



THE ICONIC

# Modern Slavery Statement

2023

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## Introduction

This Modern Slavery Statement (Statement) is published by Internet Services Australia 1 Pty Limited (THE ICONIC) in accordance with its obligations under the Modern Slavery Act 2018 (Cth) for the financial reporting period 1 January 2023 – 31 December 2023 (inclusive).

THE ICONIC is a wholly-owned indirect subsidiary of ultimate parent company Global Fashion Group S.A. (GFG) which is incorporated in Luxembourg and listed on the Frankfurt Stock Exchange.

This Statement sets out the actions taken by THE ICONIC in 2023, in identifying and addressing risks of modern slavery in its operations and supply chain, due diligence and remediation activities, as well as the effectiveness of those actions.

This Statement has been reviewed and approved by the Directors of THE ICONIC.

27 June 2024

## Acknowledgement of Country

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In the spirit of reconciliation, THE ICONIC acknowledges the Traditional Custodians of Country throughout Australia and their connections to land, sea and community. We pay our respects to their elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today.



## A Statement from the CEO, Jere Calmes

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In our dynamic global landscape, our team at THE ICONIC continues to remain committed to upholding human rights across our operations and supply chain, as well as our zero tolerance approach to modern slavery. Over the last year, businesses have had to navigate escalating challenges including geopolitical instability, inflation, and the rising cost of living. These challenges have not only presented operational hurdles, but also heighten the risk of modern slavery, particularly in already vulnerable sectors. As we navigate these challenges, safeguarding human rights within our workplace and supply chain is as important as ever, and we are committed to remaining vigilant and proactively addressing risks of exploitation. I am proud to present THE ICONIC's fourth annual Modern Slavery Statement, which outlines the progress our team has made as we strive towards

achieving our 2030 People & Planet Positive goals, in partnership with our parent company Global Fashion Group.

Our dedication to ethical sourcing practices extends beyond compliance as we foster a culture of transparency, accountability, and respect for human dignity. As part of our approach, we continue to conduct thorough risk assessments, implement rigorous due diligence and remediation measures, and collaborate with stakeholders across our supply chain to drive positive change within our sphere of influence. In 2023, we strengthened our governance by updating a range of policies including our Supplier Code of Conduct, and established our Responsible Purchasing Framework and Human Rights Standards. Transparency and traceability remain at the forefront of our Ethical Sourcing Strategy, which has been developed to prioritise human rights. We have further embedded the ambitions

set within our overarching commitment to environmental and social responsibility into our business by developing a range of protocols to encourage and empower our team to work cross-functionally. Our goal? To create leaders of change.

We recognise that our actions today will shape the future of our industry and the lives of countless individuals around the world, however, we acknowledge that we have a long way to go. Our mantra of 'Progress Always' remains our guiding principle as we work alongside our fellow industry colleagues and internal team to tackle such major challenges within our industry.

A handwritten signature in black ink, appearing to read 'Jere Calmes'. The signature is fluid and cursive, written over a white background.

Jere Calmes  
CEO, THE ICONIC



# 2 Our structure, operations & supply chain

## About THE ICONIC

Launched in 2011, THE ICONIC is Australia and New Zealand's leading platform for fashion and lifestyle. With a curation of over 2,500 global and local brands, THE ICONIC saw 20 million monthly site visits in 2023, and is proud to have delivered over 6.8 million orders to its two million active customers in Australia and New Zealand.

**OUR PURPOSE** is to 'create a better way for people to shop'. We invest in being a good corporate citizen through our community and sustainability efforts.

Style, that's full of substance.

## People & Planet Positive. Progress, Always.

Our commitment to our 2030 People and Planet Positive strategy remains unwavering, and our mantra of 'Progress, Always', is steadfast. As we reflect on some key achievements from 2023, across our five pillars: Responsible Workplace, Diversity, Inclusion and Belonging, Circularity and Conscious Consumption, Fair and Ethical Sourcing, Climate Action; we also stand ready for the challenges that may lie ahead as we continue to

transform our business to positively impact our People and our Planet.

Forging strong relationships with our supply chain is paramount to creating further transparency and enables us to actively engage in strengthening the capabilities of both our suppliers and partners, while also having feet on the ground to assess and enhance working conditions. The voices of our workers are at the forefront of our strategy, and we provide training to improve their understanding of their rights, including avenues of expression. We also continue

to invest in the education and training of our team, as well as improved processes across ethical trade, supply chain traceability and responsible procurement. Our agenda is driven by the moral imperative, the responsibility we have as a corporate citizen. We maintain a zero tolerance approach to modern slavery and labour abuses, and work diligently to defend human rights and create genuine lasting change for the better of our people, our communities and our planet.

## 2030 People & Planet Positive fair & ethical sourcing strategy targets

### AHEAD OF 2030

Collaborating with our third-party brand partners to ensure they all meet our human rights standards.

Continuing living wage assessments at all of our Own Brand factories.

Ensuring our teams are always operating in line with our Responsible Purchasing Practices.

Enabling all workers effective grievance channels through our in factory assessments and implementing independent grievance mechanisms.

## A highlight of key achievements for 2023



We are proud to have commenced our journey to become BCorp certified. This is an important way to build on our journey and recognise our ambition to operate our business at a standard that demonstrates purpose, backed by credible action.

Through ongoing engagement and visits with our Own Brands factory base in China, Bangladesh and India, there are now active worker dialogue and grievance mechanisms in 77% of our direct and indirectly contracted factories.



26% of all cotton sourced for our Own Brands in 2023 was either organic, recycled or Australian cotton.

THE ICONIC X FNFD Incubator Program: Throughout 2023, we ran our 12-month industry-first program in partnership and co-design with First Nations Fashion + Design.



We are proud to be Foundation and Board members of Seamless, Australia's National Clothing Product Stewardship Scheme, recognising that transformational change is required to build a circular fashion system.

GETTY IMAGES

2022 PROGRESS		2023 PROGRESS
14%	→	18%
of brands meeting GFG's human rights standards for brands		
0%	→	14%
of Tier 1 factories assessed against living wages benchmarks where they exist		
42%	→	77%
of workers in Tier 1 factories can access an effective in-factory worker dialogue mechanism or an independent grievance mechanism		

**NOT TRACKED:** Purchase orders placed in line with responsible purchasing practices

## About Global Fashion Group

THE ICONIC is part of Global Fashion Group (GFG), a leading fashion and lifestyle destination across 11 countries and three main regions: LATAM (Dafiti), SEA (ZALORA) and ANZ (THE ICONIC). We offer customers a seamless, one-stop shopping experience via our inspiring platforms with a broad and relevant assortment. GFG connects a population of more than 800 million people with over 6,000 fashion and lifestyle brands across its three well-

established ecommerce platforms. As a global business with deep local roots, diversity is at the heart of everything we do and gives real meaning to Global Fashion Group's overarching purpose of 'True Self-Expression'.



## Our Structure & Operations

Headquartered in New South Wales, Australia, THE ICONIC's operations function across four Sydney-based locations: the CBD Head Office, our E-commerce Production Hub, our Fulfilment Centre and Operations Facility. As of 31 December 2023, we directly employed 947 people, including both permanent employees and casuals, throughout these four hubs across seven business areas including:

Commercial and Sustainability, Finance, Legal, Customer, Operations, People & Culture, Technology and Product.

