

M.J. BALE

Modern Slavery Statement

FOR FINANCIAL YEAR 2024
1 AUGUST, 2023 - 31 JULY, 2024





M.J. Bale is committed doing right
by our customers and community, so
together we can do right by the
world.

Provenance | Authenticity | Integrity | Character



Introduction

This statement has been published in accordance with the Australian Modern Slavery Act 2018. It outlines the actions undertaken by M.J. Bale in the financial year ending 31 July 2024 to assess and address the risks of modern slavery in its business and supply chain, as well as focus areas for the future. The Australian company number of Newbale Clothing PTY LTD trading as M.J. Bale is ACN 136405091 and ABN 33136405091. The registered office Details are: Unit 24, Rosebery Engine Yards, 115-151 Dunning Ave, Rosebery NSW 2018

References to ‘M.J. Bale’, ‘we’ or ‘us’ in this statement refer to Newbale Clothing.

We do not own or control any other trading entities and therefore there was no other consultation with any other entities in preparation of this statement.

This statement as approved by the board of M.J.Bale groups in their capacity as the principal governing body of M.J. Bale on 23 July 2025.

This statement is signed by Matt Jensen in his role as the Chief Executive officer of M.J. Bale on 23 July 2025

A handwritten signature in black ink that reads "Matt Jensen". The script is cursive and fluid, with the first letters of "Matt" and "Jensen" being capitalized and prominent.

Matt Jensen
Chief Executive Officer of M.J. Bale
23 July 2025

Structure & Operations

M.J. Bale Group Pty Ltd is an Australian incorporated company that is the holding company for Newbale Clothing Pty Ltd, trading as M.J. Bale.

Founded by Matt Jensen in 2009, M.J. Bale is an Australian-owned, vertically integrated business with over 80 retail locations. The company creates wardrobe solutions for men, from business and formalwear to lifestyle casuals and accessories.

All products are available via the M.J. Bale website, at M.J. Bale stores throughout Australia, department stores and a selection of online marketplaces.

The M.J. Bale Support Office is based in Sydney, Australia with both office and retail staff located nationwide, as well as a small team in Vietnam.



