

Modern Slavery



Simba Global

Statement

Financial Year 2024–2025



Our Purpose

Making Better, Together

We work to contribute to a better world – for every person, every relationship, and every community. In all that we do, in every country that we touch, we will be better tomorrow than we are today.

Acknowledgement

Simba acknowledges the Traditional Custodians of all lands on which we operate. We recognise their continuing connection to land, sea and community; and we pay our respects to their Elders - past, present and emerging.

This Statement is made by Simba Global Pty Ltd
ACN 613 005 039 with registered office at 289-311
Bayswater Road, Bayswater North VIC 3153, for the
period of 1 July 2024 to 30 June 2025.

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Message from the Managing Director

Modern slavery remains a significant global challenge, impacting millions worldwide. In today's interconnected world with heightened awareness of human rights, the textile sector holds a crucial role in setting ethical standards and promoting sustainable practices. As active participants in this dynamic industry, we recognise our duty to uphold the highest levels of social and environmental responsibility. Our Modern Slavery Statement underscores our pledge to transparency, accountability, and ongoing improvement in combating modern slavery and human trafficking across our operations and supply chains.

As a leading entity in textiles, we acknowledge the complexities within our supply chains spanning multiple countries and involving numerous stakeholders. This year we completed mapping 45% of our Product Supply chain to Tier 4 suppliers and 18% to Tier 5, which has greatly enhanced the visibility of our supply chain. There is still more work to be completed which we will endeavour to complete to meet our 2026 goal. Whilst visibility is important, it will be critical to ensure that suppliers across all Tiers meet our stringent standards. We will commence auditing tier 2 and beyond in 2026.

Central to our mission is empowering workers throughout our supply chains, ensuring dignity, fair wages, and safe working conditions. We have conducted assessments on the wage practices among our Tier 1 product suppliers (manufacturers). We are pleased that all of our manufacturers pay equal to or above minimum wage. Furthermore, the Living Wage Indicator Typical family shows that 40% of our manufacturers in China are paying above a Living wage.

Our engagement with suppliers has focused on enhancing performance through an online self assessment; revising our supplier performance requirements; setting supplier targets for social and environmental outcomes; maintaining our Tier 1 audit regime and regular quality visits which allows us on-site access on a weekly basis.

Whilst progress is always continuous, we acknowledge there is much work ahead and remain steadfast in our commitment to achieving our goals. We invite collaboration with suppliers, partners, customers, and stakeholders to amplify our collective impact. Together, we can achieve meaningful change, fostering a brighter future for all.



Kamal Somaia
Managing Director

Summary of our FY25 Actions & FY26 Commitments to address risks of Modern Slavery

Improvement area	What we did in FY25	What we will do in FY26
Governance, policies, whistleblowing	New Human Rights and Corruption and Anti-Competitive Behaviour Policy were introduced. Our Ethical Sourcing Policy and Supplier Manual were updated and we strengthened our Whistleblower Policy and program.	95% staff training on new policies; 100% Tier 1 supplier sign off on the supplier manual.
Supplier onboarding and self-assessment	Self-Assessment questionnaire deployed; discrepancy analysis begun.	95% Tier 1, 80% Tier 2 completion; automate discrepancy flags into the Sustain IQ dashboard.
Supplier scorecards	Pilot scorecards linked to audit, self-assessment questionnaire, and site visit data.	Roll out to all Tier 1; publish aggregate bands.
Audits and site visits	Independent social audits across Tier 1 and some Tier 2; weekly site visits for Class 1 suppliers.	Increase Tier 2 coverage; sample Tier 3; reduce CAP aging; maintain zero-major findings.
Supply chain mapping	45% of product manufacturing suppliers have been mapped to Tier 4 (Spinners) and 14% of suppliers mapped to Tier 5 (Ginners) have been completed.	Remaining suppliers to be mapped to Tier 4 (Spinners). Continue mapping Tier 5 (Ginners) across the full product supply chain.
Worker voice and grievance	Whistleblower channel open to suppliers and workers.	Posters and QR access; worker briefings in higher risk clusters; track usage and outcomes.
Capability building	Live supplier webinar (English with live Mandarin).	Continue proactive engagement and include supplier training on worker voice, timekeeping & wages, environmental basics.
Platforms and data	Investigated and reviewed SEDEX buyer membership	Join SEDEX as buyer; onboard Tier 1 and Tier 2; set data completeness rules; integrate CAP tracking



About us

Our Business



For more than four decades, Simba Global has set the benchmark for textiles in Australia, combining deep product expertise with dependable delivery and service. From our Melbourne headquarters, we connect customers to the scale and reach of our parent company, Magnum Asia Pte Ltd, a network that spans Australia, New Zealand, Asia, and the United States.

