

NUMEN PTY LTD

MODERN SLAVERY STATEMENT (2019-2020)

1 Introduction

1.1 Background

Numen Pty Ltd (ACN 006 339 180) (**Numen**) is the parent company of various subsidiary companies (which are described in Part 1) (**Numen Group, we or us**).

The Numen Group opposes slavery in all of its forms and recognises the important role that it plays in reducing the incidence of modern slavery.

This is Numen's first Modern Slavery Statement (**Statement**), which has been prepared in accordance with sections 14 and 16 of the *Modern Slavery Act 2018* (Cth) (**Act**). This Statement jointly covers all relevant entities within the Numen Group (which are described in Part 1, clause 1.1(a) to (c)).

Numen has undertaken steps during the reporting period from 1 July 2019 to 30 June 2020 (**reporting period**) to ensure that the relevant operating subsidiaries have identified and introduced measures to assess and address modern slavery risks within its various supply chains. This Statement also outlines initiatives that we intend to implement in the future to further improve Numen's ability to assess and address those modern slavery risks.

The steps taken by Numen during the reporting period have involved:

- (a) identifying modern slavery risks by supplier and country and developing a risk assessment framework;
- (b) addressing and refining current practices to reduce the modern slavery risks in the supply chains (modern slavery program);
- (c) monitoring and enforcing the modern slavery program;
- (d) reviewing the modern slavery program and considering new initiatives to incorporate into the modern slavery program.

1.2 Review of Statement

The preparation of this statement is an important part of the Numen Group's risk management framework. The actions taken by Numen to identify and address modern slavery risks will be assessed on an annual basis and a modern slavery statement will be prepared for each future reporting period, in accordance with the requirements of the Act.

2 Covid-19

2.1 Impact on operations

All of the operating entities within the Numen Group were greatly impacted by the global Covid-19 pandemic. And, given all of these subsidiaries are located primarily in Victoria, the impact was very keenly felt. It created a challenging operating environment for all of these operating entities and their staff.

As the Covid-19 pandemic set in, the operating entities within the Numen Group prioritised the health and safety of its staff and customers, and so the decision was made to temporarily suspend operations,

including the closure of all retail stores on 26 March 2020 and standing down all retail staff. This was a difficult decision, as there was, at the time, no indication of when the operations may re-start, which created enormous uncertainty for the businesses.

At the same time, as the entire global economy was becoming more and more affected, both local and international supply chains were dramatically impacted, particularly in relation to manufacturing and distribution of finished Apparel Products (see below) in China, Vietnam, Sri Lanka and India, whereby some orders were unable to be completed, and completed orders were not delivered within the required timeframes.

Then, in Victoria, the government implemented a state-wide "Stage 4" lockdown, which included the closure of workplaces and all non-essential retail services. In some cases, this led to permanent closure of retail stores.

Staff continued to work from home during this period, and the Numen Group's operating entities were primarily focussed on the continuance of business operations. However, the operating entities recognised that the risk of modern slavery practices in supply chains was increased during this period, due to commercial pressures which may impact the supply chain, both upstream and downstream.

Due to travel restrictions imposed during the latter part of the reporting period, physical inspection of suppliers' factories was not possible, and so audits were deferred to after the reporting period. Offices in countries where the factories were located continued to deal with suppliers by phone, but were unable to conduct virtual inspections. The entities tried to assist and respect the difficulties faced by factories and other suppliers by adhering to agreed timelines and not imposing additional costs. However, there were disruptions in the supply chains, due to reduced customer demand, which impacted raw material holding within the factories. In particular, Voyager and Sunday's Jump are continuing to work through the raw material holding issues.

Part 1. Identity, Company Structure, Operations and Supply Chains

This part describes the structure of the Numen Group and the operations and supply chains of the relevant subsidiaries.

3 Identity and Company Structure

3.1 Numen

Numen is a registered Australian proprietary company. It is the parent company of the Numen Group. Its registered office is in South Melbourne, Victoria.

Numen does not trade and, therefore, it has no operations, employees or supply chains to report on.

3.2 Numen Group

The Numen Group comprises of several subsidiaries, as follows:

- (a) privately owned, registered Australian, non-trading or investment companies that do not have any operations, employees or supply chains to report on, so have not been listed in this Statement;
- (b) Landmark Concept Limited (Hong Kong Company Number 0964819) (**Landmark**), being a registered Hong Kong company that:
 - operates two "Seed Heritage" stores in Hong Kong;
 - acts as a wholesaler of products to an international customer; and
 - operates a warehouse to supply products to its Hong Kong stores and three "Seed Heritage" stores in Singapore.

