

A woman with long, wavy brown hair is captured in a dynamic pose, her arms raised and hands near her head. She is wearing a sleeveless, knee-length dress with a vibrant blue and gold pattern featuring geometric and floral motifs. The dress is flowing, suggesting movement. The background is a clear, bright blue sky.

Camilla

AUSTRALIA PTY LIMITED

MODERN SLAVERY STATEMENT FY24

REPORTING PERIOD:
FOR THE YEAR ENDING 30 JUNE 2024

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INTRODUCTION – THE REPORTING ENTITY

This is the modern slavery statement lodged by Camilla Australia Pty Limited (ABN 67 135 300 382 / ACN 135 300 382), in accordance with the requirements of the Modern Slavery Act 2018 (Cth).

Camilla Australia Pty Limited (CAMILLA) is an Australian based, global luxury fashion brand.
We remain committed to addressing modern slavery throughout our operations and supply chains.

APPROVAL AND REVIEW OF THIS MODERN SLAVERY STATEMENT

This Modern Slavery Statement was approved by the Board of Camilla Australia Pty Limited in their capacity as the principal governing body of Camilla Australia Pty Limited on 18 December, 2024.

Pursuant to the requirements of the Modern Slavery Act 2018 (Cth), the contents of this Statement have been reviewed and confirmed as accurate by responsible members of the principal governing body, the undersigned.

This statement is signed by David Nolan, Director, on 18 December, 2024.



David Nolan
Director
18 December, 2024

A MESSAGE FROM OUR CEO

As a leading luxury fashion label, we are committed to ethical practices that reflect our values. Our commitment to transparency and accountability continues to shape our operations and partnerships. This Modern Slavery Statement reflects our continued vigilance against the abhorrent practice of modern slavery. It clearly formalises the progress we have made and illustrates our team's commitment to ongoing improvement.

During this reporting period, there have been several notable achievements. As a business, we have:

- ✦ Strengthened relationships with our suppliers through meaningful in-person engagements
- ✦ Enhanced training for our design and product teams, with focuses on responsible sourcing
- ✦ Reached a significant milestone in our sustainability journey by becoming a Certified B Corp

We remain steadfast in our commitment to combating modern slavery at all stages of our production journey, guided by our strategic action plans, our unwavering devotion to this planet and its people, and our fierce respect for artistry, craftsmanship and authenticity.



Rebecca Mansergh
CEO, Camilla Australia Pty Ltd

HIGHLIGHTS FOR FY24

- ✦ The CAMILLA Modern Slavery Policy was launched, owned by the ESG Manager, following contributions from key internal and external stakeholders. It is a reminder to suppliers that we take a zero-tolerance position to any form of modern slavery practices. The Policy consolidates our suite of measures to prevent human rights risk across our operations and supply chain.
- ✦ Building long term, mutually beneficial partnerships with suppliers is critically important to CAMILLA and in FY24 we re-inforced our practice of visiting factories and aligning our goals. We had 4 employees visit 12 of our supply chain partners (included Tier 1 & 2) in this reporting year.
- ✦ CAMILLA, in partnership with our key supplier in India, commenced a living wage assessment within the partner's operations. This included seeking advice from industry experts and third-party assessments. We ensure all our suppliers are paid legal wages as minimum, in FY25 we will continue our journey with location-specific living wage audits allowing us to understand the opportunities to reach living wage conditions.
- ✦ We established a structured framework for supplier onboarding, with specified steps and actions to ensure new suppliers are operating in line with our Supplier Code of Conduct, Modern Slavery Policy, and related requirements. More details about the framework are included in page 20.



OUR STRUCTURE AND OPERATIONS

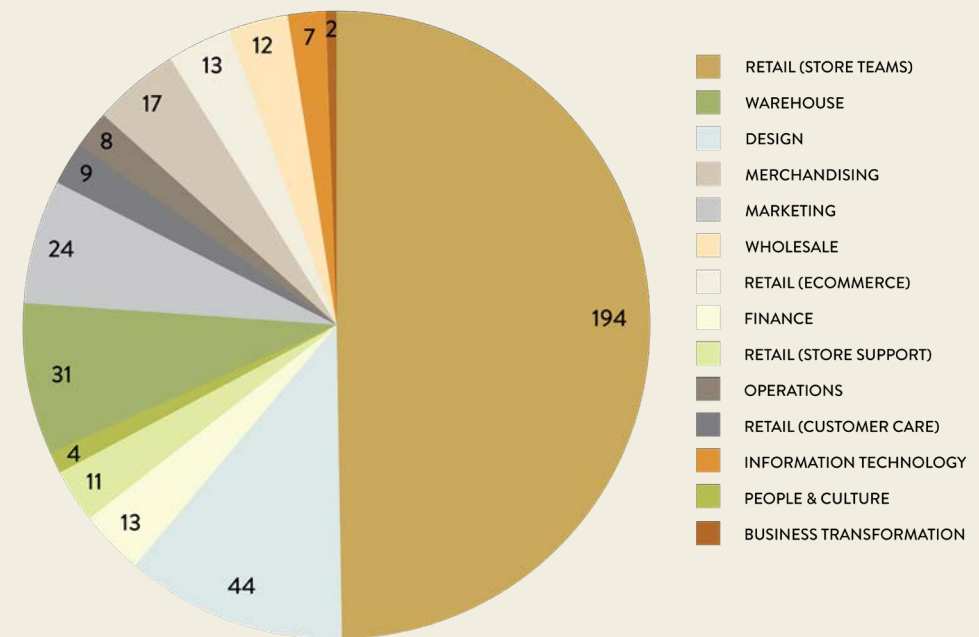
CAMILLA designs and sells products, on a retail and wholesale basis, to customers globally, using original prints. Our focus is women's clothing, swimwear, resort and accessories alongside childrenswear, menswear and home.

Our main operating entity and holding company is **Camilla Australia Pty Ltd**. This entity owns one international subsidiary, **Camilla Corporation**, which operates our retail stores in the United States and is registered in the state of Delaware.

The CAMILLA head office is in Sydney, Australia, with an additional sales office in Manhattan, New York City.

We continue to engage with contractors for short-term positions throughout the business, in design, finance, marketing, e-commerce, retail and administration. Warehouse contractors are recruited via an agency. We acknowledge higher risk in temporary work arrangements and enter into agreements directly through one recruitment agency with clear commitments to ensure employees are paid per the Modern Award, receive all entitlements, rights and working conditions per Fair Work Australia. On commencement, all contractors are provided with the Contractor Policy Handbook which includes our Code of Conduct.

