.

Under our risk management framework, the Group Internal Audit function is also responsible for providing independent assessment to the Board and Executive Leadership Team regarding the effectiveness of controls in place to manage particular risks and provide feedback to enhance our risk management framework and supporting processes and activities.

Periodic reviews of ethical sourcing processes and controls are also performed by Group Internal Audit, with outcomes presented to management and the Audit and Risk Committee for oversight.

In FY26, Group Internal Audit undertook an audit review of the Ethical Sourcing Program, specifically focusing on governance structures, accountabilities and operational processes. These insights are informing ongoing refinements to governance processes as our program continues to evolve.

What we source

As a large retailer, we have a multi-tiered[1] extended supply chain spanning diverse product categories, services and geographies.

We broadly define our supply chain in two categories – goods for resale (GFR) and goods not for resale (GNFR). Below are some examples of what we source (not an exhaustive list).

1. Tier one suppliers have a direct contractual relationship with us. Tier two suppliers support tier one suppliers by providing necessary products, services or processes to them. Tier three suppliers are engaged by tier two suppliers, often supplying product components.

Goods for resale

We procure a range of GFR from over 4,300 direct suppliers. These include the products we retail in our stores and online from proprietary suppliers, as well as goods from suppliers producing Coles Own Brand or Coles Liquor Own Brand products.

Bakery, Dairy, Frozen	Bread, packaged cakes, seasonal fruit mince pies, cheese, milk, frozen fruit and vegetables, ice cream
Fresh Produce	Fresh fruit, nuts, vegetables, packaged salad leaves, prepared vegetables, herbs, flowers
Grocery	Sauces, rice, pasta, canned foods, confectionery, tea, coffee, cereals, beverages, oils, ambient juices
Non-Food	Homewares, beauty, cleaning, personal care, electronics, toilet paper, pet food
Liquor	Wine, beer, spirits, ready-to-drink options
Meat, Deli, Seafood and Convenience	Fresh and processed meats, antipasto, olives, gourmet cheese, fresh and frozen fish, ready-to-eat meals

Goods not for resale

We procure a range of goods and services from over 4,000 GNFR suppliers to help us build, operate and maintain our retail stores, manage our distribution networks and facilities, and transport and market our products.

Capital Works	Store fit-out and installation services
Indirect and Marketing	Marketing, print and media services, uniforms, packaging materials
Property and Construction	Property construction, management and development
Store Operations	Utilities, maintenance, trolleys, installation services, security, cleaning services, waste management, consumables such as gloves
Supply Chain	Logistics, warehousing, transport services, last-mile delivery suppliers,[2] labour hire
Technology	Hardware, software, technology-related services

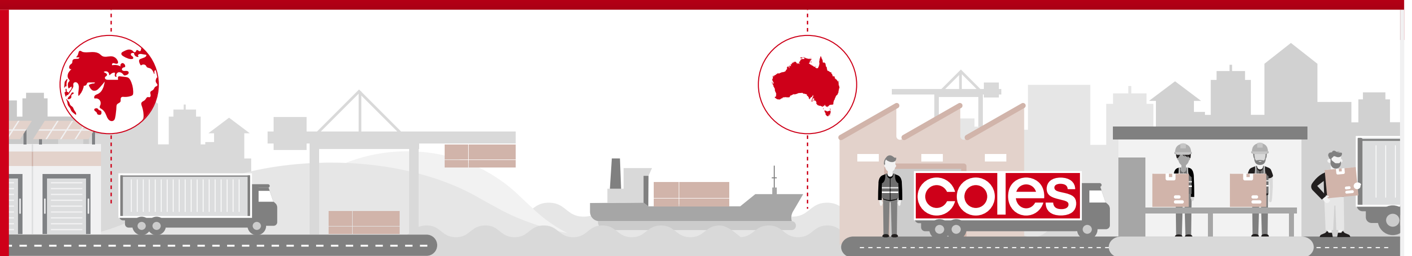
2. Last-mile delivery is the final step in getting an order to its ultimate destination, usually a customer's home.

Pictured: General Manager Advisory, Ethical Sourcing & Special Projects, Amy Cunningham speaking in the Human Rights Coalition breakout session at the Consumer Goods Forum Sustainable Retail Summit in Paris, France.

Helping Australians eat and live better every day continued

International logistics and shipping supply chain

International & Australia



Land		Sea	Land	
Overseas manufacturing A range of Coles Own Brand products sold in our retail stores are manufactured overseas as part of global sourcing arrangements. These products are produced by workers in our extended supply chain at international supplier sites. **Land freight overseas** Workers involved in land transport help move manufactured goods from supplier sites to seaports.	**Seaports** Logistics workers deliver manufactured products to overseas consolidation centres. Seaport workers receive the products and load them into shipping containers for onward sea transport.	**Ocean freight** Containers are loaded and transported across international waters by ocean vessels operated by shipping lines and crewed by seafarers. Voyages typically last days or weeks.	**Wharf cartage** Once the vessel has arrived at an Australian port, workers and drivers transfer containers from vessels to port consolidation centres in preparation for domestic distribution. **Deconsolidation centres** At the deconsolidation centres, workers unpack containers and load them onto trucks ready for transport to distribution centres. Due to Australia's geographical size, various transportation methods are used to deliver the goods across the country.	**Distribution centres** At distribution centres, workers unpack and sort products from inbound freight and pack them onto pallets to facilitate storage and delivery to stores. **Distribution to stores** Palletised products are delivered to Coles stores by truck drivers as the final stage of distribution before store replenishment occurs.

Understanding seafarers' exposure to modern slavery risks in the shipping sector

Coles utilises shipping vessels to transport Coles Own Brand and GNFR products. In FY26, we partnered with The Mission to Seafarers (MtS) to visit five vessels in the Port of Melbourne, to better understand how modern slavery risks in the shipping sector could relate to our business. These visits complemented our existing activities, including contractual requirements for shipping providers and knowledge sharing through the Institute for Human Rights and Business (IHRB) Responsible Shipping Dialogue.

During each visit, an Ethical Sourcing team member and MtS representative conducted a vessel walk-through and engaged with seafarers onboard and at MtS' onshore facility. These visits supported us to:

- better understand vessel working environments, including crew composition, and contract duration.
- further understand shipping industry risks in our extended supply chain, including characteristics of smaller vessels and crews operating in Asian and Australian ports.
- share learnings internally to improve awareness of shipping-related risks, including having a legal team member involved in shipping contract negotiations participate in a vessel visit.

These insights will help inform our ongoing engagement with industry partners and advocacy groups on seafarer welfare and modern slavery risks in the international shipping sector.

Australian and international seafood – from ocean to plate[1]

Imported – Vietnam

We source frozen and prepared seafood products, like our prawn party platters, from countries including Vietnam. Vietnamese prawns are often farmed and processed locally and sold through exporters and marketing agents.

	Raw material sourcing	Processing and packing	Logistics	Customer's basket
Cooked prawn platter	Prawn farms connected to the processing site.	The prawns are cooked, peeled and packed at the processing plant. Some sites in our supply chain have automation for large parts of this process, while others rely more on manual labour.	The packaged products are shipped internationally by ocean freight. Once in Australia, the products will also travel by truck to distribution centres then stores.	The product is picked up for consumption.

Local – Australia

Fish can be sourced in a variety of different ways, such as line fishing, trapping or trawling the open ocean, or marine and freshwater farming.

	Raw material sourcing	Processing and packing	Logistics	Customer's basket
Australian snapper fillet	Fish are caught by line or other fishing methods in Australian waters. The fish is then flash frozen onboard to maintain freshness.	The fish is processed into fillets and packed at the processing site.	The products are transported by truck to distribution centres and stores.	The product is picked up for consumption.

1. Supplier engagement and in-person visits to supplier prawn farms and seafood processing sites helped us better understand some of our seafood supply chains.

Modern slavery risks

Our due diligence activities and closer engagement with day-to-day operations are bringing modern slavery risks into sharper focus and deepening our understanding of how and where they may occur across our operations and supply chain.

Pictured: Coles team members Aimee and Lynne with Simon from Koala Cherries in Victoria.

Our modern slavery operations risk profile

We assess that our highest modern slavery risk areas are in our extended supply chain rather than our direct operations.

This has been informed by, and validated through, our salient human rights assessment, modern slavery risk assessment processes and ongoing review of our employment practices.

We understand that modern slavery occurs at the most severe end of a spectrum that ranges from the provision of decent work to serious unacceptable conduct.[1] While modern slavery risks are distinct from broader workplace matters, we recognise the importance of maintaining systems in our own operations to support appropriate work and conditions.

We consider our direct engagement of operational and store support team members to present a lower risk of modern slavery due to the range of controls and processes we have to mitigate this risk. These include, amongst other things, controls in relation to working conditions, psychosocial risk management, industrial instruments negotiated with relevant unions, and processes to prevent the employment of individuals under the age of 15 years (refer to section on *Due diligence to manage modern slavery risks* on page 28).

We also provide products and services to certain business customers. During the reporting period, we responded to queries from some of these business customers regarding our risk profile and our modern slavery response, including relating to the products we supply, our retail manufacturing facilities or road transport services. We expect this trend to increase given evolving legislative requirements and stakeholder expectations. For further information on due diligence for high-risk third-party service providers for our extended supply chain, refer to the section on *Managing risks in our supply chain* on page 29 and *Review into the high-risk services sector in Australia* on page 39. This also includes due diligence on labour hire providers used in our operations.

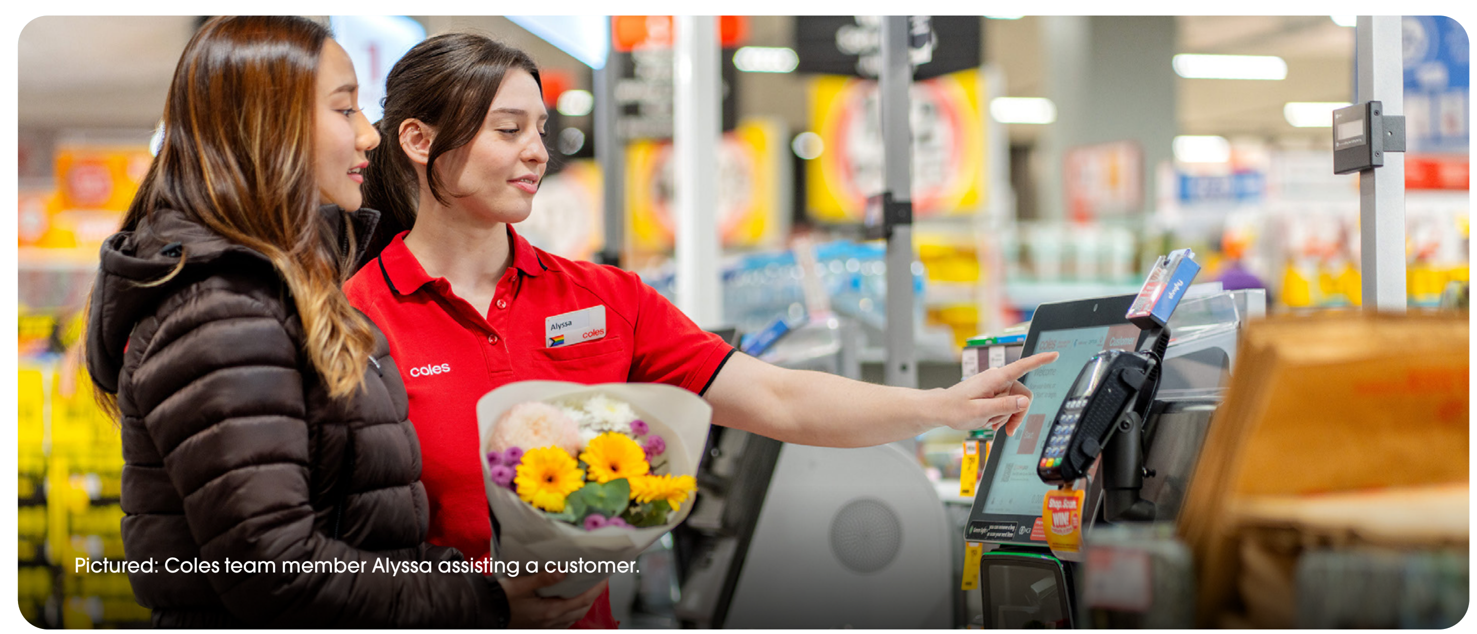
Undertaking a third-party ethical audit in one of our processing facilities

During FY26, we commissioned a third-party ethical audit at our milk processing site to assess the effectiveness of our controls in our direct operations and workforce, inclusive of our use of labour hire providers.

The audit covered labour standards, health and safety, environmental management and business ethics.

While opportunities for improvement were identified, these primarily relate to contractor documentation practices. This reinforces our assessment that modern slavery risks within our direct operations remain low, supported by established oversight mechanisms and controls, and union-regulated working conditions.

The audit helped validate our ongoing focus on providing a safe, respectful and compliant workplace, with no systemic critical issues identified and evidence that processes are in place to support appropriate work practices and payment of entitlements.



Pictured: Coles team member Alyssa assisting a customer.

1. Further information on where modern slavery fits on the spectrum of working conditions is available in the Australian Government's Commonwealth *Modern Slavery Act 2018* Guidance for Reporting Entities May 2023, available at: modernslaveryregister.gov.au/resources/Commonwealth_Modern_Slavery_Act_Guidance.pdf.

How we understand and assess our modern slavery risk profile

As an omnichannel retailer, our extended supply chain spans diverse sectors, geographies and workforce contexts, exposing us to a broad range of potential modern slavery risks.

These risks are not uniform and are often highly contextual. During FY26, we undertook a project to revalidate these risks, reflecting changes to our business and the wider modern slavery risk environment since our previous risk assessment.

Our risk review project involved:

1. Targeted research into relevant risks
2. Engagement with commercial teams
3. An in-person workshop with an external business and human right advisory firm
4. Interviews with relevant commercial teams

Through this process, we developed 10 modern slavery risk factors tailored to our business context (refer to *Our modern slavery supply chain risk profile* on pages 20 to 21). We mapped these against commercial categories to identify where modern slavery risks may be concentrated in our extended supply chain and how contextual factors influence our risk profile. We also worked with commercial teams to identify and address scenarios where products or services could present lower level of commercial risk to the business but higher modern slavery risk to people.

What we learned

Building on previous assessments, this review enabled our risk assessment to evolve beyond commercial category-level risk into nuanced assessments at a goods or services level. This was supported by insights from across our business and engagement with suppliers to refine our understanding of high-risk sectors and categories.

For example, while seafood and fresh produce are known higher-risk sectors for modern slavery, the level of risk can vary depending on product type and contextual factors:

- Fresh produce: aggregation models used for certain produce types such as some berries and vegetables, where we purchase from a supplier that aggregates produce from multiple suppliers in further tiers of the supply chain, can reduce visibility of working conditions in these tiers.
- Seafood: modern slavery risks vary across product types, such as canned, frozen and fresh seafood, depending on factors including the species (e.g. scallop or tuna), sourcing locations and how the product is processed (refer to our deep dive review on pages 24 to 25).

These insights are informing refinements to our due diligence. The identified risk factors provide a consistent framework for assessing modern slavery risks, strengthening cross-functional understanding of risks and supporting targeted engagement with commercial and procurement teams.

Monitoring emerging risks that may increase vulnerability to modern slavery

Identifying emerging risks is not a point-in-time exercise. Our deepening understanding of our operations and supply chain is strengthening our ability to proactively identify risk areas, informed by insights from supplier engagement, remediation activities and monitoring of external developments, including media and stakeholder reporting.