Our portfolio covers linens, towels, medical textiles, and corporate apparel for commercial, institutional, hospitality, retail, corporate, resort, and promotional clients. In Australia, we manage 3 divisions we fully control, Commercial, Retail, and Promotional, with sourcing and manufacturing to meet local market needs.

Magnum Asia supports this with teams across 8 countries, including the United States, Australia, New Zealand, Singapore, India, China, Pakistan, and Bangladesh with over 100 employees spread across these teams.

Our Governance



There have been no changes to the governance structure since the last reporting period.

The Simba Global Board is accountable for the Simba Conscious strategy, which sets our commitments on sustainability, ethical sourcing, human rights, anti-corruption, and the mitigation of modern slavery risks. The Chief Executive Officer and the Board’s Executive Chair are responsible for delivering the strategy. Oversight is provided by the Simba Conscious Committee, which monitors progress against each pillar and reports to the Board.

The Head of Strategic Sourcing leads the Building Sustainable Supply Chains pillar, including identification and management of modern slavery risks in the supply chain. The Head of People and Culture ensures compliance with labour laws in our operations and supports supplier compliance across the supply chain.



Policy Framework

Our policies and processes require that universally recognised human rights are respected and safeguarded across our operations and supply chains. During the year, we introduced 2 new policies: the Human Rights Policy and the Corruption and Anticompetitive Behaviour Policy. These additional policies support and strengthen our existing framework.

Key policies that support our modern slavery program are:

- ♦ **Human Rights Policy**- states our commitment to respect internationally recognised human rights, including freedom of association and collective bargaining, and sets expectations for our operations and suppliers.
- ♦ **Corruption and Anticompetitive behaviour Policy**- prohibits bribery, facilitation payments, kickbacks, and improper advantages, sets rules for gifts and hospitality, charitable donations, sponsorships, political engagement, and third-party interactions.
- ♦ **Ethical Sourcing Policy**- Outlines our ethical procurement commitment and states our minimum expectations on business ethics, labour rights, child labour, anti-discrimination, harassment, working conditions, and working hours.
- ♦ **Supplier Manual**- provides the guidance document for suppliers to do business with Simba, including compliance to the ethical sourcing policy and principles.
- ♦ **Employee Code of Conduct** – Sets out the standards of behaviour expected of our employees including how they engage with suppliers and their workers.
- ♦ **Employee Grievance Policy** - Outlines the process for employees to lodge a grievance and how the company will investigate and address that grievance.
- ♦ **Whistleblower Policy**- provides protected channels to report suspected breaches of law or policy, including modern slavery and corruption concerns, with protection from retaliation.

Simba is committed to complying with the laws and regulations of the countries in which we operate. We prohibit any activity involving modern slavery. We are committed to safe and healthy working conditions, the right to freedom of association and collective bargaining, the elimination of forced labour and child labour, non-discrimination, and access to grievance and remedy. We prohibit bribery and corruption in all forms and expect the same standards from our suppliers, agents, and business partners.

Our Supply Chain

Our supply chain is global, working with more than 340 direct suppliers across both product and non-product goods and services.

Product suppliers

Our portfolio covers linens, towels, medical textiles, and corporate apparel. We partner with manufacturers in India, China, Pakistan, and Bangladesh, with many relationships extending beyond 10 years.

This continuity supports transparent oversight, shared improvement plans, and dependable delivery.