FY24 - AU & USA TOTAL EMPLOYEES (389)



We employ
389
people across
AUS & USA

Our brand is stocked
in **55** countries,
359 wholesale doors
& **250** stockists

We operate
26 Camilla Boutiques
(22 in AUS & 4 in USA)
4 websites
49 online shipping
destinations

OUR VALUES



ADVENTUROUS SPIRIT

Embracing the freedom to innovate, being playful, creating beauty from the unexpected and challenging the status quo.



WITH LOVE

Inspiring people with our passion, leadership, positivity, care and integrity.



ONE TRIBE

We are united, honest & loyal. We respect and empower others while embracing our diversity.



WARRIOR ANGELS

We are courageous, resilient, accountable, and disciplined in our determination to colour the world.

OUR BRANDS

Camilla



Women's Apparel & Swimwear

HOTEL FRANKS
BY Camilla



Menswear

milla
BY Camilla



Childrenswear, Babywear & Swimwear

VILLA
Camilla
XXC



Homewares

OUR PRODUCT LINES



Womenswear



Menswear



Children's & Babywear



Swimwear



Gifting



Footwear



Bags & Accessories



Tableware & Napery



Bed & Bath



Sunglasses



✕ SUPPLY CHAIN OVERVIEW

DEFINITIONS

SUPPLIER: Supplier is the business partner that supplies the manufactured goods. The supplier holds the third party relationship with the factory, multiple factories or could be an agent, a license agreement or a collaboration.

FACTORY: The factory is the actual place of manufacture or assembly.

DIRECT: The relationship is directly with the manufacturing source. All communication and transactions are conducted directly with the factory teams.

AGENT: The agent works as a mediator between CAMILLA and the factories. They provide a service as a 'middle-man'.

LICENSE AGREEMENT: The Licensee enters into the agreement with CAMILLA for design assistance, production, packaging, despatch and marketing assistance as specified, approved and agreed. The licensed product is sold via a wholesale agreement with department stores in addition to being sold in our channels.

SALE OR RETURN AGREEMENT: The agreement is with the brand to design and make product and CAMILLA agrees to stock in our stores on a sale or return basis.

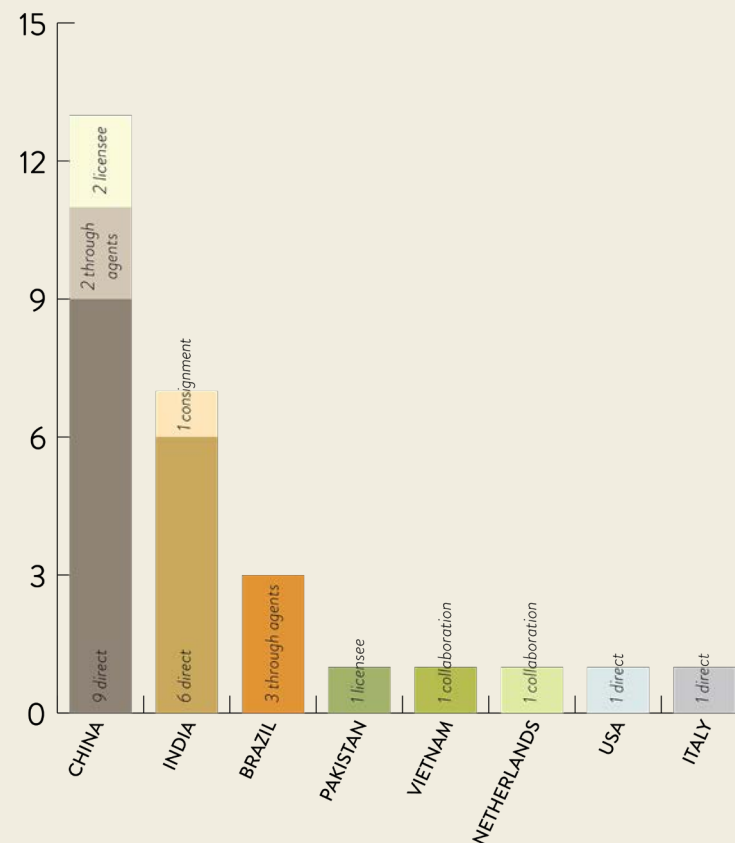
COLLABORATION: A collaboration is when we work together with another organisation or brand to bring co-branded product to market.

FULL VISIBILITY: Full visibility is when the supplier or factory, provide authorised third-party audits and any subsequent corrective actions plans.

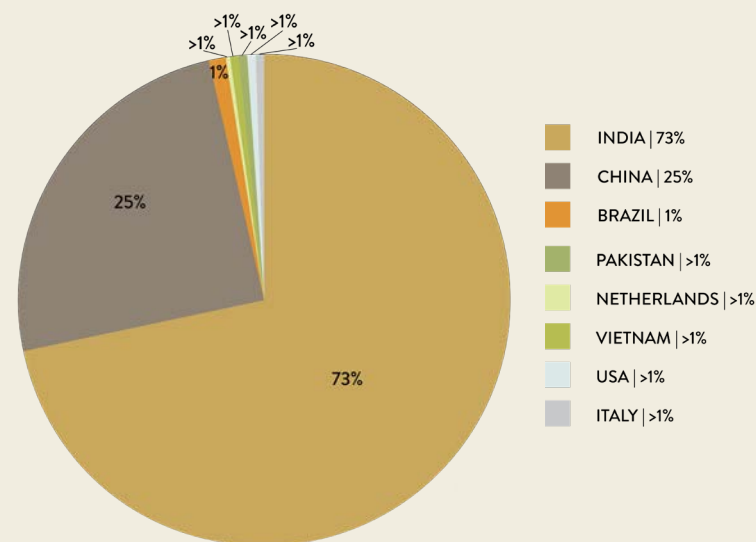
Top supply chain points during the FY24 reporting period:

- ✦ In FY24, around **99%** of CAMILLA products were made in factories that had undergone a globally recognised social audit during the same period, including through certified auditors Sedex, Amfori BSCI and ABVTEX.
- ✦ We increased our primary supply chain to **28** factories from **24** in the previous year.
- ✦ We expanded our supply chain to accommodate an extended product range, including a collaboration with Superga, a Royal Delft range of ceramics made in the Netherlands, an additional ready-to-wear factory in India and a specialised jewellery and hardware factory in China.
- ✦ **77%** of the factories are through direct relationships and make up over **94%** of the intake at cost.
- ✦ We continued our strong presence in India, with **73%** of our products manufactured in the region.
- ✦ We continued to improve visibility throughout our supply chain, including by deepening relationships with suppliers beyond Tier 1. In FY24 there were two factories which didn't supply global third-party audits. These represent **1.1%** of intake units. One of these relationships, a jewellery factory in India, we mutually ceased our relationship as a result of a change of strategic design direction. The other relationship is a sole manufacturer in the US making ornamental magnets. Given there is no associated workforce, there is a very low risk of modern slavery.
- ✦ Our **5** highest volume suppliers, which make up nearly **95%** of our total merchandise cost value, remain unchanged and we continue to enjoy strong, mutually beneficial partnerships.