OPERATE IN AUSTRALIA

79

STORES ACROSS NSW, VIC, QLD, SA, TAS, ACT AND WA

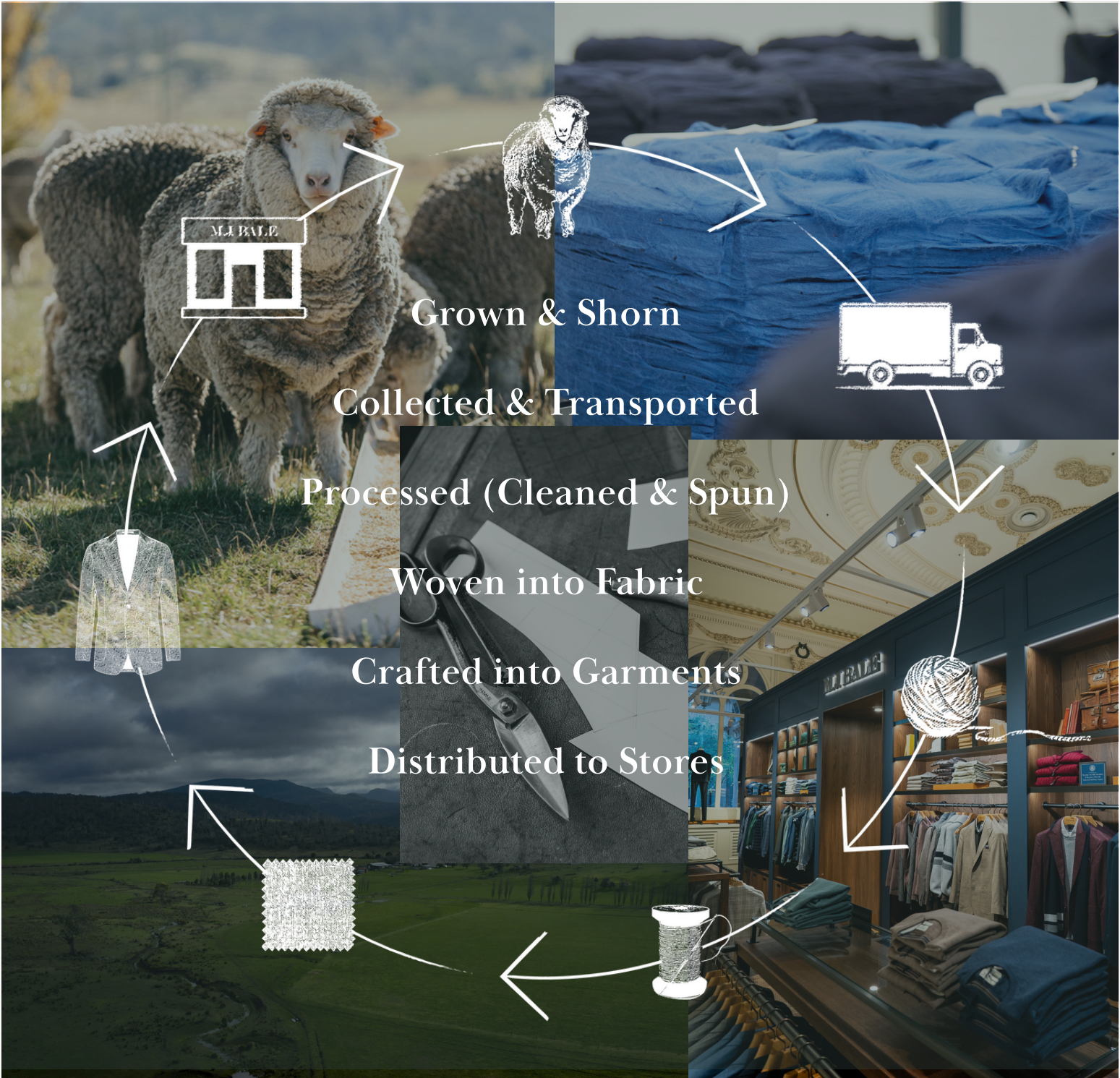
69

SUPPORT OFFICE STAFF (FULL TIME & PART TIME)

291

RETAIL STAFF (FULL TIME, PART TIME & CASUAL)

Our Supply Chain



42%

SUPPLY CHAIN SPEND

58%

NON-TRADE SPEND

Our Supply Chain

M.J. Bale sources a wide range of goods and services globally. In FY23/24, we directly sourced from over 80 suppliers, 37 were Tier 1 suppliers.

Our top 30 suppliers, based on spend, are a combination of Tier 1, and Tier 2 suppliers and are located in Italy, Japan, China, Korea, India, Thailand and Vietnam.

Collectively, our Top 30 suppliers represent over 85% of our FY23/24 production spend.

