



## SUPPLIER QUESTIONNAIRE: MODERN SLAVERY

### 1. Purpose of the questionnaire

- 1.1 The purpose of this questionnaire is to help Lowes – Manhattan Pty Ltd with our due diligence procedures to assess the risk of modern slavery in our supply chain, in compliance with our obligations under the *Modern Slavery Act 2018* (Cth), our organisational values and ethics and our zero-tolerance approach to modern slavery.
- 1.2 When supplying copies of documents and other requested information, please comply with the following guidelines:
  - (a) provide the appropriate documents or information, or an appropriate negative statement, as soon as is practicable;
  - (b) where you are uncertain of the scope of any question, or the relevance of any information or document, please provide too much rather than too little information;
  - (c) where the same information and documents are to be supplied in response to two or more different questions, you need not repeat your response if all appropriate cross-references are made; and
  - (d) please contact us to update your responses as more information becomes available or if subsequent events make any earlier responses inaccurate.
- 1.3 We confirm that we will keep confidential all documents and information provided by you in response to this questionnaire, save to the extent that any disclosure is compelled by law.
- 1.4 To assist in our due diligence review, we may request to hold interviews with relevant employees, workers, sub-contractors and agents directly.
- 1.5 This is an initial request for information and we may ask for further information in due course. If there are any issues you would like to discuss with us or any questions you have, please contact Lowes' ESG Manager.
- 1.6 Your responses on behalf of the undersigned supplier to this questionnaire will help us to:
  - (a) confirm your compliance with our modern slavery policy and code of conduct;
  - (b) confirm your compliance with the *Modern Slavery Act 2018* (Cth);
  - (c) identify, assess and address the risk of modern slavery in our supply chains; and
  - (d) foster a collaborative relationship to help mitigate the risk of modern slavery and in appropriate circumstances remediate harm caused.

### 2. Instructions for completing the questionnaire

- 2.1 Please provide your responses to the questionnaire, including appropriate supporting documents by the date requested by Lowes.

- 2.2 This is an initial request for information and we may ask for further information in due course.
- 2.3 Include appropriate cross-references where the same information and documents are to be supplied in response to two or more different questions. You do not need to repeat your response.
- 2.4 Answer as openly as possible.
- 2.5 Where uncertain as to the scope of a question or the relevance of any information or document, provide more rather than less information, or contact us for clarification.
- 2.6 Notify us and update your responses as more information becomes available or if subsequent events make any earlier responses inaccurate.

**Please provide the following information and documents:**

**3. Modern slavery laws**

- 3.1 Are you a reporting entity for the purposes of the *Modern Slavery Act 2018* (Cth)?
- 3.2 If so, please provide a copy of your modern slavery statement(s) submitted in the last two years.
- 3.3 Has modern slavery occurred, or are risks of modern slavery present, in your business operations? If so, please provide details, including what steps you have (or are) taking to address the harm or risk.

**4. Sedex Membership**

- 4.1 Are you a member of the Supplier Ethical Data Exchange platform (Sedex)? If yes, please provide us with evidence of your membership.
- 4.2 If not, please confirm the date by which you will become a member.

**5. Structure and operations**

- 5.1 Provide details of the following in relation to your business:
  - (a) full company name and where applicable, ABN;
  - (b) any business name(s) or trading name(s);
  - (c) registered office address;
  - (d) contact person;
  - (e) email of contact person;
  - (f) any related or group entities;
  - (g) sector or industry in which the business operates;
  - (h) key business operations; and
  - (i) main countries of operations.
- 5.2 What sector is your primary business in? Do you have any ancillary business in additional sectors?
- 5.3 Do you supply goods and/or services directly or do you work with third party suppliers?
- 5.4 Do you have records of the other businesses and supply chains your company is connected to in relation to delivery of goods and/or services? If so, please provide as detailed a record as possible.

