



MODERN SLAVERY STATEMENT
25 NOVEMBER 2025



Brighann Cotton Pty Ltd
1500 Watercourse Road
Moree NSW 2400
Australia

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1. Introduction

This Modern Slavery Statement (“the Statement”) is made by Brighann Cotton Pty Ltd (ABN 57 143 025 307) pursuant to the *Modern Slavery Act 2018* (Cth) (“the Act”). Brighann Cotton Pty Ltd (ABN 57 143 025 307) is the Reporting Entity defined by section 5 the Act.

References in this statement to “we,” “us,” or “our” refers to Brighann Cotton Pty Ltd (ABN 57 143 025 307).

The Statement was prepared to meet the seven mandatory reporting criteria set out under the Act. The Table below identifies where each criterion is disclosed within different sections of the statement.

2. Table 1: Mandatory Reporting Criteria

Criteria	Summary	Page
1. Identify the reporting entity.	Brighann Cotton Pty Ltd (ABN 57 143 025 307).	4
2. Describe the structure, operations, and supply chains of the reporting entity.	We are a private corporate entity, led by a Board of Directors, comprised of 8 Board Members. This includes 1 Chairman, 5 Members, 1 General Manager and 1 Executive Adviser.	5, 6, 7
3. Describe the risks of modern slavery practised in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.	We engage mostly Australian-based companies to provide goods and services. For this reason, the potential for modern slavery risks within the supply chain is low. We also engage Brazilian-based companies to provide goods and services. We accept that the potential for modern slavery risks within our Brazilian operation, is greater than our operations within Australia.	7
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.	We are a supplier and manufacturer member of the Better Cotton Initiative. We abide by the Better Cotton Initiative Code of Practice and Mission Statement. We regularly assess the Codes of Conduct and Modern-Day Slavery Statements of those who we engage in business activities with. We purchase Better Cotton Initiative cotton bales wherever possible within our Brazil operations.	7, 8



	<p>We regularly audit our suppliers to ensure that their operations uphold ethical labour practices.</p> <p>We are developing educational and policy frameworks so that we may engage with and educate producers.</p> <p>We are developing a Whistleblower Program.</p> <p>We are committed to continuous improvement in our risk assessment practices, to ensure that modern slavery risks are being managed and mitigated.</p>	
5. Describe how the reporting entity assesses the effectiveness of such actions.	<p>We are unaware of any allegations of modern slavery in the current reporting year.</p> <p>We measure our effectiveness through the issuing of Better Cotton Initiative Credits.</p> <p>We are developing a reporting process for modern slavery risks.</p> <p>We acknowledge that we are limited in our ability to assess the effectiveness of our actions and are committed to continuous improvement and investment in this area.</p>	8, 9
6. Describe the process of consultation with any entities that the reporting entity owns or controls and in the case of a reporting entity covered by a statement under section 14 the entity giving the statement.	N/A.	N/A
7. Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	No additional information relevant.	N/A

3. The reporting entity

Brighann Cotton Pty Ltd (ABN 57 143 025 307) is the Reporting Entity defined by section 5 the Act.



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4. The structure, operations, and supply chains of the reporting entity

A) Structure

We are a privately owned Australian cotton merchandising company, committed to upholding the highest ethical standards across all aspects of our operations. Our registered head office is located at 1500 Watercourse Road, Moree NSW 2400, Australia.

We are led by a Board of Directors comprised of 8 Board Members. This includes 1 Chairman, 5 Members, 1 General Manager and 1 Executive Adviser.

With deep roots in family farming, we have grown into an international enterprise providing a comprehensive merchandising service. We connect Australian cotton growers with global markets. Our team of more than ten employees is based across Moree and Brisbane, ensuring strong regional and international engagement.

B) Operations

As a leading exporter of quality cotton lint, we are recognised for delivering exceptional products and reliable service. Our expertise spans every stage of the supply chain including farming practices, warehousing, logistics, and international shipping. Our comprehensive supply chain allows us to maintain the highest standards of quality and efficiency. We operate in both Australia and Brazil, this enables us to support growers across key producing regions and consistently and ethically supply global textile markets.

In Australia, we source cotton from growers throughout New South Wales, Northern Territory and Queensland. We assist growers in marketing their production into major international markets through our extensive supply chain network.

We work closely with responsible and sustainability-focused producers, including those participating in the Better Cotton Initiative (“BCI”). The BCI is the world’s leading cotton sustainability program. BCI growers are committed to improving environmental outcomes, promoting gender equality, and the elimination of child labour and forced labour. Our alignment with these principles emphasizes our dedication to ethical sourcing and responsible supply chain management.

C) Supply Chain

Our supply chain encompasses every stage required to move cotton from farm to global markets. This includes collaborating directly with local growers, managing storage and warehousing, and coordinating transportation to facilitate the efficient export of cotton.

While we operate within an international supply chain, most of our suppliers remain local producers in Australia and Brazil. We also engage with reputable local traders to supplement supply when needed, ensuring continuity and flexibility across varying market conditions.



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Logistics forms another critical component of our operations. This includes:

- Inland freight providers who transport cotton from growing regions to gins, warehouses, and port facilities;
- Warehousing partners who ensure secure, efficient storage; and
- Ocean freight carriers responsible for moving our cotton lint and cottonseed to global destinations.

These logistics relationships are essential for maintaining product quality, ensuring timely delivery, and supporting the reliability of our supply chain.

In addition to agricultural and logistics partners, our broader supply chain includes permanent office staff, technology and software providers, and international agents who support communication with buyers. These service providers play a key role in areas such as administration, traceability, contract management, and customer service, helping us maintain strong commercial relationships and meet the expectations of our global customers.