### An ICONIC Snapshot

947

EMPLOYEES

328

LABOUR HIRE EMPLOYEES

2500+

THIRD PARTY BRANDS

6.8+m

ORDERS PER YEAR

20m

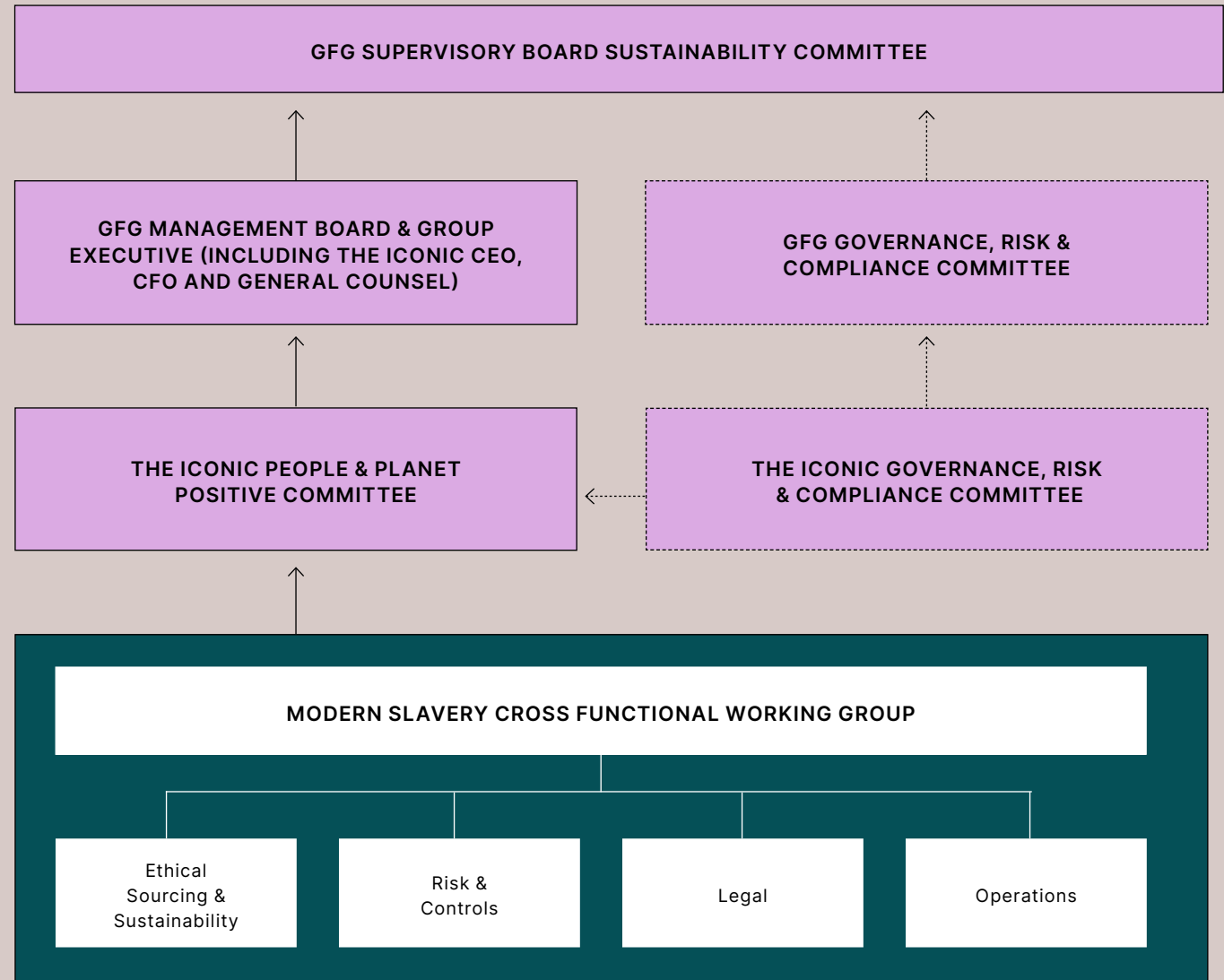
SITE VISITS PER MONTH



In addition to those THE ICONIC directly employs, we engage employees indirectly via labour hire service providers to perform work at our Fulfilment Centre. In 2023, we engaged 328 staff through labour hire service providers - a significant decrease from 2022. We also have 182 dedicated Customer Service, IT, Production Content and Commercial staff located in the Philippines, Vietnam and China. These employees are engaged via intercompany agreements, directly recruited and employed by our sister company ZALORA, however are dedicated resources contributing to THE ICONIC's operations.

Our Modern Slavery Cross Functional Team remains in place to direct governance and oversee the progress of our modern slavery action plan. Although ultimate accountability of modern slavery risks sits with our Executive team, we have implemented training and a strong suite of policies that apply across all team members across the business, including staff and contractors. It is imperative that each individual in our organisation has an understanding of human rights and is supported to identify, manage and mitigate any associated risk.

## THE ICONIC Modern Slavery Governance Structure



- > Key line of responsibility & accountability
- - -> Consulted & informed as part of overall Enterprise Risk Management

## THE ICONIC's Global Product Supply Chain

THE ICONIC's product supply chain is categorised into two distinct groups: global and local **Third Party Brands**, and our **Own Brands**. As our selection of products continues to evolve, so too will our supply chains. As a result of this additional diversification and complexity, it is even more important to ensure that we are working diligently to manage our social and environmental impact.

### THIRD PARTY BRANDS

We source products from our Third Party Brands via two business models:

- **Retail**<sup>1</sup>, where products sold to customers are owned by THE ICONIC
- **Marketplace**<sup>2</sup>, where brand partners list their products on our shopping platform



### THE ICONIC OWN BRANDS

Our Own Brands are proudly designed in our Sydney Head Office, and as at 31 December 2023, comprise 13<sup>3</sup> brands across the apparel, footwear and accessories categories manufactured via a global supply chain. During this reporting period, we partnered closely with 43 independently owned final stage manufacturing facilities to bring our goods to life, with the majority being in China (79%), followed by India (14%) and Bangladesh (7%). Collectively, 7,988 people are employed across these locations, 53% of employees are female, and 22% are local migrant workers. Our factory list is published on our [website](#) and the [Open Supply Hub](#), and is updated monthly.

### Our Own Brands

Atmos&Here

Atmos&Here  
CURVE

Atmos&Here  
MATERNITY

A E R E

DAZIE

LOVER

  
*Double Oak Mills*  
CLOTHES AND TAILORS

endless

COMMUNE

minima  
esenciales

*Spurr*

STAPLE SUPERIOR

MOOD.DNM

1. Retail products are sold either via Wholesale or Consignment arrangements

2. Marketplace products are either shipped via a Dropship arrangement (from the brand's warehouse using the brands's delivery services), Shipped by THE ICONIC arrangement (shipped from the brand's warehouse using THE ICONIC delivery services) or Fulfilled by THE ICONIC arrangement (brand utilises THE ICONIC's warehouse and fulfilment services)

3. AERE, Atmos&Here, Atmos&Here Curvy, Atmos&Here Maternity, Commune, Dazie, Double Oak Mills, Endless, Lover, Minima Esenciales, MOOD.DNM, Staple Superior, SPURR

**THE ICONIC'S NON-TRADE SUPPLY CHAIN**

Goods and services that do not generate revenue are sourced through our non-trade supply chain. We acknowledge that our indirect relationships with these suppliers limits our visibility and

influence, exposing us to social and environmental risks. The nature of labour hire arrangements and the lack of transparency associated with this employment model, for example, lends itself to a higher risk profile.

**THE ICONIC Non-trade Supply Chain Categories**

<p><b>LABOUR HIRE ARRANGEMENTS AT FULFILMENT CENTRE</b></p>	<p>Labour hire service providers enable flexibility in our fulfilment staffing.</p>
<p><b>OTHER EMPLOYMENT ARRANGEMENTS</b></p>	<p>We hire a range of specialists on a contract basis to support both our local and international operations, commercial, technology and production teams. These include models, influencers, photographers, call centres, tech and sourcing teams.</p>
<p><b>INDIRECT (NON-STOCK PRODUCTS)</b></p>	<p>Non-stock products include packaging, IT and fulfilment centre equipment, miscellaneous items for our team members across various functions of the organisation including production.</p>
<p><b>INDIRECT (NON-STOCK) SERVICES</b></p>	<p>Indirect services include those that support the overall maintenance, efficiency and operations of the business such as cleaning, security, marketing, production, repairs, maintenance &amp; utilities.</p>
<p><b>OPERATIONS - LOGISTICS &amp; TRANSPORT</b></p>	<p>Logistics and transport play a pivotal role in our end-to-end supply chain management. We work with third-party vendors to fulfil this role.</p>



A close-up photograph of a person's hand holding a silver smartphone. The phone's screen is on, showing a reflection of an outdoor scene with people and buildings. The hand is positioned over a light-colored, textured suit jacket. The jacket has several dark buttons visible. The overall lighting is soft and natural, suggesting an outdoor setting.

