

OROTON

MODERN SLAVERY STATEMENT FY25

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Oroton Group acknowledges the Traditional Custodians of the lands across Australia where we operate. We acknowledge the Gadigal people of the Eora Nation as the Traditional Custodians of the land on which our head office in Chippendale, New South Wales, is located. We pay our respects to their Elders past and present and recognise their enduring connection to land, waters and culture. We are committed to building meaningful relationships with Aboriginal and Torres Strait Islander communities to deepen our understanding of what sustainability and ethical practice truly mean in the context of Australian fashion.

The Oroton Group remains committed to a continuous improvement approach and continues to treat our modern slavery response as an integral feature of our broader business strategy.

PLEASE FORWARD ANY COMMENTS TO:

customercare@oroton.com

Phone: We are available via 1800 061 047

Chat: We are available through our chat widget

OPERATING HOURS:

Monday - Tuesday 10:00am - 5.30pm AEST

Wednesday - Friday 10:00am - 8.30pm AEST

Saturday - Sunday 12:30pm - 8.30pm AEST

CEO Statement

Oroton is pleased to present its FY25 Modern Slavery Statement, which outlines the steps we have taken over the reporting year to better understand and address the risks of modern slavery within our operations and supply chains. As an Australian brand with a long heritage in design and craftsmanship, we recognise that our products rely on diverse supply chains involving many workers, facilities and jurisdictions, each with distinct risk profiles and regulatory environments.

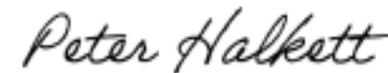
Modern slavery remains a recognised risk within the global fashion industry, particularly for vulnerable workers engaged in lower tiers of production and raw-material processing. Oroton does not claim full visibility over all parts of its supply chain, nor do we assume that any system eliminates the possibility of modern slavery. Instead, we focus on improving the information available to us, strengthening our governance processes and taking incremental steps to build greater transparency over time.

During FY25, Oroton continued working with its established Tier 1 and Tier 2 suppliers across China, India, Italy and Australia. Our activities included updating social compliance audits across high-volume suppliers, reviewing corrective-action plans, expanding our Tier 2 questionnaire, progressing risk assessments for various departments, and preparing for Living Wage audits for selected Tier 1 Chinese factories. These activities contribute to a more informed understanding of the conditions within parts of our supply chain.

We also strengthened our internal governance by engaging an ESG consultant to support the development of environmental, social and governance targets and a roadmap for delivery. The scoping of a dedicated ESG Manager role was completed during FY25, with recruitment scheduled for FY26 to provide additional oversight and coordination across the business. We also advanced responsible-purchasing initiatives, including piloting product cost breakdowns for accessories to increase transparency in costing structures and reduce the risk of downward pressure on labour costs.

Oroton also continued its collaboration with partners such as QIMA, Baptist World Aid Australia, Thread Together and Seamless. These partnerships support aspects of our ethical-sourcing program, including audit capability, circularity initiatives and community impact.

Our commitment is to a measured and continuous-improvement approach. The steps outlined in this statement reflect progress made during FY25. As we move forward, Oroton will continue to strengthen its systems, build better-quality data, and pursue responsible business practices that reflect our values.



Peter Halkett
Chief Executive Officer
OrotonGroup (Australia) Pty Limited

01

Reporting Entity

This Modern Slavery Statement is submitted in accordance with the requirements of the Modern Slavery Act 2018 (Cth) ('the Act'). It outlines the steps taken by Orotan Group (Australia) ('Orotan') (ABN 31 000 704 129) during the reporting period 1 August 2024 to 31 July 2025 (FY25) to identify, assess and address the risks of modern slavery in its operations and supply chains. This statement reflects Orotan's ongoing commitment to ethical business practices, human rights and responsible sourcing.

The registered office of Orotan Group (Australia) Pty Limited is located at 14–16 Buckland Street, Chippendale NSW, Australia.



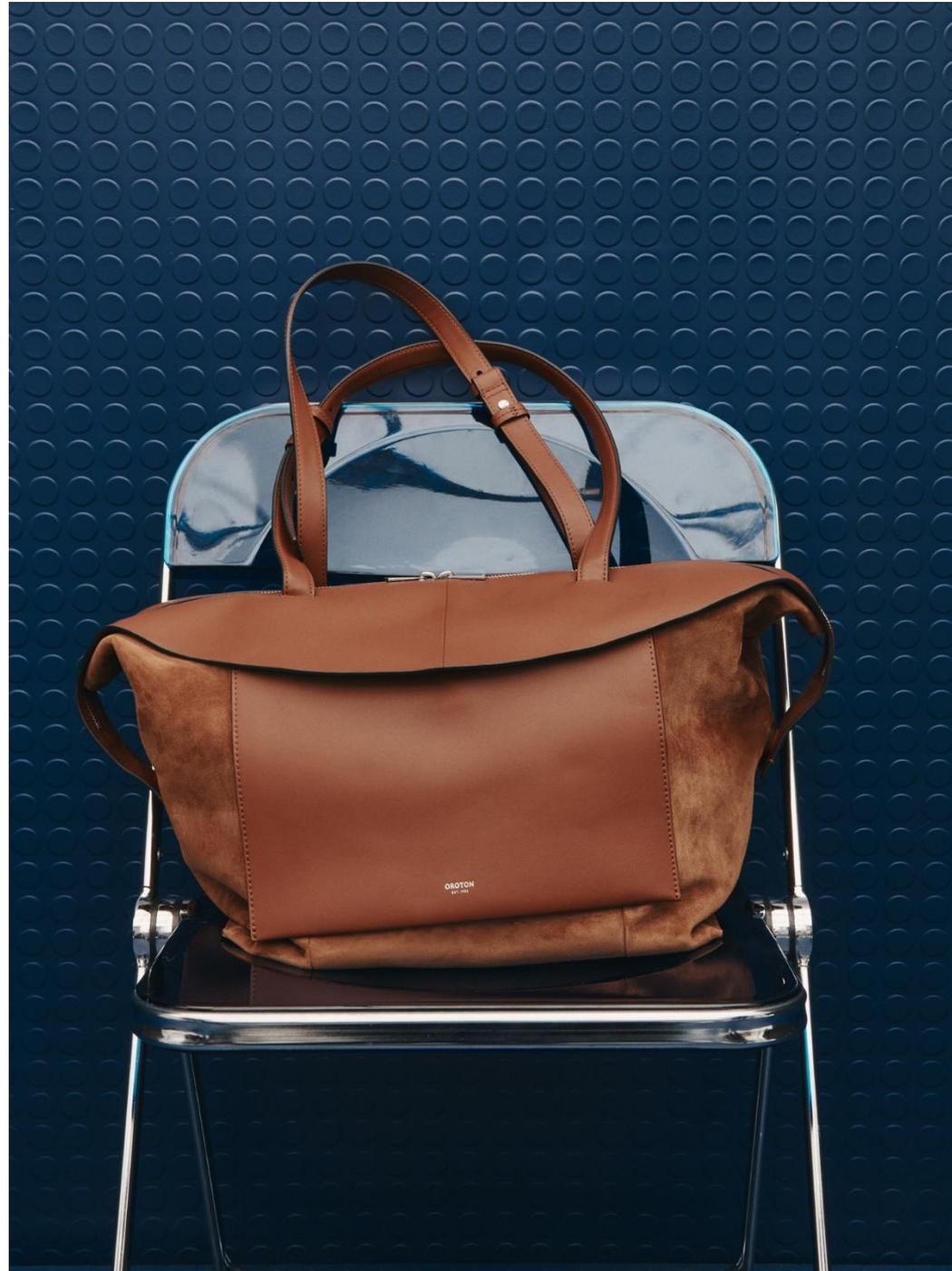
Mandatory Reporting Criteria:

In accordance with section 16 of the Modern Slavery Act 2018 (Cth), Orotan has addressed each of the seven mandatory reporting criteria within this statement.