5. Table 2: Supply Chain Overview

SUPPLY CHAIN OVERVIEW	
Raw Cotton Sourcing	<ul style="list-style-type: none">• Local growers in Australia (New South Wales, Northern Territory and Queensland) and Brazil; and• Additional supply purchased from reputable local traders.
Storage and Handling	<ul style="list-style-type: none">• Warehousing and storage facilities to maintain product quality before export.
Inland Transportation	<ul style="list-style-type: none">• Freight providers transporting cotton from farms to gins, warehouses, and port facilities.
International Shipping	<ul style="list-style-type: none">• Ocean freight carriers delivering cotton lint and cottonseed to global markets.
Supporting Services	<ul style="list-style-type: none">• Permanent office staff managing administration, contracts, and customer service;• Technology and software providers supporting traceability, logistics, and business operation; and



- International agents consulting with buyers and facilitating global transactions.

6. The risks of modern slavery practices in the operations and supply chains

Most of our operations are based in Australia, which is recognised as one of the world's leading countries in upholding human rights and maintaining one of the lowest rates of modern slavery. As such, the risk of Brighann Cotton directly contributing to modern slavery is considered extremely low.

The remainder of our supply chain is primarily located in Brazil. While Brazil presents a higher slavery risk compared to Australia, it is still ranked among the countries with the lowest prevalence of modern slavery according to the Global Slavery Index.

Nevertheless, Brighann Cotton acknowledges the following potential risks within our supply chain:

- a) The agricultural sector's reliance on seasonal labour, which often includes foreign or vulnerable workers who may be at greater risk of exploitation;
- b) Inland freight operators who may impose unreasonable or unsafe working hours on drivers; and
- c) Maritime transport and shipping sectors, where seafarers can face poor working conditions and other unethical labour practices.

7. Actions taken to assess and address those risks, including due diligence and remediation processes

We recognise and fully support the intent of the Act, which aims to promote transparency, strengthen oversight, and prevent the occurrence of modern slavery throughout supply chains. We are committed to meeting all requirements of the Act and embedding its principles into the way we operate.

In 2020, we strengthened our ethical sourcing commitments by becoming a supplier and manufacturer member of the BCI. Through this membership, we adhere to the BCI Code of Practice and actively support its mission to improve the sustainability of global cotton production.

Oversight of our supplier relationships is a responsibility led by senior management, particularly in high-risk areas of the supply chain. When procuring ocean freight services, we undertake due diligence to ensure that potential partners share our values and ethical expectations. This involves reviewing their code of conduct, assessing their Modern Slavery Statements, and ensuring their organisational practices align with our own.



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The concentration of our suppliers in Australia further supports our ability to monitor and assess labour practices, through close engagement with growers and service providers. Senior management ensures that suppliers uphold our commitment to the eight fundamental conventions and decent work standards established by the International Labour Organization. Our alignment with BCI reinforces this commitment, helping us maintain high ethical standards across our domestic operations.

We acknowledge that visibility is more limited when sourcing cotton from growers in Brazil. To help mitigate this risk, we prioritise the purchase of BCI accredited cotton bales whenever possible. Although these bales command a higher price, they provide traceable credits verifying that growers have completed the necessary due diligence processes.

Protecting our reputation and maintaining integrity within the cotton industry is a responsibility we take seriously. We continuously monitor our supply chain and remain vigilant for any signs of unethical labour practices. In circumstances where a supplier is found to be in breach of our standards, we have clear processes in place to suspend operations and reassess the relationship.

Looking ahead, we intend to deepen our engagement with suppliers to strengthen awareness and understanding of modern slavery risks. We aim to support growers and partners by providing educational resources, sharing best practices, and promoting safe and fair working conditions.

Planned future initiatives include the development and introduction of:

- Internal policy frameworks;
- Internal audit processes;
- Supplier questionnaires;
- Compliance assessments; and
- A whistleblower program.

These measures will enable us to further reduce risk and enhance transparency across our supply chain.

8. How the reporting entity assesses the effectiveness of such actions

Senior management confirms that no instances of modern slavery were identified within our operations or supply chain during the current reporting year. While this is reassuring, we recognise that our ability to measure the effectiveness of our efforts is still developing.

At present, our primary measurable indicator relates to our commitment to the BCI. The volume of BCI credits purchased throughout the year provides a tangible benchmark of our engagement with accredited, responsibly sourced cotton and offers a degree of visibility over ethical performance in higher-risk regions.

However, we acknowledge that additional structures and tools are required to strengthen our capacity to detect, assess, and respond to potential modern slavery risks. To address this, we are committed to building more robust internal systems for monitoring and remediation. This includes establishing a formal whistleblower program that will enable employees, growers, and partners to report concerns confidentially and without fear of



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reprisal. In parallel, we will develop the previously outlined internal policies and audit processes, which will create a more consistent framework for risk identification and supplier assessment.

We remain committed to continuous improvement and are actively reviewing our current processes to enhance transparency, accountability, and overall effectiveness in preventing modern slavery within our supply chain.

9. The process of consultation with any entities that the reporting entity owns or controls

Not applicable.

10. Any other information that the reporting entity, or the entity giving the statement, considers relevant.

We do not consider any other information relevant.

11. Board Approval

This statement was approved by the resolution of the board of directors of Brighann Cotton Pty Ltd on 25 November 2025.

Signed by:

Neil Anderson
General Manager
Brighann Cotton Pty Ltd