# 3 Identifying and addressing risks in our operations & supply chain

## Policies and Governance

We are dedicated to 'good governance' and recognise that it creates the foundation for ensuring compliance, transparency and upholding ethical standards across our entire enterprise. We comply with relevant legislation and industry codes, and we have developed a suite of policy controls specific to modern slavery. We also require robust reporting across the organisation to ensure the provisions within these policies are implemented. Our onboarding and training process is applicable to our staff, contractors and suppliers, to ensure that there is a thorough understanding of modern slavery in all its forms. We believe that empowering each individual to identify and respond to modern slavery risks in their role greatly contributes to combating the risk. This empowerment is informed by one of our core company values, 'Stronger Together'. This year, we made a range of updates to increase compliance, as well as support both our internal and external stakeholders.

- **Supplier Code of Conduct:** We have commenced the process of updating our Supplier Code of Conduct in order to ensure that it continues to align with internationally recognised best practice standards while ensuring practical local application, and GFG group policies.
- **Responsible Purchasing Framework:** In 2022, we redefined our Responsible Purchasing Framework to outline the minimum commitments related to

buying behaviours and acting with integrity in our dealings with suppliers. The addition of corresponding metrics in 2023 will enable us to monitor our buying behaviours in a tangible way from 2024 onwards.

- **Human Rights Standards:** We formalised our Human Rights Standards and Framework and will begin formal implementation of our e-learning program for our Third Party brand partners in 2024.

A focus in 2023 was decentralising the responsibility to manage modern slavery across relevant business functions and leadership. Over time this will enhance responsibility for each individual to be accountable and proactive in actively identifying, managing and mitigating risk across business operations and supply chain. This holistic approach not only

### THE ICONIC & GFG Policies List

- Business Conduct and Ethics Policy
- Health, Safety and Wellbeing Policy
- Discrimination, Harassment and Bullying Policy
- Anti-Bribery and Anti-Corruption Policy
- Contractor Management Policy
- Insider Trading Compliance Policy
- Sanctions Policy
- Governance Policy
- Speakup/ Whistleblower Policy
- Responsible Purchasing Policy
- Sustainable Cotton Policy
- Child and Forced Labour Remediation Policy
- Guiding Principles for Recruitment & Employment of Labour Services Provider Staff
- Procurement Policy

embeds and integrates the work into our business processes, but also aims to create leaders that can continue to combat modern slavery in our industry

We commenced our BCorp certification journey in 2023 with an aspiration to formally join a global movement of businesses working to

workers, community, environment, and customers. Companies are required to achieve a minimum verified score and make a legal commitment to consider stakeholder interests in addition to shareholder interests.

The BCorp certification is a voluntary initiative that reflects a

## We Are Stronger Together

redefine success in business by building a more inclusive and sustainable economy. To become a certified BCorp, companies must undergo a rigorous assessment process conducted by the non-profit organisation, B Lab. This assessment evaluates a company's performance across five key impact areas: governance,

company's commitment to responsible business practices and social responsibility. It serves as a credible and transparent way for consumers, investors, and other stakeholders to identify and support businesses that are making a positive impact on society and the environment.

## Modern Slavery Risk Assessment – Enterprise Wide

THE ICONIC performs an annual, enterprise-wide Modern Slavery Risk Assessment in order to anticipate, manage and mitigate risks across our business, local and international supply chains, and contractors.

Given the inherent complexities within our industry and supply chain including lack of transparency and traceability, temporary and migrant labour and subcontracting, we operate under the assumption that we are intrinsically linked to modern slavery.

In 2023, our Modern Slavery Cross Functional Team implemented a range of actions as part of our Modern Slavery Action Plan, across eight identified areas of our business.



Our cross-functional team ensures a business-wide approach to risk identification and management.

### Identified Risk Areas at THE ICONIC



Our teams worked in collaboration to make a pivotal update to our Modern Slavery Risk Assessment profile and risk map, to align the methodology with THE ICONIC's enterprise risk management risk methodology. As such, the "Y" axis has been updated from measuring "spend exposure" to "likelihood" and the "X" axis has been updated from measuring "inherent risk profile" to "impact". This revision supports a more robust assessment of the residual risk as it considers a broader risk view, whereby, the "impact" considers not only financial impact, but also non-financial such as regulatory, human, reputational risk factors. Similarly, the "likelihood" considers not only the spend exposure

of that risk factor, whereby greater spend may correlate with a greater risk exposure, but also the probability of a risk materialising, in consideration of the inherent risks associated. This has also seen the risk map updated from a "3 x 3" to a "5 x 5" risk map, which means that risks previously rated on a scale of (1) "Low" to (3) "High" are now rated on a scale of (1) "Very Low" to (5) "Very High". Therefore a risk rated "High" in 2022 may be transposed as rated "Very High" using the updated risk ratings scale, although the risk level has not necessarily increased.

A broader set of criteria not only enables us to be more effective in identifying the overall likelihood of

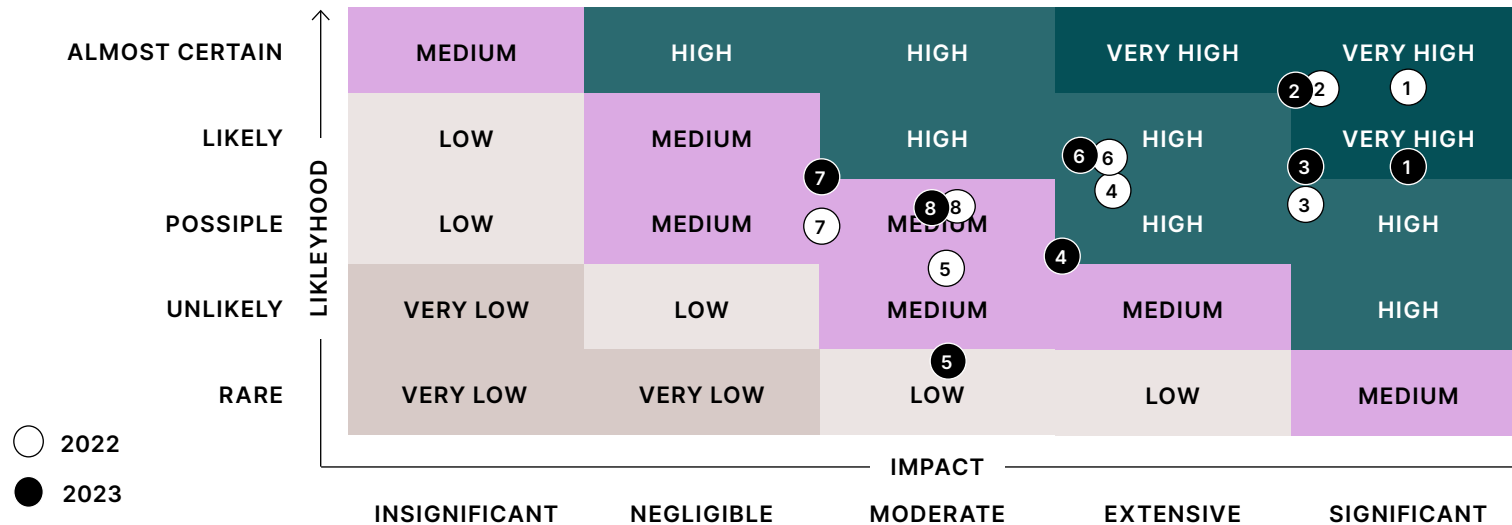
risks, but gives us the ability to be more proactive in developing strategies to ameliorate modern slavery, which can lead to enhanced corporate responsibility and stakeholder confidence.

Stringent regulations concerning labour standards set out by the International Labour Organisation continue to be implemented globally, increasing the need to identify areas of non-compliance and implement corrective actions. We apply rigour in adhering to these standards, as well as being proactive by engaging in working groups that aim to drive knowledge and understanding, as well as problem solving amongst local stakeholders as a part of our dedication to collaboration and collective action.