	Tier 1	Tier 2	Tier 3	Tier 4	Tier 5																																										
 Product	Finished Product	Wet processing/ Stitching	Fabric	Yarn	Fibre																																										
 Who	Manufacturers Total suppliers: 44	Processing Mills Total known suppliers: 24	Fabric Mills Total known suppliers: 18	Spinning Mills Total known suppliers: 15	Ginners Total known suppliers: 6																																										
 Processes completed	Cutting, sewing, finishing, packing, shipping	Dyeing, printing and embroidery	Weaving and knitting	Spinning	Cotton process																																										
 Geography	<table border="1"> <thead> <tr> <th>Country</th> <th>Tier 1</th> <th>Tier 2</th> <th>Tier 3</th> <th>Tier 4</th> <th>Tier 5</th> </tr> </thead> <tbody> <tr> <td>China</td> <td>21 Total Suppliers</td> <td>11 Total Known Suppliers</td> <td>9 Total Known Suppliers</td> <td>6 Total Known Suppliers</td> <td>0 Total Known Suppliers</td> </tr> <tr> <td>India</td> <td>3 Total Suppliers</td> <td colspan="3">vertically integrated Tier 1 - 4</td> <td>0 Total Known Suppliers</td> </tr> <tr> <td>India</td> <td>10 Total Suppliers</td> <td>6 Total Known Suppliers</td> <td>2 Total Known Suppliers</td> <td>4 Total Known Suppliers</td> <td>3 Total Known Suppliers</td> </tr> <tr> <td>Pakistan</td> <td>2 Total Suppliers</td> <td colspan="3">vertically integrated Tier 1 - 4</td> <td>1 Total Known Suppliers</td> </tr> <tr> <td>Pakistan</td> <td>7 Total Suppliers</td> <td>1 Total Known Suppliers</td> <td>1 Total Known Suppliers</td> <td>1 Total Known Suppliers</td> <td>2 Total Known Suppliers</td> </tr> <tr> <td>Bangladesh</td> <td>1 Total Suppliers</td> <td colspan="2">vertically integrated Tier 1 - 3</td> <td>0 Total Known Suppliers</td> <td>0 Total Known Suppliers</td> </tr> </tbody> </table>					Country	Tier 1	Tier 2	Tier 3	Tier 4	Tier 5	China	21 Total Suppliers	11 Total Known Suppliers	9 Total Known Suppliers	6 Total Known Suppliers	0 Total Known Suppliers	India	3 Total Suppliers	vertically integrated Tier 1 - 4			0 Total Known Suppliers	India	10 Total Suppliers	6 Total Known Suppliers	2 Total Known Suppliers	4 Total Known Suppliers	3 Total Known Suppliers	Pakistan	2 Total Suppliers	vertically integrated Tier 1 - 4			1 Total Known Suppliers	Pakistan	7 Total Suppliers	1 Total Known Suppliers	1 Total Known Suppliers	1 Total Known Suppliers	2 Total Known Suppliers	Bangladesh	1 Total Suppliers	vertically integrated Tier 1 - 3		0 Total Known Suppliers	0 Total Known Suppliers
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Our Supply Chain

Supplier Segmentation

Our Tier 1 manufacturers fall into 2 classes. Class 1 suppliers are publicly listed firms that specialise in high-volume, high-quality production and account for about 80% of our procurement. Class 2 suppliers are smaller, family-owned operations that provide lower volume and more specialised products, making up the remaining 20%.

Regional operating models

We have increased visibility of our supply chain in India, to Tier 5 Ginnners, across both Class 1 and Class 2 suppliers.

In China, Tier 1 suppliers focus on cut and sew or final manufacturing, with Tier 2 - Tier 5 suppliers handling upstream stages such as ginning, spinning, weaving, dyeing, and finishing. We have made good progress on increasing the visibility of this horizontally integrated supply chain.

In Pakistan, two of our major suppliers are vertically integrated and we have commenced mapping to Tier 5 across suppliers who are not vertically integrated.

Work continues to be undertaken to map all suppliers to provide the visibility needed to enhance our program. Whilst it is complex, good progress has been made and we continue to progress towards our 2026 goal of a fully mapped product supply chain.

Oversight

Transparency underpins our supplier relationships

- Performance reviews:** We have introduced annual internal Supplier Scorecards for Tier 1 suppliers to track delivery, quality, and ESG performance. This has been piloted with 3 suppliers and will be rolled out next financial year.
- On-site quality checks:** Our quality team conducts weekly visits to Tier 1 Class 1 sites to inspect finished goods and escalate any concerns about labour practices to procurement leadership.
- Independent audits:** Completing 6 audits across the vertically - integrated suppliers , with audit visibility to Tier 4, and 25 audits of the remaining Tier 1 product suppliers. Ethical sourcing position

We do not knowingly engage factories that fail to meet our Ethical Sourcing Policy. Non-conformances trigger corrective actions with defined owners and timeframes. Persistent non-compliance results in offboarding.

Cotton Traceability

A key industry challenge is tracing the origin of cotton fibre with certainty. We require spinners and knitters to avoid sourcing from known modern slavery hotspots; however, current technology limits full traceability. As fibre identification solutions mature and our Simba sustainability program advances, we will continue to strengthen verification and transparency standards year on year.

Metric	FY2025 result	Notes
Tier 1 audits completed	31	SEDEX and BSCI
Tier 2 audits completed	1	SEDEX and BSCI
Site visits conducted	1239	Quality team, on-site
Supplier Scorecards completed	3	Annual, internal
Suppliers on corrective action plans	8	Open CAPs at year's end
Suppliers offboarded for non-compliance	1	Ethical Sourcing Policy breaches

Non-product suppliers

Our operations depend on a network of suppliers offering various goods and services. In FY25, we engaged with 240 non-product suppliers, representing 20% of our total annual expenditure. The primary categories where our spending was concentrated include:

- Warehousing and logistics 60%
- Financial services 10%
- IT and telecommunications 5.7%

We recognise that global shipping can carry modern slavery risks, including deceptive recruitment, poor conditions, and exploitation of vulnerable seafarers in remote ports. Most of our products move by sea, however, we have controls that significantly reduce our exposure.

