

Report under the
**Fighting Against
Forced Labour And
Child Labour In
Supply Chains Act**

FINANCIAL YEAR ENDED
30 JUNE 2024

EVER NEW



Ever New recognises the importance of eradicating forced labour and child labour, an issue that affects both the global apparel industry and families alike. This report represents our commitment to fair and safe working conditions throughout our supply chains and operations.

INTRODUCTION

This report describes the risks of forced labour and child labour identified in our operations and supply chains and the steps taken during this reporting period to minimize the likelihood of those risks occurring.

This report applies to the reporting period 1 July 2023 – 30 June 2024 and is submitted by Ever New Melbourne Ltd (corporation number 805301-4), a corporation incorporated under the *Canada Business Corporations Act* (referred to throughout this report as 'Ever New'). Ever New's related companies are also required to submit modern slavery statements as required in Australia by the *Modern Slavery Act 2018*; and in the United Kingdom by the *Modern Slavery Act 2015*.

APPROVAL AND ATTESTATION

This report has been prepared in accordance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act. This report was reviewed and approved by the board of Ever New Melbourne Ltd on 26 May 2025.

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, and in particular section 11 thereof, I, in the capacity as Director, attest that I have reviewed the information contained in the report on behalf of the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed within this report.



Dipendra Goenka

Director and CEO, Ever New Melbourne Ltd

26 May 2025

I have authority to bind Ever New Melbourne Ltd.

OUR STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

OUR STRUCTURE

The Board of ADT Group Holdings Pty Ltd (ADT, an Australian company) is responsible for the overall governance, management and strategic direction of Ever New in accordance with all duties and obligations imposed by law. This includes oversight of its Supplier Code of Conduct and other ethical sourcing initiatives such as our Young Worker and Child Labour Policy and Forced Labour Policy.

ADT is the parent company of Ever New Melbourne Ltd, our Canadian operating entity. ADT's head office is in Melbourne, Australia.

The Board of ADT has delegated some of its responsibilities to the Audit and Risk Committee, including oversight of Ever New's risk management and compliance framework.

The Executive Leadership Team of ADT is responsible for the implementation and delivery of Ever New's strategy, risk management and compliance framework. Each member of the Executive Leadership Team directly reports to the Chief Executive Officer of Ever New. Within Ever New's business, the General Manager of Production and Quality continues to oversee the management of Ever New's ethical sourcing initiatives. Our Sustainability and Social Compliance Specialist is a dedicated resource who is responsible for the day to day management of all ethical sourcing activities and initiatives within Ever New.

Our structure remains unchanged from our last report.

OUR ACTIVITIES

Headquartered in Melbourne, Australia, Ever New commenced business in Canada in 2012. During this reporting period,

ADT's business comprises the distribution and sale of women's apparel and related accessories under its brands:

- 'Ever New'
- 'Ever New Curve'
- 'Forever New'; and
- 'Forever New Curve'.

The brands 'Ever New' and 'Ever New Curve' are used in Canada, USA and Philippines. The brands 'Forever New' and 'Forever New Curve' are used in all other countries such as Australia, New Zealand, Singapore, India, South Africa and the European Union.

Ever New is part of a global omni-channel business selling its products in 24 countries via the following channels:

- Free-standing retail stores in Canada, Australia, New Zealand, Singapore, India, South Africa and Namibia
- Concessions ('store-in-stores') located in department stores throughout Canada (in Hudson Bay), Australia, Singapore, India, South Africa, United Kingdom, European Union and the Middle East
- Online through our own websites and third-party websites
- As a franchisor in the Philippines and Indonesia;
- Free-standing retail stores in the Middle East pursuant to a joint venture; and
- Wholesale.

Our subsidiary companies in Canada, New Zealand, Singapore, South Africa, United Kingdom, European Union and India operate our business in those countries. ADT also operates regional offices in Cape Town (South Africa) and Gurgaon (India) and sourcing offices in Hangzhou, Guangzhou and Qingdao (China).

Globally, we directly employ over 2,275 people with a small number of staff engaged on a contract basis. In Canada, we directly employ around 228 people as at 30 June 2024, with a country manager overseeing day to day operations. The country manager reports to the Chief Retail Officer, who is a member of the Executive Leadership Team.

Our operations consist of design, retail, corporate, customer service and warehouse functions. Our in-house design team based in Melbourne, Australia designs product ranges for both the Northern and Southern Hemisphere markets which are manufactured by third parties overseas. Ever New does not itself manufacture any goods. A small select range of accessories are now also designed in South Africa. All goods sold by Ever New are imported into Canada.

Our head office comprises support functions including finance, marketing, e-commerce, IT, buying, design, quality assurance, store development, operations, supply chain and logistics, legal, human resources and planning. We use our own distribution centres located in Australia and India to distribute merchandise to our store networks and fulfill online orders. Third party logistics and warehouse service providers are used in Canada, New Zealand, Middle East, USA, South Africa, Singapore and the United Kingdom.

In Canada, our operations comprise 13 standalone stores and 40 concession stores located within Hudson's Bay department stores as at June 2024.