However, due to its close operational alignment with other entities (some of which do not form part of the Numen Group), Landmark has submitted a joint modern slavery statement with F.C. Australia Pty Ltd (ACN 081 217 165), Steambrook Pty Ltd (ACN 114 765 703), Seed Heritage New Zealand Pty Ltd (ACN 603 950 616), Seed Heritage Singapore Pte Ltd and Seed Heritage Canada Holdings Ltd;

- (c) Century Plaza Trading Pty Ltd (ACN 006 643 296) (**Century Plaza**), which is a privately owned, registered Australian company that provides a variety of services, primarily financial and legal, to related entities within the Numen Group. It has 16 employees and its office is located in Melbourne, Victoria; and
- (d) the following companies within the Numen Group, which are privately owned, registered Australian, trading companies that operate wholesale and speciality retail brands in Australia and New Zealand:

(i) Voyager Distributing Company Pty Ltd (ACN 006 628 379) (**Voyager**)

- Voyager is a registered proprietary company and is a 100% Australian owned company.
- It has been operating in Australia as an importer, wholesaler and retailer of womenswear since 1967, and has a portfolio of three brands (Jump, Kachel and Ginger Tree), and a large number of private label brands.



- Voyager's head office is in Carlton, Victoria and has 100 employees.
- Voyager also has two other offices, in:
 - Shanghai, China with 30 employees; and
 - District 1, Ho Chi Minh City, Vietnam with 12 employees.

(ii) Sunday's-Jump Pty Ltd (ACN 005 102 287) (**Sunday's-Jump**)

- Sunday's-Jump is a registered proprietary company and is 100% owned by Voyager.
- It has been operating in Australia as wholesaler of womenswear and accessories since 1975 and has one brand, Ping Pong.



- Sunday's-Jump's head office is in Carlton, Melbourne and has six employees.

(iii) F.C. Australia Pty Ltd (ACN 081 217 165) (**French Connection**)

- French Connection is a registered proprietary company and is 100% Australian owned.
- It has been operating in Australia as a retailer of womenswear, menswear and accessories under the "French Connection" licensed brand since 1998.
- Due to the size of its operations and close operational alignment with other entities (some of which do not form part of the Numen Group), French Connection has submitted a joint modern slavery statement with Steambrook Pty Ltd (ACN 114 765 703), Seed Heritage New Zealand Pty Ltd (ACN 603 950 616), Seed Heritage Singapore Pte Ltd, Landmark and Seed Heritage Canada Holdings Ltd.

4 Operations

4.1 Voyager

Voyager is primarily a wholesaler of womenswear to retailers in Australia, but it also operates a few retail stores (outlined below). Voyager develops product lines inhouse and its products are manufactured by third party factories located in China, Vietnam and Sri Lanka. It also sources products for manufacture in India.

Overview of operations

Wholesale operations

- The wholesale business is predominantly in Australia and involves the supply of product to major retailers for resale to consumers.
- There is also a medium-size business in wholesale to boutiques under the Jump brand.
- There is also a small presence overseas:
 - in the USA with one retail customer; and
 - in New Zealand with one retail customer.

Retail operations

During the reporting period, it operated five "stand alone" retail stores under the "Ginger Tree" brand in Victoria, which has approximately 15 employees. Three of these stores closed permanently during 2020 as a result of the Covid-19 pandemic.

Voyager did not have any online retail operations during the reporting period.

Warehouse operations

Voyager uses a warehouse in Footscray, Victoria, from which products are distributed to its retail customers and its concession and leased stores.

4.2 Sunday's-Jump

Sunday's-Jump is a wholesaler of womenswear and accessories to retailers in Australia.

Overview of operations

Wholesale operations

- The wholesale business is predominantly in Australia through major retailers.
- There is also a small-size business in wholesale to boutiques under the Ping Pong brand.

Warehouse operations

Sunday's-Jump shares a warehouse in Footscray, Victoria with Voyager, from which its products are distributed to its retail customers.

4.3 Century Plaza

Century Plaza is a supplier of financial, managerial and legal services to other entities within the Numen Group.

5 Supply Chains

5.1 Voyager

Voyager sources a diverse range of products and services for its operations.

It has a total of 140 suppliers operating in Australia and overseas (see table below).