The following section outlines each criterion and includes the corresponding page reference:

1. Identify the reporting entity- **Page 6**
2. Describe our structure, operations and supply chains- **Page 9**
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls -**Page 12**
4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes -**Page 19**
5. Describe how the reporting entity assesses the effectiveness of these actions-**Page 25**
6. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls –**Page 27**





Consultation Process

OrotonGroup (Australia) Pty Limited (ABN 31 000 704 129) is the principal trading entity of OrotonGroup Pty Limited and is a privately owned Australian company. Oroton does not own or control any other entities. Accordingly, no consultation with other entities was required in the preparation of this Modern Slavery Statement for the FY25 reporting period.

This statement has been prepared solely in respect of Oroton and reflects its operations, supply chains and modern slavery risk-management processes during the reporting year. Should Oroton acquire or control additional entities in future reporting periods, appropriate consultation processes will be implemented to ensure compliance with section 16 of the Act.



02

Our Structure, Operations & Supply Chains

Business Overview

Oroton is a premium Australian fashion brand recognised for its commitment to craftsmanship, modern luxury and considered design. Headquartered in Chippendale, Sydney, Oroton designs and markets a broad range of products including leather handbags, small leather goods, fashion accessories, jewellery, apparel and sunglasses.

The brand is known for blending sophisticated tailoring and refined materials with a distinctly Australian sense of style.

Founded in 1938 by Boyd Lane, Oroton began as an importer of luxury European textiles before progressing into design and manufacturing. The introduction of woven metallic mesh evening bags became a defining moment in the brand's history, establishing an enduring association with innovation, glamour and material quality. These heritage pieces continue to influence Oroton's approach to design, material development and fabrication.

Under the creative direction of Sophie Holt since 2018, Oroton continues to reinterpret classic silhouettes through a modern lens. Each collection draws on the brand's heritage while incorporating contemporary shapes, elevated finishes and thoughtful detailing suited to everyday wear. Oroton's product offering reflects a balance of design heritage and modern functionality.

The business is led by Chief Executive Officer, Peter Halkett, who oversees the ongoing development of Oroton's brand strategy, operational structure and product direction. Oroton continues to operate within a dynamic retail environment, focusing on design excellence, customer experience and responsible business practice as it grows and evolves.

Structure and Operations

As at the end of the FY25 reporting period, Oroton operated 47 retail locations across Australia, comprising of 20 boutiques, 16 outlet stores and 11 concession stores. Oroton also maintains a digital flagship store at www.orothon.com, which provides shipping services to customers domestically and to selected international markets where commercial conditions permit.

Across its Australian retail network and head office operations, Oroton employed 483 people, excluding its Philippines team. The workforce consisted of approximately 57 per cent casual employees, 31 per cent full-time employees and 12 per cent part-time employees. Oroton's head office team, based in Sydney, supports a range of business functions including design, marketing, merchandising, planning, product development, production, logistics, finance, IT and e-commerce management.

Oroton continues to operate within a dynamic retail environment, supported by a customer and design lead approach aimed at improving accessibility to the brand's products and customer experience. The company's operational footprint and workforce structure inform the way Oroton identifies and manages modern slavery risks across its operations and supply chains.



PRODUCT SUPPLY CHAIN

Oroton’s supply chain is structured into four tiers.

- **Tier 1** consists of finished-goods manufacturers that produce apparel, handbags and accessories.
- **Tier 2** includes tanneries, fabric mills and trim suppliers.
- **Tier 3** involves raw-material processors, such as yarn-spinning facilities and raw hide preparation.
- **Tier 4** encompasses raw-material producers, including cotton farms, wool growers and other agricultural sources.

During the FY25 reporting period, Oroton worked with a broader supplier base across China, India, Italy and Australia. Our Tier 1 and Tier 2 suppliers range from small businesses with fewer than 50 employees to larger factories employing more than 1,000 workers. Most finished-goods production occurs in China, with smaller production volumes in India, Italy and Australia. Additional specialist materials and components are sourced through Tier 2 suppliers, primarily in China.

TIER	NUMBER OF DIRECT SUPPLIERS	NUMBER OF PRODUCTION SITES	LOCATION BREAKDOWN BY VOLUME
TIER1 ACCESSORIES	28	28	China 98.42% India 0.53% Italy 1.00% Australia 0.05%
TIER1 APPAREL	8	10	China 100%
TIER2 ACCESSORIES	70	70	China 100%
TIER2 APPAREL	18	18	China 99.4% Italy 0.6%

These figures reflect Oroton’s current visibility across its Tier 1 and Tier 2 suppliers. Mapping of Tier 2 suppliers continued to expand during FY25, with preparation underway for deeper engagement across Tier 3 in future reporting periods.

Services We Use

To support its business operations, Oroton engages a range of third-party service providers. These include logistics and fulfilment services, warehouse management, cleaning and property maintenance, IT and digital services, photography and creative production, digital marketing, talent engagement, customer-service support, recruitment agencies and labour-hire providers.

While many of these services are delivered within Australia, they may still involve heightened labour risks, particularly where services rely on outsourced, subcontracted or temporary labour. These characteristics can limit visibility over working conditions and contribute to elevated modern slavery risk profiles across certain categories of service providers.

03

Our Modern Slavery Risk

Products

Oroton acknowledges that modern slavery risks remain embedded within global fashion supply chains, which involve complex networks of suppliers, varying legal and regulatory conditions, and differing levels of oversight. As a brand specialising in apparel, leather goods, accessories, sunglasses and jewellery, we recognise that risks can arise at multiple stages of production and raw-material sourcing. These risks are not unique to Oroton and reflect broader structural vulnerabilities within the global fashion industry.

