



General Pants Co.

MODERN SLAVERY 2024

ACKNOWLEDGEMENT OF COUNTRY //

In the spirit of reconciliation, General Pants acknowledges the Traditional Custodians of this country throughout Australia and their connections to land, sea and community. We pay our respect to their Elders past and present and emerging.

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A NOTE FROM THE CEO //

General Pants Co. is committed to ever evolving and finding new ways to play our part in helping to create a sustainable world with no boundaries.

Our vision to work towards a retail industry that causes no harm to our planet and is free from all aspects of modern slavery or coercion is core to our culture.

This commitment is anchored through in governance and ethical sourcing focus. Through a variety of strategies and a structure to prevent modern slavery in our business and entire supply chain.

We continually review our processes to identify new ways to improve & support our partners in achieving this shared goal. We work collectively to solve complex challenges & deliver change.

Ethical sourcing and auditing are at the forefront of these strategies, to in turn increase transparency and traceability within all aspects of our business and sourcing model.

As a key cultural leader within the youth fashion industry, we acknowledge our responsibility to lead by example and drive transformation both from the inside out, and the outside in.

Scott Evans

Scott Evans
CEO





INTRODUCTION //

STATEMENT

General Pants Co. is part of the Alquemie Group Holdings Pty Ltd (the “Group”) (ABN 55 637 401 104) Alquemie Group is a retail and consumer brands investment and growth platform partnering with compelling brands across Australia and New Zealand. Registered at 11 Bowden Street Alexandria.

This statement has been made in accordance with the Modern Slavery Act 2018 (Cth) (“Modern Slavery Act” or the “Act”). This is the Group’s second statement under the Modern Slavery Act, and the sections that follow reflect the criteria required under the Act. This statement is made on behalf of the General Pants brand within the Group.

The statement has been reviewed and approved by the Board of Alquemie Group Holdings Pty Ltd (the “Board”). Unless otherwise indicated, all information below is for the first reporting period of 1 January 2024 to 31 December 2024

INTENT

We are committed to conducting business with the highest standards of ethics when dealing with our employees, clients, customers, partners and suppliers.

Our Statement is an account of how we deliver on that commitment. We fully support the United Nations Guiding Principles on Business and Human Rights. We do not tolerate modern slavery within our business operations or supply chain.

General Pants Co. is committed to identifying and preventing any potential modern slavery risks within our operation and supply chains.

ABOUT GENERAL PANTS Co.

General Pants Co.



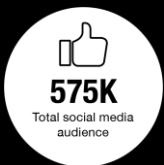
ABOUT GENERAL PANTS //

General Pants Co. is one of Australia's largest and most respected youth fashion retailers, with stores across Australia and New Zealand.

Starting from humble beginnings back in 1972 as a speciality denim store on Sydney's George Street, we are LED BY NONE, never defined, never boxed in. Delving into style, music and art, our team of culturally connected designers pioneer the latest trends and conversations. We like to mix things up; encouraging our community to bring together different genres, styles, and ideas.

Our omni-channel offering sees 12.5 million customers visit our stores yearly, and we have 10 million website sessions per year.

We own of a stable of 13 market leading brands and showcase these with both additional local and international cutting-edge brands.



<https://www.generalpants.com/au>

General Pants Co.