The main categories of suppliers are as follows:

- finished apparel products and accessories sold to retailers for resale to consumers (**Voyager Apparel Products**);
- raw materials sourced directly and provided to apparel manufactures for conversion into finished apparel;
- delivery and distribution services of Voyager Apparel Products from its warehouse to customers and its own retail stores;
- packaging and consumables for the Voyager Apparel Products;
- pressing and steaming of Voyager Apparel Products;
- plant and equipment (eg fit out materials for retail stores);
- IT services;
- office supplies, cleaning and repairs;
- courier and mail services;
- permanent and temporary labour recruitment firms;
- professional service firms (legal, advisory, auditing, banking, design);
- retail landlords; and
- utilities.

Key supplier statistics

51 suppliers of Voyager Apparel Products:

- 74.5% are located in China.
- 13.7.0% are located in Vietnam.
- 2.0% are located in Sri Lanka.
- 7.8% are located in India.
- 2.0% are located in the UK.
- The majority of Apparel Products came from 15 suppliers.
- 60% of the manufacturing spend of Apparel Products came from these 15 suppliers.
- Voyager has long standing relationships with these suppliers, on average 15 years.

15 suppliers of raw materials:

- 60.0% are located in China.
- 40.0% are located in Australia.

9 suppliers of delivery and distribution services.

1 supplier of packaging and consumables.
6 suppliers of IT services.
20 suppliers of office, cleaning and repairs.

5.2 Sunday's-Jump

Sunday's-Jump sources a diverse range of products and services for its operations.

It has a total of 31 suppliers operating in Australia and overseas (see table below).

The main categories of suppliers are as follows:

- finished apparel products and accessories for Ping Pong (**Sunday's-Jump Apparel Products**);
- raw materials sourced directly and provided to apparel manufactures for conversion into finished apparel;
- delivery and distribution services of Sunday's-Jump Apparel Products from its warehouse to customers;
- packaging and consumables for the Sunday's-Jump Apparel Products;
- pressing and steaming of Sunday's-Jump Apparel Products;
- office supplies, cleaning and repairs;
- courier and mail services;
- permanent and temporary labour recruitment firms; and
- professional service firms (eg legal, advisory, auditing, banking, design).

Supplier statistics

12 suppliers of Sunday's-Jump Apparel Products:

- 91.7% are located in China.
- 8.3% are located in Australia.
- The majority of Sunday's Jump Apparel Products came from five suppliers.
- 80% of the manufacturing spend of Sunday's-Jump Apparel Products came from these five suppliers.
- Sunday's Jump has long standing relationships with these suppliers, on average ten years.

5 suppliers of delivery and distribution services.

10 suppliers of professional services.

5.3 Century Plaza

Century Plaza sources products and services directly from Australian suppliers only (including a considerable portion located within Victoria) in the following categories:

- IT services;
- office furniture and equipment;
- office supplies (eg paper, stationery, etc);

- office cleaning and repairs;
- courier and mail services; and
- professional service firms.

Part 2. Risks of Modern Slavery in Operations and Supply Chains

This Part describes the risks of modern slavery practices in the operations and supply chains of the Numen Group

Modern slavery can exist in a variety of forms across various sectors that operate within these types of supply chains, in particular including:

- **Forced labour:** people are forced or threatened to work against their wish;
- **Debt bondage:** workers are forced to work for nothing to pay off a debt which gives them no bargaining power in terms of working conditions;
- **Child labour:** children are employed to work in factories;
- **Wage underpayment:** workers are not paid in accordance with the law;
- **Deceptive labour/recruitment:** people are misled about the conditions under which they will be working or living in places controlled by their employers.

Numen has identified that there are modern slavery risks within Numen Group's supply chains. Numen recognises that certain countries constitute a higher risk of modern slavery practices in certain sectors, due to a variety of factors (see table below). And, whilst it considers that the risk of modern slavery with its direct Australian suppliers is low, Numen recognises that it can be indirectly exposed to modern slavery risks further up the supply chain, particularly if those suppliers are located in countries that are considered more high risk.

As noted above, Numen Group's supply chains are primarily linked to the clothing manufacturing sector, which can have multiple and complex elements. Its suppliers include:

- factories that produce and assemble the finished clothing and accessories;
- suppliers of fabrics and trims, which also engage dyeing houses (for dyeing of fabrics);
- suppliers that process raw materials (eg cotton / linen / wool / viscose / polyester / leather);
- suppliers that source the raw materials (eg cotton farms / tanneries / animal farms); and
- suppliers that produce packaging.