Key evolving risk areas we are monitoring as part of our ongoing due diligence include:

- **Cost-of-living crisis** – Inflation, rising fuel and energy costs, and broader economic pressures continue to place strain on businesses, workers and supply chains. This can increase the risk of cost-cutting practices in supply chains that could impact vulnerable supply chain workers.
- **Inconsistent buyer expectations** – Differing buyer standards and modern slavery due diligence requirements can result in bifurcated supply chains, where suppliers apply higher standards of traceability, transparency and labour practices only to products, facilities or sourcing streams that are subject to customer or regulatory scrutiny. This creates a risk that modern slavery risks are displaced rather than addressed across the supplier's operations. It also raises responsible purchasing considerations, as buyers may continue sourcing from suppliers based on confidence in specific supply chains while having limited visibility into other areas of the same supplier's business.
- **European supply chains with a reliance on migrant labour** – We source products from Europe such as cheese, deli items and canned produce. External reporting highlight risks of migrant worker exploitation in some European countries, despite these typically being considered lower risk in third-party risk ratings.

Our tools to identify and address risks

The tools we use in our Ethical Sourcing Program to identify and assess modern slavery and broader human rights risks are detailed below.

Tools to identify risks		How they help us assess risk
Audit scheme platforms	**Sedex (Supplier Ethical Data Exchange) platform** – an online supply chain management platform that also manages SMETA ethical audits.	Provides visibility of third-party ethical audit non-conformances, enabling us to identify, assess and monitor specific risks at supplier sites and prioritise follow-up actions.
	Fair Farms – a certification program for fresh produce suppliers that also manages Fair Farms audits.	
Supplier-facing platforms	**SAP Ariba** – integrates third-party supplier risk assessment and due diligence into the procurement lifecycle of our GNFR suppliers, as part of our TPRM process.	Stores and provides Ethical Sourcing with access to in-scope GNFR supplier responses to due diligence questionnaires completed during supplier onboarding and risk screening.
	Fusion – houses information on our GFR Coles Own Brand suppliers and products from creation to completion, including supplier sites responsible for manufacturing, product specifications and product certification.	Provides visibility of active products, suppliers and sites that we source from, allowing us to prioritise supplier sites for ethical sourcing risk assessment and due diligence through Informed365.
Third-party risk platforms	**Informed365** – consolidates data from third-party ethical sourcing data platforms and in-house systems into one platform to track Ethical Sourcing Program compliance.	Consolidates compliance and risk information used to assess supplier site risk, monitor compliance with our Ethical Sourcing Program Requirements, and inform due diligence, supplier engagement and commercial decision-making.
	Salesforce – a database used to track initial GNFR supplier inherent risk reviews and results of risks assessments conducted by Ethical Sourcing and other functions during supplier onboarding as part of our TPRM process.	Enables supplier risk information to be shared with the Ethical Sourcing team for review, and supports recording of residual risk ratings and due diligence activities.
	Exiger and Dow Jones – provide risk monitoring and due diligence capabilities. We use Exiger to screen proprietary and Own Brand GFR suppliers and we use both platforms to review in-scope GNFR suppliers during the TPRM process.	Supports initial screening of suppliers during the sourcing and onboarding stages by identifying potential risk indicators and any adverse media information relevant to ethical sourcing and modern slavery risks.
	InfoTrack – provides information on companies and business names, including status, directors and shareholders.	Supports assessment of ethical sourcing risks (such as phoenixing[1] and other unethical or illegal conduct) and supports investigations of grievances raised through our grievance channels.
Monitoring and engagement	**Public reporting** – we monitor media and public reports relating to human rights issues as a risk identification tool.	Supports identification of emerging issues, external allegations and sector-wide trends that may require further assessment or targeted due diligence.
	Site visits – in-person supplier and site visits conducted by the Ethical Sourcing team.	Provides more direct insights into site operations, workforce characteristics and working conditions, helping us assess risks that may not be visible through desktop reviews or audits.
Grievance mechanisms and worker voice	We track grievances raised through our grievance channels (outlined on page 37).	Helps us to identify areas of concern. Feedback from unions and workers in our supply chain also helps us understand risks on the ground.

1. Illegal phoenix activity is when a new company is created to continue the business of an existing company that has been liquidated to avoid liabilities including taxes and employee entitlements (Department of Employment and Workplace Relations).

Our modern slavery supply chain risk profile

Understanding our modern slavery risk profile and how it may evolve supports us to target our risk management actions.

Our business context

Our assessment of our modern slavery risks is anchored in our understanding of our business context as a large Australian retailer, including the characteristics outlined to the right.

- Widespread physical presence (bricks and mortar stores and distribution centres) across the country.
- Reliance on extensive transportation and logistics networks.
- Reliance on a large workforce, where some roles have low barriers to entry to support our operations.
- Diverse resale and not for resale procurement footprint.
- Focus on high-volume and low-margin products.
- Global sourcing footprint from 43 countries.

Modern slavery risk factors

Understanding our business context helps us assess the modern slavery risk factors that are relevant to us as a retailer. Some of these risk factors are likely to be different to other sectors. For example, some parts of our supply chain are highly seasonal like selected fresh produce products.

During the reporting period, we worked to further understand modern slavery risk factors relevant to our business context, including those shown to the right.

Workforce

The nature of work performed and labour arrangements within our extended supply chain may give rise to potential modern slavery risk factors, including:

- Comparatively high levels of fluctuation in workforce (including reliance on third-party labour hire).
- Shorter periods of high intensity work.
- Comparatively lower skilled work requiring minimal training.
- Higher levels of informality, including unauthorised subcontracting and casualised recruitment.
- Workforce located in remote or inaccessible areas.

Supply chain structure

The structure of our extended supply chain may involve modern slavery risk factors, such as:

- Exposure to higher geographic risks and use of higher risk raw materials.
- Reliance on fragmented supply chains including where multiple sites supply product to packaging/canning/ or assembly points.
- Unforeseeable fluctuations in supply.

Product risks and purchasing practices

The types of products we source, and the commercial practices and pressures that may be present within related supply chains, may give rise to potential modern slavery risk factors, including:

- Comparatively high-volume, low-margin products.
- Compressed production schedules and deadlines for delivery.

Our potential level of involvement

In line with the United Nations Guiding Principles on Business and Human Rights (UNGPs), we recognise three ways businesses can be involved in modern slavery harm:

Cause

A business may cause modern slavery or other human rights harm where its actions directly result in the harm occurring.

Contribute

A business may contribute to modern slavery or other human rights harm where its actions or omissions facilitate or incentivise the harm occurring.

Directly linked

A business may be directly linked to modern slavery or other human rights harm through its services, products or operations. This includes situations where modern slavery may occur in a business' extended supply chain.

Our modern slavery risk profile is shaped by three key elements: our business context as a large retailer in Australia; the types of modern slavery risk factors relevant to our business context; and our potential level of involvement with each risk.

Our business context means we have a diverse modern slavery risk profile. The hypothetical examples below are selected to illustrate the range of risks that could arise. These are examples and are not an exhaustive list of the potential modern slavery risks that we have assessed through our modern slavery risk review (refer to page 18).

Potential risk areas	Hypothetical examples	Potential risk factors
Canned produce	Canned produce sourced through an aggregating supplier (that brings together produce from multiple suppliers for processing) could include produce from lower tiers of the supply chain harvested by workers experiencing forced labour, such as restriction of movement, or threats/coercion.	+ Reliance on fragmented supply chains, including where multiple sites supply product to packaging/canning/or assembly points.
Fresh produce	Temporary migrant workers used by a supplier to pick highly seasonal fresh produce in a remote area could be sourced through a labour hire provider and be forced to work excessive hours to complete the harvest as quickly as possible.	+ Shorter periods of high-intensity work, fluctuations in workforce, operations in remote or isolated areas.
Frozen meal products	A supplier may need to quickly source an alternative ingredient supplier for a frozen meal product due to adverse weather conditions affecting their existing ingredient supplier. This may result in the ingredient being sourced from a geography with a higher risk of modern slavery practices, such as the worst forms of child labour.[1]	+ Exposure to higher geographic risks and use of higher-risk raw materials. + Unforeseeable fluctuations in supply.
Cleaning services	Cleaning services often rely on layered subcontracting arrangements and work performed outside standard operating hours, reducing visibility and oversight of workforce practices. Workers engaged through these arrangements may face increased risks of unrecorded working hours, dependence on supervisors for ongoing shifts, social isolation and feeling unable to raise workplace concerns. These factors can make them more vulnerable to modern slavery.	+ Higher levels of informality, including unauthorised subcontracting and casualised recruitment. + Comparatively high levels of fluctuation in workforce. + Comparatively lower-skilled work, including workers requiring minimal training.
Seasonal holiday products	Low-cost seasonal holiday products sold for a short and selected period of the year may be manufactured at comparatively high volumes and to set deadlines in factories that use lower-skilled workers. This high-volume and lower-cost manufacturing model and time constraints could place pressure on working conditions for vulnerable workers, including payment of wages and entitlements.	+ Comparatively high-volume, low-margin products. + Compressed production schedules and deadlines for delivery. + Comparatively lower-skilled work.

1. Based on the International Labour Organization (ILO) Convention 182 (1999), the worst form of child labour includes: all forms of slavery, trafficking, debt bondage, forced labour including for use in armed conflict, use of a child for illicit activities, or work that is likely to harm the health, safety and wellbeing of children.

Our exposure to geographic risks

Geographic factors, including weak labour protections, socioeconomic conditions, high migrant worker populations, conflict and natural disasters, can elevate modern slavery risks.

Given the scale of our extended supply chain, understanding the composition and demographics of the supply chain workers our efforts are intended to support is important to us. In FY26, we initiated steps to intentionally incorporate a worker-centred lens into our approach, including reviewing supplier disclosed workforce demographic data (such as the presence of women and migrant workers) to better understand the workforce in our extended supply chain.

This map highlights the countries where in-scope suppliers are located and examples of products or services we source (refer to Appendix 3).

300,000+ supply chain workers in supplier sites in scope of our Ethical Sourcing Program[1]

Of these, supply chain workers identified as:[1]

47% female

53% male

0.01% other

Total supply chain workers by top five countries[1]

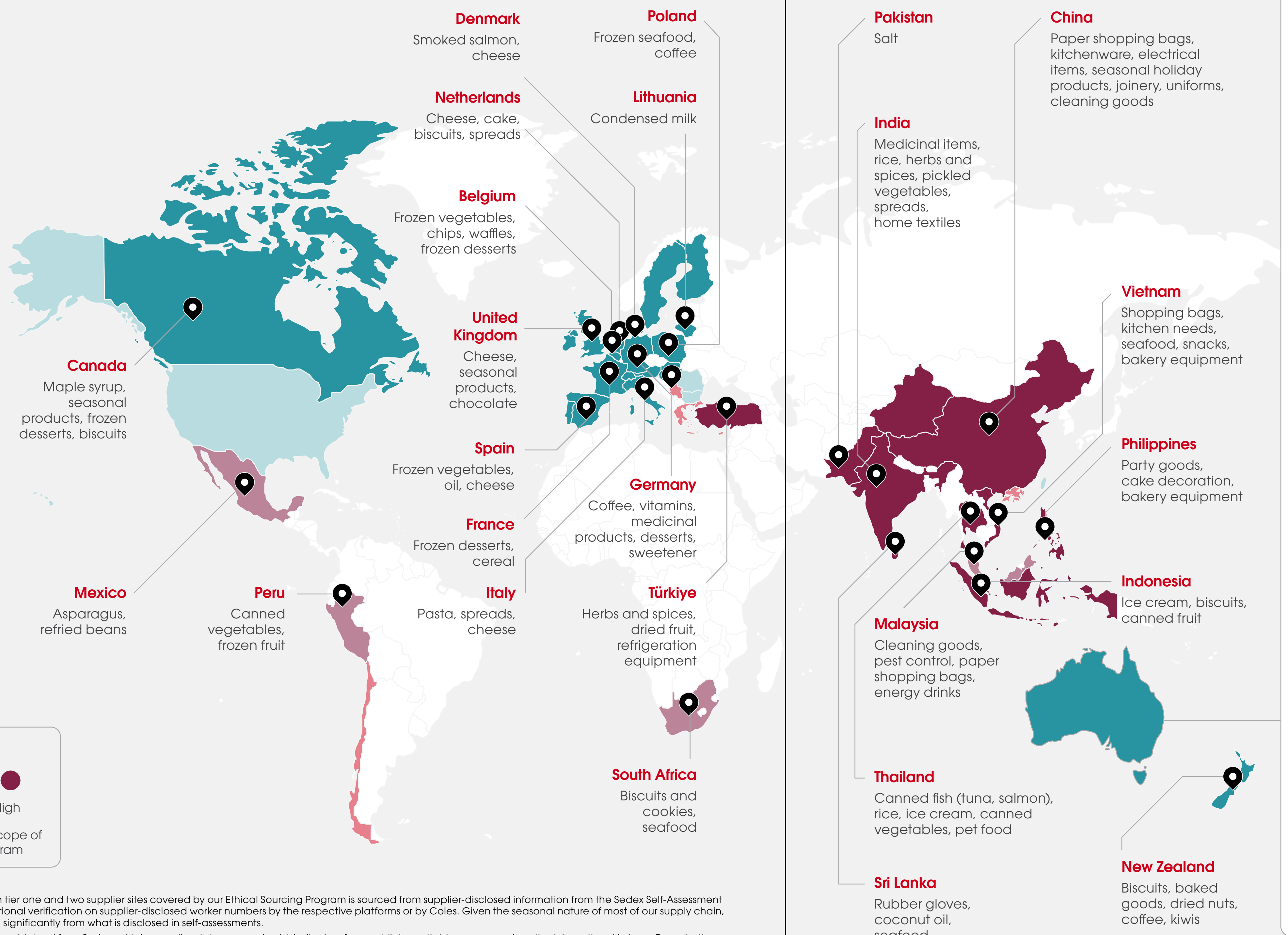
108,000+ Australia

49,000+ China

32,000+ Thailand

23,000+ Vietnam

15,000+ New Zealand



Risk level

Low Medium High

Regions without sites in scope of our Ethical Sourcing Program

1. The number of supply chain workers in tier one and two supplier sites covered by our Ethical Sourcing Program is sourced from supplier-disclosed information from the Sedex Self-Assessment Questionnaire (SAQ). There is no additional verification on supplier-disclosed worker numbers by the respective platforms or by Coles. Given the seasonal nature of most of our supply chain, actual worker numbers may fluctuate significantly from what is disclosed in self-assessments.

Source: Country and region risk ratings are obtained from Sedex, which compiles data on country risk indicators from publicly available sources such as the International Labour Organization (ILO), the World Economic Forum, Walk Free Foundation and the International Trade Union Confederation.

