



HARVEY NORMAN HOLDINGS LIMITED

MODERN SLAVERY STATEMENT

2023

Harvey Norman Holdings Limited ACN 003 237 545 is listed on the Australian Securities Exchange (ASX: HVN), (Registered Office: A1 Richmond Road, Homebush West NSW 2140).

This modern slavery statement is provided by Harvey Norman Holdings Limited (**HNHL**) in respect of each of HNHL and each of its relevant material controlled entities¹ (each a **Relevant Material Controlled Entity**), (**Modern Slavery Statement**).

¹ See list of material HNHL controlled entities published in the HNHL 2023 Annual Report, pages 143 and 144.

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Letter from our Chief Executive Officer

HNHL and each Relevant Material Controlled Entity supports the objectives of governments around the world (including Australia) to eradicate all forms of modern slavery and human trafficking.

Each of HNHL and each Relevant Material Controlled Entity conducts business in a manner that is consistent with the corporate governance and risk management framework of each of HNHL and each Relevant Material Controlled Entity. Each of HNHL and each Relevant Material Controlled Entity requires the same level of compliance and behaviour from all suppliers, subject to all applicable laws.

This Modern Slavery Statement is the fourth modern slavery statement prepared and published by HNHL for the purposes of the Modern Slavery Act (Cth) 2018 (**Modern Slavery Act**). In accordance with the Modern Slavery Act, this Modern Slavery Statement describes the actions that each of HNHL and each Relevant Material Controlled Entity has taken to address modern slavery risks in operations and supply chains, and the effectiveness of those actions.

Each Relevant Material Controlled Entity has continued to implement and improve processes and procedures in identifying and addressing modern slavery risks in supply chains.

Each Relevant Material Controlled Entity will continue to work closely with suppliers and manufacturers to identify and address modern slavery risks in supply chains and business operations.

Each of HNHL and each Relevant Material Controlled Entity is committed to the on-going development of the modern slavery risk management framework of each of HNHL and each Relevant Material Controlled Entity and eradicating all forms of modern slavery within operations, supply chains and business relationships, and acting ethically and with integrity and transparency in all business dealings and relationships.

K.L. Page

A handwritten signature in black ink that reads "Katie Page". The signature is written in a cursive, flowing style.

Chief Executive Officer
Sydney
23/12/2023

Our Structure, Operations and Supply Chains

FRANCHISE OPERATIONS IN AUSTRALIA

HNHL and subsidiaries of HNHL own valuable intellectual property rights, including the trade marks Harvey Norman®, Domayne® and Joyce Mayne® (**Trade Marks**).

In Australia, a subsidiary of HNHL (a franchisor) grants separate franchises to independent franchisees to use certain intellectual property, including the Trade Marks, and to conduct the retail business of the franchisee online or at or from a store within a particular branded complex, pursuant to the terms of a franchise agreement.

Each franchisee is an independent business. Each franchisee owns and controls the franchisee business of that franchisee. HNHL does not control, or have any ownership interest in, any franchisee or the franchisee business of any franchisee. Franchisees do not form part of the Consolidated Entity.

Note: HNHL and subsidiaries of HNHL, in Australia, do not sell goods or services at or through any physical or online store under any name "Harvey Norman®", "Domayne®" or "Joyce Mayne®".

NON-FRANCHISING OPERATIONS

Non-franchising operations include:

Retail operations outside of Australia

- offshore company-operated retail stores trading under the Harvey Norman® brand in New Zealand, Singapore, Malaysia, Ireland, Northern Ireland, Croatia and Slovenia; and

Retail and wholesale trading in Australia

- retail and wholesale trading operations in Australia which are conducted by wholly-owned, controlled or jointly-controlled subsidiaries of HNHL.



Our Corporate Governance and Risk Management Framework

MANAGEMENT FRAMEWORK



The board of each of HNHL and each Relevant Material Controlled Entity (**Relevant Board**) is committed to a high standard of corporate governance, and is responsible for establishing, maintaining and monitoring the corporate governance framework of each of HNHL and each Relevant Material Controlled Entity.

Each Relevant Board aims to foster a culture of compliance, with an emphasis on ethical behaviour, accountability, corporate and individual integrity and respect for others.