FY24 - LOCATION OF FACILITIES BY COUNTRY



FY24 - COUNTRY OF ORIGIN BY COST VALUE



TIER 1

We classify Tier 1 as the finished goods manufacturers, print and artisan producers. Primary manufacturers: finished product / final assembly factories including cut, sew, and assembly. Includes input subcontractors: printing, layering, embellishers, embroiders.

PRIMARY SUPPLIERS

During the reporting period, CAMILLA engaged a total of **28** Tier 1 factories who manufactured our products.

- ★ **73%** of our products continue to be manufactured in India
- ★ **25%** in China
- ★ **1%** in Brazil, and **Less than 1%** in Italy, Netherlands, Pakistan, USA and Vietnam

The **28** individual Tier 1 manufacturing factories are from a group of **22** supplier relationships. They include **17** direct factory suppliers, **5** agent partnerships, **3** license agreements, **1** sale or return agreement and **2** collaborative partnerships.

The **22** supplier relationships we have make up just under **97%** of the intake at cost. Some of these relationships are vertically integrated with all operations taking place in the one facility, including our key partner. Other Tier 1 suppliers have varied processes, especially printing, at separate facilities. In addition, the sale or return agreement was with a primary supplier, the jewellery supplier in India.

AGENTS

We continue to use agents for our accessories, primarily for footwear, bags and belts. Utilising the Brazilian agent is the most effective way to partner with their factories, as it facilitates our communications.

LICENSEE AGREEMENT

We hold licensee agreements with our eyewear and bed and bath partnerships. As part of our agreements we have full visibility of their manufacturing facilities in China and Pakistan.

COLLABORATION

During the last reporting period we commenced collaborations with two brands to launch CAMILLA branded product, Superga (sneakers) and Royal Delft (decorative bone china). The umbrella group that owns Superga maintains strong global compliance of a very large supply chain. Our collection was manufactured through an established facility in Vietnam. Whilst Royal Delft's facility in the Netherlands did not have a globally recognised program structure, we regard the Netherlands as a very low risk country for modern slavery breeches and were given significant visibility into their operations.

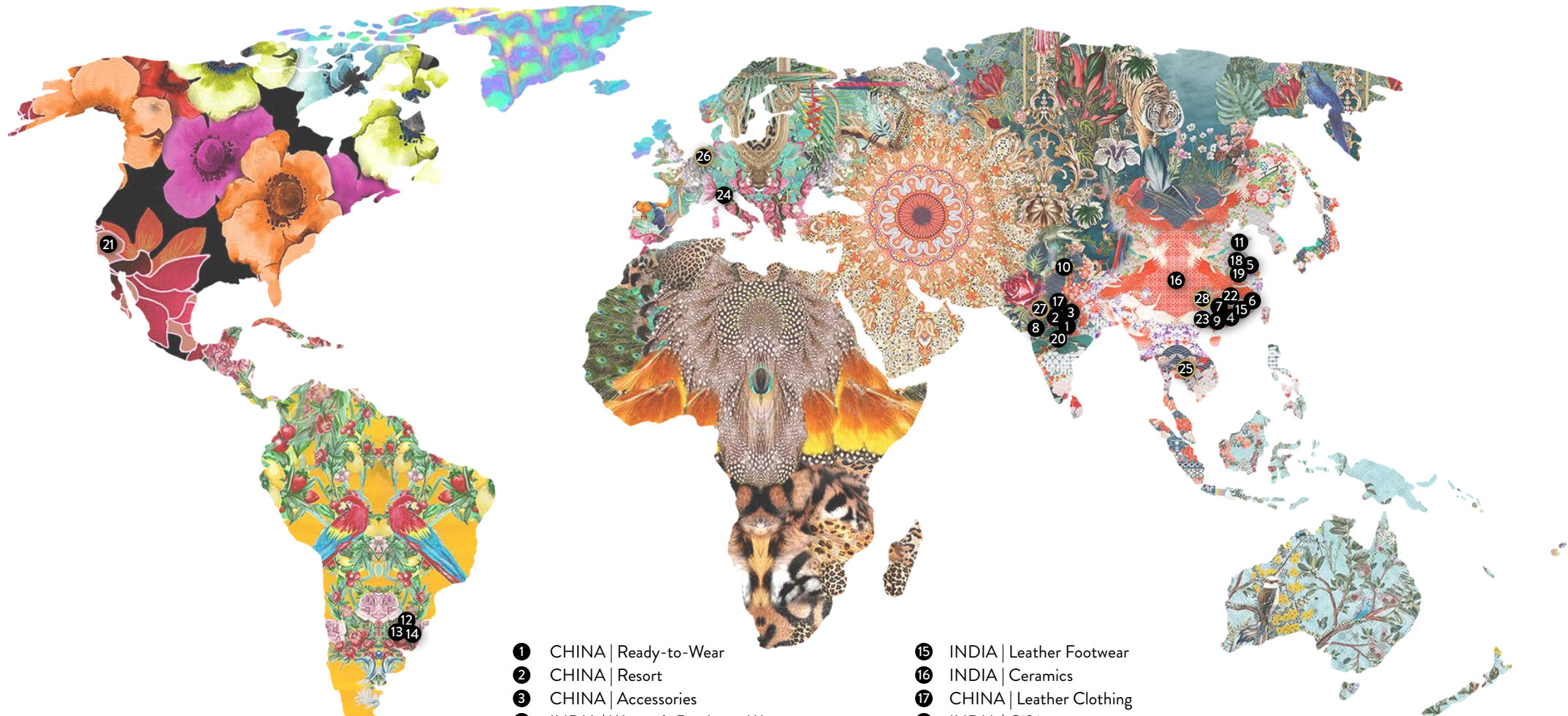
Circa 20 years ago, Camilla Franks met our 'key partner' where Camilla navigated her way through the Indian creative and manufacturing processes.