1,833 Tier one and two suppliers managed through our Ethical Sourcing Program

43 Countries where suppliers managed through our Ethical Sourcing Program are located

1,215 In-scope suppliers located in Australia

618 In-scope suppliers located overseas

Australia

Composition of the 1,215 Australia-based suppliers in-scope of the Ethical Sourcing Program by business category

56% Fresh Produce

12% GNFR (products and services)

8% Grocery

7% Dairy, Frozen & Convenience

7% Meat, Deli, Seafood

4% Bakery

4% Health & Home

2% Liquor

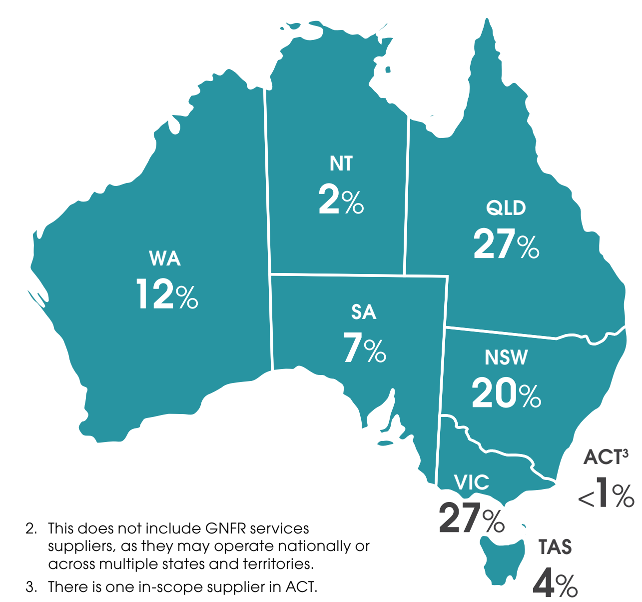
Supply chain

Poultry, meat, dairy, seafood, fresh fruit and vegetables, nuts, wine, beer, spirits, paper products, ready-made meals, construction, security, gig economy, transport and logistics

Our operations

Labour hire, cleaning, food manufacturing, meat and milk processing, trolley collection

Composition of product suppliers[2] in scope of the Ethical Sourcing Program in Australia by state or territory



2. This does not include GNFR services suppliers, as they may operate nationally or across multiple states and territories.
3. There is one in-scope supplier in ACT.

TARGETED DEEP DIVE

Seafood sector modern slavery risks

As reported in past statements, seafood is a known high-risk sector for modern slavery.

Coles seafood volume[1]

60% Farmed

40% Wild-caught

4

International seafood processing site visits conducted by Ethical Sourcing team members

During FY26, we enhanced our understanding of seafood-related modern slavery risks by:

- proactively engaging with suppliers of wild-caught Australian prawns regarding recruitment practices and working conditions
- working to understand the dynamics around living wage in international seafood processing.

Coupled with our existing work around seafood, these actions help further our understanding of our modern slavery risk profile and identify learnings we can integrate into our due diligence.

How this work supports our modern slavery response

Effective due diligence activities need to be informed by the specific contexts of extended supply chains, including workers' experiences 'on the ground'. Whilst seafood is considered a high-risk sector for modern slavery, risks can vary greatly across different products due to factors such as the species, sourcing locations, processing and packing methods, and the workers involved across the value chain (refer to the diagram *Australian and international seafood – from ocean to plate* on page 15).

As a retailer, we are exposed to seafood-related modern slavery risks across a diverse range of products. This includes seafood sold through our in-store delis, as well as refrigerated, canned and frozen products. Seafood-derived ingredients are also used in a wide variety of goods, from ready meals and seasonings to pet food, extending our exposure beyond primary seafood categories. Given the breadth of this risk profile, it is important we continue to strengthen our understanding of the contexts in which our extended supply chains operate.

Engagement with domestic Australian prawn suppliers

Wild-caught seafood (such as prawns) can involve modern slavery risks due to the isolation of workers on vessels, the potential reliance on migrant workers, and the likelihood of high working hours at sea. During FY26, our Ethical Sourcing team engaged with three suppliers of wild-caught prawns across Australia to increase our understanding of workers' recruitment and conditions across different operating models.

Our supplier engagement underscored how modern slavery risks in this supply chain can be shaped by suppliers' different operating contexts:

- **Workforce composition**: Suppliers can draw on a diverse workforce with differing levels of vulnerability to modern slavery. Workers can range from employer-sponsored skilled migrant labour to working holiday makers and Australian citizens or permanent residents living locally.
- **Working hours**: Working hours are influenced by factors such as catch volumes and weather conditions that can change daily, as well as how long vessels typically spend at sea – with some returning to port daily and others away for longer periods.
- **Pay**: Workers can be paid using different systems. Some visa holders are entitled to a minimum wage including during downtime and leave (such as periods where they may return to their home countries). Other workers may be paid a percentage of the catch value and operate as sole traders responsible for their own taxation and superannuation, with no guaranteed minimum earnings, creating potential vulnerabilities in unprofitable seasons.

Assessing living wage dynamics in our international seafood supply chain

'Living wage'[1] is one of our salient human rights issues and we have a target to develop a living wage framework for high-risk countries in our international supply chain. Paying a living wage to workers can reduce their vulnerability to modern slavery risks, such as needing to work excessive hours or entering into debt to seek additional income. Assessing whether workers are paid a living wage assists us to understand where and how modern slavery risks could arise.

Building on our FY25 living wage gap analysis of two grocery suppliers in Thailand, we conducted a second living wage gap analysis in FY26. This covered two key prawn processing supplier sites in Vietnam, in partnership with an external sustainability advisory group and relevant internal teams. This evaluated workers' wages against living wage benchmarks[2] to understand any shortfalls.

The assessment team reviewed wage data and conducted site visits to verify data through worker interviews and sample document checks. The analysis also included a desktop review of published living wage strategies, and consultation with subject matter experts. Ethical Sourcing team members visited the Vietnam sites during the reporting period, as well as the two sites in Thailand.[3] The living wage gap analysis, based on verified data from a sample of site workers, found that both supplier sites in Vietnam paid workers above the legal minimum wage. One site appears to have exceeded the living wage benchmark, whereas the other appeared to be below it, with the difference driven primarily by variations in additional earnings rather than differences in base pay. In addition, the analysis helped increase our understanding of our international seafood processing supply chain context, including:

- The importance of freedom of association and collective bargaining. These impact workers' ability to influence wages, noting that the recognition and exercise of these rights can differ across jurisdictions.
- How contextual differences can shape living wage. The assessed sites in Vietnam relied more on local labour, with workers living nearby in a regional area where the overall cost of living is typically lower than in larger urban centres. In contrast, sites in Thailand had a higher proportion of migrant workers, some of whom may remit part of their wages to support families elsewhere.
- How product-related differences can affect wages. Prawn processing and canned tuna processing involve different processing activities and skill requirements, which may contribute to variation in wage outcomes for production workers. Overtime was also more common at the sites in Thailand to supplement base pay.

These insights will help inform the living wage framework and a phased rollout in the coming years.

Assessing our effectiveness

We will track the effectiveness of this work by evaluating how insights gained from this deep dive can be used to further tailor our due diligence activities. For example, our engagement with domestic suppliers is helping us to understand the types of risk factors we can focus audits and other due diligence checks on to make them as effective as possible. The living wage gap analysis is building our understanding of living wage gaps in high-risk sourcing countries in our international supply chain and helping identify where we can focus our efforts to support progress.

Pictured: Coles team member Hai Xia with Matt from Australian Prawn Farms in Queensland.

1. Key farmed species and sources include Atlantic salmon, prawns, barramundi and basa from Australia, Norway and Asia. Key wild-caught species and sources include tuna, prawns, salmon and whitefish from the Pacific, Australia, New Zealand, Alaska and South Africa.

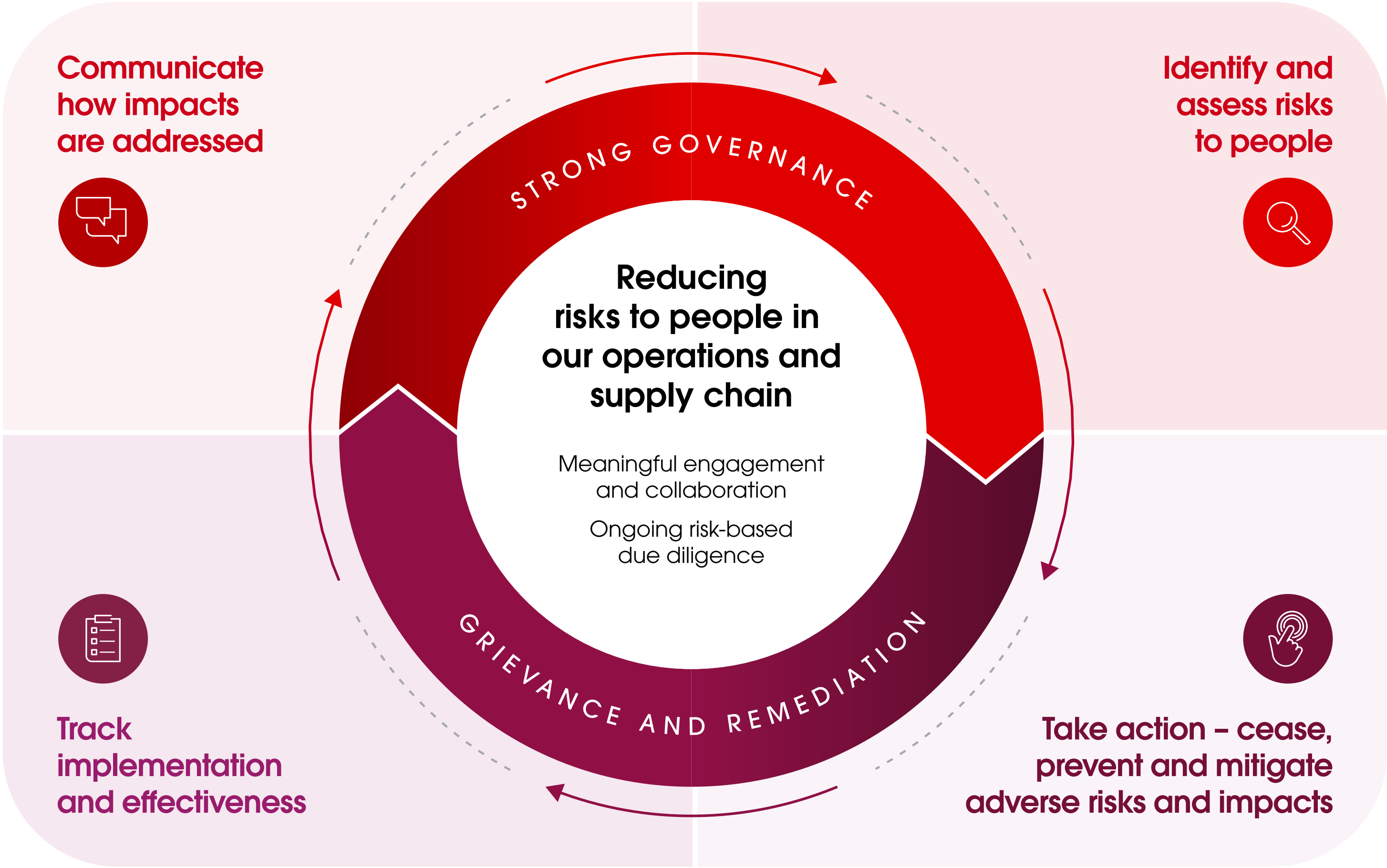
1. A living wage is the minimum income required for a worker to afford a decent standard of living for themself and their family in their local context, covering essential costs such as food, healthcare and education.
2. The living wage benchmark was based on the Anker Living Wage Methodology using the published Living Wage Reference Value for Vietnam (Minimum Wage Region 3).
3 In FY25, we undertook phase one of the development of our living wage framework, including a living wage gap analysis of two supplier sites in Thailand – a canned seafood producer and a snack food manufacturer. This is reported in our 2025 Modern Slavery Statement.

Our modern slavery response

In line with our commitment to the United Nations Guiding Principles on Business and Human Rights (UNGPs), we implement a suite of due diligence activities to reduce our modern slavery risks. We continuously refine our approach so it is targeted, as effective as possible, and delivers meaningful outcomes.

Pictured: Coles team members David and Andrea at Fresh Select in Victoria.

The following section outlines the key components of our modern slavery response, including:



Maintaining a feedback loop

Continuing the feedback loop approach shared in our previous statement, we maintained our focus on continuous improvement where:

- insights from due diligence, management of grievances, and ongoing internal and supplier engagement **inform our policies and actions**
- those updated actions then **generate new data and outcomes**
- these are then **reviewed and fed back in again** to improve the overall approach of our program.

For example, we identified subcontractor oversight as a recurring challenge, which informed targeted actions.

This included tailored supplier training on subcontractor management and collaboration with suppliers to strengthen oversight and deepen our understanding of their subcontractors, including geographic locations and rostering practices. The training provided tailored recommendations for suppliers of different sizes, recognising varying supplier capability and risk exposure. We reviewed our effectiveness by monitoring recurrence to inform and refine our support for subcontractor management.

Our human rights due diligence approach

Our approach to human rights due diligence is informed by international standards such as the UNGPs.

In FY26, we conducted three deep dives in high-risk sectors with heightened worker vulnerability, including seafood, temporary migrant workers in Australian horticulture and high-risk services in Australia. We sought to better understand how we can maximise our impact in addressing these risks, including by further tailoring our due diligence actions to our business context. These deep dives also strive to respond to stakeholder expectations for greater transparency on high-risk areas and action to address them. We will continue this work in future reporting periods.

Due diligence to manage modern slavery risks

Managing risks in our operations

One of our priorities in our Human Rights Strategy is providing team members with appropriate work and conditions.

Multiple teams are responsible for implementing systems and measures to safeguard human rights in our direct operations, including the following:

- People and Culture teams – who oversee payroll compliance, remediation, culture and inclusion, Indigenous affairs, performance and reward, and partnering with operations.
- Employee Relations team – who manage industrial relations and other employment compliance matters.
- Health, Safety and Wellbeing teams – who are responsible for our safety management system to provide a safe and healthy environment for people across our operations.
- Risk, Compliance, Insurance and Legal teams – who manage our organisational risk process, business protection (including whistleblower process), workers' compensation, compliance within our direct operations and other legal aspects.

Policies relating to the requirements expected of team members are outlined on pages 40 to 41. Key measures supporting our approach are described below.

Working conditions and wages	• Long-standing industrial instruments negotiated with the relevant unions specify and regulate working conditions for our operational team members. We respect their rights to freedom of association and collective bargaining and work closely with relevant unions and team members' representatives. • Written contracts set out remuneration, working hours, leave and other benefits for team members. • Established processes to regularly review, set, monitor and address remuneration requirements to support payment of correct entitlements. • Where practicable, direct employment of workers in higher-risk sectors, such as trolley collection and cleaning, rather than engaging external contractors.
Recruitment, age verification and other employment checks	• Processes for pre-hire checks during recruitment to verify the age, identity, working rights and qualifications of applicants, including procedures for monitoring of temporary working rights where required. • Established processes during recruitment to request electronic copies of personal identity documents. • Processes in place to prevent employment of individuals under 15 years of age.[1]
Health, safety and wellbeing, including psychosocial safety	• Health, safety and injury management system supported by safety professionals across the business. • Mental health and wellbeing initiatives, central hub of wellbeing resources, psychosocial risk[2] management processes and training for leaders.
Due diligence	• Ethical Sourcing Program due diligence covers in-scope GFR and GNFR suppliers in our extended supply chain, including suppliers who provide services to our operations.
Grievance mechanisms and remediation	• Established investigation protocols, and accessible and confidential grievance mechanisms including remediation procedures (refer to the *Grievance management and remediation* section on pages 36 to 38). • Dedicated team within our People and Culture function to manage workplace grievances raised by team members and appropriate resolution.
Team member engagement	• Team member engagement surveys to seek feedback and support ongoing consultation across the business. Includes opportunities for anonymous feedback on what is working well and where the opportunities lie.