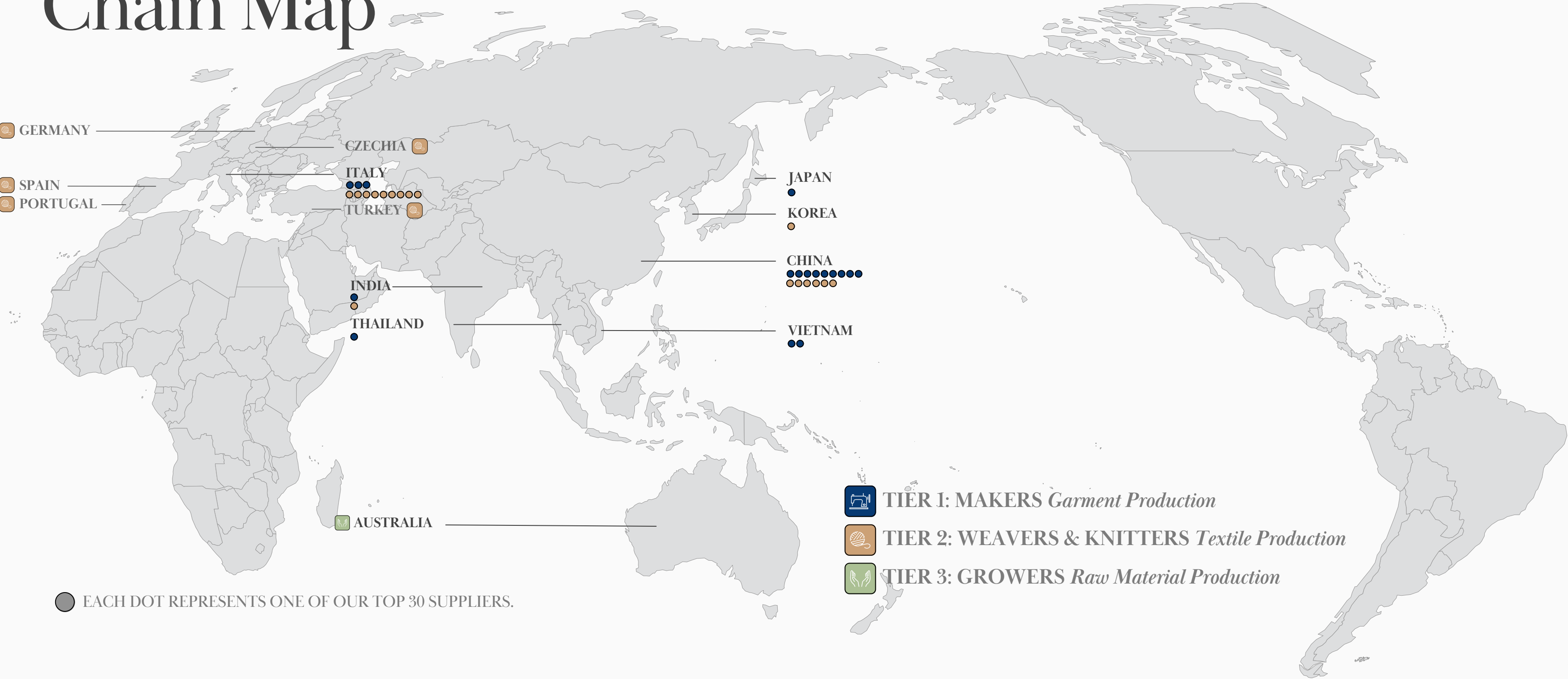
Generally, characteristics of our supply chain tiers are:

Tier			Visibility
	TIER 1 <i>Makers</i>	Finished good manufacturers such as cut, sew and assembly.	100% mapped
	TIER 2 <i>Weavers & Knitters</i>	Fabric mills who are responsible for textile production including weavers, spinners and ginners, as well as trim suppliers.	Visibility 30 Weavers, 2 spinners and 5 trim suppliers
	TIER 3 <i>Growers</i>	Raw material producers including wool, cotton and linen farms.	3 wool farmers including 2 in Tasmania

Direct Suppliers provide goods or services that are found in or directly involved with our products.

Indirect Suppliers are not within our supply chain, providing goods or services that contribute to our business operations such as cleaning or consulting services.

Our Supply Chain Map



Modern Slavery Risks

At M.J. Bale we regularly undertake assessments of modern slavery risks across our operations and supply chain, carefully considering how we may be causing, contributing or directly linked to modern slavery practices. Importantly, we acknowledge that operating in the garment industry heightens the risk of modern slavery within our supply chain. Factors such as the geographical location of some of our suppliers, sourced materials for some of our products and the nature of producing seasonal collections, all play a role. We also recognise that a lack of visibility in certain areas of our supply chain may carry additional modern slavery risks due to being unable to ensure accountability to our high ethical standards and practices. This is mainly regarding our tier 2 suppliers, weavers and knitters, and Tier 3 suppliers, growers of raw materials.

The following risk factors have been identified as increasing the likelihood of modern slavery practices occurring throughout our supply chain:



Industry Risk

The key characteristics of the garment industry generally involved low skilled workers, labour intensive tasks and short lead times. This creates a higher risk for certain labour and human rights impacts. These risks exist at every level of the supply chain.



Geographical Risk

Some countries are more at risk of modern slavery due to poor governance, failure to adopt international conventions and socioeconomic challenge. These risk can lead to labour rights violations, inadequate worker protections and high exploitation rates among vulnerable populations.



Product Risk

Some products hold a higher risk of impact than others due to the processes used make them. For example, cottons are known for risks associated with forced labour and slavery practices in harvesting cotton.