RISK MANAGEMENT FRAMEWORK

The audit and risk committee in respect of each of HNHL and each Relevant Material Controlled Entity (**Audit and Risk Committee**), assists the Relevant Board in overseeing systems of internal control and its risk management framework, including:

- monitoring management's performance against the risk management framework;
- receiving reports from internal audits on its reviews of the adequacy of the processes for managing risk (including modern slavery risks);
- receiving reports from management concerning new and emerging sources or risks, including any risks of modern slavery practices in our operations and supply chains; and
- reviewing the risk management framework at least annually to satisfy itself that the risk management framework continues to be sound and that HNHL and each Relevant Material Controlled Entity is operating with due regard to the risk appetite of each Relevant Board respectively, and (where appropriate) making recommendations to the Relevant Board regarding any changes.

RISKS OF MODERN SLAVERY PRACTICES IN OPERATIONS AND SUPPLY CHAINS

The risk management framework of each of HNHL and each Relevant Material Controlled Entity, in relation to modern slavery risks, includes the following elements:

- risk assessment to identify and mitigate risks of modern slavery practices;

- evaluation of modern slavery risks within sourcing processes and procurement activities;
- monitoring modern slavery risks which may arise in the employment of employees or engagement of contractors in our operations or supply chains;
- raise awareness and understanding of modern slavery risks within the operations of the Consolidated Entity through education and training to ensure that relevant teams are adequately trained to identify and report modern slavery incidents or practices; and
- actions to eliminate modern slavery risk in the businesses of each Relevant Material Controlled Entity.

MODERN SLAVERY COMMITTEE

The Modern Slavery Committee (comprised of executive directors of Yoogalu Pty Limited, a controlled entity of HNHL) has the responsibility for oversight of modern slavery risks and issues in respect of each Relevant Material Controlled Entity.

The responsibilities of the Modern Slavery Committee include in relation to each Relevant Material Controlled Entity:

- to manage, monitor and report on the compliance status and risks of modern slavery in operations and supply chains of each Relevant Material Controlled Entity to the Audit and Risk Committee;
- to develop or approve, or both, actions to address modern slavery or the risks of modern slavery in operations and supply chains;
- to assist in developing policies, standards, rules and procedures relating to modern slavery, including content and format of internal reporting of modern slavery matters that are to be followed or complied with by each Relevant Material Controlled Entity;
- to keep informed as to trends in the types of risks of modern slavery practices in the operation and supply chains to ensure that appropriate control measures are implemented to eliminate or minimise any identified risks;
- to develop a process to assist each Relevant Material Controlled Entity to consider and respond to, and to comply with applicable modern slavery laws;
- to develop an internal reporting process for identifying and managing

changes to operations and supply chains which may have an impact on the risk of modern slavery in those operations and supply chains;

- to ensure that regular risk assessments (including due diligence) are conducted with respect to the operations and supply chains by suitably qualified people, including independent experts;
- to consider, and make such recommendations to the Relevant Board directly or through the Audit and Risk Committee, as the Modern Slavery Committee sees fits, with respect to modern slavery, including any matter arising from any identified risk;
- to consider any matter of modern slavery that is referred to the Modern Slavery Committee by any person;
- to consider the reports prepared by management with respect to modern slavery; and
- to monitor and evaluate the drafting, completion and submission of each modern slavery statement as required by the Modern Slavery Act.

The Modern Slavery Committee may make recommendations to the Relevant Board directly, or to the Audit and Risk Committee, or both, to assist each Relevant Material Controlled Entity to comply with applicable modern slavery laws.

POLICIES

Each Relevant Material Controlled Entity conducts its businesses and engages with suppliers in a manner that complies with all applicable laws (including all relevant modern slavery laws) and which is consistent with the corporate governance framework, including the following policies:

- Modern Slavery Policy;
- Code of Conduct;
- Whistleblower Policy; and
- Anti-Bribery and Corruption Policy.

Each of HNHL and each Relevant Material Controlled Entity expects suppliers to have the same level of compliance and behaviour, subject to applicable laws of the country or countries where the business is carried out.