Regular review of our Group Risk Standard to monitor changes in risk and establish controls and activities for ongoing improvements, including relating to our team members.

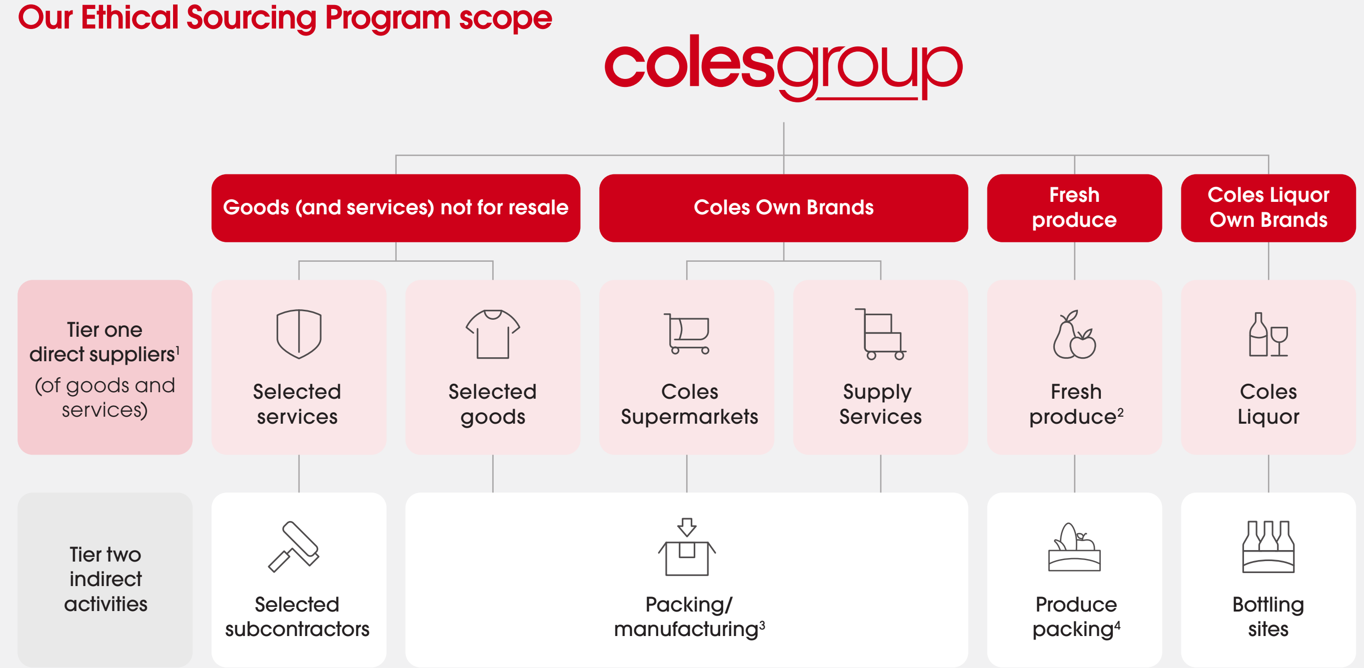
1. Five workers were recruited prior to reaching 15 years of age; however, they did not commence work until they had reached 15 years of age.
2. Psychosocial hazards are workplace factors that can cause psychological and physical harm. Safe Work Australia defines these as including (but not limited to) job demands, fatigue, poor support, remote or isolated work, poor physical environment, violence, bullying and harassment.

Managing risks in our supply chain

One of our key tools to address modern slavery risks is our Ethical Sourcing Program.

While compliance with our Ethical Sourcing Policy is a condition of trade for direct suppliers (unless an approved alternative is in place) and is embedded in supplier contracts, we apply enhanced due diligence to higher-risk categories through our Ethical Sourcing Program. This covers both GFR and GNFR, as outlined below.

Our Ethical Sourcing Program scope



1,833
Tier one and two suppliers in scope of the Ethical Sourcing Program.

1,803
Suppliers risk assessed under the Ethical Sourcing Program.

1,112
Ethical audits conducted by in-scope suppliers.

1
Supplier suspended for non-compliance.

Resources allocated to implementing the Ethical Sourcing Program

The **Chief People Officer**[5] and the **General Manager Advisory, Ethical Sourcing & Special Projects** oversee the Ethical Sourcing Program.

12 team members in the Ethical Sourcing team supporting GFR and GNFR sourcing activities, our Human Rights Strategy, and a dedicated program team driving training, reporting and continuous improvement initiatives.

Two contractors based in China – supporting supplier sites globally, including in Asia, America and Europe, and local supplier sites in Australia.

Commercial, Procurement, Legal and other business unit teams support our Ethical Sourcing Program execution, communicating supplier requirements, and being a point of escalation where requirements are not met.

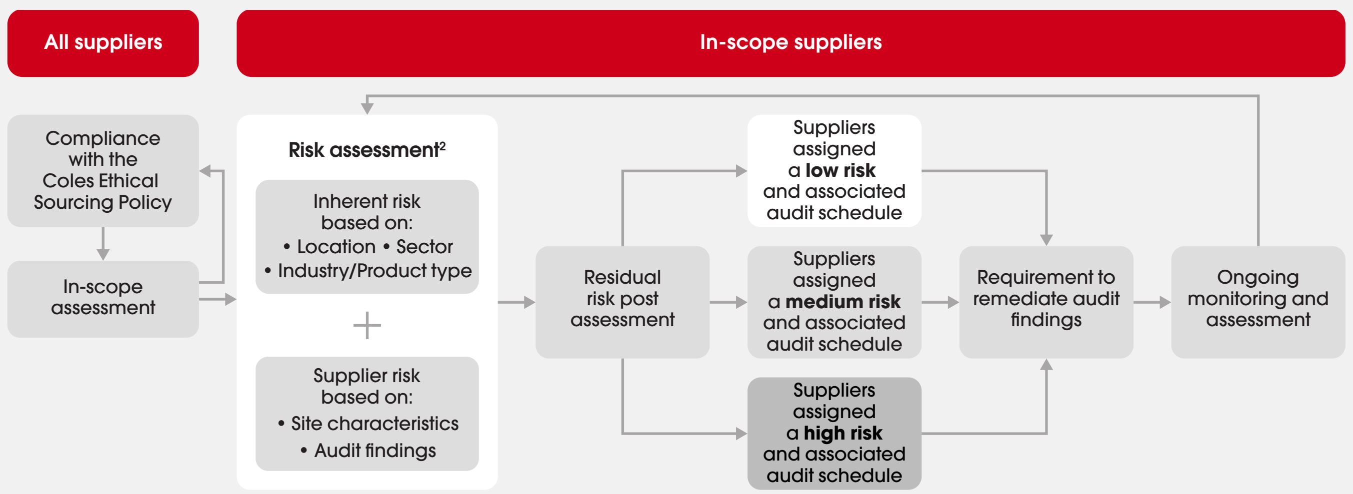
1. Tier one suppliers are those we have a direct contractual relationship with. These can include agents, manufacturers or service providers. In some cases, manufacturers can also be tier two suppliers if they supply us through an agent.
2. Fresh Produce means unprocessed fruit, vegetables and flowers, and includes Coles Own Brands as well as proprietary brands.
3. Packing/manufacturing refers to sites that manufacture or pack Coles Own Brand products into their final retail form.
4. Produce packing includes packing sheds, as well as farms that pack produce on site. In cases where the farm harvest produce then send to a packhouse, only the packhouse and supplier of final products are in scope of the Ethical Sourcing Program.
5. During the reporting period, oversight of the Ethical Sourcing Program moved from the Chief Legal Officer (as reported in previous modern slavery statements) to the Chief People Officer.

Due diligence to manage modern slavery risks continued

How our Ethical Sourcing Program works

Suppliers in scope of our Ethical Sourcing Program are assessed and managed based on risk, informed by their ethical sourcing performance, which may include audit results. Sedex or Fair Farms is used to conduct enhanced due diligence on in-scope GFR and GNFR product suppliers, while services suppliers are assessed via our TPRM process. Audit frequency depends on risk classification.[1]

1. As outlined in our Ethical Sourcing Program Requirements.



2. Based on information supplied in the Sedex Self-Assessment Questionnaire (SAQ).

In FY26, we progressed a strategic review of our Ethical Sourcing Program, refining our approach to supplier oversight based on sector, audit performance and stakeholder insights. This is helping us better target higher-risk areas of our extended supply chain.

Our supply chain due diligence tools

We also recognise that effective human rights due diligence cannot rely on a one-size-fits-all approach. Applying different targeted approaches across supply chain contexts has strengthened our understanding of which tools best suit different risk scenarios. We view due diligence as a spectrum of interconnected activities from desktop reviews to in-depth investigations and traceability exercises (refer to the diagram on page 31). Each tool serves a different purpose. For example, desktop reviews may be used to assess inherent risk or verify supplier documentation, while in higher-risk contexts, onsite ethical audits and investigations may be required. Our approach aims to be risk-based, proportionate and adaptive. It is underpinned by placing worker risk at the centre, prioritising actions according to the severity of actual or potential harm to workers and incorporating worker perspectives where feasible.

Our due diligence tools for our extended supply chain

Level of engagement, resources and involvement

	Initial desktop review Desktop review of publicly available and supplier provided information	**Enhanced desk review** Review of supplier SAQ	**Onsite ethical audit** Assessment of facilities and management systems against audit standards	**Deep dive investigation** Focused investigation of specific risks, incidents or allegations	**Traceability audit/ supply chain mapping** End-to-end mapping and verification of supply chain relationships
Purpose	Initial screening and risk prioritisation	Validate information and assess inherent risk	Identify gaps at site, verify compliance	Understand root causes and verify concerns	Understand supply chain compliance and links to upstream risks
Data sources	Public sources, policies, supplier clarification, certifications, media	Supplier declared information, policies, procedures, records	Onsite observations, interviews, records	Onsite observations, interviews, records, third-party inputs, stakeholder engagement	Transport records, raw material delivery receipts, purchase orders, batch records, invoicing data
Engagement	**Minimal** – limited supplier engagement	**Remote** – some online supplier engagement	**Onsite** – supplier and workers	**Targeted** – supplier, workers, third-parties	**Extensive** – supplier and other tiers
Outputs	Risk summary	Risk assessment rating	Audit report, corrective action plan	Investigation report	Traceability audit report
Examples of where we have applied this	Public media monitoring	Sedex supplier SAQ (refer to page 30)	Ethical audits; services audit methodology (refer to pages 30 to 33)	Human rights grievances (refer to Appendix 2)	Polysilicon traceability audit (refer to page 31)

Worker-centric approach: considered during due diligence.
Risk-based and proportionate approach: selecting the level of due diligence based on risks, leverage, context and purpose.

Applying our due diligence tools in practice

The initiatives below show how we applied various tools in FY26 to address diverse supply chain risks, reflecting our ongoing efforts to refine due diligence, strengthen supplier oversight and focus resources where they can have the greatest impact.

Services audit methodology

We tailored our methodology to focus on services procured by Coles, rather than applying a customer-agnostic approach. This included introducing a service provider template, reinstating worker interviews and conducting additional pilot audits across catering, labour hire and transport providers.

The service provider template helps auditors assess specific risks across suppliers and subcontractors, including prior substantiated issues, subcontracting practices, and higher-risk locations or workforce demographics.

Details on work location, subcontracting structures and vulnerable workers enable auditors to focus on higher-risk impacts to human rights. The template also guides auditors to verify supplier processes designed to protect both direct and subcontracted workers, including controls to monitor migrant worker recruitment, visa conditions and payment of legal entitlements. These changes support targeted risk identification and collaboration with suppliers to remediate audit findings.

As previously reported, the absence of worker interviews limits the detection of individual risks to workers such as potential underpayment in subcontracted services. Reintroducing worker interviews helped strengthen the methodology and support a worker-centric approach.

We facilitated the participation of a road transport supplier in Sedex's global services audit pilot, involving drivers across regional and remote areas and complex subcontracting arrangements. This reinforced the need to adapt an audit methodology to Australia's service sector and labour risk profile.

Given these refinements and the rigorous testing undertaken, we plan to embed our services audit as a standard due diligence measure for high-risk services.

Unannounced audits

Internationally, 28 unannounced audits[1] were conducted in China, Indonesia and Vietnam, covering strategic Own Brand and GNFR products. No business critical non-conformances requiring immediate attention were identified. Critical findings relating to worker health and safety and working hours were identified and remediated by the suppliers. The audits provided additional insights into labour conditions and management systems, reinforcing their value as a component of our broader due diligence approach.

Traceability

During the onboarding of a new solar panel supplier, we reviewed its due diligence and traceability management systems across the polysilicon supply chain to improve visibility for raw material sourcing. We also reviewed their sub-tier suppliers, from quartz to module production, against known modern slavery risks in government, academic and third-party sources, and incorporated enhanced traceability and reporting requirements into the supplier agreement.

1. This includes unannounced audits commissioned by us, as well as those conducted by other customers at shared in-scope supplier sites. Overall, 34 unannounced audits were conducted within our extended supply chain. This analysis focused on unannounced audits from China, Indonesia and Vietnam.