OUR SUPPLY CHAIN

Merchandise suppliers (goods for resale)

Our products are mostly manufactured in China, which accounts for 91% of our production volume across

apparel, accessories and footwear. Vietnam is our second largest production country with approximately 7% of production volume; and the balance is produced in India, Turkey and Bangladesh. We mainly source directly, with a very limited range of products sourced via agents, being less than 1% of total production volume.

In this reporting period we worked with 115 suppliers.

We regularly capture numbers on known vulnerable working groups in our supply chain through our social audit program. Across our Tier 1 supply chain, there are around 18,900 workers, of which 19% are domestic migrant workers and

66% are women. There were no international migrant workers recorded in our Tier 1 supply chain this reporting period.

Non-merchandise suppliers (goods and services not for resale)

We work with over 1,000 suppliers across more than 30 categories globally.

OUR POLICIES AND DUE DILIGENCE PROCESSES

Our policy framework continues to be the cornerstone of our operations, establishing minimum requirements for our team members and suppliers, as applicable.

Our Supplier policy suite to which all suppliers must comply (where applicable) includes the Ever New Supplier Code of Conduct, which addresses forced labour risks including child labour and debt bondage. The Ever New Supplier Code of Conduct, coupled with our ethical sourcing policy suite, stipulates the minimum

requirements of our trading relationships with suppliers.

The Ever New Supplier Code of Conduct takes account of the United Nations Declaration of Human Rights, in addition to the Ethical Trading Initiative (ETI) Base Code and applicable ILO Conventions. To assist with compliance and understanding, we have translated the revised Ever New Supplier Code of Conduct into local languages for our main sourcing countries, being China and Vietnam. Suppliers' compliance with our Code of Conduct

and policy suite is monitored through our social audit program.

All policies are issued to suppliers during on-boarding and are available on our social compliance software. Employees have access to policies through shared company folders, and selected policies are available on our website. The following table summarises our current policy framework:

POLICY	PURPOSE
Ever New Supplier Code of Conduct	Outlines our minimum standards for compliance and ethical sourcing.
Young Worker and Child Labour Policy	Intended to ensure all organizations involved in the manufacture or supply of goods and services to Ever New understand their responsibilities in preventing instances of child labour and where suspected or identified, the remediation processes they must undertake. In addition, this policy outlines our expectations in relation to the protection of young workers and compliance with ILO conventions on child labour as well as applicable laws and regulations.
Forced Labour Policy	Intended to ensure all organizations involved in the manufacture and supply of goods and services to Ever New understand their responsibilities in preventing forced labour and where suspected or identified, the remediation processes they must undertake.
Living Wage Commitment	Ever New is committed to providing living wages for all workers within our supply chain, a requirement which forms part of our Code of Conduct, agreed to by all suppliers.
Responsible Sourcing and Purchasing Policy	Outlines our approach to responsible purchasing practices and is supported by Responsible Sourcing & Purchasing guidelines.

Ban on Cotton Harvested from Uzbekistan and Turkmenistan	As a signatory to these pledges, we are stating our firm opposition to the use of child and adult forced labour in the harvest of cotton.
Environmental Protection	All suppliers are required to comply with relevant environmental laws and regulations, including obtaining necessary permits and licensing. Environmental Management Systems, which consider water treatment, waste reduction and disposal, air pollution, carbon emissions and the management of chemicals must be maintained.
Gender Equality in the Supply Chain Policy	Outlines Ever New's commitment and minimum requirements to gender equality in the supply chain.
Responsible Fibre & Sourcing Policy	Outlines Ever New's preferred materials and material specific requirements in a conscious effort to minimize the environmental impact our material choices have.
Animal Welfare Policy	Outlines our expectations that all animals within the Ever New supply chain are treated humanely and with respect and our conditions of supply of animal derived materials.
Chemical Management and Restricted Substance List (RSL)	Details the chemical restriction limits for Apparel, Accessories and Footwear.
Packaging Policy	Outlines Ever New's preferred materials and material specific requirements for packaging to ensure that the sourcing of raw materials used in our packaging is procured in a responsible and sustainable way.

Our whistleblower policy and independent hotline continues to form a key role in bringing any issues of concern to our attention so they can be investigated and resolved in an expeditious manner. Issues can be raised via the hotline anonymously if requested,

and in multiple languages or formats to increase accessibility. Our Merchandise Supply Terms continue to govern the supply of merchandise to Ever New. These Supply Terms require

suppliers to comply with the Ever New Code of Conduct and ethical sourcing policies and stipulate modern slavery compliance obligations to be met by our suppliers.

FORCED LABOUR AND CHILD LABOUR RISKS

RISK IN OUR OPERATIONS

In Australia, New Zealand, Canada, South Africa, India, the EU, and Singapore, our assessment indicates that the risk of forced labour and child labour within our retail and head office operations

remains low, in alignment with our previous report. This is primarily attributed to the stringent control and influence exerted by Ever New. We continue to engage two external companies to provide remote workers on an occasional basis for selected functions

at our Melbourne head office. Both third-party entities have executed agreements explicitly addressing and mitigating modern slavery risks and in view of the level of oversight by our head office team in relation to these entities, the risk is deemed low.