## 2023 Risk rating

1. Own Brand Supply Chain  
**VERY HIGH**
2. Third Party Brand Supply Chain  
**VERY HIGH**
3. Marketplace Brand Supply Chain  
**VERY HIGH**
4. Labour Hire Arrangements  
**HIGH**
5. Other Employment Arrangements  
**LOW**
6. Ops Logistics and Transport  
**HIGH**
7. Indirect Spend - Products  
**MEDIUM**
8. Indirect Spend - Services  
**MEDIUM**

## 2023 Modern Slavery Enterprise Risk Profile



## THE ICONIC's Own Brands Supply Chain

Our portfolio of 13 Own Brands spans womens and mens apparel, footwear and accessories ranges. Working with a mix of directly contracted suppliers and factories, as well as subcontractor factories, continues to pose challenges given the lack of supply chain visibility. Despite continuing to implement programs and controls to minimise the violation of human rights across the production of our Own Brands, we still recognise that it requires long-term strategies to see improvement, therefore fair and ethical sourcing is embedded as a key pillar of our 2030 People and Planet Positive strategy.

The engagement of our Own Brand suppliers increased significantly this year as we continue to work towards

strengthening our relationships with workers across our supply chain. The partnership between Own Brand buying, sourcing and planning teams, with the sustainability and ethical sourcing teams has strengthened a number of processes in place to engage our suppliers and factories on topics related to human rights and sustainability.

We've established a cross-functional supplier and factory onboarding process, which has seen an improvement in identifying factory suitability from a social compliance, sustainability and capabilities perspective. We have also introduced a seasonal supply planning process to ensure all parties (including vendors) are informed of production planning well in advance, set up workshops to collect feedback from vendors regarding new initiatives, provide monthly feedback opportunities during transition stages

of new initiatives, and enhanced vendor management through data collection and communication with vendors.

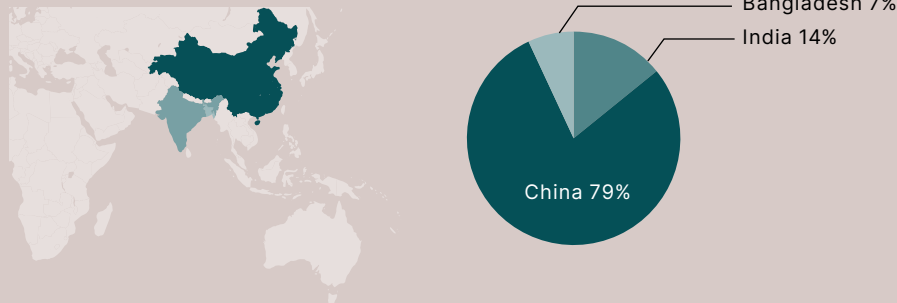
Country specific factors also amplify the inherent risk of modern slavery. In 2023, our Own Brand products were produced in Tier 1 factories across Bangladesh, China, India. Whilst our Tier 2 factories remained steady in China, we amplified our traceability efforts through our Preferred Materials programme, which gave us greater visibility of our supply chain beyond Tier 2. We also implemented the Responsible Wool Standard, which verifies animal welfare and land management requirements and tracks it from farm to final product. In doing so, we have been able to identify additional regions that our certified wool is sourced from such as Argentina, Australia, New Zealand, Uruguay & South Africa.



Left to right: 1-HU IV-Cutting; 2-LUO Guochang-Ironing; 3-XU Guoliang-Electric Cutting; 4-ZI Jinhua-Sewing

### Own Brand Sourcing by Country and Category Split

#### BY COUNTRY



#### BY CATEGORY SPLIT





**COUNTRY RISK ASSESSMENT**

Our annual country risk assessment remains essential and in 2023, we broadened our scope of analysis to reflect the greater visibility we obtained into the countries we knowingly manufacture and source materials for our Own Brands. Our Country Risk Calculator is developed utilising publicly available global resources<sup>4</sup> and reveals exposure to modern slavery due to inherent country and commodity risks. Our Own Brand manufacturing facilities, and many of our subsequent materials facilities, are located in countries that are known to have high exposure to modern slavery. Therefore, our Country Risk Assessment deemed these countries a 'Critical' risk rating. However, the social compliance programs we have in place at Tier 1 and 2 factories, as well as the increase in sourcing of certified cotton to 26% of all Own Brand cotton in 2023, decreased

our exposure to regions of concern. This has provided further risk mitigation in this area of our business, however, we continue to work towards further visibility with a focus on manufacturing and processing locations.

**We continue to work towards further visibility, with a focus on manufacturing and processing locations.**



**Own Brand country risk assessment**

CHINA <b>CRITICAL</b>	INDIA <b>CRITICAL</b>	BANGLADESH <b>CRITICAL</b>	TURKEY <b>CRITICAL</b>	KRYGYZSTAN <b>CRITICAL</b>	TAIWAN <b>MODERATE</b>
TAJIKISTAN <b>CRITICAL</b>	ARGENTINA <b>CRITICAL</b>	AUSTRALIA <b>INSIGNIFICANT</b>	NEW ZEALAND <b>INSIGNIFICANT</b>	URUGUAY <b>INSIGNIFICANT</b>	SOUTH AFRICA <b>MODERATE</b>




4. 2023 Rule of Law Index - World Justice Project; Global Conflict Tracker 2023 - Council of Foreign Relations; Poverty headcount ratio at national poverty lines (% of population) - World Bank; Corruption Perceptions Index 2023 - Transparency Index; 2022 list of goods produced using child or forced labour - Bureau of International Labour Affairs, US Dept of Labour; 2023 Global rights Index - The International Trade Union Confederation (ITUC); 2023 Global Slavery Index - Walk Free

**OWN BRAND SOURCING STRATEGY**

A year after introducing our formalised Own Brand sourcing strategy in 2022, we continue to see efficiencies in our business in 2023. The main pillars of the sourcing strategy continue to focus on:

- Transitioning to a ‘direct to factory’ model providing more visibility and control of our supply chain, and subsequently, vendor consolidation;
- Ensuring our country sourcing strategy sets us up for long term success;
- Establishing and maintaining strategic relationships with suppliers; and
- Digital transformation and optimisation with all phases of design to deliver to increase efficiencies and transparency.

**THE ICONIC Supply Chain Tiers**

<p><b>TIER 1 *</b> Production sites completing final stage manufacturing of orders</p>	 Cutting	 Sewing & Finishing	 Knitting & Stitching	 Gluing & Assembly	 Packing & Shipping	
<p><b>TIER 2 *</b> Production sites completing some or all final stage manufacturing processes of orders</p>	 Cutting	 Sewing & Finishing	 Knitting & Stitching	 Gluing & Assembly	 Packing & Shipping	
<p><b>TIER 3</b> Sites completing enhancements to product</p>	 Printing & Dyeing	 Embroidery	 Washing (of product e.g knitting and denim)	 Blending	 Injection Moulding	
<p><b>TIER 4</b> Fabric and components manufacturers</p>	 Weaving	 Knitting	 Spinning	 Dyeing	 Tanning	 Production of Hardware & Trims
<p><b>TIER 5</b> Raw materials processing</p>	 Farming	 Ginning	 Synthetic Extraction			

\* Social Audit required

Icons - GETTY IMAGES

## FACTORY DUE DILIGENCE

Supply chain transparency and factory audits remain core components of our Ethical Sourcing & Sustainability Compliance Programme. Our on-ground Social Compliance manager, based in China oversees the implementation of our Own Brand factory audit program and examines employment practices, working conditions and management systems in order to demonstrate compliance with legal requirements, industry standards and THE ICONIC's social responsibility commitments.

In 2023, eight full audits were conducted and reviewed to facilitate the onboarding of new factories, with 16 follow up audits conducted and reviewed for existing factories. Recommendations from these audits inform remediation and corrective action plans, capacity-building initiatives, and sustainability programs aimed at addressing modern slavery risks over time. The outcome of these remediation and corrective action plans saw 22 critical, 113 major and 95 minor issues found during the audits of existing or new factories remediated during 2023, averaging a total of 57.21% issues closed.