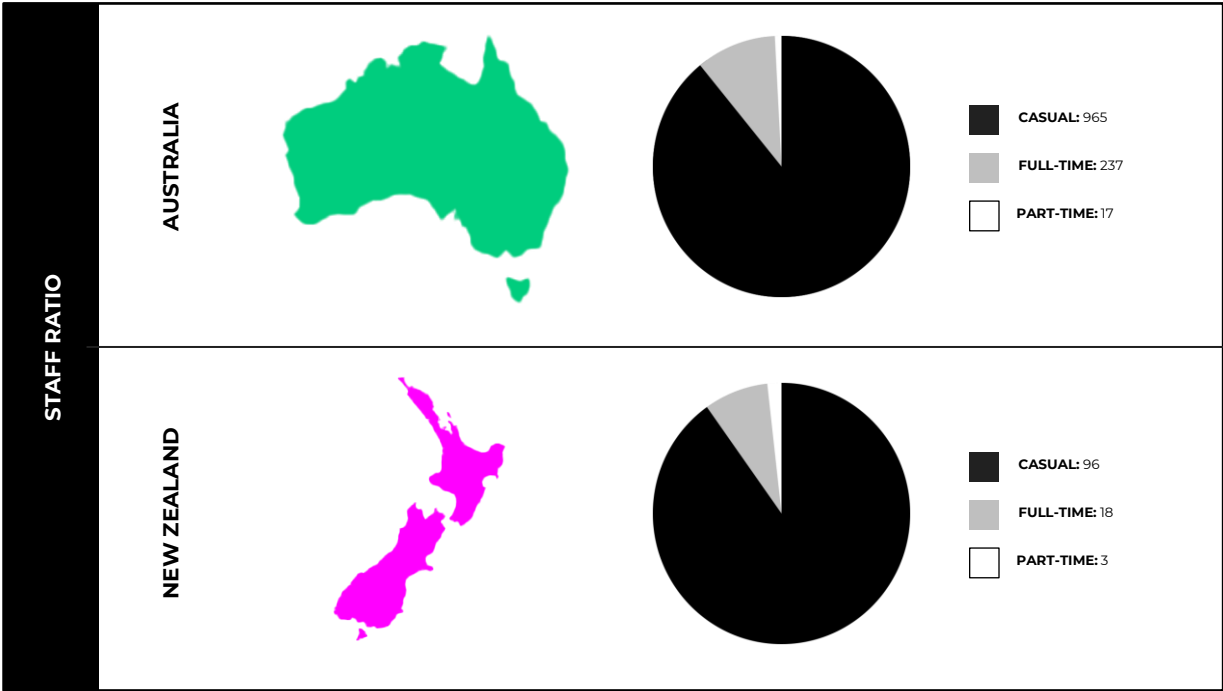


OPERATIONS AND SUPPLY CHAIN

General Pants Co. is one of Australia's largest and most respected youth fashion retailers of streetwear, casualwear and accessories.

Our operations include retail, marketing, and distribution of, apparel, footwear, accessories, and gifts through both brick-and-mortar stores and e-commerce.

Across our 58 General Pants brick and mortar retail stores throughout Australia and New Zealand & 2 distribution centres we have 1336 employees, of which approx. 90% are based in Australia & 10% in New Zealand. This includes team members that work full time, part time and on a casual basis



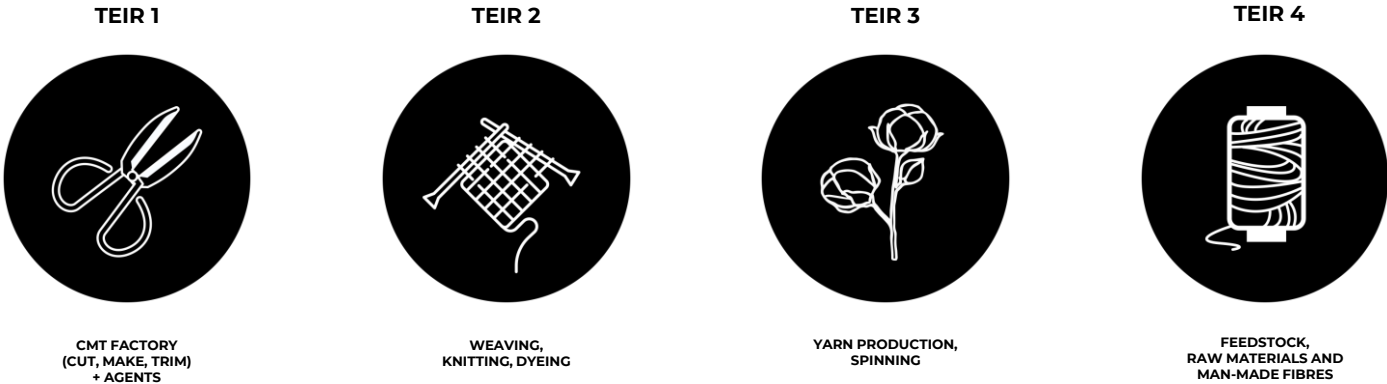
OUR SUPPLY CHAIN FOR GENERAL PANTS //

In total we work with over 70 partners spanning all elements of our business operations.