Raw Materials-Related Risks

Cotton:

The global cotton industry continues to carry well-documented risks of forced labour and child labour, particularly in jurisdictions where harvesting is undertaken through state-mandated or informal family-labour systems. Historic concerns in Uzbekistan and Turkmenistan have centred on state-imposed forced labour, while the Xinjiang region of China has been subject to significant international scrutiny regarding allegations of Uyghur forced labour. Even in countries with stronger regulatory frameworks, including India and Pakistan, cotton farming and ginning can involve low wages, hazardous conditions and informal work arrangements. Supply chains are highly fragmented, and cotton from multiple farms is frequently mixed during processing, making full traceability difficult and increasing the risk of undisclosed labour practices.

Silk:

Silk production presents both social and animal-welfare risks. Cocoon harvesting and reeling are labour-intensive tasks often performed by low-paid workers, sometimes in informal or unregulated environments without adequate safeguards. Silkworms are commonly killed during filament extraction, with limited transparency around welfare standards. The supply chain is decentralised, with cocoons sourced from many small farms and processed through multiple facilities, making verification of labour practices and traceability challenging.

Wool:

Wool supply chains carry labour-rights and animal-welfare risks. In regions where sheep farming is intensive, issues such as mulesing, limited access to veterinary care and inadequate handling practices may arise. Labour risks can occur in shearing operations that rely heavily on seasonal or migrant workers, particularly where oversight is limited or grievance mechanisms are weak. Wool from multiple farms is often aggregated and blended early in the supply chain, making it difficult to validate claims regarding non-mulesed wool or farm-level working conditions.

Leather:

Leather production combines high-risk raw-material sourcing with labour-intensive chemical processing. Tanneries in some sourcing regions operate with restricted oversight and may use hazardous chemicals, such as chromium compounds, without adequate protective equipment or environmental controls. Workers, often migrants or temporary labourers, may be exposed to unsafe conditions, long hours and limited contractual protections. Early-stage sourcing of hides frequently occurs through local traders, creating distance and opacity between farms, slaughterhouses and tanneries, which increases the difficulty of assessing working conditions at origin.

Metals and precious materials:

Hardware and jewellery components may contain metals such as gold, silver, brass and copper. These materials can originate from artisanal or small-scale mining sectors in countries with governance challenges, including the Democratic Republic of Congo, Myanmar and Peru. Risks associated with these contexts include hazardous working conditions, child labour and links to armed groups or illicit networks. Even in larger-scale mining operations, limited transparency through intermediaries and refiners can obscure the true origin of materials and the conditions under which they were extracted.

Synthetic textiles and blended fabrics:

Synthetic materials such as polyester and nylon are produced through industrial processes that often involve multiple stages - dyeing, weaving and finishing - carried out in low-cost manufacturing regions such as China, Vietnam and Indonesia. These processes commonly rely on low-paid labour, and facilities may subcontract work to smaller operators with limited oversight. Risks in these environments include excessive overtime, chemical exposure, inadequate safety protections and piece-rate payment systems that incentivise long working hours. Environmental impacts related to energy and water use may also exacerbate economic vulnerability in sourcing regions, increasing risks for workers.



Geographic Risks

China:

China remains central to global fashion manufacturing and hosts both highly sophisticated facilities and regions with elevated labour-rights risks. These risks include allegations of state-imposed labour in politically sensitive regions such as Xinjiang, as well as the exploitation of internal migrant workers who may have limited access to social protections. Many workers live in employer-provided dormitories and may face long working hours or restricted mobility. The scale and complexity of China's manufacturing landscape mean that unauthorised subcontracting can occur, limiting transparency over production sites and making it difficult to verify working conditions across all tiers of the supply chain.

India:

India's garment and leather manufacturing sectors rely heavily on informal and unregulated labour. Workers may be engaged through verbal agreements without payslips, formal contracts or access to statutory benefits. In peri-urban and rural regions, home-based or workshop-based production is common, particularly in embroidery, stitching and embellishment work, and can involve entire families, including children. Caste-based discrimination and gender inequality continue to shape vulnerability, particularly for Dalit communities and women in precarious forms of employment. These characteristics contribute to heightened modern slavery risks across multiple stages of production.

Italy:

Italy is generally viewed as a lower-risk sourcing country, however, emerging evidence highlights labour-rights concerns in parts of the textile and leather sectors, particularly in the southern regions. Migrant workers from Eastern Europe, North Africa and South Asia may be employed in subcontracted factories or informal workshops, sometimes receiving below-minimum wages, limited legal protections and limited oversight of working hours. These risks can be difficult to detect where subcontracting is not disclosed by primary suppliers, creating gaps in visibility across the supply chain.

Japan:

Japan is widely regarded as a jurisdiction with strong worker protections and regulatory oversight. Despite this, concerns have been raised internationally about the treatment of foreign workers participating in the Technical Intern Training Program, including cases involving wage underpayment, contract irregularities and restrictions on movement. Although Japan's manufacturing processes typically involve higher levels of compliance, risks may still arise in subcontracted facilities or where imported raw materials are used without full traceability.

Vulnerable Worker Groups

Migrant workers:

Migrant workers make up a significant share of the global fashion workforce and are frequently employed in roles with limited security and oversight. Many may be exposed to exploitative recruitment practices, including the payment of recruitment or placement fees that can create situations of debt dependency. Language barriers, restricted mobility, limited awareness of rights and constrained access to grievance mechanisms can increase their vulnerability to coercion, excessive working hours and unsafe conditions. These risks are well documented across manufacturing, processing and logistics sectors in a range of sourcing countries.

Women:

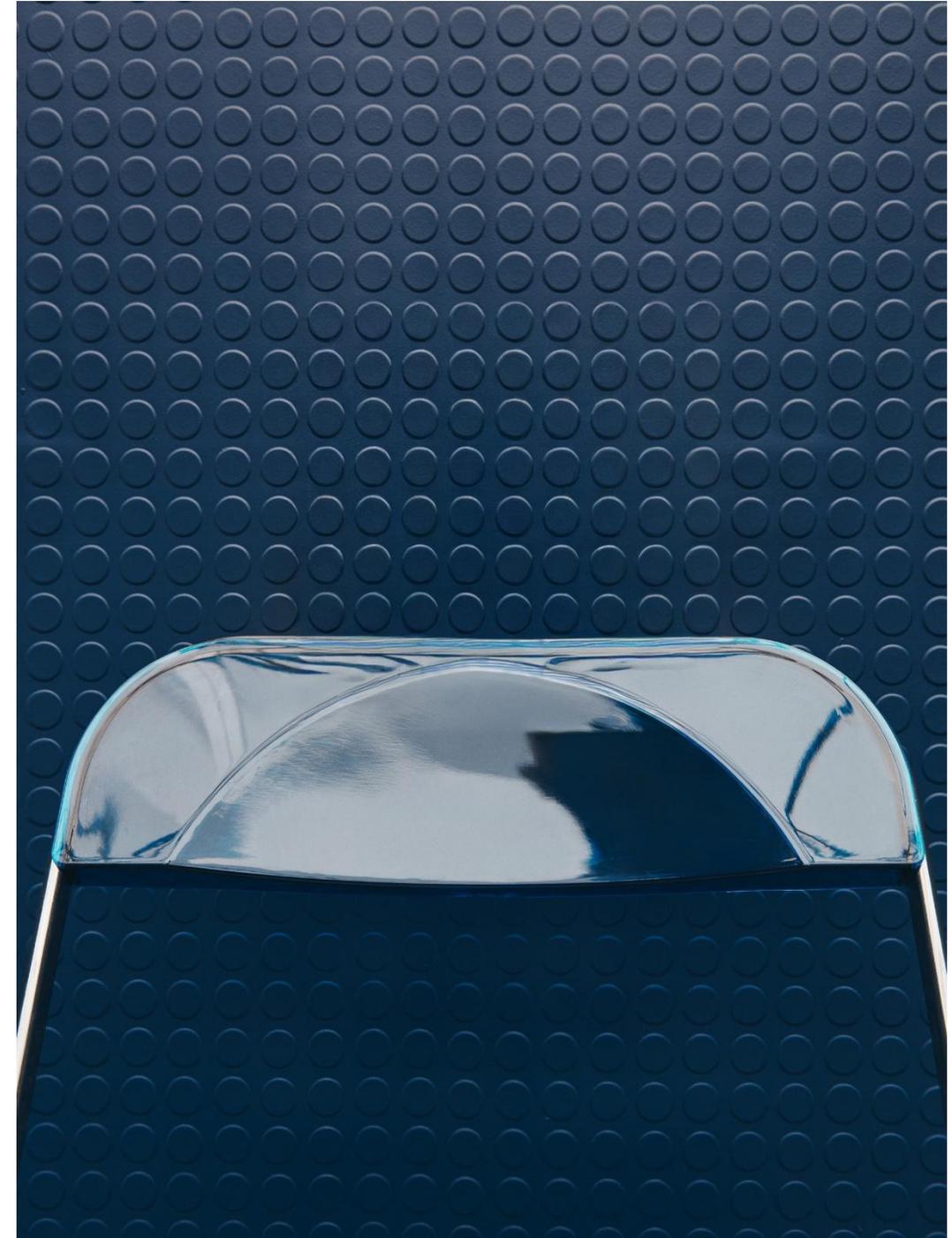
Women are over-represented in lower-paid and low-skill roles across garment, textile and footwear supply chains. They may face gender-based discrimination, wage inequality, limited progression opportunities and risks of harassment in the workplace. In home-based or informal settings, women may have little or no access to legal protections, childcare support or formal grievance pathways. Structural factors, including gendered norms and economic dependency, can further increase the risk of exploitation or underpayment.

Child labourers:

Children are at heightened risk within informal sectors such as agriculture, home-based manufacturing and artisanal production. In cotton farming, family-based work arrangements can normalise children's participation in harvesting and sorting activities. In embroidery, beading or other hand-finishing processes, children may be engaged due to perceived dexterity, particularly in unregulated workshop settings. These environments often lack adequate safeguards relating to education access, health, safety and age verification.

Subcontracted workers:

Workers engaged through labour-hire agencies or informal subcontracting chains may experience elevated vulnerability. These workers may be paid below legal wage thresholds, may not receive formal contracts, and may be unclear about who their actual employer is. Where subcontracting occurs without disclosure, visibility over working conditions becomes limited. Such workers may be exposed to hazardous environments, inconsistent payment practices, excessive working hours and retaliation if they attempt to raise concerns.



Subcontracting and Informal Labour Risks

Undisclosed subcontracting:

Subcontracting may be used by suppliers to manage fluctuations in demand or to complete specialised production processes. When subcontracting occurs without disclosure, it significantly reduces visibility over production sites and limits the effectiveness of audit or compliance processes. Lower-tier facilities may operate with minimal regulatory oversight, limited labour protections and a higher concentration of vulnerable workers. These conditions can increase the risk of excessive working hours, unsafe environments and exploitative terms of employment. The prevalence of informal or unauthorised subcontracting in some sourcing regions remains a structural challenge across the fashion industry.

Home-based work:

Home-based production is common for detailed or labour-intensive tasks such as embroidery, hand-finishing or component assembly. This type of work is typically informal and performed outside standard factory settings. Workers are often paid on a piece-rate basis, which can result in low and inconsistent income levels. Access to clean water, ventilation and personal protective equipment may be limited, and workers may have minimal contact with formal support systems or grievance channels. The isolated nature of home-based work reduces visibility for external monitors and increases the risk of unsafe or exploitative working conditions.

Sector-Specific Risks and Challenges

Short lead times:

Seasonal production cycles and collection deadlines can place pressure on suppliers to deliver within tight timeframes. In some contexts, this can contribute to excessive overtime, the use of informal labour, or the outsourcing of work to facilities that have not been disclosed or approved. These conditions increase the risk of forced, unpaid or otherwise unsafe labour practices. Such pressures are well documented across the fashion sector and can arise at multiple points in the supply chain.

Pricing pressure:

Cost considerations within the fashion industry can create downward pressure on suppliers, particularly in labour-intensive categories. In some cases, suppliers may respond by reducing wages, using informal or undocumented labour, or compromising on working conditions. These pressures may be felt beyond Tier 1, where cost constraints can cascade into earlier stages of production, heightening vulnerability among workers with limited protections.

Opaque lower-tier sourcing:

While Tier 1 and Tier 2 suppliers typically fall within formal contractual and audit frameworks, visibility decreases significantly beyond these levels. Tier 3 and Tier 4 suppliers are often involved in raw-material sourcing, processing or specialised component production, where regulation and oversight can be inconsistent. These deeper tiers are typically the most difficult to access, verify or monitor, creating inherent risk exposure for brands that rely on complex global supply chains.