As our programme continues to mature, our focus remains on strengthening the relationships with our suppliers and increasing our on-site presence. During the reporting period we conducted 25 factory visits in China. This provided further insight into real-time compliance, risks and an opportunity for workers to communicate to our team



directly, enabling us to provide practical solutions to remediate where possible, and develop continuous improvement pathways beyond audit. These visits also provide an opportunity for us to identify any risk or event of unauthorised subcontracting, which we are acutely aware of as an issue facing our supply chain and industry more broadly. In 2023, we were not made aware of any unauthorised subcontracting occurring in Tiers 1 or 2 of our supply chain. We plan on increasing our factory visits outside of China in 2024, through both physical and virtual visits. This year, our onboarding process became even more stringent as we introduced further controls in the aim of accelerating our People & Planet Positive goals. As a result of

increased vetting, we took steps to reject the onboarding of three factories during this reporting period due to critical issues identified during the audit and onboarding process. We have further bolstered our processes whereby it is now a mandatory requirement for THE ICONIC to conduct a pre-approved on-site or virtual factory visit in order to onboard new facilities for Own Brand products. Our Sourcing team works closely with our Social Compliance manager to evaluate both the capacity and risks across Tier 1 and Tier 2 suppliers, and are prioritised based on various risk indicators including country risk, regional risk and audit timeframe.

## 2023 marks the 10th anniversary of the Rana Plaza factory collapse in Bangladesh.

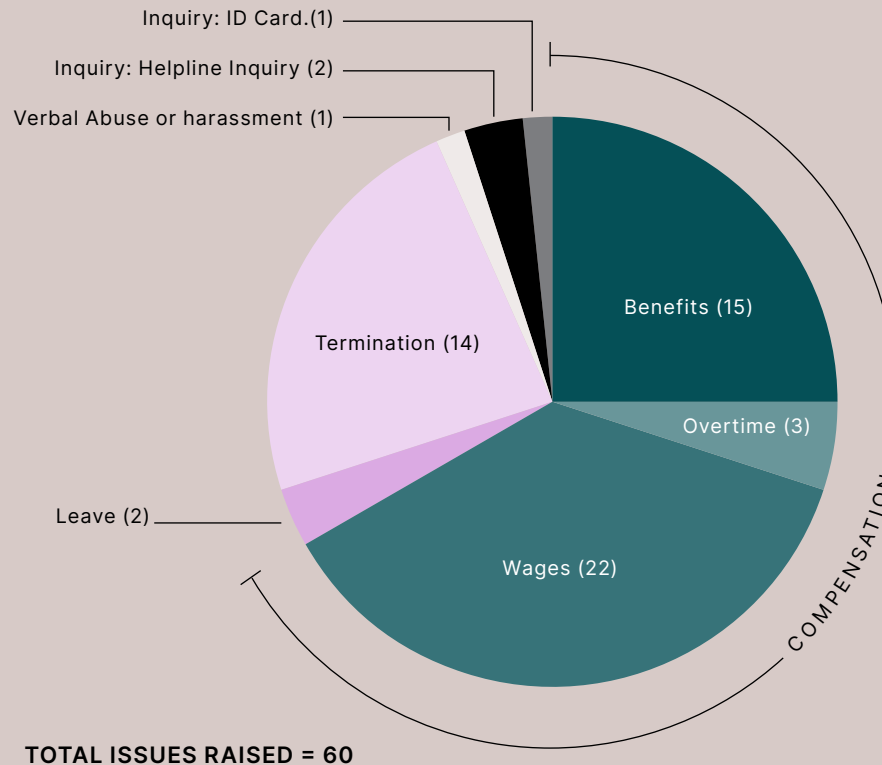
It stands as a tragic reminder of the human cost behind the fashion industry's rapid production demands. The collapse of this eight-story building claimed the lives of over 1,100 garment workers and injured thousands more. This devastating event brought global attention to the unsafe working conditions, poor building standards, and systemic labour rights violations prevalent in many garment factories in Bangladesh and other low-cost production countries. In response to the Rana Plaza tragedy, the Accord on Fire and Building Safety in Bangladesh (Bangladesh Accord) was established, a groundbreaking agreement between brands, trade unions, and NGOs aimed at improving factory safety and working conditions in Bangladesh's garment industry. The Bangladesh Accord has since been renewed and expanded into the International Accord for Health and Safety in the Textile and Garment Industry (International Accord), setting rigorous safety standards, conducting inspections, and overseeing remediation efforts to ensure that factories are safe and workers' rights are respected. The Rana Plaza collapse and the subsequent establishment of the International Accord have been pivotal in driving industry-wide changes, highlighting the need for greater transparency, accountability, and responsible sourcing practices in the global fashion supply chain. THE ICONIC is a proud signatory to the International Accord.

**WORKER VOICE & GRIEVANCE MECHANISMS**

Part of cultivating our culture at THE ICONIC is the expectation to communicate honestly and authentically to cultivate fair, safe and dignified workplaces. Our worker voice and grievance initiatives are aimed at empowering workers in our supply chain through training and the provision of tools, to express their opinions, concerns, and feedback regarding working conditions, labour rights, and other relevant issues in the workplace through access to the same dignified communication channels as the rest of our business and supply chain. These programs are designed to ensure that workers have a meaningful voice and are actively engaged in decision-making processes that affect their lives and livelihood, without retribution. Over 5,840 workers had access to effective

CATEGORY	PRINCIPLES
<b>INDEPENDENT</b>	<ul style="list-style-type: none"> <li>Confidential</li> <li>Non-retaliatory</li> <li>Impartial</li> </ul>
<b>ACCESSIBLE</b>	<ul style="list-style-type: none"> <li>Multi-channel                             <ul style="list-style-type: none"> <li>Known</li> <li>Responsive</li> <li>Resolutive</li> </ul> </li> </ul>
<b>FORMALISED</b>	<ul style="list-style-type: none"> <li>Policy</li> <li>Process</li> <li>Recorded</li> <li>Analysed</li> </ul>

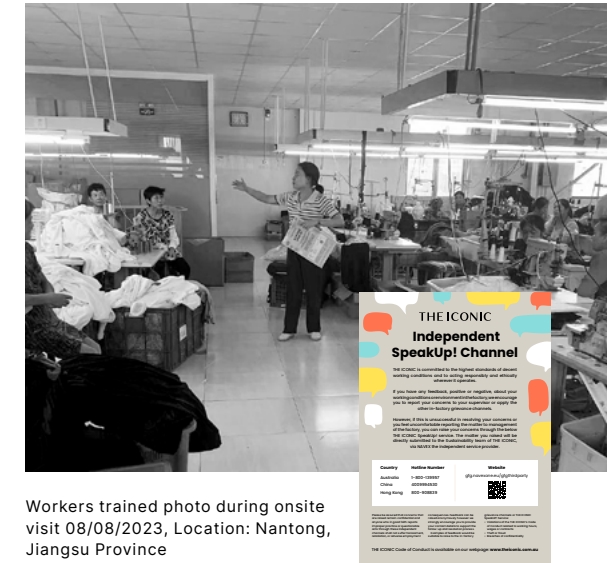
**Labour Issue Categories Raised via Amada Kotha Hotline**



worker dialogue mechanisms as at 31 December, 2023.

In addition to the continuation of the Amader Kotha hotline in Bangladesh in 2023, we also expanded our grievance mechanism initiatives and implemented the SpeakUp! hotline in 23 factories in China. This hotline enables direct access to our global legal and sustainability team as a vital mechanism for reporting

concerns and addressing misconduct in the aim of promoting our culture of transparency, accountability and the protection of human rights across the entire business operations and supply chain. To complement the launch of the program, we facilitated in-person training to over 1,500 workers and factory management on how to access the hotline and utilised posters and business cards



Workers trained photo during onsite visit 08/08/2023, Location: Nantong, Jiangsu Province

to further raise awareness and reinforce its presence on-site. We continue to emphasise the significance of this training in order to ensure workers understand how they can raise grievances, and how supervisors can effectively support and respond. The implementation of this programme has been received well with factory owners, management and staff. We also recognise that some factories have effective grievance channels already in place such as the International Accord grievance channel; where this is the case we have not implemented the SpeakUp! hotline in an effort to reduce hotline fatigue. As of 31 December 2023, 77% of workers in our Tier 1 factories now have access to in-factory worker dialogue mechanisms and grievance mechanisms.