Our international apparel and accessory supply chain consists of over 20 suppliers. The use of 'Suppliers' within the Statement encompasses all suppliers of goods or services, including every factory, subcontractor, agent, or affiliate that manufactures or finishes products for retail within General pants or from whom General Pants Co. procures goods and services for its own operational use. The key product categories we source include apparel, accessories, and footwear.

General Pants Co. have 13 in-house apparel brands, that are sourced from over 20 international manufactures that supply our apparel and accessories, and 1 supplier located in Australia.

Our apparel and accessory supply base include Tiers 1-3 of the supply chain. We have suppliers that are only Tier 1 and others that spin their own yarn and make their own fabric (Tier 2 and 3).



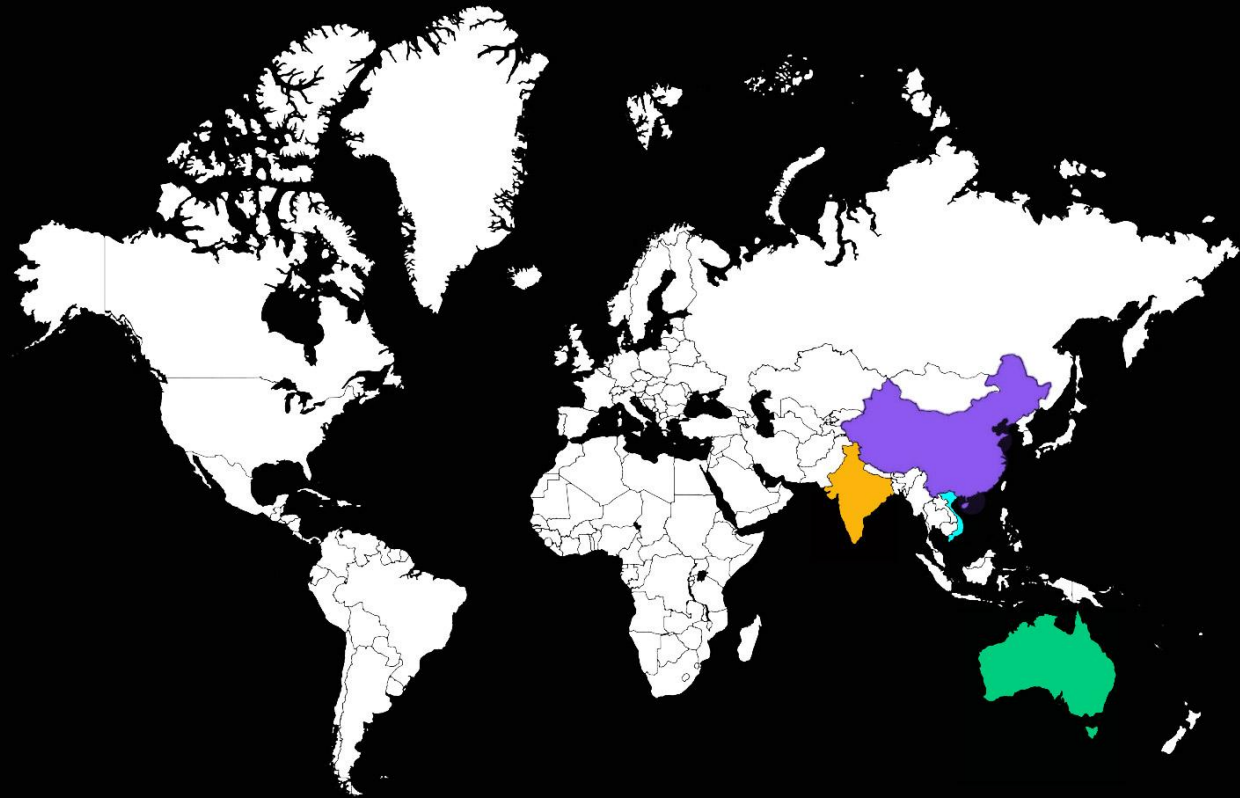
OUR SUPPLY CHAIN //

General Pants Co. are currently expanding the supply base into Vietnam and India to further increase our sourcing capacity, speed and quality.

This expansion will further support our business sustainability goal in line with the five UN sustainability pillars, economic, social, environmental, cultural and security aspects

In addition to our 13 owned brands, General Pants Co. also retails market leading third-party brands within its stores and digital platform. Brands such as Birkenstock, Levis, Wrangler, Deus & Ray Ban.