Business Model Risk

An enterprise's business model, including the variety and frequency of product line changes, influences supply chain risk. More product lines and frequent cycles increase risks due to varied materials, production processes and shorter production time frames, potentially leading to labour abuses.

Assessing Modern Slavery Risks

As an Australian owned and operated fashion brand, we have few modern slavery risks within our operations. However, the garment industry's supply chain is highly susceptible to modern slavery risks. The Walk Free Global Slavery Index Report 2023 identifies the garments as a top at-risk product. Other risk factors, such as geography, product and business model, add to the complexity of modern slavery in the fashion industry.

Fashion Industry Risks

The primary reason why the fashion industry is associated with higher risks of modern slavery is due to the primary product being garments. The garment industry has high rates of reported forced labour and other modern slavery practices which are made more complex to address due to opaque supply chains involving subcontractors and intermediaries

Geographic Risks

As outlined above, the geographic allocation of suppliers is a risk factor for modern slavery. Several key countries including China, India, Thailand and Vietnam are known garment production locations with an increased risk for modern slavery.

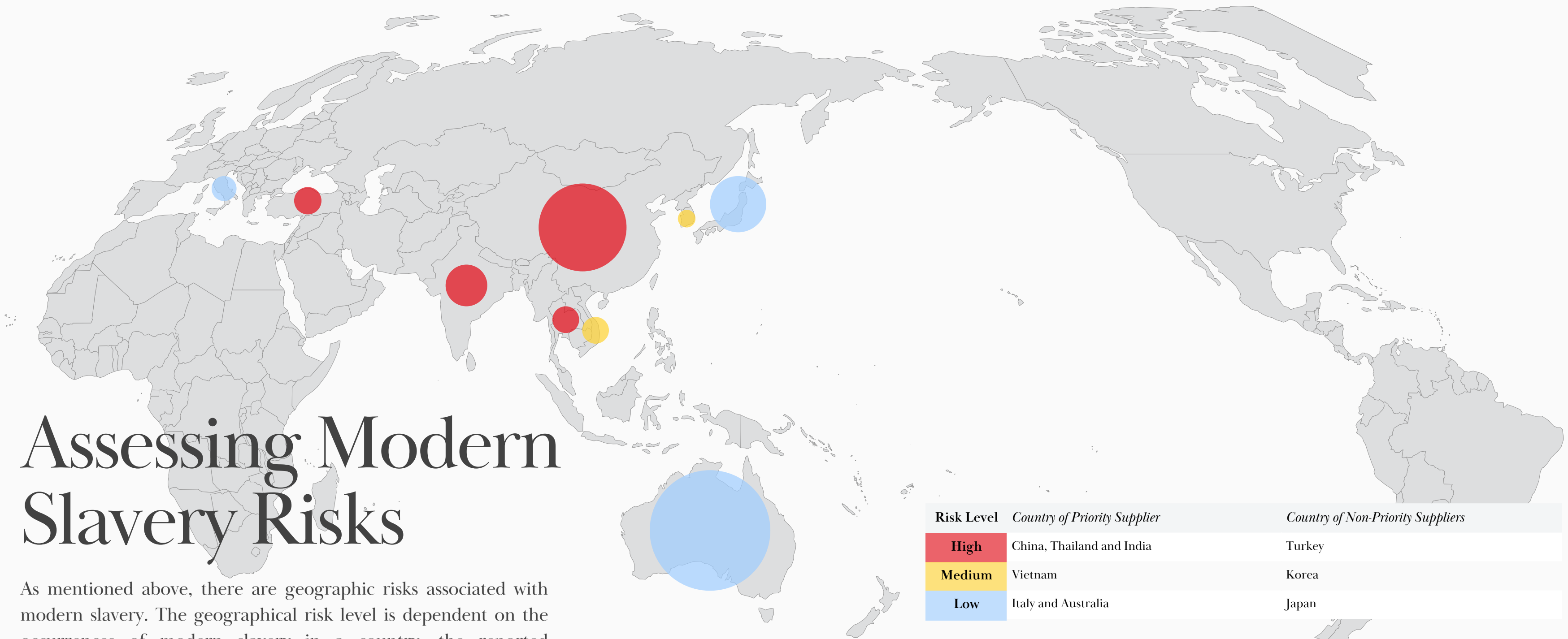
At-Risk Products

Additionally, some products involved in the garment production process further increase the risk of modern slavery throughout the supply chain, where cotton, textiles and thread/yarn were also identified, as were other at-risk products