GETTY IMAGES

### Case Study: Living Wage Assessment

Both the United Nations Universal Declaration of Human Rights and the International Labour Organisation have acknowledged the importance of a living wage, however, while progress has been made in raising awareness and initiating actions to address living wages in the apparel and textile industry, significant challenges remain as it is a sector that relies on labour-intensive manufacturing processes and there is a prevalence of low-wage jobs.

A living wage goes beyond meeting basic needs such as food and shelter, but allows workers to afford a healthy diet, access to healthcare, education for their children, and participation in their communities, without having to work excessive hours or rely on additional sources of income. The International Labour Organisation ‘denotes that the concept of a living wage is: the wage level necessary to afford a decent standard of living for

workers and their families, taking into account country circumstances and calculated for work performed during normal hours, calculated in accordance with the ILO’s principles of estimating the living wage; to be achieved through the wage-setting process in line with ILO principles on wage setting.”<sup>5</sup>

As part of our 2030 target to have 90% of Tier 1 factories assessed against living wage benchmarks, GFG built a living wage assessment tool that has since been completed during the visits of five factories in 2023. On average, 86.67% of assessed workers were found to have been paid at or above the recognised living wage benchmark in their regions.

Achieving widespread adoption of living wages requires collaboration across stakeholders, long-term commitment from brands and retailers, improvements in supply chain transparency, and supportive policy environments.

### A worker should be able to afford

Icons - GETTY IMAGES



FOOD



HOUSING



HEALTHCARE



EDUCATION



CLOTHING



TRANSPORTATION



SAVINGS

5. <https://www.ilo.org/resource/news/ilo-reaches-agreement-issue-living-wages>

## OUR RESPONSIBLE PURCHASING FRAMEWORK

One of our key focuses in 2023 was to further develop our responsible purchasing practices to meet GFG's People & Planet Positive goals of 100% Own Brand purchase orders placed in line with responsible purchasing practices by 2030. As we recognise that our own purchasing practices could unintentionally contribute to non-compliance, our Responsible Purchasing Policy was transposed into a Responsible Purchasing Framework. This change further embeds processes and behaviours that support our commitment to ensure that we create an environment where minimum expectations for fundamental human rights and decent work can be met by suppliers. We introduced a variety of corresponding metrics to enhance accountability, enabling us to tangibly monitor our purchasing behaviours and further recognise our contribution to the ability of our suppliers to ensure decent working conditions for workers.

Recognising it is more effective for us to operate within established industry frameworks, we have developed the framework in consideration of the "ACT (Action, Collaboration, Transformation)<sup>6</sup> Purchasing Practices - Accountability and Monitoring Framework".

6. <https://actonlivingwages.com/>

## Responsible Purchasing Framework



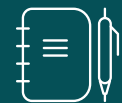
### PAYMENT

- Ensuring payments are made on-time to suppliers
- Fair contract payment terms



### SOURCING STRATEGY

- Buyers and sourcing staff receive training on purchasing practices
- Responsible factory exit



### CONTRACTS

- Contracts compliant to the latest contract template
- Contract renegotiations to ensure fair terms

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## Case Study: Traceability & Integrity through Preferred Fibres

Following the successful implementation of our Preferred Materials program, Sustainable Cotton Policy, and the subsequent rollout of our requirements on regions of concern, our suppliers were incredibly receptive, working with us every step of the way as we trialled new restrictions throughout our supply chain. The Preferred Materials program and Sustainable Cotton Policy naturally continues to evolve with broader industry challenges and innovations, and our consultation with third parties assists us in revising our guidance whilst supporting our suppliers in feeling capable and comfortable with the new requirements. This constant collaboration with our suppliers has helped build a greater level of trust and engagement. It is a requirement that our final stage manufacturers provide Scope and Transaction Certificates relevant to each standard, in order to verify the raw materials and approve the status of their ability to supply it. Since this occurs prior to the development phase, it affords us the opportunity to assess the sourcing regions and working conditions before initiating onboarding procedures.

By implementing these controls in our sourcing processes for certified materials, we can ensure we are not sourcing cotton from any regions of concern - country or provenance. While this lowers our risk of our Own Brand products being produced with forced or child labour, we remain aware of the risks that persist in our uncertified material supply chains, despite our continued focus on increasing the uptake of certified cotton. Through the collection of traceability documentation such as

Transaction Certificates, we have gained visibility of a greater portion of our Tier 3 supply chain, as well as various sourcing regions that include as many as 11 countries. By working with these globally recognised third party programmes we can trace fibre origins from China, Turkey, Kyrgyzstan, India, Taiwan, Tajikistan, Argentina, Australia, New Zealand, Uruguay & South Africa.

In 2023, 14% of our total Own Brand materials were sourced in accordance with a recognised third party certification or standard such as the Global Organic Textile Standard (GOTS), Global Recycling Standard (GRS) or Organic Content Standard (OCS). With a particular focus on cotton, 26% of this fibre mix met a certification standard.

Internally, we worked closely to align our Sourcing Strategy with our Preferred Materials requirements, where collaboration with Sustainability, Sourcing Teams, Logistics and our Own Brand teams meant that we could address every stage of the sourcing journey and pinpoint where improvements were necessary. We've made significant strides in our data collection process, streamlining the information populated at the product creation stage down to the certificate detail collected, which has allowed us to develop triggers within our processes and prevent items being shipped if they lack the required documentation. Although we are still transitioning into full implementation with these new functions, there are efficiencies seen for every team, ensuring a greater level of accuracy and reliability in our data, another step up in terms of visibility, as well as less disruption for our suppliers.

A high-angle, top-down drone photograph of a blue cotton picker operating in a vast, golden-brown cotton field. The picker is positioned in the lower-left quadrant of the image, moving across the rows of cotton plants. The field extends to the horizon under a clear sky.

Increasing our  
volume of certified  
preferred materials  
remains a monumental  
focus for us.

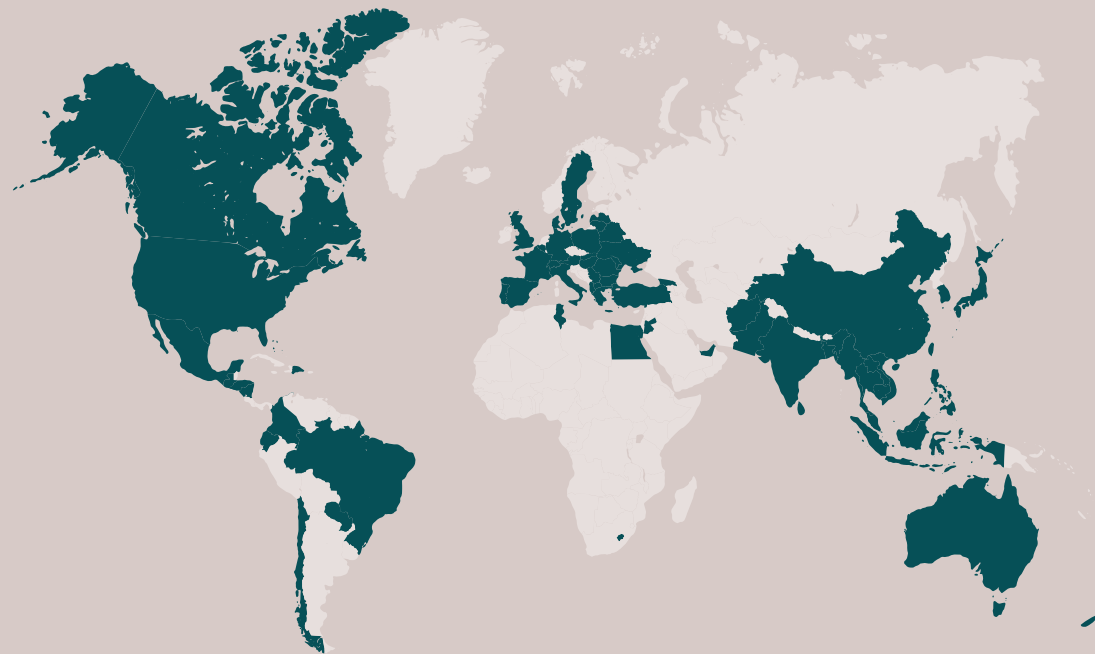
Drone image looking down on a  
cotton picker harvesting a cotton  
field, Queensland, Australia  
GETTY IMAGES