In our previous report, we identified our distribution centres and franchise operations as areas requiring further due diligence to understand any potential modern slavery risks. In Australia, most of our distribution centre workforce continues to be directly employed, assuring a low risk of forced labour or child labour. We presently engage a labour hire company in our Australian distribution centre which has signed an agreement containing our modern slavery compliance clause. In our Indian distribution centre, a small number of staff are engaged through third parties, ensuring compliance with Indian labour laws, including Provident Funds laws and Employees State Insurance, thereby minimizing the risk of forced labour or child labour. During this calendar year, the Indian distribution centre moved to a third party logistic and warehouse provider. More information on this will be outlined in our next report.

Our contracts with third-party logistics and warehouse service providers in New Zealand and the United Kingdom include our modern slavery compliance clause, and we are progressively extending this clause to all relevant parties within our operations. In the last reporting period, a Self-Assessment Questionnaire (SAQ) was dispatched to all third-party logistics and warehouse providers to enhance our understanding of existing controls.

There were no issues identified in the SAQs that required further due diligence.

Concession staff in Hudson's Bay continue to be predominantly employed directly by Ever New and operate under Ever New employment contracts. The use of recruitment agencies for concession staff is infrequent and generally confined to short-term engagements, such as seasonal sales support. Where department stores provide staffing, salary costs are paid by Ever New. Our assessment concludes that the risk of modern slavery associated with concession staff, whether directly employed by Ever New or by the department store, continues to be low.

RISK IN OUR SUPPLY CHAIN - MERCHANDISE SUPPLIERS

Our Risk Register utilises third party indices and benchmarks, such as the International Labour Organization (ILO) and Walk Free GSI (Global Slavery Index), the US Govt List of Goods Produced in Child or Forced Labour and TIP reports to evaluate risks in our merchandise and non-merchandise supply chains as well as our operations. The Risk Register is populated with data based from third-party indices, presenting a risk scorecard per country in which we operate. The Risk Register continues to assist us to:

- understand and determine our salient risks across all regions by country, industry, and commodity
- identify vulnerable worker groups
- prioritise our risk mitigation and due diligence efforts commensurate with the level of risk; and
- frame our remediation strategy

We have identified the following categories of workers as the most vulnerable in the apparel industry, which remains unchanged since our first report:

- female workers
- migrant labour
- subcontracted labour
- agency and temporary/contract labour; and
- young/child workers.

Also unchanged from our first report, our risk assessment has identified the following potential forced labour and child labour risks as the most salient to the apparel industry, these include but are not limited to:

- forced labour
- bonded labour
- the worst forms of child labour; and
- deceptive recruitment practices.



INDUSTRY RISK

The apparel industry has a complex supply chain, with each supply chain tier facing different levels and types of inherent risk, often linked to the level of visibility. This, combined with high levels of low-cost production, prevalent use of low-skilled labour and short-term contracts, makes the apparel industry at risk of engaging in forced labour and child labour.

Forced labour and child labour do not necessarily occur in isolation – it could be driven by site specific risk prevalent in the apparel industry. We recognise the following risks in the apparel industry as key indicators for the potential of forced labour and child labour to occur:

- unauthorised subcontracting
- excessive overtime
- the use of migrant, low skilled workers
- lack of freedom of association
- temporary labour contracts
- lack of access to effective grievance mechanisms; and
- gender inequality and gender-based violence in the supply chain.



COUNTRY RISK

The inherent level of risk and challenges in the apparel industry can differ between geographical areas and tiers of the supply chain. Countries with insufficient government regulation or enforcement and high socio-economic inequalities can increase the risk of forced labour and child labour. Risks identified are managed through our Ethical Supply Framework and other initiatives outlined in this report.

We use the Risk Register to understand a country's risk profile. Should we find any salient risk present in a potential new market, we may decide not to source from this country or region or we may introduce targeted initiatives to manage identified risks.



MATERIAL RISK

Some materials commonly used in the apparel supply chain are identified as potentially a higher risk of being linked to forced labour and child labour. One example is cotton, which is listed as the commodity most linked to child and forced labour on the US Department list of Goods Made with Forced Labour. Cotton picking and manufacturing often use low skilled workers, already identified as a vulnerable working group. Most companies do not have visibility of Tiers 4 and 5 in the supply chain. The lack of brand presence and risk mitigation in this tier can increase the risk of forced labour and child labour and be more difficult to identify.

Risk in our supply chain – Non-Merchandise Suppliers

As a global retailer, we work with a diverse range of suppliers across more than 30 categories, each with its own unique

risk factors. These risks range from the use of third-party labour, young or migrant workers, our partners having a lack of visibility across their own network of suppliers or a lack of understanding of what is meant by forced labour and child labour and how the risks may be prevalent to them.

These risks will be increased when one or more factors are combined with a higher geographical risk: for instance, a business based in a country where there is a lower level of governance of employee rights and/or immigration. For example, in countries such as the Philippines and Indonesia, there is an elevated risk due to different standards in labour laws compared to Canada and Australia. As the brand owner in this case, we are one step removed from their non-merchandise suppliers, making monitoring more complicated. Even in countries with higher regulation such as Canada, Australia or the UK, there are elevated risks across business such as warehousing and supply chain due to the nature of workforce required and the occasional use of third-party labour.