71% of our intake at cost in FY24 was manufactured by our key partner. The business is based in Gurugram, just outside of Delhi. It started with one factory and 20 workers and now employs approximately 1300 people on a full-time basis, across 3 factories, a print mill and head office.

CAMILLA x DISNEY launched another collection in FY24 with ranges across all categories. The CAMILLA supply chain was certified through the stringent Disney International Labor Standards (ILS) Program, which, as outlined by Disney, seeks to foster safe, inclusive, and respectful workplaces wherever Disney-branded products are produced.

During this reporting period, we onboarded two new factories. To accommodate changes to certain product lines, these new factories were chosen for their specialist manufacturing techniques in jewellery, hardware and women's read-to-wear. CAMILLA team members visited the factories, showrooms and offices of both suppliers as part of the onboarding and induction process. These new suppliers were onboarded according to the new supplier onboarding framework as described on page 20.

PRIMARY SUPPLIERS MAP



- ① CHINA | Ready-to-Wear
- ② CHINA | Resort
- ③ CHINA | Accessories
- ④ INDIA | Women's Ready-to-Wear
- ⑤ INDIA | Swim, Active, Body
- ⑥ INDIA | Kidswear, Womens Resort
- ⑦ INDIA | Women's Swim
- ⑧ CHINA | Knitwear, Clothing & Accessories
- ⑨ INDIA | Accessories
- ⑩ CHINA | Bedding
- ⑪ INDIA | Towels
- ⑫ BRAZIL | Leather Accessories
- ⑬ BRAZIL | Leather Accessories
- ⑭ BRAZIL | Accessories

- ⑮ INDIA | Leather Footwear
- ⑯ INDIA | Ceramics
- ⑰ CHINA | Leather Clothing
- ⑱ INDIA | Gifting
- ⑲ INDIA | Gifting
- ⑳ CHINA | Jewellery
- ㉑ USA | Magnets
- ㉒ INDIA | Eyewear
- ㉓ INDIA | Small Accessories
- ㉔ ITALY | Luxury Scarves
- ㉕ VIETNAM | Sneakers Collaboration (new)
- ㉖ NETHERLANDS | Ceramics Collaboration (new)
- ㉗ CHINA | Hardware & Jewellery (new)
- ㉘ INDIA | Women's Ready-to-Wear (new)

TIER 1 CERTIFICATION SUMMARY

CAMILLA have **22** supplier relationships which manufacture in **28** individual Tier 1 manufacturing factories. Of the factories, **26** of the **28** provided current global social audits. This is nearly **99%** of products have been produced in factories which have undergone social auditing during this period.

The social audits address working conditions including health, safety and other key modern slavery risk indicators. The social audits are actioned by certified third party auditors, Sedex, Amfori BSCI, Bureau Veritas and in Brazil, ABVTEX.

SUPPLIER	COUNTRY OF ORIGIN	CERTIFICATIONS & ACCREDITATIONS
KEY PARTNER	INDIA	SEDEX (4 PILLAR)
WOMEN'S READY-TO-WEAR SUPPLIER	CHINA	SEDEX (2 PILLAR)
WOMEN'S SWIM SUPPLIER	CHINA	AMFORI BSCI, SEDEX (4 PILLAR)
SWIM, ACTIVE, BODY SUPPLIER	CHINA	SEDEX (4 PILLAR), WRAP
KNITWEAR, CLOTHING, ACCESSORIES SUPPLIER	INDIA	SEDEX (4 PILLAR)
KIDSWEAR, WOMEN'S RESORT SUPPLIER	CHINA	SEDEX (4 PILLAR)
LEATHER CLOTHING SUPPLIER	INDIA	SEDEX (4 PILLAR)
ACCESSORIES SUPPLIER	CHINA	SEDEX (2 PILLAR)
BEDDING, TOWELS SUPPLIER	PAKISTAN & CHINA	AMFORI BSCI, SEDEX (4 PILLAR)
ACCESSORIES SUPPLIER	CHINA	SEDEX (4 PILLAR)
ACCESSORIES SUPPLIER	CHINA	AMFORI BSCI, SEDEX (4 PILLAR)

TIER 1 CERTIFICATION SUMMARY (CONTINUED)

SUPPLIER	COUNTRY OF ORIGIN	CERTIFICATIONS & ACCREDITATIONS
ACESSORIES SUPPLIER	BRAZIL	ABVTEX, SEDEX (4 PILLAR)
CERAMICS SUPPLIER	CHINA	SEDEX (4 PILLAR)
MAGNETS SUPPLIER	USA	REFER TO PAGE 11
SUNGLASSES SUPPLIER	CHINA	SEDEX (4 PILLAR)
ACCESSORIES SUPPLIER	CHINA	SEDEX (2 PILLAR)
ACCESSORIES SUPPLIER	ITALY	BUREAU VERITAS
JEWELLERY SUPPLIER	INDIA	REFER TO PAGE 11
SNEAKER COLLABORATION *NEW	VIETNAM	REFER TO PAGE 12
CERAMICS COLLABORATION *NEW	NETHERLANDS	REFER TO PAGE 12
HARDWARE AND JEWELLERY SUPPLIER *NEW	CHINA	SEDEX (4 PILLAR)
WOMEN'S READY-TO-WEAR SUPPLIER *NEW	INDIA	SEDEX (4 PILLAR)

TIER 2




We classify Tier 2 as the fabric mills, tanneries, trim suppliers. Input processors and suppliers: including fabric mill, leather tannery, trim producer, embellishment manufacturer, laundry, dye house.

Our Tier 2 exploration advanced forward with mapping progressing. The main challenges to significant progress – particularly in India, where we manufacture the bulk of our products – are the complex and unregulated nature of the industry, which lacks the infrastructure of other developed countries.

Traditionally the factories have been reluctant to reveal details of Tier 2 factories due to confidentiality concerns. As we continue to build strong mutually beneficial relationships with our top 5 factories, we are seeing these barriers come down.