## THE ICONIC's Extended Supply Chain - Third Party Brands

We offer a diverse range of products to our customers through our Third Party Brands across categories including fashion, beauty, home, accessories and technology. The Global Slavery Index estimates that annually, Australia imports products valued at US\$17.4 billion that are at risk of being made using forced labour, with US\$15.7 billion of that in garments, textiles and electronics alone. Given we source these products directly from the brands themselves, we lack visibility into their supply chains, therefore it is reasonable to assume that a significant proportion of goods are manufactured in countries associated with this risk. The extraction of minerals, particularly within the beauty category, presents risks of unsafe working conditions and child labour; the production of electronics carries a risk of forced and bonded labour in Malaysia and China<sup>7</sup>; and artisan products in our beauty, homeware and accessories offerings present risks of unmonitored home work<sup>8</sup>.

Lacking influence on the supply chains and control over business policies and processes of our Third Party Brands to manage modern slavery risks, we have developed a range of initiatives and programs that encourage brands to undertake the task of implementing due diligence within their business

### Third party brands known sourcing countries



Afghanistan	Colombia	Haiti	Lithuania	Peru	Thailand
Albania	Denmark	Honduras	Macedonia	Philippines	Tunisia
Australia	Dominican Republic	Hong Kong	Madagascar	Poland	Turkey
Austria	Ecuador	Hungary	Malaysia	Portugal	Ukraine
Bangladesh	Egypt	India	Mauritius	Romania	United Arab
Belarus	El Salvador	Indonesia	Mexico	Serbia	Emirates
Belgium	Europe	Italy	Moldova	Slovakia	United Kingdom
Brazil	Fiji	Japan	Morocco	South Korea	United States
Bulgaria	France	Jordan	Myanmar	Spain	USA
Cambodia	Georgia	Kenya	New Zealand	Sri Lanka	Vietnam
Canada	Germany	Laos	Nicaragua	Sweden	
Chile	Greece	Latvia	Pakistan	Switzerland	
China	Guatemala	Lesotho	Paraguay	Taiwan	

7. <https://respect.international/wp-content/uploads/2019/03/Eradicating-Forced-Labor-in-Electronics.pdf>

8. <https://www.walkfree.org/global-slavery-index/findings/spotlights/stitched-with-slavery-in-the-seams/>



operations and supply chain. One-on-one engagement with Third Party Brands occurred on an ad-hoc basis in 2023 while we continued our brand onboarding due diligence process with RepRisk. The RepRisk process will be replaced by an internal onboarding assessment process in 2024 utilising our Human Rights Standard brand assessment tool, which was further developed in 2023, as well as a human rights e-learning program. This brand assessment tool provides insight to the current policies and protocols in place based on publicly available information, and found that 18% of our Third Party Brands meet our Human Rights Standard. This result indicates an opportunity for further engagement and training as we recognise the role we play to advance understanding of and implementation of human rights due diligence programs within our sphere of influence.

The e-learning program, developed in collaboration with ELEVATE in 2023, has been designed to provide an introduction to human rights in the supply chain, as well as provide some practical takeaways for brands who may lack the in-house expertise or capabilities, to implement to ensure effective supply chain due diligence. It also enables the development of a human rights roadmap and action plan. The development and execution of this training is an important part of our commitment to upholding human rights in all contexts and rollout will commence in 2024.

## Human Rights Standards for Third Party Brands

<b>NON-COMPLIANT</b>	<ul style="list-style-type: none"> <li>THE ICONIC's Human Rights Standards are not met</li> </ul>
<b>BASIC COMPLIANCE</b>	<ul style="list-style-type: none"> <li>Participate in THE ICONIC's eLearning program and develop a Human Rights Compliance Action Plan</li> <li>Human Rights Policy</li> <li>Participation in human rights programmes</li> </ul>
<b>OPTIMUM COMPLIANCE</b>	<ul style="list-style-type: none"> <li>Modern Slavery Statement</li> <li>Human Rights Policy</li> <li>Tier 1 Factory Traceability</li> <li>Factory audit program inclusive of remediation</li> <li>Social Impact Targets &amp; Reporting</li> <li>Grievances and complaints mechanism</li> </ul>
<b>EXCEEDING EXPECTATIONS</b>	<ul style="list-style-type: none"> <li>Participation in human rights multi stakeholder organisation</li> <li>Third-party factory audit program</li> <li>Third-party industry rating</li> <li>Tier 2 &amp; 3 Factory List</li> </ul>

## Human Rights eLearning Modules Content



## THE ICONIC Operations

Whilst we continue to address modern slavery risks within our product supply chain, mitigating risk within our operations also remains a critical focus. Our risk assessment outcomes across labour hire, logistics, transport, and non-stock supply chains, as well as in other contracted arrangements, has identified potential risk indicators including migrant or refugee labour and temporary labour—especially through our use of labour hire workers—and potential risks of forced labour, bonded labour, and wage underpayment (or withholding), across our operational supply chain including our non-stock and logistics supply chain. Through the decentralisation of our procurement function in 2023, there is opportunity to improve the governance and due diligence processes in this area of our business to optimise risk mitigation.

## Our Non-Trade Procurement Supply Chain

The categories of non-trade procurement encompass logistics, marketing, cleaning, technology, electronics, and international freight forwarding, all of which were flagged for potential modern slavery risks during our risk assessment. The 2023 Global Slavery Index identifies electronics as one of the top five product categories imported into Australia being potentially tainted with Modern Slavery. Risk indicators include the use of migrant or refugee labour, temporary or



### Case Study: A step change - Labour Hire Service Providers at our Fulfilment Centre

The nature of labour hire arrangements, and lack of transparency and visibility, leads to a higher inherent risk profile, which is why we have in place Guiding Principles for Recruitment & Employment of Labour Service Provider Staff. We closely monitor and review the onboarding of labour hire service providers and the people employed or engaged by these labour hire service providers through our Labour Service Providers Due Diligence Framework. In 2023, we made a significant step change and reduced our reliance on labour hire service providers at our Fulfilment Centre by reducing the number

of providers from four down to two, and transitioned 187 labour hire services provider staff to become employees of THE ICONIC on permanent, part-time and casual contracts. In doing so, these workers have access to THE ICONIC's full suite of policies and employee benefits, access to holiday and sick leave as well as employment pathways across the organisation. The transition not only created more workplace flexibility, but also reduced risks associated with the reliance on labour hire service providers for our fulfilment activities.



contract labour in logistics and marketing supply chains, wage underpayment or withholding in cleaning supply chains, and the possibility of conflict-affected zones in countries sourcing non-stock products. Inherent risks such as forced labour and bonded labour were identified in shipping supply chains. Although the scale of these business areas is considerably smaller than that of our Own Brand and Third Party supply chains, resulting in a lower overall risk profile, they still warrant attention due to the lack of visibility and need for due diligence with indirect vendors which has increased the overall risk rating of this area of our business year on year.

## Speak Up! and Whistleblowing Culture

Serving as a secure and dependable channel for reporting issues or concerns, our Speak Up! initiative also applies across our internal business and operations, incorporated into our Code of Conduct applicable to all employees, officers, directors, and others acting on behalf of THE ICONIC (including consultants, contractors, suppliers and agents) and Personal Grievance Policy.