## **6. Workforce and worksites**

- 6.1 Give an overview of workforce composition. For example:
- (a) how many employees, subcontractors, labour hire or temporary workers are engaged by the business; and
  - (b) are there any vulnerable workers due to gender, language difficulties or poverty?
- 6.2 Provide details of any subcontractors involved in the supply of goods and services to us.
- 6.3 If you operate any worksites:
- (a) where are these worksites located;
  - (b) what systems do you have onsite to tackle modern slavery;
  - (c) is there any union or other worker representation onsite; and
  - (d) are workers able to access grievance mechanisms or anonymously raise issues with respect to work conditions?

## **7. Policies**

- 7.1 Do you agree to comply with our modern slavery policy?
- 7.2 If no, please provide details as to why and the extent of non-compliance.
- 7.3 If yes, please provide details as to how you will comply.
- 7.4 Does your organisation have any written policies and procedures relating to:
- (a) modern slavery;
  - (b) responsible sourcing;
  - (c) codes of conduct including supplier and factory codes of conduct;
  - (d) grievance processes; or
  - (e) whistleblowing?
- If so, please provide copies or links to where these documents can be accessed.
- 7.5 Do any of your policies include reference to labour rights? If so, does it include reference to accepted international standards, such as the ILO Declaration on Fundamental Principles and Rights at Work?
- 7.6 Do any of your policies include grievance mechanisms and remediation processes? Do those processes cover your direct employees only or do they include those in your wider supply chain?
- 7.7 Is there any other document or values statement by the organisation that you wish to bring to our attention? If so, please provide copies or links to where these documents can be accessed.
- 7.8 How frequently are your modern slavery policies and procedures updated (if any)?
- 7.9 Is your organisation a signatory to, or a member of, any ethical trading or ethical working conditions initiatives, or modern slavery initiatives or charters? If so, please provide details.

## **8. Policies in practice**

- 8.1 Has your company established due diligence processes to identify and understand any adverse impact of its operations (and those of its supply chain) on human rights, including labour rights?
- 8.2 Do you have any processes for prioritising and addressing the risks you identify?

- 8.3 Do you have monitoring and evaluation processes in place to monitor any modern slavery risks identified?
- 8.4 Do you have any programmes to ensure that forced labour does not exist in your operations? Do you have any such programmes for your supply chain?
- 8.5 Do you work with any third parties to identify the risks of slavery and human trafficking in your operations and/or supply chains?
- 8.6 Do you have any examples where your whistleblowing or other complaints processes or grievance mechanisms have been used, either generally or specifically to raise concerns about modern slavery?

## **9. Operations**

- 9.1 Can you confirm your operations are in compliance with all national laws and regulations as well as other applicable standards (such as collective bargaining agreements or other Codes of Conduct) on modern slavery and labour laws?
- 9.2 Have you ever identified any incidents of modern slavery or human trafficking in your operations? If so, what steps did you take to address it?
- 9.3 Do you provide any modern slavery and human trafficking awareness training to your staff? If so, how, when and to whom is training provided?
- 9.4 Can you provide a breakdown of the workers at your site: gender, nationality, language spoken, number of permanent or temporary contracts?
- 9.5 Are any workers at your site on agency contracts or employed by other third party providers? If so, do you have visibility of their employment standards?
- 9.6 Is there trade union recognition on any of your sites? If so, please provide details including of any representatives on-site.
- 9.7 If not, is there any other form of worker representation on any of your sites?
- 9.8 Are workers able to access grievance mechanisms or generally make complaints about conditions? Are you able to share any examples (without sharing personal information) of this being successfully used?
- 9.9 What, if any, other steps do you take to ensure that workers know their employment rights?

## **10. Your supply chain**

- 10.1 Do you have a Code of Conduct? Does it cover indirect suppliers, so those below your "first tier" or direct suppliers?
- 10.2 Do you place any contractual obligations on your suppliers to meet particular standards, such as compliance with the UN Guiding Principles on Business and Human Rights?
- 10.3 Who are your direct and indirect suppliers and subcontractors for the supply of goods and services by you to us, how many do you have, and in which countries and sectors do they primarily operate? You should include suppliers of raw materials or other component products here.
- 10.4 If your suppliers and contractors are overseas, have you done any risk-mapping of those countries and can you disclose any identified risks?
- 10.5 Do you have any restrictions on your own suppliers subcontracting or otherwise outsourcing the goods or services they provide to you?