Country	Modern Slavery Risks	Sectors	Contributing factors	Risk Assessment
<p>China (cotton / linen / viscose / polyester)</p> <p>India (leather)</p>	<ul style="list-style-type: none"> Forced labour Child labour Deceptive labour Wage underpayment Exploitation of migrant workers <p>There may also be poor working conditions (eg excessive overtime, insufficient rest, poor accommodation, unsafe working environments).</p>	<p>Agricultural farming (cotton / linen / polyester / viscose)</p> <p>Livestock farming (leather / wool)</p>	<p>Growing and production of agricultural materials exist in countries of high risk.</p> <p>Less regulation and governance leads to high prevalence of labour rights violations.</p> <p>Less transparency of working conditions (eg farms may engage in poor labour practices).</p> <p>Socio-economic factors (eg poverty).</p> <p>High levels of migrant workers.</p>	<p>Direct Causal Risk – Extremely Low</p> <ul style="list-style-type: none"> Voyager and Sunday's-Jump do not operate any raw material facilities locally or internationally. <p>Contributing Risk – Low</p> <ul style="list-style-type: none"> Voyager and Sunday's-Jump source a majority of their products internationally, and the contributing risk has been assessed as low. The assessment of low is based on: <ul style="list-style-type: none"> Long-standing relationships with factories that source raw materials, with an average time of 15 plus years. Factories are provided with detailed technical packs and sample fabrics to quote on, enabling them to source raw materials accurately. Multiple factories are cross-quoted, to ensure a fair market price is obtained. Products are re-designed in conjunction with the factories and raw material suppliers, if quoted price does not meet the internal target margin. Target prices are not provided. Fabric sourcing by the factories is transparent, and inquiries are generally made of the identity, location and operations of the mill house where the fabric is being dyed. Trims sourcing is wide, so there is less known about this supply chain. <p>Linked Risk – Low</p> <ul style="list-style-type: none"> Voyager and Sunday's-Jump source the majority of their products internationally, and the linked risk has been assessed as low. The assessment of low is based on: <ul style="list-style-type: none"> Fabric sourcing by the factories is transparent, and inquiries are generally made of the identity, location and operations of the mill house where the fabric is being dyed.

Country	Modern Slavery Risks	Sectors	Contributing factors	Risk Assessment
China Vietnam Sri Lanka India	<ul style="list-style-type: none"> Forced labour Child labour Deceptive labour Wage underpayment Exploitation of migrant workers <p>There may also be poor working conditions (eg excessive overtime, insufficient rest, poor accommodation, unsafe working environments).</p>	<p>Manufacturing (apparel). Manufacturing (samples of apparel). Plant / equipment (office furniture / equipment). Manufacturing (office supplies).</p>	<p>Less regulation and governance (eg factories subcontracting orders to third parties that might engage in modern slavery practices). Less transparency of working conditions. Socio-economic factors (eg poverty). High levels of migrant workers.</p>	<p>Direct Causal Risk – Extremely Low</p> <ul style="list-style-type: none"> Voyager and Sunday's-Jump do not operate any factories locally or internationally. Voyager and Sunday's-Jump do operate a sample production facility in Vietnam. Risk has been assessed as extremely low, as any direct facility under its control is controlled by onsite management, and senior executives from the businesses have also visited and reviewed the operations. <p>Contributing Risk – Low</p> <ul style="list-style-type: none"> Voyager and Sunday's-Jump source the majority of their products internationally, and the contributing risk has been assessed as low. The assessment of low is based on: <ul style="list-style-type: none"> Long-standing relationships with factories, with an average time of 15 plus years. Factories are provided with detailed technical packs and sample fabrics to quote on. Quotes are provided detailing fabrics, trims, complexity of garment and quantity to be supplied. Multiple factories are cross-quoted, to ensure a fair market price is obtained. Products are re-designed in conjunction with the factory, if quoted price does not meet the internal target margin. Target prices are not provided. Five factory audits were performed on behalf of Voyager and Sunday's-Jump and a number of others were visited through its Shanghai office. <p>Linked Risk – Low</p> <ul style="list-style-type: none"> Voyager and Sunday's-Jump source the majority of their products internationally, and the linked risk has been assessed as low.