Business Model Risks

Lastly, it is common practice for brands to design seasonal collections which can lead to a business model risk. This is because pressure is placed on garment manufacturers to deliver products with tight turnarounds which can result in a drop in safety standards and excessive working hours. In addition, businesses often negotiate for competitive pricing with suppliers and to do so, suppliers may reduce employee wages to save on cost.





Assessing Modern Slavery Risks

As mentioned above, there are geographic risks associated with modern slavery. The geographical risk level is dependent on the occurrences of modern slavery in a country, the reported prevalence, and government action or inaction on addressing modern slavery. The Risk Level diagram provides our risk level assessment for our direct suppliers for the reporting period.

Priority suppliers are those whom we conduct a higher volume of business and spend greater cost value for the reporting period. These suppliers therefore are of top priority when assessing and addressing modern slavery risks.

Assessing Modern Slavery Risks

Through our Modern Slavery risk assessment, we identified certain modern slavery practices that are more likely to occur in our supply chain due to the aforementioned modern slavery risk factors.

MODERN SLAVERY RISK	WHERE RISK IS MOST LIKELY	RISK FACTOR	CONTINUUM OF INVOLVEMENT
Under age and forced child labour	1 2	  	A risk that we may be directly linked to modern slavery through our procurement of product.
Forced Labour	1 2 3	  	A risk that we may be directly linked to modern slavery through our procurement of product.
Exploitative of migrant workers	1 2 3	 	A risk that we may be directly linked to modern slavery involving our indirect workforce.
Workplace health and safety	1 2 3	  	A risk that we may be directly linked to modern slavery through our procurement of product.
Non compliance with minimum wage laws	1 2 3	 	A risk that we may be directly linked to modern slavery involving our indirect workforce.
Wages not meeting family living needs	1 2 3	  	A risk that we may be directly linked to, or without appropriate due diligence, contractual controls and monitoring processes, we may contribute to modern slavery involving our indirect workforce.
Excessive working hours	1 2 3	  	A risk that we may be directly linked to, or without appropriate due diligence, contractual controls and monitoring processes, we may contribute to modern slavery involving our indirect workforce.
Debt bondage	1 2 3	 	A risk that we may be directly linked to modern slavery through our involving our indirect workforce.
Lack of formal employment or contracts	1 2 3	  	A risk that we may be directly linked to modern slavery through our involving our indirect workforce.
Gender-based and cultural discrimination	1 2 3		A risk that we may be directly linked to modern slavery through our involving our indirect workforce.

SUPPLY CHAIN TIER			
1	Makers: Garment Production	2	Weavers & Knitters: Textile Production
		3	Growers: Raw Material

MODERN SLAVERY RISK FACTORS							
	Industry Risk		Geographical Risk		Product Risk		Business-Model Risk

Actions Addressing Risks

Over this reporting period, our approach to addressing modern slavery risks has focused on strengthening governance, deepening supplier engagement, and enhancing internal capability. These actions reflect our commitment to continuous improvement and alignment with global best practices.

We continued to refine and implement policies and procedures that reduce risk exposure across our operations and supply chain. This included updating our Employee Code of Conduct and Supplier Code of Conduct to provide clearer expectations on ethical labour practices, worker protections, and supplier responsibilities. We also continually review our Bullying, Harassment, Equal Employment Opportunity, Discrimination, and Whistleblower Policies to ensure they effectively address risks related to modern slavery and exploitation.

To support stronger supplier oversight, we introduced a new supplier screening and engagement process in 2024. This included tailored questionnaires, resource guides, and onboarding requirements aligned with our Supplier Code of Conduct. We also verified supplier responses to identified risks and, where needed, edited contractual terms or clarified expectations to support corrective actions.

We continue to progress our use of the SEDEX platform, onboarding priority suppliers and using the portal to review available audit data, assess flagged risks, and begin targeted follow-up. We also continued to engage in supplier auditing and undertook internal reviews of identified risks to guide remediation actions.