Due diligence to manage modern slavery risks continued

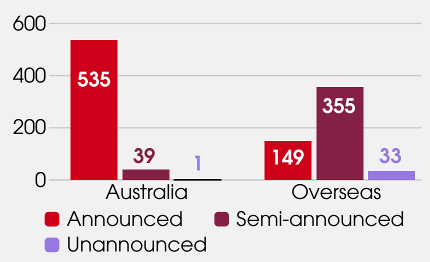
Ethical audit findings and trends

1,112
Audits in FY26

Audits conducted by business categories

346	252	514
Fresh Produce	Non-Food	All other categories

FY26 audits



Non-conformances identified in FY26

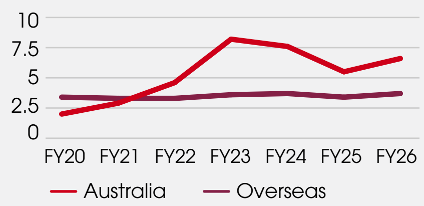
10	938	3,689
Business critical	Critical	Major

3,386
Non-conformances remediated by end FY26

Top five non-conformance categories

FY26		FY25	
Health, safety and hygiene	52%	Health, safety and hygiene	50.4%
Working hours	10.8%	Working hours	10.3%
Wages	9.3%	Wages	9.4%
Entitlement to work	8.2%	Regular employment	6.9%
Regular employment[1]	3.4%	Entitlement to work	4.9%

Average number of non-conformances per audit



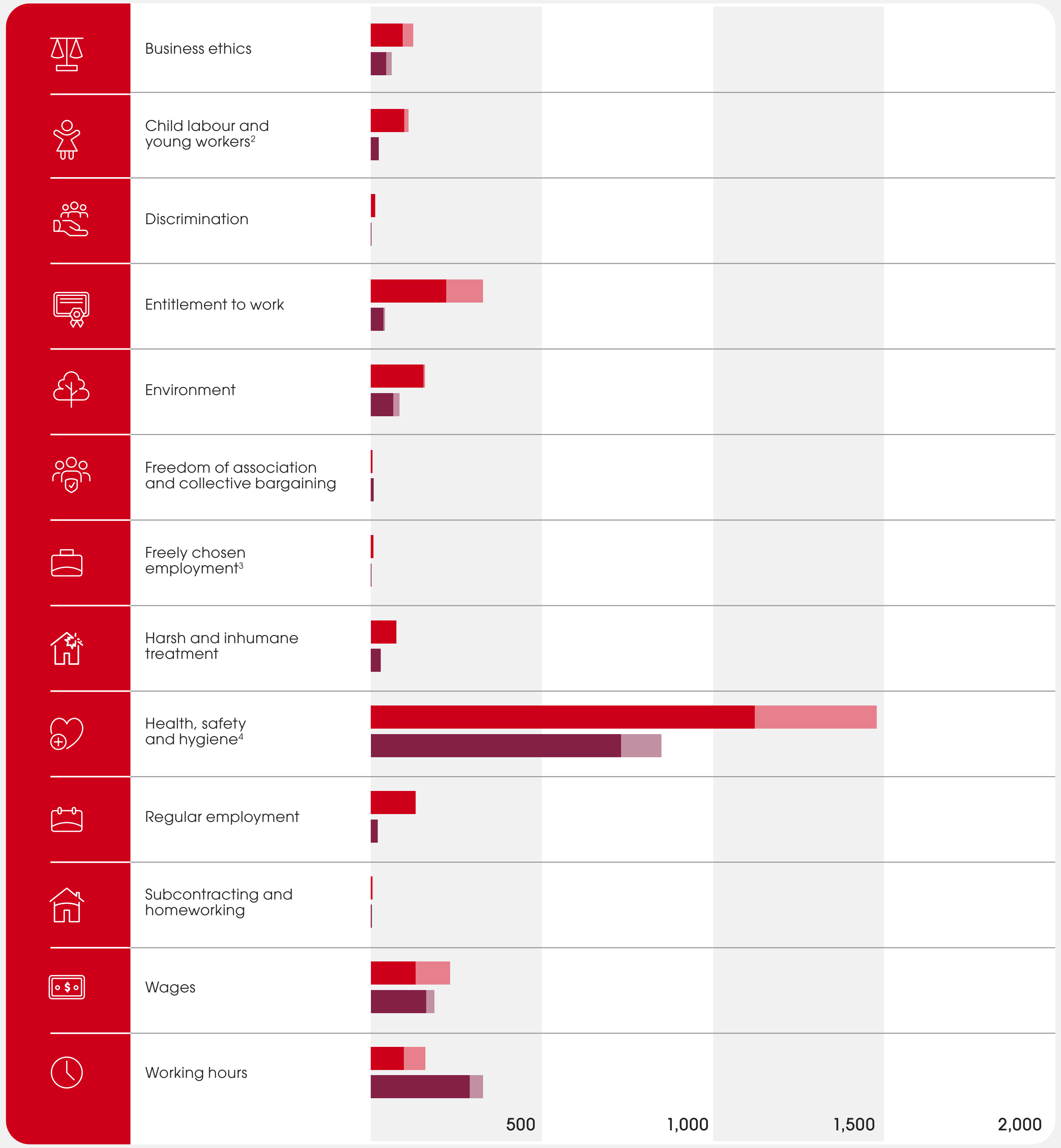
In FY26, 1,112 audits were completed, resulting in 4,637 non-conformances raised. **Key audit trends identified during the year** include:

- Consistent with FY25, the **health, safety and hygiene category had the highest proportion of non-conformances**, with the most frequent findings related to the absence of or inadequate health and safety risk assessments and incidents of workers not using personal protective equipment where appropriate.
- **Working hours continue to be a significant non-conformance category in our in-scope suppliers' social compliance ethical audits.** We manage this through our Board approved Working Hours Framework,[2] engaging with suppliers to monitor and reduce excessive working hours. We understand there are extenuating circumstances that can lead to excessive hours, including extreme weather events and unexpected production peaks, but consistent excessive hours can lead to negative outcomes for workers.
- **Audits continue to raise non-conformances related to employment documentation, including incomplete, inaccurate or missing contracts and payslips.** Clear and accurate documentation is critical to ensuring workers understand their rights, employment conditions, remuneration and working hours, enabling them to identify concerns and advocate for themselves.
- **Ten Sedex-rated business critical non-conformances were identified across seven suppliers, relating to workplace safety and the obstruction of auditor access to documents or facilities.** In accordance with our supplier requirements and escalation framework, findings assessed as business critical under Sedex's criticality rating methodology were subject to enhanced oversight and tailored remediation measures. Actions taken, as appropriate to the nature and severity of the findings, included supplier engagement, corrective action plans, formal breach notices, and independent verification of remediation activities prior to closure.
- **Compared with FY25, overall, we have seen an increase in semi-announced and unannounced audits undertaken by sites overseas.** This change may be due to customers increasingly moving away from announced audits as part of their supply chain ethical requirements. The majority of audits conducted in Australia are announced, with a small number of semi-announced audits occurring.

We apply additional scrutiny to audit outcomes when working with suppliers to remediate non-conformances, recognising that audit methodologies, the classification of non-conformances, and the recommended remediation timeframes may vary between auditors. As this can result in inconsistent experiences for suppliers, we aim to have more oversight so that findings are applied and addressed consistently.

1. The non-conformance category 'Environment' had 95 more non-conformances than 'Regular employment', but we have chosen to highlight 'Regular employment' as a key category because of the greater relevance to the Ethical Sourcing Program. Environmental non-conformances in the financial year largely related to lack of action plans and assessments rather than unmanaged hazard to workers.
2. Our Ethical Sourcing Policy, embedded in our supplier contracts, outlines our requirements regarding working hours in our supply chain.

FY26 supplier audit non-conformances identified[1]



Australian suppliers
Non-conformance criticality
Critical[5] Major

Overseas suppliers
Non-conformance criticality
Critical[5] Major

1. A non-conformance is recorded by the auditor if the site does not meet the requirements of the relevant legislation (local, national or international), the applicable code (e.g. Ethical Trading Initiative Base Code for Sedex ethical audits) or relevant standards (e.g. Fair Farms Standard for suppliers managed under Fair Farms).
2. This includes eight subcategories including policies and record-keeping, minimum age, and children and young workers working in hazardous conditions. In FY26, we had 138 non-conformances relating to the category of children and young workers. None of these related to modern slavery in our supply chain. Findings related mainly to the lack of child labour remediation policies in line with ILO guidance.
3. This includes 10 subcategories including recruitment fees, freedom of movement, forced labour and debt bondage. In FY26, we had 12 non-conformances relating to the category of freely chosen employment. None of these constituted modern slavery in our supply chain. Findings related mainly to not meeting modern slavery reporting requirements such as publishing an annual Modern Slavery Statement, and inadequate systems to identify and prevent modern slavery within third parties, e.g. subcontractors and labour hire.
4. This includes over 15 subcategories, including relating to fire safety, chemicals, health and safety management, electrical aspects and machinery.
5. Critical includes business critical non-conformances. In FY26, we had 10 business critical non-conformances, with six raised in Australia and four raised overseas.

TARGETED DEEP DIVE

Temporary migrant worker risks in Australian horticulture

As outlined in previous statements, modern slavery risks affecting temporary migrant workers in the Australian horticultural sector are an ongoing focus area for us.

32,645

migrant workers participating in the Pacific Australia Labour Mobility (PALM) scheme across Australia[1]

56%

of PALM scheme workers work in Australia's agriculture sector[1]

As part of our ongoing efforts to identify and address labour rights risks in Australian horticulture, we have implemented a range of measures, including supplier engagement and training, worker education and outreach, ethical audits along with other due diligence processes, collaboration with industry stakeholders, and promotion of Coles STOPLine, a confidential multilingual grievance mechanism available to workers.

While these measures remain important controls, we recognise that poor labour practices can continue to occur within the sector. These issues are shaped by a range of structural factors, including evolving visa settings, labour shortages and the seasonal labour demands of fresh produce production.

Refining our approach to due diligence in Australian horticulture

In FY26, we evaluated and recalibrated our approach. Rather than viewing individual activities as standalone interventions, we initiated a broader systems-level look at seasonal fresh produce production to better understand labour demand across produce categories, regions and harvest periods, and the relative importance of those categories to our business. This highlights that labour rights risks vary across horticulture, with some crops requiring more labour-intensive, seasonal and lower-skilled workforces than others. These early insights are strengthening our understanding of produce-specific risks and informing ongoing improvements to our due diligence approach.

Building this horticulture risk profile involved more than harvest and workforce data. We drew on multiple sources of insight to better understand worker experiences and the broader factors influencing labour rights risks across the sector, including:

- **Supply chain engagement and site visits:** We visited farms, packhouses and worker accommodation, and engaged with business category managers, suppliers and civil society organisations to better understand worker experiences, recruitment practices, accommodation, workforce mobility and other factors that may influence labour rights risks. In-person visits also enabled deeper engagement with suppliers and helped us build a more nuanced understanding of how risks may present in practice.
- **Worker outreach and engagement:** Through the Ethical Retail Supply Chain Accord (ERSCA), we conducted worker engagement events in key growing regions since 2022. Delivered in partnership with unions and other stakeholders, these events provide an opportunity to share information on workplace rights and hear directly from workers about their experiences and concerns. In FY26, we convened four events in Mareeba (Queensland), Grafton (NSW), Koo Wee Rup (Victoria) and Leeton (NSW). These locations were chosen based on supplier location, workforce composition and harvest activity, drawing on sources such as the national harvest guide and media reporting. Each event is tailored to the relevant worker cohort and may involve representatives from the relevant union and subject matter experts to advise workers on issues such as superannuation, visa-related support and grievance channels. In Queensland, we also worked with Moe Turaga (pictured), a community representative with lived experience, to support pre-engagement with PALM scheme workers and help facilitate discussions.

  While the events continue to provide a channel for understanding worker experiences and sharing information on labour rights, attendance has been mixed. Some events have attracted strong participation, while others have had low turnout. This has highlighted the importance of understanding local context, including whether other worker-focused activities, culturally significant events or sporting events may affect attendance. These learnings help shape our thinking on how worker outreach may be better targeted and delivered over time.
- **Accommodation oversight:** We continued to promote the Accommodation Standard through supplier engagement, accommodation visits and audit activities. This work helped strengthen our understanding of accommodation-related risks, including challenges associated with housing shortages, labour hire arrangements and maintaining visibility of worker living conditions across multiple accommodation sites.

  Whilst we see ongoing positive efforts by suppliers to provide suitable accommodation, the need to find short-term accommodation for large groups of workers in communities already experiencing housing shortages continues to drive increased costs and lack of choice for workers. There are also challenges monitoring the quality of accommodation. Workers may also travel significant distances between accommodation sites and host farms, further reducing visibility of living conditions. Onsite audits of farms that use multiple accommodation sites are also typically only able to visit a select few.

How this has supported our modern slavery approach

Through this work, we gained several important insights:

- **Supplier capability remains an important differentiator of risk.** Differences in suppliers' capacity and maturity can create significantly different risk environments within the same sector and region.
- **Labour hire arrangements continue to be a key risk area.** In highly seasonal production systems, reliance on labour hire providers can increase labour rights risks, particularly where multiple parties are involved or governance arrangements are weak.
- **Access to clear and timely information remains an important protective factor for workers.** Accessible information and support pathways can help workers understand their rights, make informed decisions and seek assistance when concerns arise.
- **Senior leadership commitment remains critical.** Ongoing engagement across Commercial, Ethical Sourcing, the Executive Leadership Team and the Board has strengthened oversight and supported continued action in response to identified risks.

Assessing our effectiveness

We will use the insights from this deep dive to further understand how our existing due diligence activities are helping us identify and respond to labour rights risks, including where our controls may have the greatest influence. For example, the work highlighted that suppliers in the same sector and region can present different risk profiles depending on factors such as labour hire arrangements. This will help inform where we focus our efforts and whether additional or more targeted action may be appropriate.

The deep dive reinforced the importance of understanding the different labour and workforce characteristics across produce categories when assessing labour rights risks. This helps us identify where labour rights risks may be more pronounced and continue to better target our due diligence efforts.

1. Figures are current up until June 2026, based on data from the Department of Employment and Workplace Relations (DEWR) and the Department of Home Affairs, published on the PALM website. Available at: www.palmscheme.gov.au/palm-scheme-data.

Pictured (left to right): Domus 8.7 Lived Experience Advisor Moe Turaga speaking at a worker education event in Mareeba, Queensland; Coles team members Aimee, Lynne and Gwen with Alison from Koala Cherries in Victoria; Workers at Koala Cherries.

Grievance management and remediation

Details of human rights-related supplier grievances

Total number of grievances received

18

Source of grievances

3	STOPline
4	Internal team members
6	Direct contact to Coles
4	Audits[1]
1	Other

1. Additional concerns raised by auditors following an audit. This can include concerns raised by workers through the audit firm's own grievance mechanisms or during the worker interviews conducted as part of the audit.

Spotting the Signs of modern slavery

During FY26, we introduced 'Spotting the Signs' training for relevant team members across our operations to strengthen the identification and escalation of potential labour rights concerns.

The training was informed by learnings from investigations, supplier engagements and site visits, and was designed to strengthen participants' ability to recognise indicators of modern slavery and labour exploitation, increase awareness of how potential labour rights concerns may present during supplier visits, and reinforced the role of team members in identifying concerns and escalating them through appropriate internal channels, particularly in higher-risk areas such as services and labour hire.

Participant feedback indicated the training improved understanding of potential indicators of modern slavery and increased awareness of signs that may warrant further assessment or escalation during supplier engagement and site visits.

Strengthening internal capability to identify and escalate grievances has been the priority of our grievance management activities this year, supported by targeted training to build team member understanding of modern slavery and ethical sourcing risks and indicators of harm.

Effective grievance mechanisms rely not only on accessible reporting channels, but also on individuals having the capability, confidence and support to recognise and appropriately escalate concerns.

We offer several avenues for raising concerns, including independent third-party and internal channels (refer to page 37), and aim to ensure concerns raised through these channels are appropriately considered and responded to.

Managing grievances

Human rights-related grievances are managed and investigated by the Ethical Sourcing team and, where appropriate, an independent third party may support the investigation. Concerns are assessed through our Investigation Protocol or Modern Slavery Incident Protocol, depending on severity.

During the reporting period, 18 grievances relating to alleged breaches of the Ethical Sourcing Policy and Program were investigated. Allegations included underpayment, inadequate accommodation, worker intimidation and excessive working hours across several areas of our supply chain. While these issues may not meet the threshold of modern slavery, we recognise that they can sit on a spectrum[1] from decent work to serious exploitation, and are assessed using a worker-centred, trauma-informed approach that prioritises respectful and confidential engagement.

Where investigations identified substantiated issues, remediation actions were undertaken. During FY26, remediation involved sustained engagement with stakeholders to monitor corrective actions, address underlying issues and support longer-term improvements.

As part of strengthening accessibility and awareness of our grievance mechanisms during FY26, we undertook key actions, including:

- targeted training to strengthen internal capability to identify and escalate grievances
- expanded STOPline language support
- distribution of materials through auditors and worker engagement
- updates to contractor sign-in processes at stores to include grievance mechanism information
- upskilling an additional Ethical Sourcing investigator through formal investigation training.

These actions strive to support accessible, responsive grievance mechanisms and earlier identification of potential issues.

Pictured: General Manager, Advisory, Ethical Sourcing & Special Projects, Amy Cunningham at a worker education event in Mareeba, Queensland.

1. Further information on the spectrum of working conditions is available in the Australian Government's Commonwealth *Modern Slavery Act 2018* Guidance for Reporting Entities May 2023 available at: modernslaveryregister.gov.au/resources/Commonwealth_Modern_Slavery_Act_Guidance.pdf.