Country	Modern Slavery Risks	Sectors	Contributing factors	Risk Assessment
Australia	<ul style="list-style-type: none"> • Exploitation of migrant workers • Wages underpayment 	<p>Manufacturing (samples of clothing). Plant / equipment (including IT equipment). Agricultural farming (wool). Delivery. Cleaning. Warehousing.</p>	<p>Migrant workers are more likely to be employed in these sectors on a casual basis and often work in shifts.</p>	<ul style="list-style-type: none"> • The assessment of low is based on long-standing relationships with factories, with an average time of 15 plus years. <p>Direct Causal Risk – Extremely Low</p> <ul style="list-style-type: none"> • Voyager and Sunday's-Jump operate a warehouse and sample production facility. • Risk has been assessed as extremely low, no facility under their control is in a high-risk region. <p>Contributing Risk – Low</p> <ul style="list-style-type: none"> • Voyager, Sunday's-Jump and Century Plaza source the majority of their products and services in Australia from modern organisations, and the contributing risk has been assessed as low. • The assessment of low is based on: <ul style="list-style-type: none"> ○ Fair and reasonable working conditions and salary arrangements. ○ Staff are provided with the ability to have an open and direct conversation with management without the fear of recrimination. ○ Most services are provided by unrelated, third party providers that have been asked to tender for business, thereby operating in a structured and impartial manner, or selected on the basis of the providers' stable business operations. <p>Linked Risk – Low</p> <ul style="list-style-type: none"> • The assessment of low is based on the commercial nature of the relationships, as Voyager, Sunday's-Jump and Century Plaza and their Australian suppliers operate in the same commercial environment (ie cost base is the same) and that environment is more mature and regulated than other countries.

Part 3. Actions taken to assess and address modern slavery risks

Numen's ability to assess and address the modern slavery risks identified in its supply chain were mostly delayed until after the reporting period due to the impact of the Covid-19 pandemic. However, certain key initiatives were identified and are outlined in the table below.

Numen is committed to continually improving how it works to meet its legal and ethical obligations to combat modern slavery practices, and is working with its suppliers to mitigate and seek to eliminate, where possible, modern slavery risks from its supply chains.

The measures adopted by the relevant entities in the Numen Group and identified initiatives to improve and enhance modern slavery risk assessment procedures are as follows:

Measure	Description	Improvements / Future Initiatives
Governance	<p>Numen recognises that addressing and mitigating modern slavery risks is the collective responsibility of all levels of governance within those relevant entities in the Numen Group, and, in particular, within Voyager and Sunday's Jump.</p> <p>It consists of the following:</p> <ul style="list-style-type: none"> the Board, which is the endorser and strategic guide for ethical and sustainable business practices; the Executive Leadership Team (ELT), comprising the Chief Financial Officer and the Commercial / Product Director, who together head up supply chain management and ethical and sustainable business practices within supply chains; the Procurement Team, who are the main contacts with all suppliers and oversee of the implementation of modern slavery risk management; and the Sourcing Manager, who supports the Procurement Team to undertake the day-to-day responsibility of assessing and managing modern slavery risks. 	<ul style="list-style-type: none"> Develop and rollout company-wide training on identifying modern slavery in the supply chain. Nominate a head of ethical sourcing, who will develop the base program laid down by the ELT and Board to ensure standards are met and risks are minimised. Develop a structured process to review, assess, onboard and KPI new or existing suppliers.

Measure	Description	Improvements / Future Initiatives
<p>Procurement / sourcing due diligence</p>	<p>Risk identification and assessment of suppliers prior to any contracting through a vetting process:</p> <p>As a result of our extremely long-standing relationship with suppliers, the need for new suppliers is and has been minimal.</p> <p>In the rare instances that a new supplier has been onboarded, country representative office managers will visit and inspect potential sites prior to any work being contracted.</p>	<p>With the appointment of a head of ethical sourcing, the following initiatives will be implemented to improve our due diligence:</p> <ul style="list-style-type: none"> • a full, existing supplier assessment and review can be undertaken; • development of standard questionnaire to deal with modern slavery; • documented, detailed supply chain mapping can be developed; • join SEDEX, to better work with clients and factories on responsible sourcing; and • consider becoming members of the Australian Circular Textile Association (ACTA).
<p>Contractual</p>	<p>Presently, there are no signed contracts with international factories and suppliers that outline standard terms and conditions that also include a section on modern slavery, given, in some instances, relationships extend over 15 plus years. However, as noted in Part 2 above, by virtue of those long term relationships with suppliers, Numen Group and its relevant operating entities have a greater degree of transparency, open communication and understanding of the suppliers' operations. This provides Numen and its operating entities with greater capacity to assess and address modern slavery risks.</p> <p>There are currently no limits on sourcing materials from any particular country or region.</p> <p>There are contracts in place with local suppliers and service providers (ie in Australia), but not all of those contracts address modern slavery risks.</p>	<p>Voyager and Sunday's-Jump will strengthen their supplier terms and conditions to ensure that modern slavery risks are specifically addressed and more rigorous auditing is implemented.</p> <p>Voyager and Sunday's-Jump will implement a new Supplier Code of Conduct, which will require:</p> <ul style="list-style-type: none"> • suppliers to confirm that they do not engage in modern slavery practices in their supply chain; • labour to be voluntary (ie no recruitment fees); • free association of workers, if they choose (including any collective bargaining); • working conditions to be safe, hygienic and not subject to excessive working hours; • payment of any applicable minimum national wage for the categories of workers; and • overarching compliance with all applicable laws and meeting of specific standards. <p>Voyager, Sunday's-Jump and Century Plaza will strengthen their contracts with local suppliers, to ensure that modern slavery risks are specifically addressed.</p>