Our team attended SEDEX member seminars and completed BCI training to strengthen our capacity to identify and respond to risk areas, uplift supplier performance, and embed responsible sourcing practices. SEDEX continues to function as a risk management tool that enables supply chain oversight which that is leveraged to, enhance our capabilities to address and mitigate slavery.

Governance and Policy Controls

We are committed to ensuring our operations and supply chain are free from modern slavery practices. Our governance framework supports this commitment through clearly defined policies, procedures, and accountability mechanisms. Key governance and policy controls include:

Supplier Code of Conduct (COC)

Our Supplier Code of Conduct outlines the minimum standards expected of all suppliers, contractors, and business partners. This includes the prohibition of forced labour, child labour, and exploitative working conditions, and sets expectations for fair wages, safe working environments, and legal compliance. All suppliers are required to confirm adherence to the Code as a condition of engagement.

Enterprise Agreements and Purchase Order Terms

Where applicable, we operate under Enterprise Agreements that support fair wages and safe working conditions for our employees. Additionally, our standard Purchase Order (PO) terms include provisions requiring suppliers to comply with applicable labour laws and human rights obligations.

Employee Code of Conduct

Our Employee Code of Conduct sets out the behavioural expectations of all staff, including integrity, respect, and ethical conduct. It reinforces our zero-tolerance stance on modern slavery and mandates the reporting of any suspected breaches through internal or external channels.

Discrimination, Harassment, and Bullying Policy

We uphold a workplace culture of safety and respect. This policy outlines our commitment to preventing all forms of workplace abuse and provides clear reporting and investigation procedures. By promoting inclusion and dignity at work, we reduce the risk of coercive or exploitative behaviours.

Labour Practice Standards and Human Rights Policies

We align with internationally recognised labour standards and support the right to freedom of association, collective bargaining, and fair working conditions. Our internal labour practice codes guide employment relationships, recruitment processes, and contractor arrangements in line with ethical employment principles.

Review of Actions and Continuous Improvement

We conduct annual reviews of our modern slavery risk management practices, including actions and learnings from supplier assessments and audit processes. These reviews inform our continuous improvement approach and are overseen by senior management.

Actions Addressing Risks

Actions we have taken in FY24 as a business to address modern slavery risks across both our operations and supply chain are summarised below.

DUE DILIGENCE Alignment to global standard best practice	• 100% of significant suppliers, based on FY23/24 spend, have signed or acknowledge the new M.J. Bale Supplier Code of Conduct. • Internal grievance mechanisms resolved 6 staff complaints where the documented mechanisms were the key to successful outcomes. • We successfully completed our onboarding to the SEDEX platform, enhancing our modern slavery risk management and supplier audit processes. • We have increased the number of active SEDEX member suppliers, strengthening our ability to monitor and manage ethical risks more consistently across the supply chain. • We continue to review third-party ethical audits and have maintained a practice of conducting SMETA audits every two years for our top suppliers.
PROVENANCE Knowledge on origins and journey of our garments	• We have continued to map our supply chain beyond Tier 1, expanding visibility into Tier 2 to identify risk areas and inform upstream engagement strategies. • In line with our commitment to greater transparency, we are now including our key trims and accessories suppliers in our Modern Slavery reporting.
COLLABORATION Continuous review and ongoing improvement of our practices	• While we recognise the importance of equipping our senior management, design, and production teams with the tools to identify and mitigate modern slavery risks, we have not yet engaged an expert partner to deliver this training. This remains a priority for the coming year. • Our participation in industry networks and working groups has been limited, and we are in the process of exploring opportunities to re-engage. • M.J. Bale successfully achieved B Corp Certification, which represents a high standard of ethical and social performance across the business, verified by B Lab ANZ.

Actions Addressing Risks

M.J. Bale continued its commitment to ethical sourcing by maintaining regular audit practices across its supply chain. In FY24, we upheld our requirement for key suppliers to undergo third-party social compliance audits on a two-year cycle using the SEDEX SMETA framework.

We recognise that audits provide only a snapshot and continue to assess risk and validate findings through additional methods.