All third-party brands have their own sourcing due diligence processes in place and need to comply with General Pants Co. supplier agreement and policies.



AUSTRALIA



INDIA



CHINA



VIETNAM

insight

SUBTITLED

A R V U S T

SPENCER PROJECT

alice in the eve.

Depactus.

blacknoise/whiterain

love
NOTES

General Pants Co.
B A S I C S

STUDIO

NEON HART

SWELL

STANDARD

Abrand Jeans



Lee®



ROLLA'S™

Ray-Ban



NEUW



Wrangler®

crocs™

CONVERSE ➔

BIRKENSTOCK®

TwoJeys™ ★★

THERAPY

SUPPLY CHAIN // VERTICAL BRANDS

General Pants Co. vertical brands and products are exclusively designed and developed in house in Australia. These designs are then produced by factories that specialise in the manufacturing of apparel and accessories. Currently our factories are based in China & Australia, with further expansion to Vietnam and India in progress

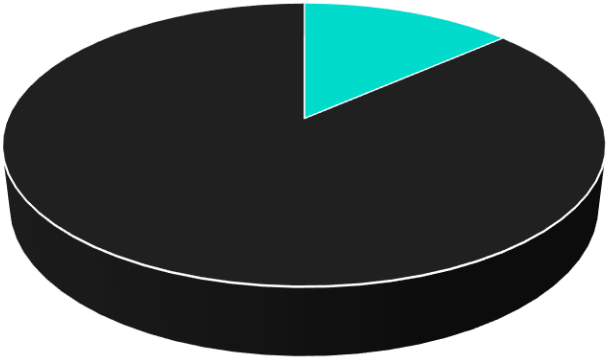
SUPPLY CHAIN // THIRD-PARTY BRANDS

Our portfolio of third-party brands is managed by our buying team who liaise with relevant parties withing their organisations.

SUPPLY CHAIN // NON-COMMERCIAL GOODS AND OPERATIONS

At General Pants Co. we categorise our non-commercial goods suppliers as those that provide, packaging, logistics, marketing and cleaning. We partnered with over 110 non-commercial goods partners during the reporting period.

GENERAL PANTS RETAIL



■ VERTICAL BRANDS ■ THIRD PARTY BRANDS

General Pants Co. respect and work closely with our supply chain building long lasting partnerships and together to eliminate Modern Slavery.

Our Supplier Code of Conduct (SCoC) outlines expectations of our direct suppliers for inhouse brands on labour and human rights. It includes our expectations on the policies, processes, and personnel in place to ensure standards our met.

The SCoC was developed with reference to the Ethical Trading Initiative (ETI) Base Code which is in turn founded on the conventions of the International Labour Organization. Suppliers agree to the SCoC as a mandatory condition of business.

A copy of the SCoC must be accessibly displayed in local language in each workplace and factory and workers must be informed verbally and in writing of its provisions.

Suppliers are required to comply with all relevant local and national laws and regulations, including, but not limited to, applicable immigration and labour laws relating to foreign and migrant workers. Through our SCoC we reserve the right to request that suppliers provide details (such as name and position description) of any workers employed by the supplier, including subcontractors.

Our SCoC asks that all suppliers take all necessary steps to eliminate exploitation of workers, deceptive practices, child labour or forced labour in their operations and in the business operations of their supply chain partners.

Our suppliers do not source Turkmenistan ,Uzbek and XINGJING cotton, due to higher risks of modern slavery in these countries.



IDENTIFYING MODERN SLAVERY RISKS

GENERAL PANTS CO. DOMESTIC AUSTRALIAN AND NZ EMPLOYEES

- **CODE OF CONDUCT**
- **GRIEVANCE POLICY**
- **WHISTLE BLOWER POLICY**

Our Code of Conduct outlines requirements for ethical behaviour and safe working conditions and applies to any place where work is carried out on behalf of the General Pants Co.

New employees are provided with definitions of key concepts and our expectations regarding victimization, harassment including sexual harassment, and non-discrimination. All employees are required to review and acknowledge our Code of Conduct, Grievance Policy and Whistleblower Policy (see Grievance mechanism below).