Our approach to grievance management

1 Grievance reported to Coles

STOPline

Coles STOPline is a confidential service run by an independent third party. STOPline will refer matters to Coles for investigation, but, if anonymity has been requested, personal details will not be shared with Coles.

Open to: All stakeholders within Coles' direct operations and extended supply chain, including Coles team members, suppliers, workers, contractors, community members and other affected stakeholders.

Availability: 24 hours a day, 7 days a week via QR code, 1300 304 550 or **coles@stopline.com.au**

Protected disclosures

Reports of potential misconduct may be made to nominated Protected Disclosures Officers or directors, secretaries or senior managers under our Whistleblower Policy.

Open to: Individuals covered by the Coles Whistleblower Policy.

Availability: Direct contact with a Protected Disclosure Officer or other eligible recipient, such as a director, secretary or senior manager.

Direct to the Ethical Sourcing team

Individuals including Coles team members can directly contact the Ethical Sourcing team.

Open to: All workers within our extended supply chain and those representing on behalf of the worker(s).

Audits

Ethical audits assess modern slavery risks through document reviews, site tours and confidential worker interviews. Worker interviews provide an opportunity for individuals to raise their concerns confidentially.

Open to: Workers at audited tier one and tier two suppliers.

Third parties

Grievances may also be submitted to Coles through trusted third parties, including unions, relevant government-associated organisations and non-government organisations (NGOs). These parties play a vital role as advocates for workers.

Open to: All workers within our extended supply chain.

2 Investigation

We assess and investigate grievances and aim to promote their timely resolution. We also strive to update the grievance raiser throughout the process. If dissatisfied with the outcome, the grievance raiser may refer the matter to the relevant National Contact Point.

Each investigation presents unique challenges. Investigations are non-linear and often require specialised expertise and careful consideration of all involved. Our approach is worker-centred and trauma-informed, prioritising respectful and confidential engagement.

Depending on the allegation, investigations may involve collaboration with specialist internal functions, including the Business Protection team. This can include reviewing business ownership structures, related entities and other information to better understand supplier relationships and potential risks. These collaborations support investigations involving phoenixing, subcontracting arrangements and other issues where a broader understanding of business relationships is required.

Investigations seek to uncover facts objectively and support decisions; where non-compliance is identified, remediation follows.

3 Remediation

When issues are identified, our approach to remedy is in line with the UNGPs, Coles may provide for, or cooperate in, remediation itself or with third parties, where appropriate. We are committed to protecting the rights of those making reports, including maintaining anonymity if requested and taking reasonable steps to minimise harm.

When applicable, a corrective action plan with agreed actions, responsibilities and timeframes is assigned to the relevant party. We aim to prioritise the needs of affected individuals, with remedies determined on a case-by-case basis.

This includes responding to labour rights harms, recognising that issues may sit on a broader continuum of exploitation and require engagement to address root causes and reduce the recurrence.

Where we identify that we have not caused or contributed to an incident of human rights harm, we seek to work with suppliers to support effective remedy in alignment with the UNGPs and our standards (as outlined on pages 40 to 41).

In these instances, we seek to consult affected individuals or their representatives, recognising that they can provide important insights into the impacts of harm and potential remediation approaches. We are also open to collaborating with appropriate judicial and non-judicial grievance mechanisms, where relevant.

If no outcome is reached within a reasonable timeframe, and all options have been exhausted, Coles may exercise its rights under the relevant agreement, which may include suspension of orders or termination if compliance with our Policy and Program Requirements are not rectified.

Governance of the process

Grievance-related matters are reported to the Board quarterly based on severity and investigation outcomes. Externally, we report grievances on our website and in our annual Modern Slavery Statement. The privacy and confidentiality of individuals and suppliers involved are respected through the process. Our procedures and processes, including the Whistleblower Policy, are based on international best practice, including the UNGPs.

Grievance management and remediation continued

Our approach to remediation

In a human rights context, remediation seeks to address harm, prevent recurrence and consider the circumstances, needs, perspectives and lived experiences of impacted people. Our remediation principles guide how we apply this approach.

In line with the UNGPs: If we identify that we have caused or contributed to human rights harm, we are committed to providing for, or cooperating in, remediation. Where we are directly linked to harm, we recognise we may also play a role in remediation.

Collaboration: We seek to work with suppliers and stakeholders to address harm, and engage with unions, civil society and individuals with lived experience to strengthen worker-centred remediation and worker voice.

Communicating our expectations: We provide guidance to suppliers on remediation[1] expectations and track progress against agreed timelines. We apply an escalation process for unresolved issues and, where appropriate, grant senior management approved derogations to support completion of corrective actions.

Remediating non-conformances from ethical audits in our extended supply chain

Addressing audit non-conformances, which may indicate actual or potential harm to workers, is central to our remediation approach. Beyond individual redress, we work with suppliers to identify root causes, support improvement and reduce recurrence risk.

In FY26, our experience reinforced that remediation of audit non-conformances can be time intensive, often requiring ongoing dialogue and iterative problem solving. For example, infrastructure-related issues may take longer to remediate, due to capital investment requirements and staged implementation to minimise disruption. Privacy considerations during due diligence can also extend the time needed to verify right to work or payroll records while protecting sensitive personal information.

We recognise challenges in assessing the effectiveness of supplier remediation, including whether it delivers sustained positive outcomes for workers, or has unintended impacts, such as worker retaliation, particularly where direct worker engagement is limited.

1. Our remediation guidance documents for suppliers include wages and benefits, child labour, and forced or bonded labour.

Deepening our understanding of recruitment fees in our international supply chain

Following several investigations into recruitment fee findings in our supply chain since 2023, worker paid recruitment fees[1] continued to be identified in FY26 audits. Driving factors include suppliers' ongoing reliance on migrant labour for lower skilled roles, recruitment corridors affected by geopolitical instability, and varying visa frameworks and recruitment fee regulations across destination countries. In this context, recruitment fees remain a persistent risk in our supply chain.

We commissioned a targeted third-party assessment of a supplier site in Thailand to further examine the site's recruitment processes and migrant workers' recruitment experiences. This followed remediation efforts already undertaken by the supplier, including facilitating and funding Memorandum of Understanding renewals for migrant workers. Through document reviews, and interviews with workers and management, the assessment identified ongoing gaps in ethical recruitment practices, particularly given the site's limited experience engaging workers through recruitment agencies.

This assessment, coupled with our observations of other suppliers' financial and operational constraints in retrospectively addressing recruitment fee findings, reinforced that supplier training is insufficient without more targeted and practical guidance to reduce risks upfront. These challenges include limited capability to assess and monitor recruitment partners, and limited supplier understanding of contractual terms or practices that may increase the risk of worker paid fees.

These experiences also highlight challenges in applying the Employer Pays Principle across jurisdictions, particularly where worker paid costs are embedded in local systems. Various suppliers have also reported challenges in implementing ethical recruitment and reimbursing fees, highlighting the need for more specific guidance on the topic, to support earlier identification and a consistent approach to mitigation and remediation.

As we look to enhance guidance for suppliers on ethical recruitment, consideration will need to be given to the evolving Sedex SMETA 7 guidelines on recruitment fees and the barriers and enablers to closing recruitment fee findings.

1. Examples of recruitment fees non-conformances include instances of workers paying recruitment fees to agents in their home country, or paying for items such as travel, formal documents and medical checks in the host country.

TARGETED DEEP DIVE

Review into high-risk services sector in Australia

Across our services supply base, over 100 suppliers, ranging from large international companies to local businesses, including labour hire providers, are within scope of our due diligence processes. Certain third-party services, particularly those reliant on lower-skilled labour and subcontracting arrangements, including cleaning, trolley collection and security, carry increased modern slavery risks. As these workers operate across our sites and interact directly with our team members, in FY26, we engaged closely with day-to-day operations to better understand how and where risks may arise in practice. This informed enhancements to our due diligence approach, including the following:

- **Refining our services supplier onboarding approach** to assess workforce composition, recruitment practices and subcontracting arrangements. Depending on the level of risk, we may review payroll records and timesheets to assess wage compliance and contractual obligations. As part of broader due diligence checks, reviews may also be undertaken through third-party platforms to verify director and ownership information and identify risks such as phoenixing activity, where a business is restructured or transferred to avoid debts, liabilities or regulatory scrutiny.
- **Strengthening ongoing due diligence activities**, including supplier audits, worker interviews and unannounced inspections, to assess working conditions, worker identity, work rights, hours worked, licensing requirements and employment arrangements. We are also evolving our services audit program and supporting the development of a global services audit standard to address the challenges of assessing workers across dispersed sites and subcontracting arrangements, where traditional point-in-time audits may provide only a limited view.
- **Regular engagement with suppliers and internal stakeholders** supports ongoing performance monitoring, identification of emerging issues and risk prioritisation. We are further embedding cross-functional approaches to supplier oversight, leveraging the diverse touchpoints our teams have with services workers and suppliers. For example, through their regular engagement with security personnel during store visits, loss prevention teams are well positioned to identify potential modern slavery indicators and support early intervention where concerns arise.

As our approach to managing modern slavery risks in services continues to mature, its effectiveness will not necessarily mean uncovering fewer issues; rather, it will be reflected in earlier identification of risks, stronger insight into worker experiences and more effective remediation where concerns arise. Increased detection may therefore be a positive indicator that our approach is becoming more targeted and effective.

Security services incident

Coles recognises that security services in Australia are inherently higher risk for modern slavery and other forms of labour exploitation, characterised by subcontracting, mobile workforces and variable working conditions. Our approach has long included enhanced due diligence activities, including audits, worker interviews and payroll compliance checks.

In late 2025, serious allegations emerged in relation to a security provider servicing corporate and government clients in Australia including Coles. The provider subsequently entered into voluntary administration. Our investigations found that, notwithstanding the prior due diligence undertaken and appropriate contractual requirements imposed by Coles, the supplier had taken deliberate steps to conceal certain work practices, including providing falsified records. These events highlighted the scale of potential workforce impacts and challenges in detecting non-compliance where providers deliberately obscure practices.

Consistent with our remediation approach, which is to remain engaged to investigate a matter and look to remediate in line with international standards rather than disengage when risks arise, our key priority during the incident was to support affected workers by facilitating workforce continuity where practicable. We engaged with our replacement provider to understand the employment outcomes of affected workers and the measures taken to reduce disruption during the transition.

We recognise our responsibility to respect human rights and to play a meaningful role in identifying, reducing and remediating modern slavery risks and wider labour rights risks in our value chain, in line with international standards. Where we identify adverse impacts related to our business activities or supply chain, we are committed to working with relevant stakeholders to support effective remediation.

Commercial relationships are entered into with clear expectations regarding compliance with applicable laws and standards focused on responsible business conduct. Where these are not met, including where either party does not act in good faith, significant challenges can arise.

As a business, we aim to identify, prevent and reduce risks, including setting clear expectations, supporting capability building and escalating concerns where necessary. Where potential criminal conduct arises, there is also a critical role for regulators and law enforcement, whose investigatory powers form an essential part of the broader system response.

Preventing modern slavery from occurring

Our deepening understanding of the business, including its operating model, processes and supply chain dynamics, combined with ongoing engagement with suppliers, civil society and internal stakeholders, has improved our ability to identify where modern slavery risks may arise in practice.

This is important because effective prevention is not achieved through generic measures alone. In a fast-moving retail environment, risks often arise at specific points in day-to-day operations, including where decisions are made under time, operational or commercial pressure. Meaningful prevention therefore requires a detailed understanding of how the business operates in real time, not only in theory.

Accordingly, prevention has been a greater focus of our work in FY26. Traditional prevention measures include policies, procedures and supplier capability-building. We have also increased our proactive engagement with commercial and procurement teams to identify potential risk points earlier and support forward planning, targeted interventions, and controls at key stages of the sourcing process.

Policies and procedures

As part of our governance approach, we maintain a suite of policies that guide our actions and support accountability. Below is a summary of these documents and how they support our modern slavery response.

For further information on our publicly available policies, refer to **colesgroup.com.au**

	Documents	Relevant to our modern slavery response and how it operates in practice
Supply chain related polices and standards	Ethical Sourcing Policy/Ethical Sourcing Program Requirements	These set out our expectations relating to human rights in our supply chain. Our Ethical Sourcing Policy is informed by international human rights frameworks and standards. Compliance with the policy is a condition of trade for direct suppliers.[1] It is included in the terms and conditions of supplier contracts and monitored through our Ethical Sourcing Program. We expect our suppliers to cascade similar requirements in their own supply relationships.
	GNFR Third-Party Management Policy/Risk and Contract Management Standards	These relate to the requirements during the contract lifecycle for GNFR third-party engagements. They are implemented through our TPRM process, which includes supplier risk assessment questionnaires and, where required, additional due diligence through our Ethical Sourcing Program.
Other policies, strategies and frameworks	Human Rights Strategy	The strategy includes our eight salient human rights issues, strategic ambition areas and pathway to achieving our commitments. Each ambition area has internal plans and targets intended to support our progress toward our FY27 goals. We report progress against the strategy through our Human Rights Steering Committee.
	Group Risk Policy/ Risk Standard	Details our requirements for effective risk management in our organisation.[2] Ethical sourcing risks are managed as a priority in accordance with this policy and standard. Controls implemented through our Ethical Sourcing Program are monitored through key risk indicators, which are reported to the Audit and Risk Committee and the Board.
	Responsible AI Policy / Responsible AI Principles	Details our requirements for the safe, ethical and responsible use of artificial intelligence (AI) in our business, including for third parties supplying AI services. It is supported by our Responsible AI Principles which include data privacy and respecting human rights. These guide the procurement, development, and use of AI systems in our business.
Operations related	Code of Conduct	Leaders, team members and contractors are expected to abide by the standards set out in our Code of Conduct, including our respect for human rights. Responsibilities are reiterated in other policies and training programs, and material breaches are reported to our Audit and Risk Committee.
	Working Rights Policy	Sets out the requirements for ensuring team members are legally permitted to work in our business, including compliance with relevant visa conditions. These are incorporated into recruitment and onboarding processes and include procedures for ongoing monitoring during employment.

1. Unless an approved alternative is in place.
2. Refer to our Annual Report and Corporate Governance Statement for further information on our organisational risk management.

	Documents	Relevant to our modern slavery response and how it operates in practice
Operations related continued	Remuneration Policy	This policy outlines our commitment to fair and equitable remuneration outcomes. It outlines our principles for the remuneration process and practices, including compliance with relevant laws.
	Health, Safety and Wellbeing Policy/ Safety Strategy/ Psychosocial framework	These are supported by our safety management system, which is designed to manage risks and hazards that come with operating our retail stores, facilities and supply chain network. We also promote member wellbeing and psychological safety through various initiatives, and have strategies in place to identify, assess and manage psychosocial risks.[1]
	Appropriate Workplace Behaviour Policy	This sets out the standard of behaviour expected of our team members and the type of conduct that is not acceptable, such as workplace bullying, harassment and aggression.
Raising and reporting concerns, grievance mechanisms and remediation	Whistleblower Policy	Outlines our process for receiving and managing allegations of potential misconduct, including human rights-related grievances. The policy is communicated to team members, and we display posters in retail and distributing sites promoting the different methods to connect with our whistleblower hotline (STOPline).
	Ethical Sourcing Remediation Framework	This framework sets out the core principles we adhere to, and expect our suppliers to adhere to, for providing effective remediation of human rights and ethical sourcing issues. Requirements are reiterated in relevant policies and training sessions.
	Immediate Reporting Policy	Sets out the key incidents which require immediate reporting in our business and includes the process for immediately communicating these to senior management, the Executive Leadership Team and the Board.