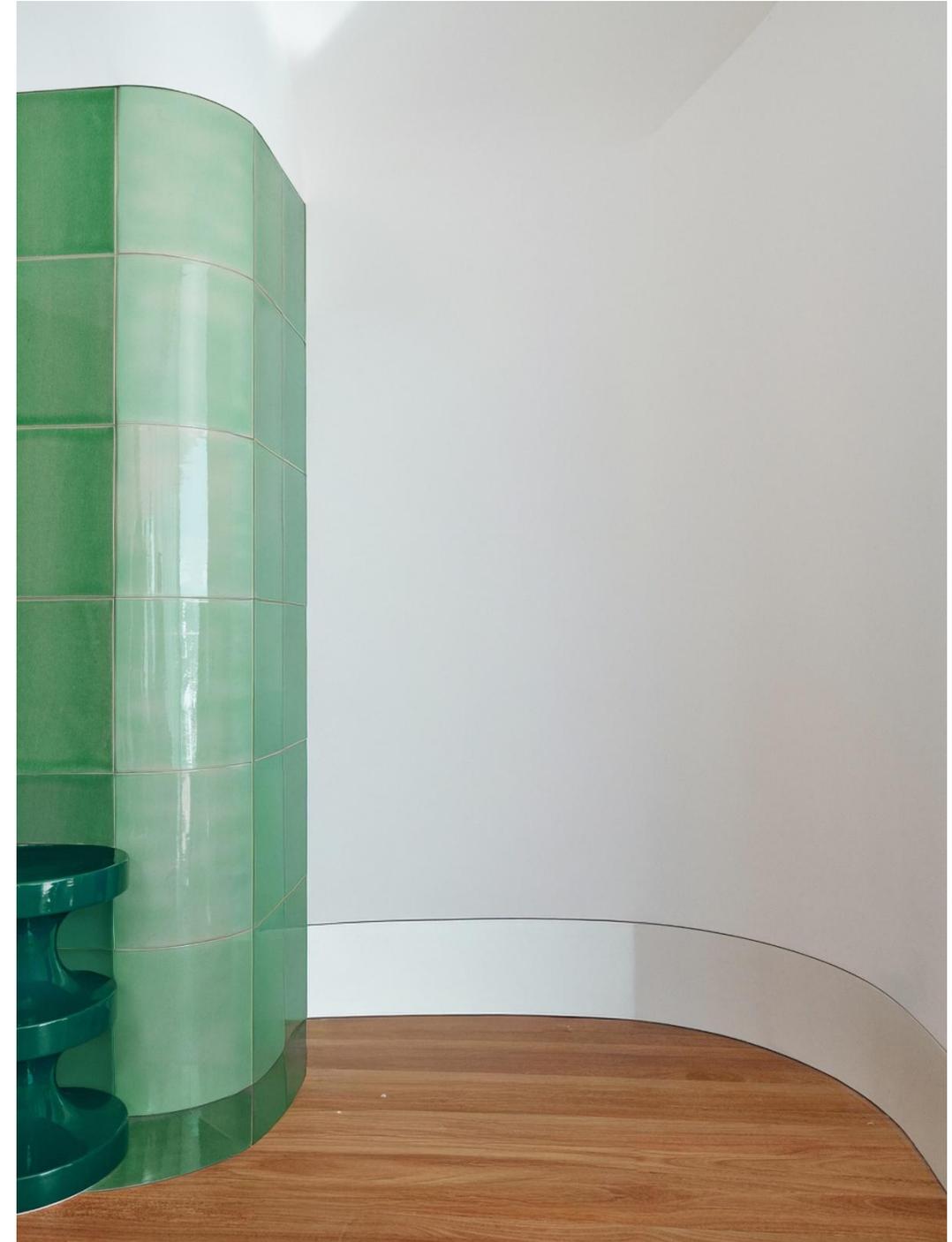
Limited leverage with suppliers:

As a mid-sized brand, Orotan may source from suppliers that also service much larger global customers. This dynamic can limit Orotan's ability to influence upstream practices, secure detailed supply-chain information or require specific remediation actions where concerns are identified. Shared supply chains can blur accountability and often require multi-brand collaboration to drive improvement. These limitations reflect sector-wide structural realities rather than actions within Orotan's control.

Services

In addition to risks associated with product manufacturing and raw-material sourcing, Orotan recognises that modern slavery risks may also arise within the services that support its Australian operations. As a fashion company headquartered in Sydney with a national store network and an expanding e-commerce platform, Orotan engages a range of third-party service providers. These include logistics and warehousing, cleaning, maintenance, recruitment, marketing, event coordination and IT and digital support.

While Australia has comparatively strong labour laws, these risks are not eliminated, particularly where services rely on outsourced, subcontracted or temporary labour. Lower-paid, high-turnover or insecure roles may be filled by vulnerable workers, including international students, recent migrants or temporary visa holders. Limited awareness of workplace rights, language barriers or concerns about job security can reduce the likelihood that affected workers will report exploitation.



Services

Cleaning services:

Cleaning across both head office and retail environments is typically performed by outsourced contractors. This sector is characterised by high levels of casualisation and sometimes complex subcontracting chains, which can obscure employment relationships and reduce transparency. Documented risks in this sector include underpayment of wages, unpaid overtime, lack of entitlements and unsafe working conditions. Workers may also be required to pay recruitment or placement fees or may work without formal contracts. Those on temporary visas or with limited English proficiency may be more vulnerable to coercion or wage non-compliance.

Logistics and warehousing:

Oroton uses third-party logistics providers for warehousing, distribution and seasonal storage. Labour-hire arrangements within this sector can reduce visibility over working conditions, particularly when workers are supplied through multiple tiers of subcontractors. Risks include excessive overtime during peak periods, inconsistent pay practices, inadequate breaks, and exposure to unsafe working environments. Migrant or visa-dependent workers may be reluctant to raise concerns due to fear of job loss or uncertainty about visa implications.

Maintenance and trades:

Maintenance of corporate premises and retail stores—including electrical, plumbing, general repairs and security - may involve small contractors or short-term labour arrangements. Inconsistent oversight or informal contracting practices within smaller trade businesses can increase the risk of non-compliance with Fair Work obligations, underpayment, and reliance on undocumented labour.

Recruitment and labour hire:

Recruitment agencies are used for casual, seasonal and specialised roles across head office and retail operations. While many agencies operate responsibly, sector-wide risks include deceptive recruitment practices, inadequate disclosure of employment conditions, withholding of wages or unreasonable deductions. Workers on temporary visas, or those relying on a specific employer for work rights, may be particularly vulnerable to coercion or limited ability to seek remedy.

Marketing and promotional services:

Oroton engages external agencies and temporary event staff for campaign activity, in-store activations and promotional events. Short lead times and inconsistent contracting arrangements can heighten risks, particularly where staffing is sourced through intermediaries or gig-based platforms. These arrangements may provide limited worker protections or insufficient clarity regarding entitlements and conditions.

IT support and digital services:

Oroton's digital operations rely on a mix of domestic and offshore service providers. While risks in skilled technical sectors are generally lower, the outsourcing of IT, web development, digital security or e-commerce support to providers in jurisdictions with weaker labour protections can create hidden risks related to subcontracting, informal labour arrangements or inadequate oversight.