- 10.6 Are you aware of any subcontracting or further tiers of suppliers from those direct suppliers? Which of those relate to goods or services you provide to us? You should include both formal sub-contracting and other temporary or seasonal work or outsourcing here.
- 10.7 Which relationships are critical for the supply of goods and services by you to us?
- 10.8 Who is responsible for managing these relationships?
- 10.9 How frequently do you review these relationships?
- 10.10 Which suppliers, if any, do you consider high risk for modern slavery?
- 10.11 What due diligence is conducted with respect to your direct and indirect suppliers and subcontractors to identify any risks of modern slavery?
- 10.12 How much visibility do you have over your direct and indirect suppliers and subcontractors?
- 10.13 Do you conduct modern slavery audits, site inspections or consult with relevant stakeholders with respect to your direct and indirect suppliers and subcontractors?
- 10.14 Has modern slavery occurred, or are risks of modern slavery present, in your supply chains? If so, please provide details, including what steps you have (or are) taking to address the harm or risk.
- 10.15 Please provide details of any steps you take to mitigate the risk of modern slavery affecting your supply chains, including any labour-related due diligence you conduct on your suppliers.
- 10.16 What contractual obligations do you place on your suppliers with respect to modern slavery?

## **11. Goods and services**

- 11.1 Where are raw materials or components for products sourced from?
- 11.2 Are you aware of any raised risk of modern slavery relating to the supply of raw material or products to us? If so, please provide details.
- 11.3 Is any part of the provision of services outsourced? If so, please provide details (including the location of outsourced services).
- 11.4 Are any services provided using migrant, contract, temporary or seasonal workers? If so, please provide details.
- 11.5 Are you aware of any:
- (a) recruitment practices (such as use of contract or seasonal workers);
  - (b) business practices (such as downward pressure on pricing or tight deadlines); or
  - (c) other factors (such as location or industry),
- relevant to the supply of goods and services that contribute to a risk of modern slavery? If so, please provide details.

## **12. Compliance**

- 12.1 Who has oversight of your modern slavery and human trafficking policies and your due diligence processes? What level of the company do they report to?
- 12.2 How is compliance with your modern slavery policies and procedures monitored?

- 12.3 Is senior management involved in enforcing your modern slavery policies? What actions follow from a breach of the policy?
- 12.4 Have there been any reports of, or concerns raised regarding, modern slavery in your business or supply chains? If so, please provide details.
- 12.5 Is there a grievance mechanism or whistleblowing process to encourage reporting of modern slavery concerns?
- 12.6 Has your business or any of your employees, subcontractors, agents or suppliers involved in the supply of goods and services to us, been investigated or charged in relation to breaches of legislation relating to modern slavery or human rights generally (in Australia or internationally)? If so, please provide details.
- 12.7 How do you respond to the risk, or occurrence, of modern slavery in your business operations or supply chains (for example, consequences for non-compliance or remediation programs)?

**13. Training**

- 13.1 Has your business (or an external provider engaged by your business) provided any modern slavery training to your employees, subcontractors or suppliers? If so, what is the content of the training, and how, when and to who is training provided?
- 13.2 Is tailored or further training given to higher risk groups, such as your procurement teams?
- 13.3 How frequently is training provided?

**14. Lowes Terms of Trade and Code of Conduct**

Do you agree to the Lowes Terms of Trade at <https://lowes.com.au/tradingterms> and the Lowes Code of Conduct at <https://lowes.com.au/codeconduct>?

**15. Further information**

Is there any further information you wish to provide that is relevant to modern slavery? If so, please provide details and attach a copy of any relevant documents.

**16. Supplier details**

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**[NAME OF SUPPLIER]**

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**[NAME AND POSITION OF PERSON COMPLETING THIS QUESTIONNAIRE]**

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**[CONTACT EMAIL AND PHONE NUMBER]**

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**[DATE QUESTIONNAIRE COMPLETED]**