A number of suppliers with whom we have a direct relationships, use external print mills. We gained greater visibility on these separate printing facilities throughout this period, although there is more work to be done. In the next period, continuing focus on larger partners' print mills, we will progress the implementation of our social compliance programmes. Our key partner's print facility, which is visited regularly, continues with Sedex 4 Pillar social and environmental compliance, and LEED certification.

SUPPLY CHAIN VISIBILITY SUMMARY - Progress Year On Year

TIER	FY22 PROGRESS	FY23 PROGRESS	FY24 PROGRESS
 Tier 1: Finished goods manufacturers, print and artisan producers. Primary manufacturers: finished product / final assembly factories including cut, sew, and assembly. Includes input subcontractors: printing, layering, embellishers, embroiders.	100% mapped	100% mapped	100% mapped
 Tier 2: Fabric mills, tanneries, trim suppliers. Input processors and suppliers: including fabric mill, leather tannery, trim producer, embellishment manufacturer, laundry, dye house.	Visibility into 12 fabric and tannery facilities, 3 major trim producers, and 5 major finishing suppliers (including packaging).	Visibility into 23 fabric, yarn and tannery facilities, 3 major trim producers, 6 major finishing suppliers (including packaging) and 5 of our major digital print mills.	Visibility into 34 fabric, yarn and tannery facilities, 29 trim producers, 6 finishing suppliers (including packaging) and 6 of our major digital print mills.
 Tier 3: Raw material processors and suppliers. This include cotton, silk, wool farm, spinning and ginning mills			Progress to be made

We achieved strong progress in understanding where our trims are being sourced. Many of these trim suppliers operate informal, handicraft-style businesses, and are the main reason we have yet to achieve full visibility beyond our Tier 1 supply chain. We are now aiming to consolidate the number of trim suppliers in India to gain better understanding of their operations.

SUPPLY CHAIN MAPPING

In FY24, we continued our process to better understand, remain accountable and more effectively manage progress in the exploration of our Tier 2 supply chain. To do this, we have split our supplier discovery into three key phases:

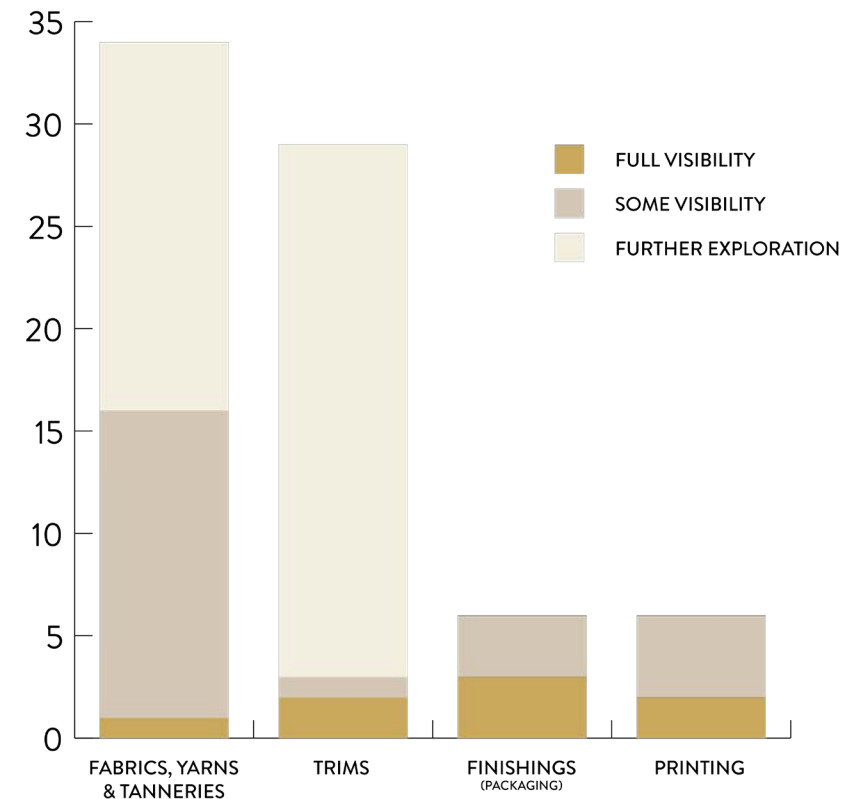
- ✦ **Full Visibility** - Name, location, certifications and audits on-hand.
- ✦ **Some Visibility** - Location known and strong compliance (social & environmental) is understood to exist. Name may be known.
- ✦ **Further Exploration** - Location understood and certifications are said to exist but we have minimal visibility and are yet to understand compliance. Name may be known.

SUPPLIERS TO OUR OPERATIONS

The CAMILLA paper packaging is produced in two plants, one in Australia (Adelaide) and one in China (Heshan). Both facilities are owned and operated by Australian based entities with published Modern Slavery Statements. Our plastic packaging, made by a leading sustainable packaging company, has Amfori BSCI and strong governance practices. Labeling, including swing tags, is produced in two sites in Guangdong, China through a global packaging and labeling business with its own Modern Slavery mandatory obligations and Human Rights Policy.

Other operational supply chains for our goods and services for head office, retail, distribution, and warehousing, remain the same procurement operations as FY23.

FY24 – TIER 2 PROGRESS OF SUPPLY CHAIN MAPPING





✕ IDENTIFYING AND ASSESSING MODERN SLAVERY RISK

Operating within the global textiles and fashion industry, particularly with a diverse supply chain and manufacturing locations, brings several areas of elevated modern slavery risk. We understand that it is our responsibility as an ethical business to ensure the people in our operations and supply chain are protected and free from exploitation.

The key areas of elevated risk include;

- ✦ India, where we source the majority of our production. In 2023 the Global Slavery Index (GSI) estimated that in 2021 there were 11 million people living in modern slavery in India, the highest number of any country. Trafficking for forced labour was the most common form of modern slavery identified. We remain guided by the Global Slavery Index, the UN Guiding Principles and continue to ensure our approach with our Indian partners is strong and transparent.¹
- ✦ Garment and textile manufacturing are identified as high-risk industries by Walkfree. Although the nature of the supply chains are complex, engagement with workers, suppliers and other stakeholders within the supply chain strengthens our approach to addressing modern slavery issues.
- ✦ The informal labour, particularly in India, creates in an unregulated workforce. It's important we maintain our structured framework to formalise our partnerships with this informal workforce.