1. Psychosocial hazards are workplace factors that can cause psychological and physical harm. Safe Work Australia defines these to as including (but are not limited to) job demands, fatigue, poor support, remote or isolated work, poor physical environment, violence, bullying and harassment.

Responsible purchasing practices

As purchasing decisions can affect working conditions in supply chains, in previous statements we committed to developing a Responsible Purchasing Policy to clarify expectations for team members and align with industry frameworks. In FY26, we expanded our purchasing practice assessment to additional commercial teams and suppliers to strengthen our understanding of internal purchasing practices.

For example, engagement with the Seafood team enabled comparison between fresh seafood and pantry items.

This highlighted how external factors such as natural disasters or extreme weather can affect availability and planning certainty. Engagement with a supplier in Vietnam, supported by our Australian-based buying partner, provided insight into supplier experiences of working with Coles.

Key reflection

The assessment indicated that responsible purchasing is understood and supported in principle but could be more consistently applied in day-to-day decision-making beyond where it aligns with the Australian Grocery Code[2] requirements, whereby the Grocery Code most strongly aligns with fair payment terms and collaborative production planning principles of the Ethical Trade Initiative's (ETI) Responsible Purchasing Framework. This aligns with supplier feedback, which indicated strong relationships and collaborative problem solving, but also practical challenges applying approaches such as open book costing in competitive sourcing environments.

We plan to extend this assessment across additional commercial units and suppliers, deepening our understanding of factors influencing purchasing practices. These findings will inform the continued development of our responsible purchasing approach, helping to incorporate human rights considerations into purchasing decision-making across the business.

2. Australian Grocery Code, effective April 2025.

Training and supplier capability building

Our experience delivering training, as outlined in previous statements, has reinforced that driving meaningful change requires a sustained and considered approach.

This means greater upfront planning time to identify priority capability gaps, design targeted and practical content and evaluate whether training is translating into improved practices. We recognise the limitations of standalone online training, which, without opportunities for application and reinforcement, are unlikely to deliver lasting behaviour change.

In response, we are refining our training strategy and, while this work is ongoing, with some FY26 planned sessions deferred to allow more considered design, our direction is to prioritise fewer, more targeted training sessions that drive meaningful and sustained improvements.

Coles' learning opportunities

During the reporting period, we hosted a range of learning opportunities for team members, and tier one and two suppliers. We assess the effectiveness of these sessions through participant engagement and feedback surveys to support continuous improvement and inform change. Training opportunities included:

Human rights essentials Completed by **4,766** participants	An online human rights module developed and incorporated into our mandatory learning requirements to support our team members to understand the key principles of the Human Rights Strategy and how their roles contribute to delivering its objectives. During the reporting period, 93.6% of role-relevant team members completed the training. This forms part of the progressive rollout of the module, supporting our target of 95% completion by end FY27.
China social insurance Attended by **86** participants	An online session conducted in Mandarin, tailored to address recent social insurance legal changes, providing an overview of the current landscape and associated risks, along with practical tools to help participants navigate and comply with the changes.
Ethical sourcing and subcontractor onboarding Attended by **138** participants	An online session was delivered to outline Coles' Ethical Sourcing Program requirements for onboarding service suppliers that engage subcontractors, highlighting key ethical sourcing risks and strengthening supplier understanding of effective subcontractor management and ongoing monitoring expectations. A strategic supplier contributed to the session by sharing its experience implementing subcontractor management processes, helping to bring the requirements to life through practical examples and lessons learned.
Coles Ethical Sourcing Program – refresher Attended by **67** participants	Coles team members in supplier-facing roles completed refresher training on key activities specific to their interactions with suppliers in relation to the Ethical Sourcing Program. The session reinforced key requirements and helped build understanding of the broader program, including how different processes work together to support implementation.
Health and safety and risk identification Attended by **73** participants	An online webinar was delivered to suppliers and sites based in China to strengthen health and safety practices, focusing on workplace risk identification and management, facility and equipment safety, employee health protection, and emergency preparedness, with practical strategies to support a proactive safety culture.
Spotting the signs Attended by **48** participants	A hybrid training session was delivered to build capability among Coles team members with supplier-facing roles, to support understanding and recognition of potential modern slavery and ethical sourcing risks, including key indicators and reporting and escalation requirements.
China social insurance and regulatory landscape update Attended by **27** participants	An internal session was conducted for Coles team members managing suppliers and sites based in China, providing an update on recent changes to social insurance regulations. The session provided additional context on broader regulatory, demographic and market developments in China, aiming to support team members' understanding of how these factors may influence ethical sourcing risks and supplier operating environments.

Introduction to Ethical Sourcing Attended by team members within the People and Culture function	Ethical Sourcing presented at a People and Culture forum to introduce the Ethical Sourcing function and outline how human rights risks in our supply chain connect to everyday business responsibilities. The session introduced the role and scope of the Ethical Sourcing Program and how it supports the identification and addressing of risks to workers in our extended supply chain.

Ethical Sourcing team training

The Ethical Sourcing team plays a crucial role in implementing the Ethical Sourcing Program. Given the evolving nature of risks, ongoing education of the team is essential for enabling early identification of risks. Training undertaken by the team in the reporting period included:

Workplace investigations: the fundamentals	Two team members completed a two-day training hosted by Q Workplace Solutions. The training covered procedurally fair, effective and people-centred investigations, including practical interview skills and strategies for managing common investigative challenges. This strengthened internal capability to manage worker-related grievances, conduct sensitive investigations and engage appropriately with potentially vulnerable workers.
Grocery Code of Conduct	As part of Coles Group enterprise-wide required learning, the team completed the newly developed Grocery Code of Conduct training to build awareness of Coles' obligations under the mandatory Code and support responsible purchasing practices. The training reinforced individual accountability, compliance expectations and the importance of considering how day-to-day commercial decisions can influence supplier relationships and outcomes.
Exiger Supplier Risk Platform	An internal session was conducted by Exiger to provide an overview of the Exiger platform, including how to interpret current supplier risk ratings and reviews, and how to onboard new suppliers for adverse media screening and ongoing risk monitoring.
Responsible use of AI	Through Coles Group's enterprise-wide required learning, the team completed the newly developed Responsible Use of AI training to build awareness of Coles' Responsible AI Policy and its framework for the safe and ethical use of AI. The training reinforced individual accountability and obligations under the Policy, including key risks such as bias and privacy, and responsible AI principles including human oversight, fairness and respect for human rights.

Supplier and stakeholder engagement

Direct engagement with suppliers, workers and other stakeholders is an important component of the Ethical Sourcing team's ongoing development and understanding of modern slavery and wider labour rights risks. During the reporting period, the team undertook visits to 34 supplier sites and our own facilities, and participated in a range of industry forums and stakeholder events. These engagements strengthened the team's understanding of supplier operations, workforce conditions and emerging risk areas, including labour hire, worker accommodation and challenges engaging transient worker cohorts. Learnings were shared through team debrief sessions and used to inform risk assessments, supplier engagement and broader Ethical Sourcing Program activities.

Pictured: Coles team member Chloe at a worker education event in Mareeba, Queensland.

Collaboration and stakeholder engagement

Intentional stakeholder engagement and collaboration are important components of our approach. We recognise that effectively identifying, assessing and addressing modern slavery and broader human rights risks requires engagement beyond audits and internal processes.

Stakeholder perspectives can highlight issues that may not appear in audits and other due diligence activities, provide insights into emerging risks and changing operating environments, and assess where our actions are having the intended impact or where further improvement may be required.

Meaningful engagement requires deliberate planning, sustained effort and a long-term perspective. Stakeholder engagement is most effective when it is targeted, ongoing and informed by our understanding of our risks. During the reporting period, we engaged with varied stakeholders, including workers, unions, suppliers, industry bodies, civil society and auditors.

These engagements contributed to our work on issues including temporary migrant workers, grievance mechanisms, remediation, responsible recruitment and international shipping.

A summary of key stakeholder engagement and collaboration activities undertaken during the reporting period is provided in the following table.

	Stakeholders	Our engagement
Representatives of affected workers We engage with unions and other worker representatives to promote a safe and ethical supply chain working environment.	**Ethical Retail Supply Chain Accord (ERSCA)** Shop, Distributive and Allied Employees Association (SDA), Transport Workers Union (TWU) and Australian Workers Union (AWU)	We convened on four worker education events across Australia. These partnerships help us have a holistic view of risks and challenges faced by temporary migrant workers and continuously refine our approach to support workers in our supply chain.
	Transport Charter Transport Workers Union	Since 2020, we have a charter with TWU on standards in road transport and the gig economy, focusing on safety, driver education and mental health. In FY26, we commenced discussions to renew the charter.
	The Mission to Seafarers	We partnered with The Mission to Seafarers to visit vessels and conduct direct engagement with seafarers. This helps us understand lived experiences of seafarers, identify risks and refine our due diligence process for shipping providers.
Civil society and non-governmental organisations We engage with civil society and NGOs to collaborate across industries on ways to tackle modern slavery and human rights concerns in our supply chain.	**Be Slavery Free**	In FY26, cross-industry working group discussions included risks to workers in seafood, remediation, worker engagement and the proposed Modern Slavery Act reforms.
	St Vincent de Paul Society	In FY26, we engaged with Biba Honnet from St Vincent de Paul Society to better understand concerns and experiences of migrant workers, including Pacific Australia Labour Mobility (PALM) scheme workers, working in the horticulture sector in regional communities.
	Australian Catholic Anti-Slavery Network (ACAN)	In FY26, Domus 8.7 Lived Experience Advisor Moe Turaga joined our team on visits to connect with horticulture workers in Far North Queensland regarding accommodation and experiences at work.
	Responsible Shipping Dialogue Institute for Human Rights and Business (IHRB)	In FY26, cross-industry discussions focused on seafarer welfare and recruitment fees, including a toolkit to support companies to assess exposure to these risks and strengthen oversight over crewing agencies.
	External human rights benchmarks	We voluntarily participated in external benchmarks, including the World Benchmarking Alliance's Corporate Human Rights Benchmark (CHRB) and KnowTheChain's (KTC's) Food and Beverage Benchmark. We also consulted with the benchmark teams to understand expectations and contribute to new methodology development.

	Stakeholders	Our engagement
Industry associations or partnerships We exchange learnings with global industry peers and collaboratively share on modern slavery and human rights topics.	**Consumer Goods Forum (CGF)**	In FY26, we joined the CGF's Human Rights Coalition, attending the meeting in Europe and presenting in-person at the Sustainable Retail Summit on human rights matters. Our CEO, who sits on the Board, also presented at the Global Summit. This year focused on human rights defenders, due diligence, responsible recruitment, third-party workers and creating measurable impact for workers.
	United Nations Global Compact Network (UNGC)	We joined UNGC in 2019 and participate in multiple forums, including the Modern Slavery Community of Practice and the Human Rights Due Diligence Working Group. In FY26, we joined the Advanced Human Rights Due Diligence Working Group.
	Sustainable Wine Roundtable	We became a member in FY26, taking part in the Labour Standards Working Group to focus on specific labour rights and modern slavery risks in viticulture across different tiers in the supply chain.
Standard setters, data and audit scheme platforms We engage these third-party providers to access audit data, supply chain risk and risk mitigation data and tools.	**Sedex**	As a Sedex member, we engaged with Sedex on the SMETA 7 audit standard annual review and updates, including the review of the collaborative action required findings.[1]
	Fair Farms	We continue to engage with Fair Farms, contributing to the ongoing development of the standard, to support improved human rights outcomes in Australian horticulture.
Government and other agencies We engage with government agencies and representatives to further understand regulatory expectations, help advocate for guidance and practical reforms, and support broader stakeholder discussions.	**Australian Government; Australian Anti-Slavery Commissioner; NSW Anti-Slavery Commissioner**	We participated in several industry consultations regarding the proposed reforms of the Modern Slavery Act, the Office of the Anti-Slavery Commissioner's Strategic Plan for 2025 to 2028, and a National Labour Hire scheme. We also partook in individual engagements with the Anti-Slavery Commissioners.
Investors Engagement with investors helps us to understand their expectations and build on our modern slavery response.	**Our investors**	Investors engaged with us on the effectiveness of our actions to address modern slavery risks, including our due diligence practices, risk assessments, and the coverage and effectiveness of audits. Investors' queries are evolving, responding to our reporting to gain a more in-depth understanding of how we identify and address issues.

1. Collaborative action required findings are a type of audit finding introduced by Sedex in the SMETA 7 audit methodology to address complex, long-term or systemic issues that require collaborative remediation beyond a single audit cycle. Further information is available here: www.sedex.com.

In FY26, we were pleased to receive external recognition for our efforts to protect human rights.

World Benchmarking Alliance

#1 food retailer and

#6 globally in the 2026 Corporate Human Rights Benchmark[1]

KNOWTHECHAIN

#2 in the 2026 KnowTheChain Food and Beverage Benchmark[2]

NSW GOVERNMENT

Commended by the NSW Anti Slavery Commissioner

for our commitment to strengthening modern slavery due diligence and risk management capabilities

1. Out of 105 companies assessed.
2. Out of 45 companies assessed. Coles' total score was 55 out of 100.

Assessing effectiveness

We define an effective response to modern slavery as reducing worker vulnerability to exploitation through improved business practices that support better outcomes for workers over time, combined with strategic collaboration where impact at scale cannot be achieved alone.

Pictured: Coles team member Pauline at a worker education event in Mareeba, Queensland.

We continued to embed evaluation of effectiveness across our modern slavery program, treating it as an integral part of the feedback loop rather than a retrospective exercise.

In FY26, consideration of effectiveness was built into the initiatives described throughout this statement, enabling us to assess progress as activities were implemented and to refine, pause or redirect action where needed to strengthen impact.

We also took initial steps to more intentionally incorporate a worker-centred lens by strengthening our understanding of the supply chain workers our efforts are intended to support.

We continued to assess effectiveness at a broader program level to understand how our interconnected actions contribute to a cohesive, impactful response to modern slavery risks.

The table below outlines how effectiveness is defined across the core areas of our response. In assessing change, we consider not only what has shifted, but whether those shifts can be reasonably attributed to our actions or external factors, informing where we focus effort and resources for greatest impact.