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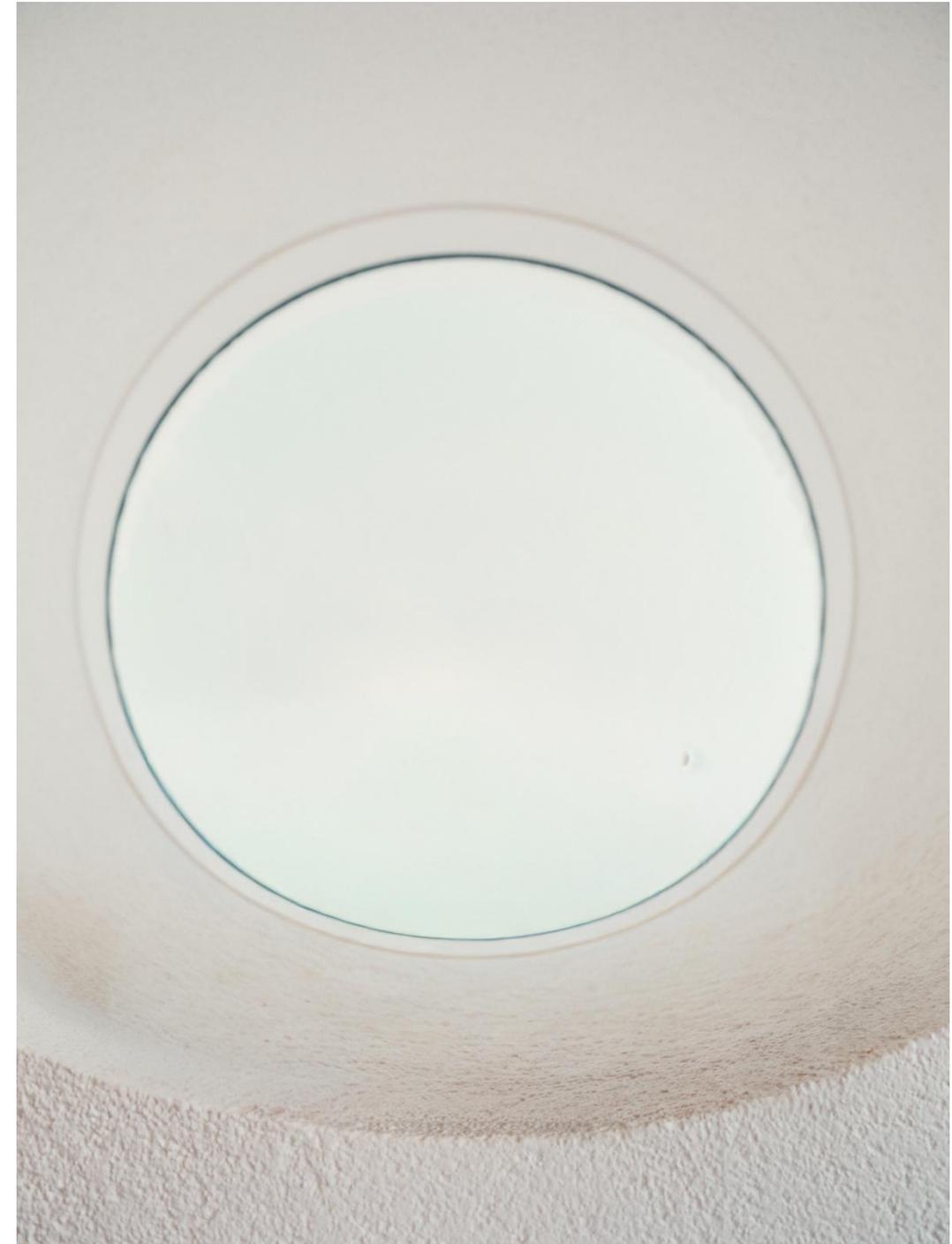
Actions Taken to Assess & Address Modern Slavery Risks (FY26)

1. Overview of FY25 Actions

During FY25, Orotan undertook a range of activities aimed at strengthening visibility, improving governance and enhancing due-diligence processes across both its Australian operations and its global supply chain. These actions recognise the structural limitations inherent in complex, multi-tier supply chains and focus on building better-quality information to inform risk management.

Key areas of progress included updated social compliance audits across Tier 1 suppliers, expansion of corrective-action monitoring, development of new Tier 2 traceability tools, the launch of an independent Worker Voice hotline, initiation of a Living Wage audit program for selected Tier 1 suppliers, and the introduction of responsible-purchasing measures designed to reduce labour risk.

Orotan acknowledges that modern slavery risks cannot be fully eliminated and that visibility into deeper tiers remains limited. The initiatives undertaken in FY25 reflect a measured, continuous-improvement approach to risk identification and mitigation.



2. Governance and Oversight

Modern slavery governance is overseen by the Orotan Leadership Team, with the Board receiving regular visibility of key risks and activities. During FY25, Orotan engaged an ESG consultant to assist with the development of ESG targets and a longer-term implementation roadmap. The business also completed the scoping of a dedicated ESG Manager role, approved for recruitment in FY26, to strengthen coordination, governance and accountability across ethical-sourcing activity. Orotan removed references to the former Conscious Consumption Committee, reflecting an updated governance model with clearer lines of responsibility.

3. Policies and Frameworks

Orotan maintains a suite of internal and supplier-facing policies that underpin ethical sourcing and human-rights protections. These include the Modern Slavery Policy, Child Labour Policy, Responsible Sourcing Policy, Unauthorised Subcontracting Policy and the Ethical Sourcing Policy contained within the Supplier Code of Conduct. All employees are required to comply with the Employee Code of Conduct, which was updated in April 2025. Modern slavery clauses have been incorporated into new and renewed supplier and service agreements to reinforce expectations around lawful employment, worker protections and safe working conditions.

4. Operational Due Diligence (Australia)

Orotan's direct operations are based entirely in Australia, where employees work under the General Retail Industry Award and applicable employment legislation. All employees have written contracts that clearly outline rights, entitlements and expectations. In FY25, Orotan conducted departmental risk assessments across logistics, maintenance, marketing and IT. No changes were identified for maintenance, marketing, IT, or DHL regarding logistics. Orotan also acknowledges that outsourced service categories such as cleaning, labour hire, logistics and temporary marketing roles can carry higher vulnerability due to casualisation, subcontracting and the presence of visa-dependent or inexperienced workers. FY25 actions included clearer contractual expectations for service providers, internal awareness initiatives related to ethical procurement and ongoing review of labour-hire due diligence.

5. Supply Chain Due Diligence

Orotan worked closely with its Tier 1 and Tier 2 suppliers across China, India, Italy and Australia. In FY25, Orotan's Tier 1 network included 28 accessory suppliers and 8 apparel suppliers operating across 38 production sites, while Tier 2 suppliers included 70 accessory suppliers and 18 apparel suppliers.

During the reporting period, Orotan completed social compliance audits across all Tier 1 accessory suppliers and 88 per cent of Tier 1 apparel suppliers. Social compliance corrective-action plans were received from 100 per cent of accessory suppliers and 87 per cent of apparel suppliers. Orotan closed 37 per cent of accessory CAPs and 100 per cent of apparel CAPs received. Open CAPs related to working hours, wage documentation, occupational health and safety practices, social management systems and worker engagement.

Orotan accepted external audits commissioned by other customers where reports met defined criteria for methodology, transparency and recency. The business also developed an expanded Tier 2 questionnaire to improve traceability, with the Chinese translation scheduled for completion in FY26. A key development in FY25 was the launch of the independent Worker Voice hotline, managed by QIMA, offering anonymous reporting channels for factory workers. The hotline is accessible via phone, WeChat and email, providing a new mechanism for workers to raise concerns.

6. Supplier Monitoring and Audit Outcomes

Supplier monitoring continued to focus on Tier 1 suppliers, where Orotan has the greatest leverage. FY25 audit outcomes highlighted recurring themes such as excessive overtime, gaps in wage documentation, occupational health and safety issues and incomplete social-management systems. These findings reinforced the systemic nature of labour risks within the fashion sector and highlighted the importance of ongoing engagement with suppliers to support corrective action. Orotan tracked CAP implementation throughout FY25 and adjusted audit schedules for higher-risk suppliers where necessary.