Operating in line with the Code of Conduct ensures compliance with Australian and New Zealand's workplace legislative framework including employment, human rights and anti-discrimination legislation, such as, but not limited to; Australian state and federal human rights and anti-discrimination legislation, the Fair Work Act 2009 Australia, the Employee Relations Act 2000, and Amendment Acts, Human Rights Act 1993 and Harassment Act 1997 New Zealand and New Zealand and Australia's Work, Health & Safety laws.



Certain groups are at higher risk of modern slavery, including women, migrant workers, contract and agency workers, marginalized groups and seasonal or temporary workers. We look for the presence of these groups of workers in our operations and supply chain to incorporate these risks into our due diligence processes.

**DOMESTIC
RISK**

- Our operations primarily involve retail and e-commerce in Australia and New Zealand. The nature of our business and the locations of our operations have lower intrinsic risks of modern slavery. General Pants employees are employed directly and are under contracts governed by Australian and New Zealand employment laws. Risks of forced labour are further reduced through the onboarding process. All new hires are required to provide official identification including proof of age, mitigating the risk of employing underage staff, and taxpayer identification information which ensures employees are legally allowed to work. Training is provided for all our retail staff including seasonal staff.
-

**INTERNATIONAL
SUPPLY CHAIN
RISK**

- We are aware of the potential of risks of forced labour, and child labour in our global apparel supply chain. Our key sourcing location currently is China, we are expanding into India and Vietnam to increase our supply chain capabilities. These countries have been identified as having modern slavery risks, in order to reduce this risk in our supply chain we request that our factories have current ethical auditing documentation. The factories also need to complete a self-assessment modern slavery questionnaire annually & are independently audited by QIMA.

**INDUSTRY SECTOR
SPECIFIC RISK**

- The fashion Industry sector is at risk of the following areas of Modern slavery Human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and child labour.

**PRODUCT AND SERVICE
SPECIFIC RISK**

- A high percentage of our garments are made from cotton, so therefore we have a high level of risk that the factories could be supplying cotton sourced from Turkmenistan, Uzbek and Xinjiang cotton. These countries have been identified as having high levels of risk of Modern slavery.

**THIRD PARTY SUPPLIER
SPECIFIC RISK**

- Our third-party brands face the same modern slavery risks that General Pants Co. face.
- The third-party Suppliers sign a Supplier Agreement which states that they comply with all the modern slavery codes of conduct and risk management.



ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS



SUPPLY
CHAIN
GOVERNANCE

General Pants Co. vertical suppliers' factories agree to following polices stated in our supplier manual and complete a modern slavery self- assessment questionnaire (SAQ)

- SUPPLIER CODE OF CONDUCT
- SUPPLIER ENGAGEMENT: QIMA MEMBERSHIP
- TRACING SUPPLIERS AND AUDITING POLICY
- ANTI-BRIBERY AND CORRUPTION POLICY
- TEMPORARY WORKERS POLICY
- LABOUR BROKERS AND RECRUITERS' POLICY
- GENDER EQUALITY POLICY
- YOUNG WORKER AND CHILD LABOUR POLICY
- GRIEVANCE POLICY
- RESTRICTED SUBSTANCES POLICY
- ANIMAL HUSBANDRY POLICY
- RESPONSIBLE SOURCING POLICY
- POLICY ON COTTON FROM UZBEKISTAN, TURKMENISTAN & XINGJING

THIRD PARTY SUPPLIER
GOVERNANCE

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SUPPLIER REVIEW

- General Pants Co. constantly reviews the supply base and if engaging any new suppliers ensures they sign the supplier Manual and follow the policies and submit up-to-date Ethical Auditing Documentation.
- Current factories for vertical operations cover Tier 1 factories, along with Tier 2 and tier 3 factories that knit and spin their own fabric. This allows clearer traceability and ownership of the modern slavery risks

MODERN SLAVERY SURVEY

- Our supplier modern slavery self-assessment survey is completed each year and reviewed.

ETHICAL AUDITING DOCUMENTATION REVIEW

- General Pants Co. has engaged QIMA to manage our factories Ethical Auditing Documentation and factory inspections . QIMA is an independent leading global compliance company.



When we are onboarding new suppliers, we request to view their ethical auditing documentation.