Area of modern slavery response	Effectiveness looks like...	Related activities	What's changed (and areas to improve on)
Identifying modern slavery risks Learn more about our work in this area on pages 16 to 25.	**Team members in our business and our suppliers are equipped to recognise indicators of modern slavery and are confident to escalate concerns appropriately, supporting early identification and response.**	• **Six learning sessions conducted to increase awareness of modern slavery risks, with over 430 attendees.** This includes the 'Spotting the Signs' and 'Ethical Sourcing Program refresher' training, delivered to relevant Coles team members in supplier-facing roles to build capability to recognise risk indicators, and escalate concerns appropriately. • **34 visits by the Ethical Sourcing team to supplier sites and our own facilities and 4 worker education events held in regional Australia.** Site visits and worker events allow us to better identify risks and gather location-specific insights. Proactive engagement with a local Coles Store Manager informed our understanding of migrant worker accommodation arrangements and supported targeted observations of potential risk indicators.	• **We continued to see an increase in human rights-related grievances raised directly to the Ethical Sourcing team** (refer to the *Managing grievances* section on page 36). These insights informed our focus on strengthening early risk identification and escalation. We will assess whether changes are driven by targeted guidance, training or other interventions. • **STOPline reports for ethical sourcing grievances remained low.** We recognise that workers may not choose formal grievance channels to raise concerns. Issues may be identified through other channels. We will continue to promote STOPline while continuing to strengthen internal capability to identify and escalate worker-related concerns.
	As a fast-moving omnichannel retail business, effectiveness means staying ahead of emerging risks, including those arising from evolving consumer trends and technologies such as automation, digital acceleration and AI. Established systems and processes support the timely identification, assessment and escalation of risks, enabling responsible innovation and growth.	• **We proactively monitor modern slavery risk intelligence** and are expanding compliance engagement with commercial teams to include discussions on evolving commercial trends, growth priorities and factors influencing supply chain change, to enable earlier visibility of emerging risks.	• **Strategic discussions with commercial teams covering business trends and future sourcing plans** are supporting earlier risk assessment and a more proactive approach to identifying and mitigating risks beyond social compliance audits. We are continuing to incorporate insights from these discussions into our risk identification process.

Assessing effectiveness continued

Area of modern slavery response	Effectiveness looks like…	Related activities	What's changed (and areas to improve on)
Addressing known modern slavery risks Learn more about our work in this area on pages 26 to 39.	**Effectiveness in addressing risks begins with prioritising actions which can have a longer-term sustained positive impact.** As circumstances evolve, the effectiveness of specific approaches may change, requiring calibration to enable responses to remain fit for purpose. Maintaining a clear pulse on changing conditions is critical to prioritising the most appropriate actions.	• **We progressed a review of the Ethical Sourcing Program to prioritise higher-risk areas.** This included reassessing risk ratings, audit performance and non-conformance trends, and undertaking deep dives into three sectors with known modern slavery risks, including seafood, Australian horticulture and high-risk services. These activities strengthened our understanding of where risks are most likely to occur and where targeted interventions are likely to have the greatest impact. • **We initiated steps to more intentionally incorporate a worker-centric lens into our approach through understanding workforce vulnerabilities and experiences.** This included consultation with affected workers or their representatives, review of supplier self-disclosed demographic data of in-scope sites, and review of worker numbers during the preparation of derogations. This supports a more people-centred understanding of where modern slavery risks may arise. • **We improved data visualisation to enable targeted engagement with our suppliers.** The data visualisation supports wider business alignment on supplier reviews and approvals.	• **We are continuing to refine our Ethical Sourcing Program to support a more targeted approach to supplier due diligence.** This includes assessing if our audit requirements are focused on the right supply chain areas where auditing can provide the most useful insights. It also included reprioritising audit non-conformances based on their criticality and highest risks to supply chain workers, enabling us to focus where it matters most. While still in initial stages of delivery, early signs suggest a shift in volume and types of non-conformances we engage suppliers on. We anticipate this work will support us to focus on pressing supply chain issues. • **Our deep dives have provided greater visibility of risk within our extended supply chain, allowing us to refine and prioritise due diligence efforts where they can have the greatest impact.** For example, our engagement with domestic seafood suppliers is helping us to better understand the types of risk factors in this supply chain and where we can reprioritise our due diligence.
Preventing and mitigating future modern slavery risks Learn more about our work in this area on pages 40 to 45.	**We know our prevention approach is becoming more effective when it improves our ability to identify risk earlier, direct attention to the areas of greatest vulnerability, and intervene before harm occurs.** Effectiveness also includes adapting prevention measures to emerging risks and embedding them into business decisions and engagement.	• **We have taken a more intentional approach to internal consultation,** using early pre-engagement to build shared understanding. • **We have established processes to support early identification of risks prior to the commencement of new initiatives or new supplier engagements.** This helps us identify risks early on and aims to prevent new engagements where risks cannot be addressed or mitigated.	• **We will continue to work closely with business units and operational teams to integrate early warning indicators** into existing sourcing processes, enabling earlier risk identification and clearer pathways to escalation and prevention. • **We will continue to engage with frontline organisations to deepen our understanding of affected workers' experiences and identify meaningful opportunities for collaboration.** These insights will support our consideration of how prevention activities can be better informed by worker perspectives.

How we have consulted within our business

We take a coordinated and consultative approach to addressing modern slavery risks across our business. Consistent with this approach, we undertook a consultation process within our business to develop this statement.

Statement development

The development of this statement was led by the Ethical Sourcing team, which consulted directly with functional teams across the Coles Group – including commercial, operations and procurement teams – to draft the statement. These teams collaborate on a day-to-day basis to implement our response to addressing modern slavery risks. For example, the Ethical Sourcing team worked closely with commercial and procurement teams to refine our understanding of modern slavery risks associated with selected products and services categories, and engaged on relevant case studies that demonstrate our approach in practice. This process informed the content of the statement and also created opportunities to deepen internal engagement and foster awareness and collaboration across functions. Throughout the process, updates were also shared with the Modern Slavery Working Group (MSWG) for consultation and inputs. The MSWG includes representatives from business functions across the Coles Group, such as ethical sourcing, procurement, commercial, risk and compliance, Own Brand, operations, legal, employee relations and sustainability.

Whole of Group level consultation

Our statement was subject to a cross-functional consultation process that encompassed engagement with directors of the reporting entities and owned and controlled entities, as well as our Executive Leadership Team, and Audit and Risk Committee. Drafts of the statement were also shared with members of the Human Rights Steering Committee and MSWG for review and feedback.

Reporting entities

Along with the director-level consultation process with reporting entities, the Ethical Sourcing team engaged with representatives of each reporting entity at the management or operational level. This was conducted either through the MSWG, regular engagement for the Ethical Sourcing Program or via separate consultation meetings.

Owned and controlled entities

As part of our organisational risk management approach (refer to the *Our governance* section on pages 11 to 12), we conducted assessments of the risk profiles of selected owned and controlled entities against our material risks, including ethical sourcing. Entities in FY26 included our retail manufacturing businesses.

Consultation also took place with both Flybuys and Queensland Venue Co., as Coles has a 50% interest in both businesses, which are required to submit their own modern slavery statements. This consultation focused on their modern slavery reporting, modern slavery risks and actions to address them in the reporting period.

Statement approval

In accordance with the requirements of section 14(2)(d)(i) of the Modern Slavery Act, this statement was approved by the Board of Coles Group Limited in its capacity as principal governing body of Coles Group Limited on 15 September 2026, and was approved by the boards of each of the other reporting entities in their capacities as principal governing bodies of those entities on 15 September 2026. The statement is signed by the Chairman and Chief Executive Officer of Coles Group Limited and by the Chief Executive Officer in her capacity as a director of each of the other reporting entities.

Ernst & Young provided limited assurance over this statement. The limited assurance process assists in improving Coles' processes for modern slavery risk management and reporting.

Peter Allen
Chairman, Coles Group Limited
15 September 2026

Leah Weckert
Managing Director and Chief Executive Officer, Coles Group Limited
15 September 2026

Appendices

Appendix 1: Compliance with Modern Slavery Act requirements

This statement was prepared in accordance with the criteria set out in the Australian *Modern Slavery Act 2018* (Cth). The following table outlines where information related to each mandatory reporting criterion can be located within our statement.

Mandatory criteria for Modern Slavery Statements	Location of information	Page
Identify the reporting entity	• Approach to reporting • Our structure	Page 2 Page 7
Describe the structure, operations, and supply chains of the reporting entity	• Our structure • Our operations and our team • What we source • Appendix 3: Country risk data	Page 7 Page 10 Pages 13 to 15 Pages 52 to 53
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	• Modern slavery risks • Our modern slavery operations risk profile • How we understand and assess our modern slavery risk profile • Our modern slavery supply chain risk profile • Our exposure to geographic risks	Pages 16 to 25 Page 17 Pages 18 to 19 Pages 20 to 21 Pages 22 to 23
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	• Our modern slavery response • Due diligence to manage modern slavery risks • Managing risks in our operations • Managing risks in our supply chain • Grievance management and remediation • Managing grievances • Our approach to grievance management • Our approach to remediation • Preventing modern slavery from occurring • Appendix 2: Coles' supplier grievances table	Pages 26 to 45 Pages 28 to 35 Page 28 Pages 29 to 35 Pages 36 to 39 Page 36 Page 37 Page 38 Pages 40 to 45 Pages 50 to 51
Describe how the reporting entity assesses the effectiveness of such actions	• Assessing effectiveness • How we assess the effectiveness of our actions is also reflected in the respective sections throughout this statement	Pages 46 to 48
Describe the process of consultation with any entities that the reporting entity owns or controls	• How we have consulted within our business	Page 49
Provide any other information that the reporting entity, or the entity giving the statement, considers relevant	• Message from our Chairman and CEO • Our approach to continuous improvement	Page 6 Pages 8 to 9

Appendix 2: Coles supplier grievances table

The following supplier grievances were received in FY26. Sources of grievances include direct contact to Coles, supplier audits, unions, regulator referrals and other external stakeholders.

Period received	Type of supplier	Nature of grievance/investigation	Outcome
April–June 2026	Fresh Produce (direct)	Allegations relating to the relationship between labour hire providers and associated business entities.	**Closed**. An internal investigation was conducted. The allegations could not be substantiated based on the information available. The matter has been incorporated into ongoing monitoring activities.
April–June 2026	Liquor supplier (indirect)	Allegations of unethical business practices, including fraud, breaches of product integrity and regulatory non-compliance.	**Closed.** An internal investigation was conducted. Based on the information available, the site was not identified as being linked with Coles' supply chain.
April–June 2026	Labour hire provider used by produce suppliers (indirect)	Allegations of underpayment and unfit accommodation.	**Closed**. An internal investigation was conducted. While the allegations could not be substantiated through the investigation, the matters raised aligned with broader risk areas already identified through our due diligence activities. These insights have informed ongoing program activities to strengthen our response.
April–June 2026	GNFR supplier (services)	Allegations of unfair dismissal.	**Closed**. An internal investigation was conducted and found the allegations to be unsubstantiated.
April–June 2026	GNFR supplier (services)	Allegations of cash-in-hand payments.	**Closed**. An internal investigation was conducted and found the allegations to be unsubstantiated.
April–June 2026	Fresh Produce (direct)	Allegations of worker mistreatment, underpayment and unfit accommodation.	**Open**. Investigation in progress.[1]
April–June 2026	GNFR supplier (services)	Allegations of unpaid superannuation entitlements.	**Closed**. An internal investigation was conducted, with findings substantiated. Repayments have been made to the workers affected.
Jan–March 2026	GNFR supplier (services)	Allegations of underpayment and sham-contracting.	**Closed**. An internal investigation was conducted and found the allegations to be unsubstantiated.
Jan–March 2026	Labour hire provider (indirect)	Allegations of underpayment and withholding passports.	**Closed**. An internal investigation was conducted. Based on the information available, the individual was not identified as being engaged by a supplier within Coles' supply chain.
Oct–Dec 2025	Fresh Produce (direct)	Allegations of underpayment.	**Closed**. An internal investigation was conducted. The supplier has paid the outstanding amounts to the liquidators, with outstanding worker payments now being managed through the liquidation process.
Oct–Dec 2025	GNFR supplier (services)	Allegations of breaches of visa conditions, excessive working hours, underpayment, and unpaid entitlements including overtime and superannuation.	**Closed**. An internal investigation was conducted. Prior to being able to complete the investigation, the supplier entered administration, and the contract was transferred to an alternative service provider.
Oct–Dec 2025	GNFR supplier (services)	Allegations of underpayment and failure to provide payslips.	**Closed**. An internal investigation was conducted. Prior to being able to complete the investigation, the supplier entered administration and the contract was transferred to an alternative service provider.
Oct–Dec 2025	GNFR supplier (services)	Allegations of insufficient working breaks between shifts.	**Closed**. An internal investigation was conducted, with findings substantiated. Repayment has been made to the worker affected.
Oct–Dec 2025	GNFR supplier (services)	Allegations of undocumented subcontractors, incorrect working rights, underpayment, leave entitlement irregularities and health and safety issues.	**Open**. Investigation in progress.[1]
Oct–Dec 2025	Unknown	Allegations of underpayment.	**Closed**. Limited information was available to support further investigation. Information was provided regarding available avenues for raising concerns and seeking further assistance.
June–Sept 2025	Fresh Produce (direct)	Allegations of underpayment and excessive working hours.	**Open**. Investigation in progress.[2]
June–Sept 2025	Fresh Produce (indirect)	Allegations of underpayment and worker intimidation.	**Closed**. An internal investigation was conducted. While the allegations could not be substantiated through the investigation, the matters raised aligned with broader risk areas already identified through our due diligence activities. These insights have informed ongoing program activities to strengthen our response.
June–Sept 2025	Fresh Produce (direct)	Allegations of underpayment and unfair dismissal.	**Closed**. An internal investigation was conducted and found the allegations to be unsubstantiated.

1. Following the reporting period, the investigations were completed and the allegations were substantiated. Coles worked with the relevant suppliers to address the identified issues and close the matters.
2. This investigation remains open due to the seasonal nature of the supplier's operations. The investigation commenced after the reporting period when the relevant seasonal operations resumed.

Appendices continued

Appendix 3: Country risk data

The table below shows the number of tier one and two suppliers in scope of the Ethical Sourcing Program (see pages 22 to 23 for further information), including the number of suppliers in each country and the types of products or services which are supplied.

Country	Inherent risk score	Bakery	Dairy, Frozen & Convenience	Fresh Produce	GNFR	Grocery	Non-Food	Liquor	Meat, Deli, Seafood	Grand total
AFRICA										
South Africa	●					1			1	2
ASIA										
China	●	1	6		56	25	172			260
Hong Kong	●					1				1
India	●		1		2	11	13			27
Indonesia	●		2		1	2				5
Malaysia	●				1	1	3			5
Pakistan	●					1				1
Philippines	●				1	1				2
Singapore	●					1				1
Sri Lanka	●		1			1	3			5
Taiwan	●				1	1			1	3
Thailand	●		1		1	20	3		1	26
Vietnam	●		4	5	1	6	5	1	8	30
EUROPE										
Austria	●		1							1
Belgium	●	3	7			5				15
Bulgaria	●						1			1
Cyprus	●		1							1
Denmark	●		1						5	6
Finland	●				1					1
France	●	3	6			3		4	5	21
Germany	●	1	1			4	3	1		10
Greece	●		2			2				4
Hungary	●					1				1
Ireland, Republic of	●	1	1					1		3
Italy	●	3	6			30	1	3	5	48
Lithuania	●					1				1
Netherlands	●	3	1			4			2	10
Poland	●	1	2			6	1		1	11
Portugal	●	1								1
Romania	●					1				1
Serbia	●		1							1
Spain	●		2			3	1		3	9
Sweden	●				1					1
Switzerland	●					3			2	5
Türkiye	●				1	5				6
United Kingdom	●	5	2		1	1		2	3	14
NORTH AMERICA										
Canada	●	2	1			2				5
Mexico	●			4	1					5
United States of America	●			3		3		1		7
SOUTH AMERICA										
Chile	●		1							1
Peru	●		1			1				2
OCEANIA										
Australia	●	53	85	683	147	96	45	20	86	1,215
New Zealand	●	6	2	41		8		1		58
Grand total		**83**	**139**	**736**	**216**	**251**	**251**	**34**	**123**	**1,833**

Inherent risk scores

Low Medium High

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