STEPS TAKEN TO ASSESS AND MANAGE RISKS OF FORCED LABOUR OR CHILD LABOUR

GOVERNANCE

The Board, together with the Audit and Risk Committee continue to share responsibility for oversight of Ever New's risk management and compliance framework with the Executive Leadership Team responsible for its implementation and delivery. This remains unchanged from our first report and continues to work effectively.

Our cross functional and regional modern slavery working group continues to report to the Audit and Risk Committee and is a standing agenda item for each meeting with a verbal update focussing on the group's activities and progress provided at each meeting. During the reporting period, the modern slavery working group was chaired by our Chief Operating Officer. The working

group is primarily responsible for ensuring that key actions and future priorities identified in our reports are undertaken, monitored and completed, together with preparing our annual statements as required under Canadian, United Kingdom and Australian laws.

CONTRACTS AND POLICIES

As mentioned above, our Merchandise Supply Terms address modern slavery risks and compliance with our ethical sourcing policies; along with our pro forma modern slavery compliance clause which is included in contracts with key non-merchandise third parties.

OPERATIONS

Our policy framework continues to be the cornerstone of our operations, establishing minimum requirements for our team members and suppliers, as applicable. Those policies are listed earlier in our report.

Our whistleblower policy and independent hotline continues to form an important role in bringing any issues of concern to our attention so they can be investigated and resolved in an expeditious manner. Issues can be raised via the hotline anonymously if requested, and in multiple languages or formats to increase accessibility.

In respect to our concession arrangements, we continue to work with Hudson's Bay to address modern slavery risks aligning with our contractual obligations. We have also distributed our Supplier Assessment Questionnaire (SAQ) to nominated non-merchandise suppliers to learn more about their efforts to identify any risks of forced labour or child labour in their businesses. Further details about the findings from the SAQs are discussed later in this report.

RESOURCING

Ever New's in-country representatives continue to be the face of our compliance program with merchandise suppliers. They are primarily responsible for oversight and management of our on-boarding processes; and also conduct audit programs, site actions and oversee any necessary or desirable corrective actions for our business.

As mentioned earlier, our modern slavery working group and dedicated Sustainability and Social Compliance Specialist respectively continue to oversee modern slavery compliance and reporting obligations; and all ethical sourcing and environmental initiatives for our business.

SUPPLY CHAIN VISIBILITY AND TRACEABILITY

The visibility of our supply chain is vital to identify any modern slavery risks and managing their impacts should they be detected. Mapping our supply chain beyond Tier 1 continues to be a key priority which we recognise as being an ongoing requirement. We have full visibility of our Tier 1 merchandise factory base and have traced more than 80% of our Tier 3 and their respective dyeing, printing and embroidery mills. During this reporting period, we have also traced and further nominated suppliers for key trim items across apparel. As outlined in our first report,

Ever New requires all new merchandise and fabric suppliers to complete a Self-Assessment Questionnaire (SAQ) at onboarding stage. The SAQ allows us to understand their business, including the likelihood of modern slavery risks and identify if there are policies and processes in place to address and/or mitigate these risks. Furthermore, the SAQ is useful to further identify dyeing, printing and embroidery mills (Tier 2) used by our Tier 2 fabric mills. The SAQ captures data on the following topics:

- Factory profile
- Management systems and training
- Recruitment procedures and worker rights
- Use of child labour and young workers
- Gender inequality and discrimination
- Subcontracting
- Freedom of association and collective bargaining
- Grievance mechanisms
- Water and waste management

Through the SAQs we have learnt that most facilities beyond Tier 1 have some environmental assessments and/or certifications, but lacked social assessments, with only a small number of facilities with a valid social audit. This is common, as brands don't always have any direct or legal ties to dyeing, printing or embroidery mills.

In this reporting period one new area of focus has been to review and validate these social assessments in with the Ever New Code of Conduct and audit program. Most of these social assessments are verified HIGG's Facility Social and Labor Module (FSLM) assessments, which follows the Social and Labor Convergence Program (SLCP) framework. The SLCP framework was developed

to reduce audit fatigue and aims to improve working conditions in the supply chain. Through our tracing initiatives, we know that many of our fabric mills (Tier 3) work with the same dyeing and printing mills (Tier 2). Ever New identified two dyeing and printing mills in China where our production volume was significant and so decided to send our own compliance team to conduct a social audit. The social audits followed Ever New's social audit program, further outlined in this report on page 9 and onwards.

MATERIAL VISIBILITY AND TRACEABILITY

One of our key strategies to enhance the visibility of our supply chain and address risks to sourcing of material is to increase our uptake of certified fibres and materials. Independent certified standards assist us to verify environmental, chemical, and social practices down to the raw material stage. Our preference, where possible is to source certified fibres and fabrics.

Our Responsible Sourcing and Fibre Policy helps us strengthen our due diligence measures to mitigate risks in this area of our supply chain. This policy requires suppliers to conduct due diligence at the materials processing level to ensure materials do not originate from regions of high risk associated with conflict, the worst forms of child labour, forced labour and human trafficking; gross human rights violations or other reasonably objective high-risk activities (such as health and safety risks).