7. Traceability and Risk Assessment Improvements

Oroton expanded its raw-material risk assessments in FY25 to include silk and wool, identifying risks related to labour exploitation, animal welfare and limited supply chain visibility. This complemented existing assessments for cotton, leather, metals and synthetics.

Tier 2 mapping advanced through the development of a new questionnaire designed to collect data on materials, subcontracting and production processes. This tool is intended to support Oroton's longer-term work to progress mapping toward deeper tiers.

Oroton acknowledges that achieving full traceability is a multi-year process requiring sustained investment and cross-industry collaboration.

8. Responsible Purchasing Practices

Oroton introduced a cost-breakdown pilot in FY25 for accessories development to improve visibility over material, labour and overhead components. The pilot demonstrated that transparent costing structures help internal teams understand cost drivers while ring-fencing labour costs, reducing the risk of downward wage pressure during negotiation. Insights from the pilot will inform the development of a broader responsible-purchasing framework in FY26.

9. Remediation Examples

During FY25, Oroton engaged in remediation-related activities that provided valuable lessons for future process improvement.

The collaboration with Qantas required Oroton to provide detailed audit documentation, certifications and CAP closure evidence across multiple suppliers.

Challenges included expired audits, open wage- and working-hours-related CAPs and outdated certification documents. Qantas paused progression until documentation was updated, highlighting the importance of consistent, proactive audit management.

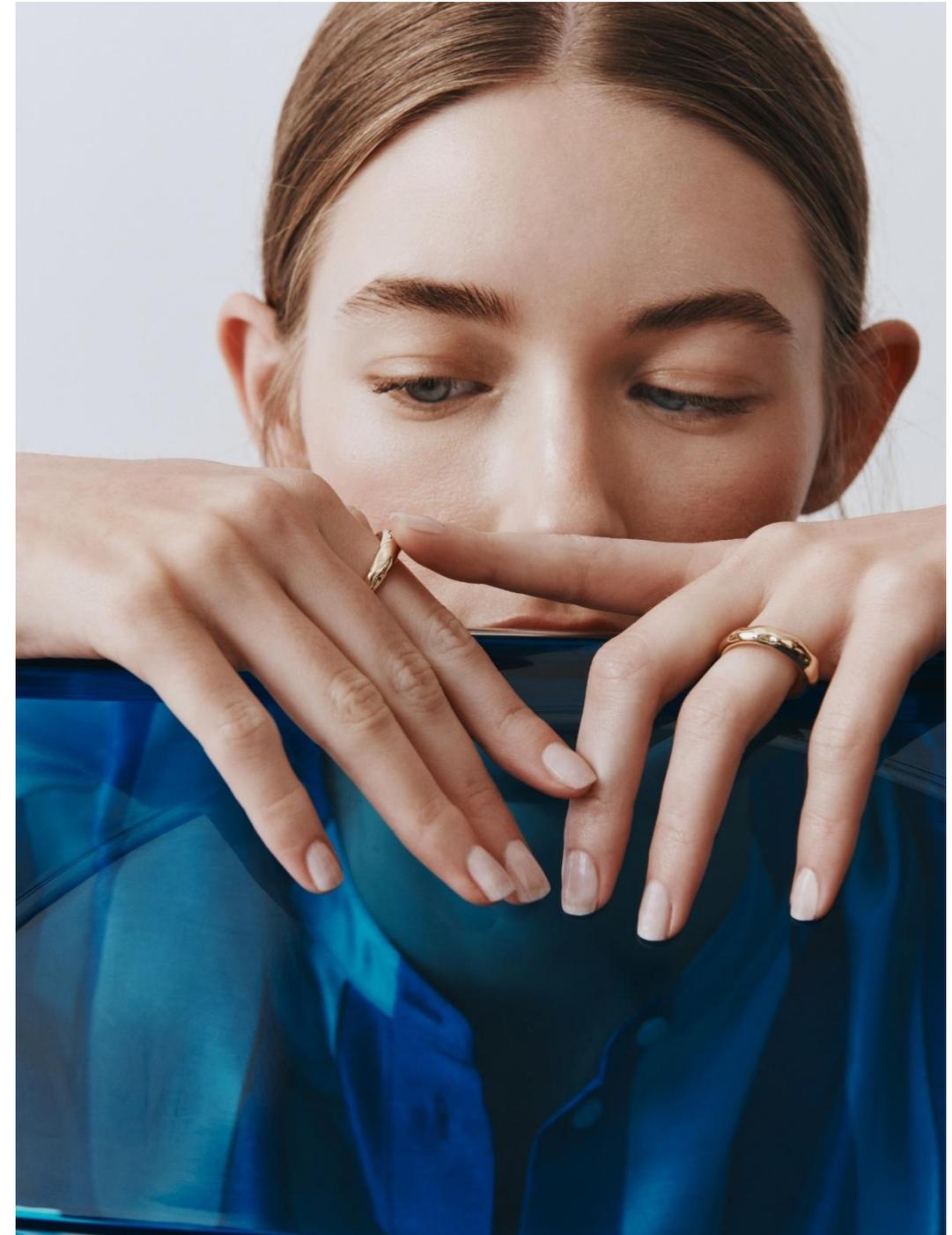
Oroton also onboarded a new supplier, WYLCO, where social compliance checks occurred later than ideal in the development timeline. The supplier had overdue CAPs and initially provided informal assurances without documentation. After further engagement, the supplier provided training evidence and information regarding efforts to improve social-insurance coverage. The experience prompted internal review of the design-to-production workflow to ensure earlier supplier-vetting processes.



Collaboration and Continuous Improvement

Oroton engages with a range of stakeholders to strengthen its modern slavery response and support continuous improvement across its operations and supply chain. During FY25, the business continued to work with industry partners, NGOs, ethical-sourcing specialists and community organisations to improve visibility, share insights and progress responsible sourcing practices. These collaborations recognise that modern slavery risks are complex, systemic and require coordinated action across the fashion sector.

Oroton acknowledges that supply chains require ongoing monitoring, engagement and refinement. As part of this commitment, the business continued to strengthen supplier engagement, expand traceability initiatives and refine due-diligence processes aimed at better identifying and addressing modern slavery risks.





Oroton continued its participation in Baptist World Aid Australia’s Ethical Fashion Project in FY25. This project promotes human rights and environmental sustainability across global supply chains and provides independent benchmarking for participating brands. The Ethical Fashion Report evaluates brands on their policies, traceability, supplier relationships, worker protections and environmental commitments across three tiers of the supply chain. Oroton received a score of 36 in the 2024 Ethical Fashion Report, placing the brand within the top 60 per cent of participating companies. This score represents an improvement from the 2022 rating and reflects ongoing efforts to strengthen ethical-sourcing practices and increase transparency. Oroton values its engagement with BWAA and recognises the role that industry benchmarking plays in supporting continuous improvement.