For FY24 we have re-set of our framework to address and measure our overall approach to modern slavery. These key areas are Due Diligence, Awareness and Monitoring.

¹ Walkfree Global Slavery Index 2023



We continue to align to the leading practice guidelines of WalkFree, an international human rights group focused on the eradication of modern slavery. This group publishes a report, the Global Slavery Index which presents the analysis of, the actions taken and the extent of the drivers of modern slavery.

Within our operations, we know it's our supply chain that has the highest risk factors relating to modern slavery. Most notably this is within our India and China footprint. The textile industry – with its complex, less transparent nature and unorganised infrastructure – increases our risk.

Geographic and industry risk combined continue to guide our focus of attention. With this in mind, we continue our due diligence of embedding our Supplier Code of Conduct, participating in robust screening and ensuring third-party audits are completed with swift responses to corrective action plans.

Sedex is our preferred third-party compliance program and alongside the audits we use the Risk Assessment Matrix to guide and re-confirm where we pay close attention.

Site visits to ensure the factory continues to align to our standards will remain an important activity. The conversations and observations during time spent with the factory teams are incredibly valuable.

These measures and activities aren't as easily available for our Tier 2 supply chain. We continue to use the approach of highest country risk, based on political, economic or environmental factors. We also continue to ensure that a clear commitment from the factory to this visibility is part of our successful partnership.

The use of the Sedex Risk Assessment Matrix confirms our highest risk suppliers. During this reporting period **77%** of our factories use the platform; the factories that do not use Sedex represent **1.4%** of total cost value. Those not on the Sedex platform use other globally recognised platforms, Amfori BCSI, Bureau Veritas and ABVTEX.

The assessment tool assists our understanding of which factories have been identified by third-party data to have highest risk. The data can be explored through many metrics and assists us in diving into specific factors of each factory based on their results. This data is a valued support to us to work towards improvement. If critical non-compliances are found, we address them as soon as we are alerted. To date there are no critical issues that relate to forced labour, human trafficking or debt bondage.

Given the importance of living wage screening we will continue to work collaboratively with industry specialists to ensure we align to best practice. Assessing the wages is a key indicator of fair controls within our supply chain.



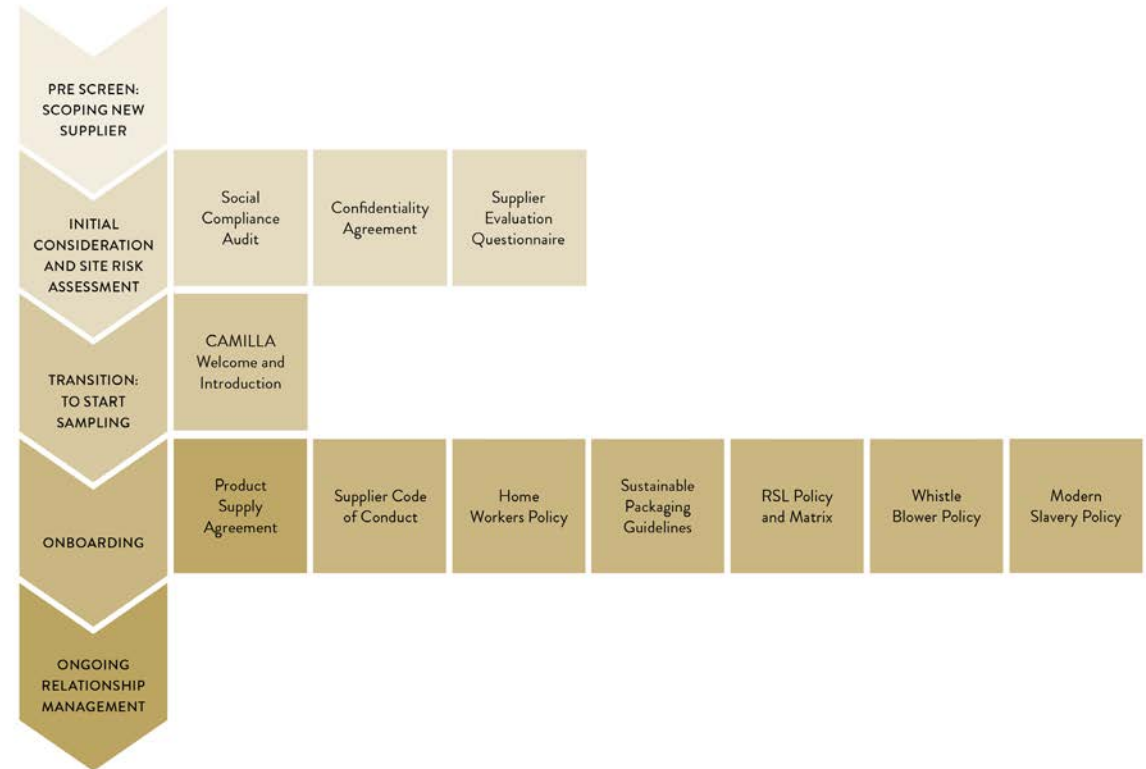
Before partnering with a supplier, we ensure they comply with our CAMILLA Code of Conduct. The code works to protect the workers' rights, to maintain our commitment to transparency and ensure safe and ethical conduct. Our due diligence while onboarding ensures the stakeholders understand our operations and business expectations with regard to ethical behaviour. We carry out regular channels of communication with our suppliers and are open to elevating this dialogue to more formalised training in the future. Whenever there is a new process or policy we circulate accordingly and where necessary train all relevant employees.

The ESG Manager manages the employee training. In FY24, we targeted this training to ethical and responsible sourcing and production. The training outlined the responsible purchasing policy purpose and guidelines, the supplier Code of Conduct, the importance of supplier screening and the new framework of onboarding. The employees involved were from our design, garment technician, production and buying departments.

To ensure a streamlined and effective process around introducing a new partnership, we developed a structured framework. The process ensures that requirements outlined in our Code of Conduct are clear alongside the zero-tolerance position in relation to all forms of modern slavery practices. All new suppliers that are being considered will be taken through the new process. These stages and responsibilities of the new process were developed in consultation with buying and production teams who have responsibility within the process. This was also an area of training to ensure employees understand the depth of the framework.

A channel to identify possible risk is through our CAMILLA Whistleblower Policy. All Camilla employees and contractors have access to a confidential channel if concerns need to be raised. Zero grievances were raised in FY24.