Actions Taken to Address Modern Slavery Risks

Set out below are the actions taken during the period from 1 July 2022 to 30 June 2023 in relation to modern slavery risks:

MODERN SLAVERY COMMITTEE

- The Modern Slavery Committee (comprised of executive directors of Yoogalu Pty Limited, a controlled entity of HNHL) continued to be responsible for dealing with modern slavery risks and issues.
- Operations and supply chains of each Relevant Material Controlled Entity were reviewed during the reporting period in relation to modern slavery risks.

MODERN SLAVERY TRAINING

Training continues to take place on an annual basis in relation to compliance with relevant modern slavery laws, including the Modern Slavery Act.

Education and training allows individuals to recognise and assess modern slavery risks and to understand when and to whom modern slavery risks should be reported.

Training in relation to modern slavery risks included education regarding:

- modern slavery risks and the application of relevant modern slavery laws to operations and supply chains; and
- dealing with manufacturers and suppliers in supply chains and identifying and addressing modern slavery risks.

DUE DILIGENCE

Each Relevant Material Controlled Entity employs a due diligence process prior to engaging (and during engagement of) suppliers for offshore company-operated retail stores and its retail and wholesale trading operations in Australia, which are wholly-owned or controlled by subsidiaries of HNHL.

This due diligence process includes assessing the risk profile of a supplier and whether that supplier complies with ethical practices and legal requirements (including in relation to modern slavery risks).

SERVICE AND SUPPLIER CONTRACTS

Where possible, each Relevant Material Controlled Entity has continued to take steps to incorporate provisions in service agreements, supply agreements and trading terms with suppliers to address modern slavery risks.

Generally, each Relevant Material Controlled Entity seeks to:

- obtain written confirmation from the service provider or supplier, including appropriate contract terms with the service provider or supplier, that the service provider or supplier and others in its operations or supply chains:
 - will comply with all applicable modern slavery laws and minimise the risk of modern slavery arising in its business; and
 - will promptly inform the Relevant Material Controlled Entity of any actual or suspected breach of applicable modern slavery laws by the service provider or supplier or any person involved in its business, operations or supply chain;
- retain the right to terminate any contractual arrangement with a service provider or supplier in the event the service provider or supplier, or any service provider or supplier in any operations or supply chain of the service provider or supplier, is found to be engaging (directly or indirectly) in modern slavery; and
- engage with the service provider or supplier to help address potential modern slavery risks in the operations or supply chains of the service provider or supplier.

Where there has been resistance from certain suppliers to agree to contractual terms that require that supplier to comply with modern slavery laws (particularly when such laws do not apply in the relevant jurisdiction in which that the supplier operates), an alternative approach has been adopted by certain Relevant Material Controlled Entities whereby the supplier is contractually required to assist the Relevant Material Controlled Entity to comply with requirements to address modern slavery risks and comply with all applicable modern slavery laws.

nor any controlled entity of HNHL (including Yoogalu Pty Limited or any franchisor) performs any audit function in relation to any franchisee.

MONITORING AND EVALUATING THE PERFORMANCE AND COMPLIANCE OF FRANCHISEES

- Each relevant franchisor (a controlled entity of HNHL) monitors and evaluates the performance and compliance of each relevant franchisee with contractual obligations, including the franchise agreement, and obligations under relevant laws (including modern slavery laws).
- Yoogalu Pty Limited (a controlled entity of HNHL) may, as a representative of each relevant franchisor, monitor and evaluate the performance and compliance of each relevant franchisee with the franchise agreement and all applicable laws (including modern slavery laws) and make recommendations to franchisees from time to time.
- Each franchisor may recommend to each franchisee to develop, implement and maintain:
 - o a compliance risk management framework in relation to modern slavery laws and risks;
 - o policies and procedures informed by risk assessments in respect of modern slavery;
 - o oversight, advice and support by subject matter experts (e.g. employees of the relevant franchisee who are qualified by training, education or experience in compliance and risk controls with support from external experts engaged by the relevant franchisee;
 - o regular audit to be carried out to objectively review and appraise whether the modern slavery policies and procedures of each relevant franchisee are working effectively and efficiently.
- For the avoidance of doubt, neither HNHL,

REPORTING PROCESS

Employees of each Relevant Material Controlled Entity are required to report any concerns regarding unethical or illegal behaviour, including but not limited to any incidents of modern slavery (**Reported Incident**).