The global cotton sector may present a high risk of forced labour. We are a signatory to the Turkmen Cotton Pledge, stating our opposition to the use of forced labour in the harvest of Turkmen cotton. In line with our commitment to source 100% more sustainable cotton, we continue to support Better Cotton's mission for more sustainable cotton farming.

SUPPLIER ENGAGEMENT

- Our sourcing values are defined in our ethical supply framework and represent our minimum standards for compliance. Our ethical supply framework consists of:
- Ever New Supplier Code of Conduct and Ethical Supply policies, as detailed earlier
- Social Audit and Corrective Action Plan Remediation program; and
- Factory Management training.

New Suppliers

We employ dedicated in-house compliance teams that conduct physical site visits in our primary sourcing countries before new suppliers are approved for production. Conditions are reviewed against the standards set out in the Ever New Supplier Code of Conduct and relevant laws. Where we are unable to send our in-house team, suppliers must provide a reputable third-party audit conducted within the past 12 months for assessment by Ever New against our ethical supply framework. Our compliance team also assesses the validity of this audit. Suppliers found to have zero-tolerances (ZT's) are not approved for production and all ZTs must be remediated before the supplier is onboarded as a supplier to Ever New. In 2025, we are expanding this to apply to all critical failure points (CFPs).

Social Audit Program

Ever New's auditors are highly experienced and qualified to conduct audits against BSCI, SA 8000, ICS, ERSA and SMETA methodologies. Ever New's own audit program follows the SMETA methodology. Ever New aims to audit all factories annually. Audits generally include an opening meeting with factory management and worker or union representatives, a factory tour, a review of relevant factory documents and policies, confidential and private group

and single interviews and finally a closing meeting with factory management and worker/union representatives.

Supplier Compliance Rating

Upon completion of a social audit, each factory will receive a rating. The rating follows a traffic light system, ranging from 'green' to 'dark red'. The factory rating is determined by audit performance, specifically the number of non-compliances identified and their severity. Once a non-compliance has been remediated, the supplier rating will be adjusted accordingly. From 2025, suppliers rated 'green' will move audit frequency from 12 to 18 months to reduce 'audit fatigue'.

Corrective Action Plans and Remediation

At each audit closing meeting, audit findings will be discussed, and a preliminary corrective action plan (CAP) will be issued. Findings are graded according to their severity with resolution timeframes ranging from immediate to 120 days accordingly. Follow up audits or desktop reviews are arranged to confirm issues are remediated. Ever New expects all suppliers to work towards continuous improvement and prioritise remediation and further prevent identified non-compliances.

Training

Ever New aims to provide factory management training annually. This training is delivered by Ever New's in-house ethical compliance team and is developed to increase awareness and the Code of Conduct and local law. Training is delivered face to face and is arranged separately to the annual social audit.

GRIEVANCE MECHANISMS AND ACCESS TO REMEDIES

Worker Voice

A social audit alone does not provide a full understanding

or insight into actual working conditions. The provision of a range of channels for workers to raise concerns is vital to ensure workers have effective and legitimate access to remedies which they feel comfortable using. During this reporting period, we launched an ethics hotline in all Tier 1 factories in Vietnam. The hotline is promoted through posters in multiple places at each factory. The posters outline Ever New's Code of Conduct, what can be reported and how to make a report. Reports can be made anonymously, without fear of retaliation, and identities will be kept confidential unless identification is required by law. Any grievances or breaches of our Code of Conduct are handled directly by Ever New's ethical sourcing team and relevant in-country representatives. Reports can be submitted in local language. In China, we continue to test the effectiveness of existing grievance mechanisms and other available channels in our Tier 1 factories. Ever New is a member of the RMG Sustainability Council (RSC). As such, all factories in Bangladesh have a health and safety complaints mechanism in place where workers can confidentially raise safety concerns, independent of the factory. This complaints mechanism will also pass on any non-health and safety issues raised through this channel to brand owners for investigation and response.

Worker Sentiment Surveys - Pilot Project

In this reporting period, Ever New engaged LRQA (formerly known as Elevate) to issue Worker Sentiment Surveys (WSS) to key suppliers' factories in China as a part of a pilot project. Worker Sentiment Surveys are a useful tool to gain insight into worker engagement, well-being and help identify areas for workplace improvement. WSS are different to social audits, in that they provide insight solely from the workers' perspective. The aim of the pilot was to allow workers a safe space to express concerns and viewpoints on workplace issues and see

how these compared to data captured through social audits. The WSS consists of a range of questions across four pillars: Labour, Health & Safety, Environment and Management Systems. Ever New chose to deploy the survey remotely, allowing workers to provide insight and feedback anonymously and from the privacy of their own home if they wished. All surveys were issued in local language and easily accessed through QR codes on posters in visible locations at each factory. To assist in the introduction of WSS in factories, LRQA engaged with management and our auditing team visited each factory to answer questions. The survey was open to workers for approximately 14 days.

Whistleblowing Policy

As mentioned in the introduction to our statement, one of our key initiatives during this reporting period was to promote the existence and function of our whistleblower policy and

accompanying hotline with employees in our head office, distribution centres and merchandise suppliers. Our hotline is externally managed to allow reports to be made on a confidential or anonymous basis (if requested) and can accept reports in multiple languages. To make it as easy as possible for reports to be made, we have also introduced toll free numbers for use in Canada, United Kingdom and New Zealand.