ONBOARDING PROCESS



Our key partner has its own governance procedures relating to Policy and Handling Mechanism. This documentation is produced in both English and Hindi. Their 'Grievance Handling Committee' includes representatives from each factory. These representatives meet quarterly with the HR team. Complaint and suggestion boxes are placed prominently at every facility. During the reporting period we were not made aware of any actual or suspected incidents.

MONITORING



Our findings show that the modern slavery risks associated with CAMILLA are within the supply chain and the network connected further down the supply chain. Due to this, it is the actions and behaviour of our suppliers where our focus continues. We ensure that we have commitments from our stakeholders and supply chain partners to comply with our framework of policies and guidelines. We maintain a commitment to work collaboratively with our partners to ensure that ethical practices are maintained throughout our supply chains.

We take several actions to identify and assess potential human rights issues within our supply chains. Monitoring the progress of our actions is an important stage in remaining accountable. Our Board reports include an update on all factory status, any critical non-compliances applicable and outlines new supplier partnerships. Our progress against our planned actions and KPI's will also become a key reporting field. To monitor and maintain awareness, our CSR committee is the platform within the business for presenting and assessing the progress. The committee meets quarterly with the ESG Manager leading and outlining the key actions taken and planned.





✕ ADDRESSING MODERN SLAVERY RISK

The global textiles and fashion industry are typically informal and in certain locations also unregulated. We continue to prioritise due diligence with our key partner in India, due to their dominance within our supply chain, their location, and the fact that it is an industry sector with typically low visibility.

The actions we are taking to address the risks throughout all our supply chains are outlined within these key areas.



EMBED SUPPLIER CODE OF CONDUCT

All our primary suppliers are required to abide by our Supplier Code of Conduct. Suppliers are, in turn, responsible for ensuring compliance with our Supplier Code of Conduct, and passing it along their own supply chains. This includes their subcontractors, and their own suppliers, including raw materials sources.

Our Code of Conduct is based on the Ethical Trading Initiative (ETI) Base Code, Conventions of the International Labour Organisation (ILO) including the Declaration on Fundamental Principles and Rights at Work, as well as internationally recognised good labour practices.

It prescribes the following requirements:

- ✦ Employment is freely chosen
- ✦ No forced, bonded or involuntary prison labour
- ✦ Working conditions are safe and hygienic
- ✦ Child labour is not used
- ✦ Living wages are paid
- ✦ Working hours are not excessive
- ✦ No discrimination
- ✦ Regular employment is provided
- ✦ No harsh treatment

Our Supplier Code of Conduct conveys our zero-tolerance position towards any form of forced, bonded, trafficked or unlawful prison labour. Suppliers are required to have a written policy to reflect this and communicate it effectively.

AUDITING

To continue our response to potential modern slavery within our supply chain and maintain visibility, we maintain our auditing program. All factories are required to;

- ✦ Undergo social audits conducted by independent, authorised third-party auditors with major suppliers to submit annually, all others to have current audits every two years
- ✦ To use the SMETA methodology and align with the Ethical Trading Initiative (ETI) base code
- ✦ Conduct the audits ideally on an unannounced or semi-announced basis
- ✦ Submit a Correct Action Plan Report (CAPR) must be supplied with the audit results. All non-compliances must be verified within the agreed timescale
- ✦ Primarily use a methodology that audits environmental factors as well as social

In FY24 we increased focus on monitoring the corrective action plans, taking time to better understand the major non-compliances with the factories individually. In each case the reasons they exist differ, as does the response from the factory. With a relatively small supply chain, we can work alongside the factory to gain deeper appreciation of the circumstances and work collectively towards corrective actions.

DUE DILIGENCE



SCREENING

For any potential new supplier partnerships, we use our onboarding process to ensure full screening before we go through the briefing of the full policy and guidelines. Part of this screening is using our Sedex risk assessment tool to outline any risk indicators.

Our face-to-face relationships during the reporting period were re-engaged with teams travelling to spend time with the employees at the facilities. The teams visited offices, factories, printing mills and fabric suppliers. These experiences remind us of the importance of this time together in strengthening and aligning our goals.

ENGAGE RISK MANAGEMENT PLATFORM

In 2022 we joined Sedex to utilise a platform for ethical sourcing data in one secure place for the majority of our supply chain. Visibility is what educates and guides our decisions on where to focus our attention. The platform gives us the ability to assess, analyse and report on our supply chain accurately.

EMBED GRIEVANCE MECHANISM

The CAMILLA Whistleblower policy encourages employees, contractors and suppliers to raise any issues or wrongdoing in a confidential and protected channel.

With the aim to help uncover potential risks in our operations, the CAMILLA Whistleblower Policy is communicated to all our primary supply chain. We ask that the policy is available to all of the factories workforces, encouraging the policy to be easily accessible, positioned in a prominent location and translated into local languages.

AWARENESS



ESTABLISH AWARENESS AND EDUCATION

CAMILLA has a suite of internal policies designed to address employee wellbeing and protection, whistleblowing (for any suspected misconduct or related concern), and responsible sourcing. CAMILLA team members are trained in relation to the content of our internal policies when they commence employment, as well as when these governance materials are periodically updated. Training staff includes topics such as responsible purchasing, briefing new policies or guidelines, outlining issues related to auditing compliance, ensuring understanding of the importance of transparency and ethical sourcing and also current subjects, for example in FY24 related B Corp assessment topics.

AWARENESS



SET EMPLOYEE EXPECTATIONS

The CAMILLA team are expected to adhere to our organisational values and ethical principles. CAMILLA has a process in place to support all new employees, aided by a suite of policies. This is available on the Go1 platform in Australia and ADP in the USA. These policies align with our commitment to ensuring legal compliance and promoting an ethical culture by observing the highest standards of fair dealing, honesty, and integrity in our business activities.

EMBED SUPPLIER ONBOARDING PROCESS

During this reporting period we restructured our onboarding process to give further clarity to each stage and, in turn, tighten the accountability. Prospective new suppliers continue to be carefully considered prior to commencing product sampling, taking care to ensure they are aligned to the CAMILLA values. The process is staged to ensure that across the business all stakeholders are engaged in the process and understand the requirements, both for CAMILLA and the supplier to adhere to. The intention of this process is to build a long-term partnership that benefits all involved.