We accept the following BSCI, SEDEX and QIMA globally accepted. Ethical Auditing documentation.

Our Existing suppliers must keep their documentation current to continue supplying General Pants Co.

All suppliers must complete a self-assessment form, and mutual recognition QIMA audit which requires disclosure on existing Ethical Trading Initiative (ETI) assessments, and how the supplier is managing indicators of forced labour.

Based on the information shared, any disclosure gaps identified, or issues raised in response, suppliers may be asked to provide clarification or further information before General Pants Co. enters a business relationship.

Examples of instances that would warrant further investigation include incomplete or inadequate responses on topics such as migrant workers or forced labour.

We continually look for ways to improve our supply chain due diligence processes and have included development in this area as part of the General Pants five-year plan.

An **Ethical Trading Initiative (ETI)** audit assesses a company's processes, suppliers, and facilities against the nine principles of the ETI Base Code, as well as ensuring compliance with relevant national and international legislation. Meeting ETI standards instils confidence that a supplier operates in a fair and ethical manner.



BUSINESS ETHICS AND COMPLIANCE



EVERY EMPLOYEE SHOULD BE TREATED WITH RESPECT

CODE OF CONDUCT



TRAINING



GREIF MECHANISM & REMEDIATION



WHISTLE BLOWER POLICY



POLICIES AND TRAINING OF GENERAL PANTS CO STAFF

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GRIEVANCE MECHANISM AND REMEDIATION

Establishing effective grievance mechanisms can provide critical information on human rights and modern slavery risks that can feed into our due diligence processes.

The General Pants Co. Whistleblower Policy currently relates to general business activities and tax affairs and applies to all General Pants employees, contractors, and sub-contractors.

It is the responsibility of the Board to ensure that all employees receive training on the policy during induction, and to ensure eligible disclosures are investigated. Currently, our Whistleblower Policy is made available to those within the Group.

SPEAK UP

Individuals can report malpractice to the Group's officers or human resources, to any supervisor or direct report, or to an available auditor. Individuals can also email (whistleblower@alquemiegroupp.com) to make a report confidentially.

General Pants Co. offers multiple Health and Well-being programs and incentives which creates an environment that help the staff feel supported please see some examples of the programs listed below.

- **EMPLOYEE ASSISTANCE PROGRAM**
- **FITNESS & WELLNESS PROGRAM**
- **SAFETY 360 SAFETY PROGRAM**
- **TEAM MEMBER INCENTIVES AND BENEFITS**



As we continue to grow, our operations and supply chain will expand & as such we will evolve & continually review our processes to ensure we are able to identify and address potential modern slavery risks .

- Regulate modern slavery self-assessment questionnaires (SAS) with all suppliers
- Plan to have greater transparency with our supply base on General Pants Co. Website
- Continue to source sustainable fabrications for our brands such as BCI and Oeko-tex approved products and recycled fabrications.
- Continual education and training of General Pants employees and supply chain
- Identifying and preventing modern slavery risk.



OUR CONSULTATION WITH GROUP ENTITIES

The Board has overall accountability for overseeing all areas of business risk, including modern slavery, at the Group level. Identified risks are socialized through direct communications with the General Managers, the CEO, and at Board meetings.

These risks are communicated through our annual Modern Slavery Statement which is circulated with management at each of our subsidiaries to provide input and verify the contents before final approval by the Board.

REGULATORY DISCLOSURE MATRIX

- This statement was prepared to meet our regulatory disclosure requirements for the Australian Modern Slavery Act 2018 (Cth). This table references where the mandatory criteria are disclosed.

MANDATORY CRITERIA	DISCLOSURE REFERENCE
Criterion 1: Identify the reporting entity	Page 4-7
Criterion 2: Describe the structure, operations, and supply chains of the reporting entity	Page 8-15
Criterion 3: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Page 16-19
Criterion 4: Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Page 20-22 Pages 24-28
Criterion 5: Describe how the reporting entity assesses the effectiveness of such actions	Page 23
Criterion 6: Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Page 29-30

A photograph of two models from the waist down, wearing jeans against a dark background. The model on the left is wearing a light blue sweatshirt and blue jeans, with hands on hips. The model on the right is wearing a white crop top and blue jeans. The text "THANK YOU" is overlaid in large white letters.

THANK YOU