During FY25, Oroton participated in the Living Wage Working Group, chaired by the ESG Changeroom. This collaboration brings together Australian brands and policy stakeholders to explore industry-led strategies aimed at addressing and closing living-wage gaps in global supply chains. Learnings from this group informed Oroton’s preparation for its own Living Wage audit program, which commenced in FY26 using the Anker methodology.



Oroton supports Seamless, Australia’s national clothing stewardship scheme aimed at creating a circular clothing economy by 2030. Seamless focuses on circular design, circular business models, improved material recovery and consumer behaviour change. Oroton’s participation reflects its commitment to contributing to long-term improvements in clothing sustainability, waste reduction and product stewardship across the Australian fashion industry.



Oroton continued its long-standing partnership with QIMA, which supports the business through product testing, production inspections, social and environmental audits, certification services, technical advisory support and digital compliance tools. QIMA plays a key role in Oroton’s audit program, Worker Voice hotline management and supplier monitoring processes, contributing valuable insight into supplier conditions and industry best practice.



Oroton continued its partnership with Thread Together, a not-for-profit organisation dedicated to reducing clothing waste and supporting vulnerable communities by distributing brand-new surplus clothing. In FY25, Oroton employees volunteered at the Thread Together distribution centre following an all-company event where the organisation’s founder shared insights into clothing insecurity and responsible redistribution. This partnership reflects Oroton’s broader commitment to social impact and responsible product management.

Continuous Improvement

Oroton recognises that reducing modern slavery risk is a long-term process that requires collaboration, transparency and engagement across the value chain. During FY25, the business continued to refine its due-diligence processes, strengthen supplier relationships, and invest in expanded traceability tools. Through its partnerships and industry involvement, Oroton remains committed to improving the quality of information available, identifying emerging risks and contributing to broader sector-wide progress.





05

Measuring the Effectiveness of Our Actions

Audits and Assessments

Oroton measures the effectiveness of its modern slavery risk-management efforts through a combination of independent audits, supplier-reported information and internal monitoring processes. In FY25, Oroton continued to conduct social-compliance audits across all Tier 1 suppliers and accepted external audit reports from other customers where they met Oroton's criteria for methodology, transparency and recency. These criteria required that audit reports be less than twelve months old, aligned with recognised social-compliance frameworks and include access to findings and corrective-action plans.

Audit outcomes in FY25 identified recurring issues across some suppliers, including excessive overtime, gaps in wage documentation, social-management system weaknesses, and occupational health and safety non-conformities. Oroton engaged closely with suppliers to review corrective-action plans and track progress. CAP closure rates for the year included 37 per cent of Tier 1 accessory CAPs and 100 per cent of Tier 1 apparel CAPs that were submitted. Suppliers with open CAPs were monitored throughout FY25, with follow-up actions informed by risk severity and due dates extending through FY24–FY26.

Oroton did not identify any confirmed cases of modern slavery in its operations or supply chain during the reporting period; however, the business acknowledges the limitations of audit data and remains cautious about the level of visibility audits provide, particularly beyond Tier 1. As such, Oroton treats the absence of identified cases as an indicator of incomplete visibility rather than absence of risk and remains committed to continuous improvement in this area.

RISK INDICATORS MONITORED

To support ongoing monitoring, Oroton collects and reviews a range of quantitative and qualitative indicators that help highlight potential labour-rights risks within supplier facilities. These indicators include:

INDICATOR
Proportion of foreign migrant workers
Proportion of female workers
Youngest worker age observed in the workforce
Reported incidents relating to forced labour, inhumane treatment or restrictions on the freedom of association
Availability and functionality of worker grievance mechanisms
Average weekly working hours
Onboarding and induction processes for new workers
Traceability progress for key raw materials, including cotton, linen, silk and leather
Traceability indicators for hardware, metals and trims

Internal analysis in FY25 again identified working hours and overtime as key areas of concern, reflecting a broader industry trend in labour-intensive manufacturing environments. Oroton engaged with suppliers throughout the year to reinforce expectations regarding compliance with local labour laws and safe working-hour practices. Internally, Oroton reviewed capacity planning and maintained its purchasing critical path to help prevent last-minute order pressures that may contribute to excessive overtime at supplier facilities.



06

Looking Ahead

Oroton is committed to improving the way it measures the effectiveness of its actions and will continue to refine its monitoring and oversight processes in FY26 and beyond. Key forward-looking priorities include:

Executive Oversight

Oroton will continue to provide regular Board-level reporting on modern slavery risks and strengthen leadership accountability for ethical-sourcing outcomes.

Supplier Mapping

Tier 1 and Tier 2 supplier mapping will continue, with a staged expansion into Tier 3 to improve visibility of raw-material processing and subcontracted services.

Supplier Code of Conduct

Oroton is targeting 100 per cent Code of Conduct execution across all Tier 1 suppliers and 80 per cent across Tier 2 suppliers, including application to Australian-based labour and service vendors.



Third-Party Audits

Oroton will continue to engage independent auditors for annual (or recency-based) audits across all Tier 1 suppliers and will explore the inclusion of wage-practice and living-wage review components.

Worker Voice and Grievance Mechanisms

Oroton launched its Worker Voice hotline in FY25. In FY26, this will be further embedded and promoted across supplier sites to improve worker access to confidential reporting channels.

Fair Wage Review

60 per cent of Tier 1 suppliers in China were selected for a living-wage audit program. These audits commenced in FY26, with results pending. Oroton will use these insights to understand wage baselines and identify potential wage gaps.

Training and Awareness

Oroton will continue to develop modern slavery awareness training for internal teams and suppliers, incorporating real case studies and clearer guidance on identifying risk indicators.

Industry Collaboration

Oroton will maintain engagement with Baptist World Aid Australia, QIMA and the Living Wage Working Group to advance shared learning and sector-wide progress.

Remediation Framework

A formal remediation framework is being considered to guide Oroton's response should indicators of modern slavery or serious labour violations emerge within its supply chain

Policy Development and Review

Oroton will continue to expand and refine its ethical-sourcing and modern slavery policy suite, ensuring expectations remain aligned with evolving regulatory and industry standards.

Supplier Engagement

Capacity-building and regular communication with suppliers will remain central to supporting improvements in transparency, reporting and risk mitigation.

Reporting and Stakeholder Communication

Oroton will continue to strengthen the quality and transparency of its disclosures to regulators, stakeholders and customers, in line with evolving global ESG expectations. Through these actions, Oroton seeks to improve the effectiveness of its modern slavery risk management systems and reinforce its commitment to dignity, safety and respect for all workers involved in the production and distribution of its products.

Oroton remains steadfast in its commitment to ethical practices and human rights. This statement reflects our dedication to identifying, mitigating, and remediating modern slavery risks across our operations and supply chains, ensuring a sustainable and just future for all stakeholders.

OROTON

MODERN SLAVERY STATEMENT FY25