All employees and contractors receive training on how to access the program with the option of remaining anonymous, and we complement training by driving awareness through communication channels including posters, email and intranet. Our Executive leaders are committed to challenging behaviours or practices that deviate from our ethical standards, and the implementation of Speak Up! empowers our employees to do the same. In 2023, the internal SpeakUp! channel continued to receive formal contacts related to health and safety, bullying, harassment, discrimination as well as other topics. Speak Up! referrals are managed and investigated in confidence in line with THE ICONIC's Investigations Policy and Speak Up! (Whistleblower) Policy. All referrals made in 2023 have been resolved. In addition to formal SpeakUp! contacts, our culture of communication encourages employees to raise concerns with our People & Culture team or their people leader on topics including working hours and wages. In 2023, feedback was also received on these matters via informal discussions and early stage grievance mitigation and remediation were implemented.





# 4 Evaluating the effectiveness of our actions

In line with our mantra “Progress Always”, we continue to re-evaluate and monitor the outcomes of our policies, programs and initiatives against key performance metrics. Taking an outside-in approach, prioritising feedback from our employees continues to be the most productive way of ensuring the effectiveness of our actions. Our Executive and leadership teams have been focused on increasing capabilities, fostering cross-functional ownership, and enhancing governance and oversight as well as identifying areas that can add value to our people.

## Industry and stakeholder collaboration

- Our continued relationship with human rights consultancy ELEVATE has supported the continued implementation of our Own Brands due diligence programs, worker hotline in Bangladesh and the development of our Third Party brands Human Rights Standard e-learning program.
- We formalised our commitment to worker safety in Bangladesh by signing the International Accord. While our Own Brands manufacturing footprint in Bangladesh remains small, we recognise the importance of multi stakeholder initiatives to drive meaningful change.
- We maintain our responsibility to uphold human rights standards through our engagement with our broader industry and partnerships with Third Party Brands. We also recognise the opportunity to share knowledge and learning opportunities to see this topic prioritised through the implementation of our e-learning program and the role we play to increase the portion of brands that meet our human rights standards.

## Own Brand supply chain engagement

- Our factory audit program continues to identify and manage issues found at Tier 1 and 2 factories, improving the working conditions for the people who make our products. In 2023, 22 critical, 113 major and 95 minor issues raised were remediated during 2023, averaging a total of just under 60% of non-compliances closed.
- Our in-house factory audits conducted during factory visits build engagement, assess conditions and provide policies and training. We conducted 25 factory visits in China in 2023, and with a more consistent presence in factories, did not identify any unauthorised subcontracting.
- We ramped up our traceability efforts through the sourcing of certified materials. The implementation of the Responsible Wool Standard gave us the ability to identify additional regions that our certified wool is sourced from such as Argentina, Australia, New Zealand, Uruguay & South Africa. Through the implementation of our Sustainable Cotton Policy, we reduced our risk based on 26% of our Own Brand cotton being certified and verified at the source.

## Grievance mechanisms and access to remedy

- Grievance mechanisms and worker dialogue continue to drive effective two-way communication between THE ICONIC and our supply chain. Our goal is to enable all workers access to independent grievance channels through in-factory assessments and access to remedy. Over 1,500 workers were provided training and 77% of workers had access to effective worker dialogue systems at our factories in China, Bangladesh and India. The effectiveness of this program is dependent on its usage and ability to remediate grievances where needed. This will be a measured focus in 2024.
- The independent hotline set up in Bangladesh received 60 calls in relation to Compensation - Benefits (15), Compensation - Overtime (3), Compensation - Wages (22), Leave (2), Termination (14), Verbal abuse or harassment (1), Inquiry: Helpline Inquiry (2), Inquiry: ID Card Inquiry (1), all of which were resolved through collaboration between the Factory, the hotline and THE ICONIC.
- Our Speak Up! Policy applies to all THE ICONIC employees, directors, contractors, labour hire contractors, consultants, suppliers, volunteers and interns. In addition, this Policy also extends to all former employees who are able to utilise THE ICONIC's Speak Up! mechanisms.

## Living wage assessment

- As part of our 2030 target for 90% of Tier 1 factories to have been assessed against living wage benchmarks, GFG built a living wage assessment tool that was implemented in five factories in China in 2023.
- On average, 86.67% of assessed workers are being paid at or above the recognised living wage benchmark in their region.

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## Non-trade procurement practices

- As we continue to decentralise the procurement function within our business and provide ownership on risk management to a broader segment of our employee base, there is a need to ensure adequate due diligence processes are developed, understood and implemented. This will be a focus for 2024.



# 5 Our modern slavery action plan

As our business adjusts to a new retail landscape amidst the current economic climate, so too will our commitments to addressing existing and emerging risks to our business and supply chain. The task of identifying and mitigating modern slavery risks is ongoing and we will continue to prioritise work that defends the rights of the people at the greatest risk of human rights abuses including all forms of modern slavery. Our Modern Slavery Cross Functional Team and Executive leadership are tasked with embedding our 2024 Modern Slavery Action Plan within our core business objectives.

Risk Focus Area	2023 Progress	2024 Action
<p><b>SUPPLY CHAIN ENGAGEMENT AND TRAINING</b> Utilise insights gained from worker empowerment program rollouts to inform factory engagement plan</p>	<p>SpeakUp! hotline implemented at 21 factories and training provided to 1,500 workers through grievance mechanism program rollout</p>	<p>Continue implementing independent grievance mechanism training and SpeakUp! rollout, and conduct SpeakUp! effectiveness assessment</p>
	<p>Further supply chain traceability gained through certified fibre sourcing strategy, on site factory visits increased and Tier 2 audit requirements remain</p>	<p>Increase supply chain traceability by leveraging certified preferred materials and system solutions</p>
	<p>Living wage assessments conducted at five factories</p>	<p>Continue living wage benchmark assessments, and commence factory capacity building program where required</p>
	<p>Responsible Purchasing Practices Framework refined and metrics finalised, training developed for rollout in 2024</p>	<p>Ensure all relevant stakeholders are training on Responsible Purchasing Practices</p>
<p><b>STAKEHOLDER ENGAGEMENT</b> Continue to build network of external stakeholders to support modern slavery and PPP action plan initiatives</p>	<p>Local industry body working group participation continued, International Accord membership finalised, Textile Exchange membership continued, and exploration of other relevant memberships is ongoing</p>	<p>Maintain partnerships with organisations on the ground in our sourcing regions or aligned with modern slavery mitigation</p>
<p><b>BRAND ENGAGEMENT AND TRAINING</b> Continue engagement with Third Party Brands to ensure Modern Slavery risks are understood and managed</p>	<p>RepRisk brand onboarding due diligence process in place for majority of year to be replaced in 2024. Human Rights Standards refined and finalised with 18% brands meeting standard</p>	<p>Introduce onboarding assessment for Human Rights Standards for Third Party Brands and continue e-learning rollout</p>
	<p>Ad hoc engagement with brands continued in 2023, as required, Human Rights Standards e-learning program developed to be rolled out in 2024</p>	<p>Improve product information data quality including country of origin and material composition</p>
<p><b>INDIRECT SUPPLIERS ENGAGEMENT</b> Continue engagement with indirect suppliers through implementation of the Labour Services Framework and Procurement Policy</p>	<p>Two additional labour service providers (Cleaning and Uniform providers) were onboarded through the Labour Service Providers Due Diligence Framework</p>	<p>Continue due diligence on indirect suppliers including electronic products, cleaning and security services, labour service providers and logistics providers</p>
		<p>Review and improve non-trade vendor onboarding due diligence process in line with relevant policies</p>



# 6 Appendix

Mandatory Reporting Criteria and relevant statement section

MANDATORY CRITERIA	SECTION	PAGE
<b>1 &amp; 2</b> Identify the reporting entity and describe its structure, operations and supply chains	Our structure, operations & supply chain	5
<b>3</b> Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	Identifying and addressing risks in our operations & supply chain	12
<b>4</b> Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	Identifying and addressing risks in our operations & supply chain	12
<b>5</b> Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Evaluating the effectiveness of our actions	28
<b>6</b> Describe the process of consultation with any entities the reporting entity owns or controls	N/a - no controlled entities	N/A
<b>7</b> Any other relevant information	Planned actions for 2024	31



# THE ICONIC

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