RESPONSIBLE SOURCING AND PURCHASING

To ensure we make purchasing decisions that facilitate good working conditions, we have developed a Responsible Purchasing and Sourcing Policy. This Policy addresses factory capacity, forecasting and lead times, cost and payment terms, purchase order efficiencies and responsible exit guidelines. A copy of our policy is available on our website. Daily responsibility for adherence with the Responsible Purchasing and Sourcing guidelines rest

with relevant Managers and overall accountability for compliance rests with each Head of Department.

STAKEHOLDER ENGAGEMENT AND PARTNERSHIPS

Ever New continues to participate in industry benchmarking reports, training sessions and webinars provided by the NGO sector. Likewise, our wholesale and concession partners also help us identify where to prioritise efforts to ensure our approach is consistent with industry standards.

INDUSTRY PARTNERSHIPS

Ever New participates in the following industry partnerships to help address forced labour and child labour risks in its merchandise supply chain:

PARTNER	PURPOSE	RISK/INDICATOR ADDRESSED
RMG Sustainability Council (RSC) , formerly the Bangladesh Fire and Safety Accord	Ever New, has been a member of the Fire and Safety Accord (now RMG Sustainability Council or 'RSC') since 2013. Our factories in Bangladesh remain members of the RSC.	Safe working conditions
Better Cotton	During the reporting period, we continued our membership with Better Cotton. Our aim is to have 100% of our cotton sourced from more sustainable sources including Better Cotton and Global Organic Textile Standard (GOTS).	Forced labour in the raw materials and processing tiers of our product supply chain
Responsible Sourcing Network	Ever New is signatory to the Company Pledges Against Forced Labour in the Cotton Sector of Uzbekistan and Turkmenistan. As a signatory to these pledges, we are stating our firm opposition to the use of forced labour in Uzbekistan and Turkmenistan's cotton production and require all suppliers to comply with this requirement.	Forced labour in the raw materials tier of our product supply chain

NON-MERCHANDISE SUPPLY CHAIN

Over the past year, we have assessed the responses to our Self-Assessment Questionnaire (SAQ) from non-merchandise suppliers and identified a number of challenges, particularly with non-responses. Given that the SAQ is often the first point of engagement with non-merchandise suppliers regarding forced labour and child labour, it is essential that all suppliers—regardless of their location or industry—fully understand the questions to ensure we collect the necessary data. As a result, we simplified the SAQ to improve response rates and the accuracy of responses.

Overall, fewer SAQs were sent to our non-merchandise

suppliers during this reporting period, as our efforts shifted to following up non-compliance issues identified in previous assessments. We also focused our efforts on engaging businesses deemed to be higher risk (such as those in warehousing and shopfitting) that had not received the SAQ in prior years. Additionally, we expanded the SAQ to include partners in countries with greater vulnerability to modern slavery (such as our franchise partners in Indonesia and the Philippines). Outstanding responses to SAQs from the prior reporting period were reviewed for any follow up action required. This includes any suppliers who had not returned their questionnaire by the deadline or where questions were not answered or supporting documentation not provided.

merchandise suppliers during this reporting period, as our efforts shifted to following up non-compliance issues identified in previous assessments. We also focused our efforts on engaging businesses deemed to be higher risk (such as those in warehousing and shopfitting) that had not received the SAQ in prior years. Additionally, we expanded the SAQ to include partners in countries with greater vulnerability to modern slavery (such as our franchise partners in Indonesia and the Philippines). Outstanding responses to SAQs from the prior reporting period were reviewed for any follow up action required. This includes any suppliers who had not returned their questionnaire by the deadline or where questions were not answered or supporting documentation not provided.

REMEDIAL MEASURES & REMEDIATION OF LOSS OF INCOME

If a supplier reports any instances of modern slavery in their operations, Ever New will work with that supplier to resolve the issue, acting in the best interests of the victims concerned and to address the underlying issues giving rise to the occurrence of modern slavery. It is not Ever New's policy to immediately terminate all agreements with a supplier in this instance, as we recognise this is likely to be counter-productive to suppliers

disclosing to us any instances of modern slavery in their operations. However, if after reasonable attempts to work with a supplier to address modern slavery risks are unsuccessful, the supplier will be in breach of the Merchandise Supply Terms and so Ever New will terminate all supply arrangements. This position remains unchanged from previous statements.

During this reporting period, we did not identify any occurrence

of forced labour or child labour within our structure, activities or supply chains and so have not terminated any suppliers for these reasons. If any instances of forced labour or child labour were identified in relation to our business, the remediation measures will vary depending on the circumstances of the case. In view of this, we did not need to take any remediation measures to address any loss of income for vulnerable families.

TRAINING

Forced Labour and Child Labour Training

Ever New is committed to equipping our team members with essential knowledge about forced labour and child labour. Modern Slavery training is an integral component of Ever New's compliance program for all employees, including our

international markets. To achieve this, we have developed a comprehensive, interactive training module for employees that delivers an engaging and impactful learning experience. To ensure both completion and comprehension of the module, there are embedded assessments to reinforce key concepts and

verify knowledge retention throughout the learning process.