Each Reported Incident will be investigated and if substantiated, or if otherwise considered appropriate, reported to the Relevant Board.

Reported Incidents referred to the Relevant Board will be reviewed by the Relevant Board to determine the appropriate process to be undertaken to ensure compliance by the Relevant Material Controlled Entity with relevant modern slavery laws.

The process will include, but is not limited to, steps to resolve or remediate the matter including but not limited to, undertaking further investigations, exercising contractual rights and reporting as required to comply with legal and statutory obligations, and to promote ethical and moral behaviour. The Relevant Board may also engage external advisers, consultants or such resources as the Relevant Board considers necessary, to assist in investigations or any remediation activities.

Effectiveness of Actions Taken

Each of HNHL and each Relevant Material Controlled Entity recognises the importance of measuring the effectiveness of different actions taken to assess and address modern slavery risks and compliance with relevant modern slavery laws.

For this reporting period, each Relevant Material Controlled Entity has measured the effectiveness of actions taken as follows:

ACTION	MEASUREMENT OF EFFECTIVENESS
Modern Slavery Committee	The Modern Slavery Committee, together with management of each Relevant Material Controlled Entity, continues to identify, assess and address modern slavery risks during each relevant reporting period in respect of that Relevant Material Controlled Entity.
Due Diligence	Each Relevant Material Controlled Entity employs a due diligence process prior to engaging (and during engagement of) suppliers for offshore company-operated retail stores and its retail and wholesale trading operations in Australia.
Modern Slavery Policy	Each Relevant Material Controlled Entity is subject to a Modern Slavery Policy, which provides the framework for managing modern slavery risks in respect of that Relevant Material Controlled Entity and promotes compliance with all applicable modern slavery laws.
Service and Supplier Contracts	Each Relevant Material Controlled Entity is continuing the process of incorporating provisions in service agreements, supply agreements and trading terms with suppliers to address modern slavery risks.
Monitoring and evaluating the performance and compliance of franchisees	Each relevant franchisor (a controlled entity of HNHL) monitors and evaluates the performance and compliance of each relevant franchisee with contractual obligations, including the franchise agreement, and obligations under relevant laws (including modern slavery laws).
Training and Education	Each Relevant Material Controlled Entity requires relevant personnel to undertake training in relation to compliance with relevant modern slavery laws and modern slavery risks.

Process of Consultation with Controlled Entities

In preparing this Modern Slavery Statement, HNHL engaged with:

- Relevant Material Controlled Entities; and
- the Modern Slavery Committee,

to obtain an understanding of the modern slavery risks in key supply chains and operations, and appropriate actions taken to address and mitigate identified risks.

Continuous Improvement

This Modern Slavery Statement is the fourth statement prepared and published by HNHL for the purposes of the Modern Slavery Act.

HNHL and each Relevant Material Controlled Entity is continuously reviewing:

- actions taken to identify and assess modern slavery risks;
- actions taken in response to any identified modern slavery risks; and
- any improvements that can be made in relation to the above.



Modern Slavery Act Reporting Criteria

MODERN SLAVERY ACT REPORTING CRITERIA	RELEVANT SECTION IN THIS MODERN SLAVERY STATEMENT
1. Identify the reporting entity	Structure, operations and supply chains
2. Describe the structure, operations and supply chains of the reporting entity	Structure, operations and supply chains; Corporate Governance and Risk Management Framework
3. Describe the risks of Modern Slavery practices in the operations and supply of the reporting entity, and any entities that the reporting entity owns or controls	Corporate Governance and Risk Management Framework
4. 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	Corporate Governance and Risk Management Framework; Actions taken to address modern slavery risks
5. Describe how the reporting entity assesses the effectiveness of such actions	Effectiveness of Actions Taken
6. Describe the process of consultation with any entities that the reporting entity owns or controls	Process of Consultation with Controlled Entities
7. Provide any other information that the reporting entity, or the entity giving the statement, considers relevant	Continuous Improvement

This statement was approved by the HNHL Board



Harvey Norman Holdings Limited
ACN 003 237 545
per David Ackery – Director