A number of non-conformances were recorded across priority suppliers. These findings primarily related to worker health and safety (including PPE, fire safety, and accommodation standards), recordkeeping, and working hours. Where issues were identified, suppliers were required to submit corrective action plans and timelines for improvement.

By the end of FY24, M.J. Bale had completed audit reviews for our top suppliers and began tracking follow-up actions to assess whether improvements had been made.

We are committed to strengthening this follow-up process in FY25 by formalising remediation tracking and incorporating regular check-ins with suppliers.

As part of our platform migration, M.J. Bale successfully onboarded to SEDEX in FY23 and FY24. This has significantly improved our ability to manage risk across our supplier network, including greater visibility into risk profiles and audit renewal cycles. We also increased the number of active SEDEX member suppliers, with the majority of our Tier 1 manufacturing sites now visible on the platform.

In line with global best practice, M.J. Bale continues to invest in tools and partnerships that improve monitoring and drive accountability across our value chain.

Assessing the Effectiveness of Actions

In line with the UN guiding principles, we strive to ensure that our actions are effective in addressing modern slavery risks that our business may contribute to or are directly linked to. We continually assess the effectiveness of our actions by tracking them against key performance indicators across our 3 approaches: diligence, Provenance and Collaboration. Some of these KPIs include grievance cases reported and remediated, suppliers who have agreed to our supplier code of conduct and regulate internal review of our governance practices. We will continue to review and develop these KPIs and improve how we address modern slavery risks over the following reporting period

FY24 Actions

- 100% of significant suppliers, based on FY23/24 spend, have signed or acknowledge the new M.J. Bale Supplier Code of Conduct.
- Internal grievance mechanisms remained effective with documented processes supporting timely complaint resolution.
- Continued two-year SMETA audit cycle with more active review of findings, though tracking of corrective actions requires strengthening
- Improved Tier 2 visibility including trims and accessories suppliers, helping identify and prioritise higher-risk areas
- Training for leadership, design and production teams not yet delivered, limiting internal capacity
- Participation in industry networks remained paused, recognised as a gap for collaboration and shared learning
- Held annual and quarterly leadership meetings to review modern slavery actions, contributing to stronger internal accountability
- Achieved B Corp Certification in FY24, validating our governance, labour and supply chain practices through independent review

Continual Improvement

M.J. Bale is dedicated to the continual improvement of our practices, as well as full transparency in our efforts to address the issue of modern slavery.

We are committed to enhancing our operations to provide our customers and community with the assurance that we are addressing and mitigating any risks of modern slavery. Our unwavering dedication to this cause is reflected in our company's value of 'integrity' and our core belief in the importance of ethical business practices. As a part of this commitment, we have outlined specific areas we wish to further improve across our operations and supply chain over the coming period:



FY25 Key Focuses

- Continue to expand supply chain mapping to include Tier 3 suppliers and indirect sourcing relationships, prioritising high-risk geographies and product categories
- Strengthen supplier engagement by introducing onboarding briefings and annual check-ins to support understanding of the Supplier Code of Conduct
- Launch modern slavery training for leadership, design, production, and sourcing teams, co-designed with external experts
- Enhance the supplier self-assessment and due diligence tool aligned to the UN Guiding Principles
- Update the Supplier Code of Conduct to reflect emerging risks, including forced labour in digital supply chains and climate-related displacement
- Strengthen corrective action follow-up by requiring time-bound remediation plans and progress reporting following audit findings
- Explore opportunities for industry collaboration
- Establish key performance indicators (KPIs) to track improvements in supplier performance, engagement, and transparency year-on-year
- Conduct a review of internal policies and grievance mechanisms to ensure alignment with worker voice best practice, including anonymous feedback channels for offshore suppliers

Appendix

Mandatory Criteria		Relevant Page in Statement
One	Identify the reporting entity	Page 3
Two	Describe the reporting entity’s structure, operations and supply chains	Page 4 - 7
Three	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Page 8 - 11
Four	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Page 12 - 15
Five	Describe how the reporting entity assesses the effectiveness of these actions	Page 16
Six	Describe the process of consultation with any entities the reporting entity owns or controls	Page 3
Seven	Provide any other relevant information	Page 17