This training forms a mandatory part of the onboarding process of our employees. During this reporting period, we launched our in-house Modern Slavery training module to select retail teams in our international markets (including Canada, Singapore,

the United Kingdom, Republic of Ireland and Europe).

Our training explores the complexities of modern slavery, identifying its signs, and understanding the appropriate actions to take if they encounter it. This approach empowers our team members with the awareness and skills needed to identify and address any suspected instances of modern slavery effectively. It usually takes approximately 15-20 minutes to complete the training module.

Our modern slavery training module had an 82% completion rate of respondents across our retail market and 64% of respondents across our head office since its launch, highlighting the importance of ongoing engagement and awareness to ensure compliance and understanding across all areas of the business.

Increasing completion rates will be a strategic priority for the upcoming reporting period, with a target benchmark of 90% across both our retail and head office teams. We aim to do this by refreshing content, setting clear communications and working

with leaders to track teams progress and integrate completion conversations in their weekly check-ins. Managers will be provided with monthly reporting to assist in driving completion rates.

Responsible Purchasing and Sourcing Training

During this reporting period, our Learning and Development team also designed and developed a bespoke Responsible Purchasing and Sourcing training module which details how we embed responsible purchasing practices and the associated impact on working conditions within our supply chain. Previously, this training module was implemented by way of face-to-face training sessions with relevant team members. However, in June 2024 we converted this training module to online format to allow greater flexibility to team members to complete the module.

A future priority will be to develop an in-depth workshop, to pair with the online module for key team members, specifically members of Buying, Design and Planning Departments.

This training module will be part of the onboarding program for these departments and will be reassigned annually.

Changing our Responsible Purchasing and Sourcing training format to an online module has allowed us to capture a higher head count as all relevant team members are required to complete the training at onboarding stage, in addition to rolling out the training to all relevant existing team members. As the online training was only rolled out in June 2024, we are unable to provide completion rates at this stage.

Additionally, by issuing the training module at onboarding stage, we ensure that Ever New's Responsible Purchasing and Sourcing Policy and expectations are outlined to team members at commencement of employment with us. By delivering the training in a short and concise manner, we have further increased awareness with our team members.

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

GOVERNANCE

As previously mentioned, our modern slavery working group is responsible for all aspects of this report and ongoing compliance initiatives and reports to the Audit and Risk Committee. During this reporting period, the working group was further strengthened with our Chief Operating Officer as sponsor who provided a direct line to the Executive Leadership Team and who also reported directly to the CEO. We conduct an annual review to assess the effectiveness of the working group and to ensure that an appropriate range of participants are members of the group. We believe this governance structure continues to work effectively to manage our modern slavery risks and reporting obligations.

NON-MERCHANDISE SUPPLIERS: SAQ

As a result of our SAQs, we concluded that suppliers in countries with limited modern slavery laws required greater time and effort to gather the necessary information and documentation compared to those in countries such as Australia and the UK with existing laws to address modern slavery. This continues to be an ongoing challenge when requesting information from our franchise partners in Indonesia and the Philippines, with closer attention and effort needed in future to ensure that any modern slavery risks are being appropriately addressed and managed. We also need to educate our partners further so they can understand modern slavery laws in greater detail.

Key findings from the SAQ responses identified the following challenges:

- 50% of respondents lacked their own ethical supply code of conduct, and 42% did not have specific modern slavery policies to address risks.
- Only 25% of respondents provided modern slavery awareness training to their own employees.
- 60% of respondents did not require their own partners to conduct any due diligence on modern slavery risks within their own operations.
- 58% of respondents identified the use of temporary workers

or subcontractors as their highest risk area for modern slavery.

The responses also indicated the below key highlights:

- No reports of modern slavery breaches were received.
- All respondents confirmed that workers receive a written contract in a language they understand, are paid at least minimum wage, receive pay slips, and have their right to work verified.
- All respondents reported that workers were not required to pay deposits or recruitment fees, and no original documents (e.g., passports) were retained.
- 75% of respondents reported that employees have access to anonymous channels to raise concerns, including confidential whistleblowing lines.
- As a result of our work mentioned in our last statement highlighting the availability of independent grievance mechanisms, we are now receiving more notifications via the Whistleblower hotline.

Consistent with previous years, additional due diligence is needed to verify information provided by some suppliers. This includes clarifying responses, obtaining copies of relevant documents (e.g., internal policies), and securing evidence of actions taken to address identified risks. Despite modern slavery being explicitly addressed in our franchise agreements, we faced challenges in obtaining details from our franchisees. We believe this is likely due to modern slavery being a relatively new concept for our partners. As a result, we need to focus more closely on these markets and implement an education campaign to help our franchisees better understand modern slavery and its key indicators.