Measure	Description	Improvements / Future Initiatives
Monitoring / Auditing	<p>The monitoring of high-risk regions, countries and suppliers is considered vital to any working program.</p> <p>Due to recent travel restrictions and reduced resources in general, Numen was unable to conduct all of its planned monitoring and auditing activities. However, an external party was still able to be appointed to perform five factory audits on behalf of Voyager and Sunday's-Jump and visit a number of others through its Shanghai office. Audit reports were provided for those factories audited.</p>	<p>With the appointment of a head of ethical sourcing, the following improvements will be implemented:</p> <ul style="list-style-type: none"> • a structured auditing program, which would seek to review all higher-risk suppliers on an annual basis and lower-risk suppliers every few years; • a standard set of auditing documents, which cover identified risk areas concerning modern slavery; and • a set of KPIs, which helps to assess a supplier's performance against agreed targets.
Training	<p>Numen identified that there was insufficient training of employees of Voyager and Sunday's-Jump around modern slavery risks during the reporting period.</p>	<p>Voyager and Sunday's-Jump will implement regular training of its staff in ethical sourcing for those in procurement and sourcing, with a particular focus on modern slavery risks, to ensure that they are aware of:</p> <ul style="list-style-type: none"> • evolving modern slavery risks (ie new risks that may emerge or trends); • new practices to prevent or reduce modern slavery risks; and • the regulatory environment. <p>Voyager and Sunday's-Jump will also approach suppliers to engage in mutually beneficial training programs.</p>
Grievance procedure	<p>The Numen Group has a series of whistleblower policies in place to encourage transparency and accountability.</p>	<p>The Numen Group will provide a more regular training sessions on the whistleblower policies to its employees.</p>

Part 4. Methods to assess the effectiveness of actions

Numen Group's actions to assess the effectiveness of its actions to combat modern slavery risks are predominantly focussed around an auditing and review process.

Measure	Description
Management of good relationships	The success of the Numen Group has been based on good, solid, long-term relationships that are founded on trust, transparency and good communication. There are a number of very long-serving staff members, who have and continue to foster the relationships.
Informal review process	In relation to international supply arrangements, through Voyager's and Sunday's-Jump's provision of detailed technical packs, patterns and sample fabrics, combined with transparent pricing and sourcing base, an informal review and understanding of the price drivers on each large order is possible.
A broad support network in the same industry	Numen Group entities will continue to develop relationships with other businesses in the same industry and sourcing pool, to foster a better understanding about high-risk areas for modern slavery.
Setting up a process to provide regular engagement and feedback	As noted above, Voyager and Sunday's-Jump will improve in the area of formal auditing and review with the appointment of a head of ethical sourcing to manage this process.

Part 5. Process of consultation within the Numen Group

Numen has consulted with the various operating entities to prepare this modern slavery statement.

This Statement is issued jointly by all of the relevant operating entities within the Numen Group, as described in item 3.2(b) to (d) of Part 1 of this Statement.

Numen consulted first with the senior executive management and the supply teams of the relevant operational entities within the Numen Group as described in item 3.2(b) to (d) of Part 1 of this Statement, and then with the directors of those companies for final approval.

The content of this Statement is approved by the Board of Numen, which is in a position to influence or control each of the operating entities covered by this Statement.

Signed by the responsible member of Numen:



Stephen Darrell Kenmar
Alternate Director

20 May 2021