MONITORING



MANAGEMENT OF ACTIONS

Our ESG Manager drives the work involved in all topics related to modern slavery, and manages the day-to-day responsibility of integration across the business. Our current CSR committee oversees the modern slavery planned actions. The committee reviews the progress of the key actions and targets, relating to its modern slavery response. Our current CSR committee includes two executive team members and employees from a variety of roles in the business. The committee oversees the modern slavery planned actions and reviews the progress of the key actions and targets.

GOVERN MODERN SLAVERY POLICY

The newest addition to our policy suite, the CAMILLA Modern Slavery Policy outlines our commitment to preventing and eradicating modern slavery within our operations, supply chains and business relationships. The policy relates to all employees, contractors, suppliers, partners and stakeholders associated with our organisation. The Policy was developed in consultation with the Tattarang Group and will be reviewed and updated as our position changes or every 4 years.

BOARD REPORTING






The CAMILLA Board has ultimate responsibility for our response to modern slavery risks, including ensuring that an appropriate framework is developed, and continuously improved, for risk management practices and long-term strategies. All Board Reports include a modern slavery progress update, top-line status of factory audits, critical non-compliances if they exist and operational project activity.



✕ MEASURING OUR EFFECTIVENESS

Continued education alongside constant improvement has always been our approach to modern slavery issues in our supply chain. To keep ourselves accountable, we consider it important to be transparent on our progress and outline below our key areas of improvement.








PROGRESS MADE IN FY24

KEY OBJECTIVE: IMPROVED OVERALL SUPPLY CHAIN VISIBILITY	PLANNED ACTIONS	PROGRESS
	Maintain and improve Tier 1 visibility ensuring complete coverage of social audit results.	
	Continue mapping of Tier 2 suppliers with primary focus on identified areas of highest potential risk.	
	For our key partner, as areas of visibility are pending verification, we will work together to review alternative approaches.	
	Where possible, encourage Tier 2 social compliance with focus on areas of highest potential risk.	
	Consider the advantages and feasibility of building on the supplier engagement program with our key partner. Considerations to be made into the structure, the post-engagement response and its practical outcome in supporting modern slavery due diligence.	

PROGRESS UPDATE

- ✦ Whilst our supply chain has grown to account for our specialist product, we remain vigilant on social compliance measures. Monitoring the supply chain has become more involved with a greater depth of understanding, and a stronger focus beyond with the wider production and buying teams.
- ✦ We have maintained transparency across our primary supply chain. We have improved on monitoring the non-compliances to make certain that any issues are dealt with effectively and supported through the corrective action plan.
- ✦ As the supply chain have increased their knowledge of the importance of visibility they have revealed more of their supply chains than we have been exposed to previously. This is an important step in true transparency to ensure we understand the operations we are dealing with.
- ✦ With a focus on our key partner, we gained more comprehension of the complexity of their supply chain. The main source being the trims and embellishment suppliers. Due to the nature of the industry and workforce in India, this will continue to be a complicated space, however we are determined to make progress.
- ✦ More of our supply chain are now using Sedex 4 Pillar Environmental methodology and we continue to encourage this as our preferred audit platform globally, as it allows us greater visibility.

PROGRESS MADE IN FY24

KEY OBJECTIVE: MORE FULLY DEVELOP AND IMPLEMENT INTERNAL GOVERNANCE PRACTICES EXPRESSLY RELATING TO MODERN SLAVERY	PLANNED ACTIONS	PROGRESS
	Governance of our modern slavery response to continue through our CSR Committee and Board reporting.	
	Training on modern slavery awareness and potential risks in our business and Responsible Sourcing and Buying training.	
	Closely monitor trends in reported supply chain risks in relevant geographic regions and industry categories.	
	Prompt and targeted due diligence to be undertaken if specific risk applies to the CAMILLA primary supply chain.	
	Investigate the inclusion of specific provisions relating to modern slavery in the CAMILLA Code of Conduct.	
	Develop a Modern Slavery Policy.	
	On-ground site visits from team members to continue to aid supplier relationships and support transparency.	

PROGRESS UPDATE

- ✦ The CAMILLA Modern Slavery Policy was developed. Embedding this policy also gave us an opportunity to better understand what human rights and modern slavery policies already exist within our major suppliers' operations.
- ✦ As we onboarded four new factories in the reporting period we used this as an opportunity to re-assess our onboarding process and give it a clear framework going forward. This creates a strong long term partnership that aligns values and goals.
- ✦ During this period we reviewed each of our policies to update and maintain relevance, making adjustments accordingly.
- ✦ We conducted employee training with the design, technical, production and buying teams, tailoring to their engagement in the supply chain with responsible sourcing and onboarding.

PROGRESS MADE IN FY24

KEY OBJECTIVE:	PLANNED ACTIONS	PROGRESS
LIVING WAGE	Continued investigation of the selected key partner to understand the specifics of the living wage analysis and align outcomes to best practice.	<div><div></div></div>

PROGRESS UPDATE

- ★ During this reporting period we undertook a third-party living wage audit of our key partner’s facility. This process and the outcomes led us to further investigate the benchmark methodology. To ensure our findings are as comprehensive as possible, the next stage is to conduct a location-specific living wage audit with our key partner.
- ★ In 2024 the Indian government has communicated that changes will be made to the legal wage to bring it more in line with the living wage, we continue to monitor the government’s progress.



PLANNED ACTIONS IN FY25



DUE DILIGENCE

KPIs

Maintain our global third-party audits with 100% of our Tier 1 primary supply chain.

Increase by at least 10% our third-party audits for Tier 2, with the focus on highest volume suppliers and highest potential risk.

Continue our exploration of the living wage with an Anker methodology benchmark audit conducted in the specific region of our key partner.

Action a more formal capacity planning program with our top 5 suppliers.



AWARENESS

KPIs

Further employee training, customised and aligned to the CAMILLA sourcing, buying and production approaches.

Equip employees conducting site visits with further understanding of risk factors and social compliance related to modern slavery.

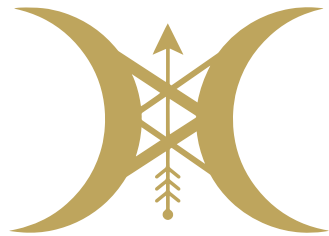


MONITORING

KPIs

Ensure that there is continued monitoring in relevant geographic regions and industry categories and encourage that employees report on any possible supply chain risks.

Continue governance of our modern slavery response through our CSR Committee and Board reporting.





Camilla