MERCHANDISE SUPPLIERS: SUPPLY CHAIN VISIBILITY AND TRACEABILITY: SAQ

Many Tier 2 dyeing and printing mills Ever New works with holds SLCP assessments that have been independently verified by independent third parties. A review of the SLCPs framework and Ever New's social audit program reveals that the SLCP framework covers the same main topics as our own program such as:

- Recruitment procedures
- Wages and benefits
- Worker treatment
- Management processes; and
- Health and safety

As outlined previously in this report, Ever New chose to audit two dyeing and printing mills in China. A total of 7 NCs were found, ranging from minor to major. Each mill was issued a Corrective-Action-Plan (CAP) upon completion of audit, and 4 of these NCs were closed within the same reporting period. Both audits were announced, due to the nature of relationship, or lack thereof, as Ever New does not hold any direct relationships with dyeing or printing mills.

The audits confirmed the management processes, policies and working conditions outlined and verified in the SLCP assessments. Ever New is currently investigating how to expand our current audit program beyond Tier 1.

MERCHANDISE SUPPLIERS: SOCIAL AUDIT PROGRAM

To measure the effectiveness of our social audit program, we have developed internal key performance indicators (KPIs) related to policy compliance, volume of social audits conducted in line with the audit schedule, and corrective action plans issued

and remediated including completion timeline of these.

In this reporting period, a total of 71 audits were conducted. On average, 3.95 non-compliances were found at each site, ranging from minor to major. A total of 46% of all corrective-action plans issued were remediated within the same reporting period. Non-compliance related to health & safety, social insurance and working hours continue to be the most prevalent findings, such as excessive overtime, not all workers covered by social insurance and workers not wearing sufficient/correct PPE.

Consistent with previous reporting periods, no instances of modern slavery were identified, and no suppliers were offboarded due to non-compliance.

GRIEVANCE MECHANISMS

To date, no grievances or reported breaches have been received via the ethics hotline in Vietnam. Ever New has regularly confirmed throughout the reporting period that ethics hotline posters are posted in visible places in all factories. Additionally, at annual social audits, Ever New's in-country social compliance representative has ensured that workers are aware of the ethics hotline and understand how to use it. It is worth mentioning that all factories already had well established grievance mechanisms managed by other brands at the time of implementing our ethics hotline.

In China, majority of Tier 1 factories have internally managed grievance mechanisms available to workers. The effectiveness of these channels is reviewed at annual social audits.

As mentioned previously, Ever New continues to be a member of the RMG Sustainability Council (RSC) in Bangladesh. Any non-health and safety complaints received by the RSC will be communicated to the brand owner. During the reporting period, no complaints were raised through this channel in any of the Tier 1 factories used by Ever New.

WORKER SENTIMENT SURVEYS

As previously mentioned, during this reporting period Ever New piloted Worker Sentiment Surveys (WSS) in some key factories. After the survey period ended, we received a summary and detailed report for each factory, together with detailed results and recommendations for improvement, where applicable. These surveys are a useful tool to compare against findings from our social audits.

In one survey, the demographics at the factory was listed as 18% international migrant workers, meanwhile our most recent audit stated there were no international migrant workers at said factory. Upon further due diligence, we confirmed with the factory directly that there were no international migrant workers, meaning this was most likely a mistake that happened in completing the survey.

At one factory, 1% of the workforce stated they had experienced sexual remarks and 2% verbal abuse. During the last audit at this factory, there was no evidence of reported instances of either, nor any findings through worker interviews or internal grievance mechanisms confirming this. This is an example highlighting the importance providing workers channels independently from factory management to express their sentiment and concerns.

Although a low reported percentage of the workforce shared this sentiment, Ever New views these results seriously and are currently working on next steps beyond reiterating our expectations for suppliers to provide a safe and respectful workplace for its workers.

There were no additional significant results that required further due diligence.

We acknowledge there are known and documented systemic issues in the apparel supply chain where workers do not feel comfortable fully expressing their sentiment in fear of retaliation. This is one of the reasons why Ever New choose to deploy the surveys remotely, in addition to reducing survey fatigue and prevent interruption to production schedules. Likewise, we understand there is a certain risk involved with remote deployment, such as verifying the worker demographic and source, as outlined above. LRQA can detect when a survey takes less than 1 minute to complete or when 3 or 4 responses in a row have the exact same reply. There were some cases where this occurred, and the data was deemed invalid and excluded from the survey results.

With the above in mind, we are currently reviewing the future of these surveys and considering the option between an on-site and remote deployment. It is likely that we will continue to use WSS in the next reporting period.

WHISTLEBLOWER HOTLINE

As discussed earlier, a key initiative during this reporting period was to increase awareness of our whistleblower policy and hotline. As a result of our efforts to publicise the whistleblower hotline, we received 13 reports via the hotline during this reporting period, from within Australia and overseas. This number represents a large increase from the previous reporting period, confirming the effectiveness of this action to raise issues within Ever New. Each of these reports did not constitute whistleblower complaints as they related to general minor workplace grievances, however it demonstrates that awareness of the availability of the whistleblower hotline continues to grow. A summary of each report was provided to the Audit and Risk Committee for its review and information.

STAKEHOLDER ASSESSMENT

Throughout the reporting period, Ever New has engaged with NGOs and taken part in various industry report focusing on topics such as human rights and worker welfare. We view participation in these assessments as useful opportunities for continuous improvement and impact analysis and continue to welcome constructive feedback from our industry peers and stakeholders.

We remain committed to transparency as we progress our strategic objectives and mitigate risks to those most vulnerable in our supply chain and operations.