We purchase on two terms. Cost-and-freight means the supplier pays costs until the goods arrive at an Australian port, then we take over. Free-on-board means the supplier pays costs until the goods are loaded onto a vessel. Under cost-and-freight, while suppliers would typically select the carrier, our Supplier Contract requires them to procure sea freight through our nominated freight forwarders.

These are Australian companies that use only reputable, audited shipping lines and vessels. Under free-on-board engage the same nominated forwarders directly. These contractual controls, combined with the use of trusted forwarders and reputable carriers, mean our shipping risk is low. We will continue to monitor these arrangements, require incident reporting where relevant, and act on any issues that arise.



Risks of modern slavery in our operations and supply chain

Our approach

We are committed to ethical conduct grounded in integrity and respect. Our due diligence is integrated into day-to-day operations and focuses on prevention, mitigation and remedy. We assess risks, act on findings, monitor outcomes, and communicate transparently with customers, suppliers, and employees.

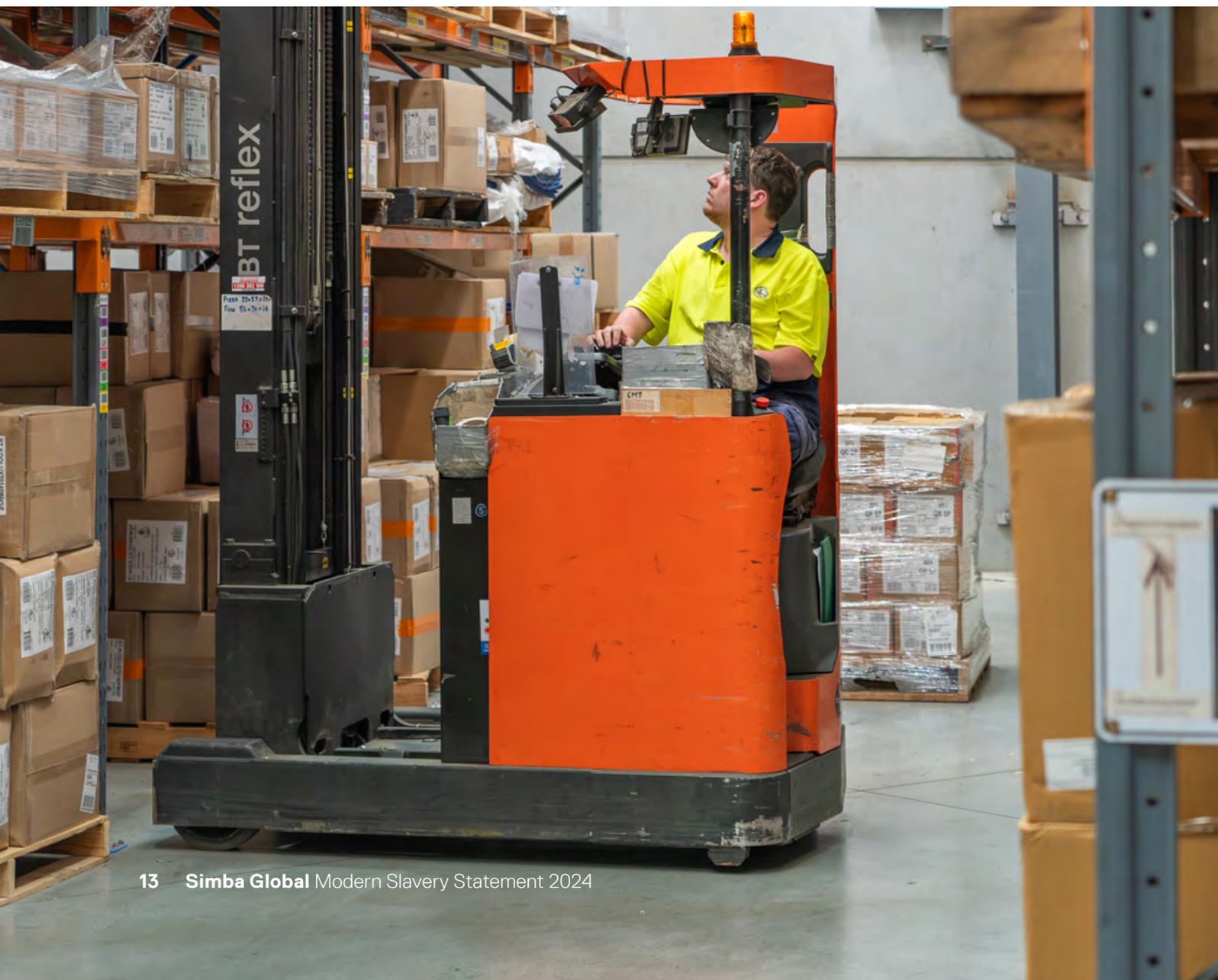
Due Diligence Cycle

 Identify and assess risks	 Take action	 Monitor and respond	 Communicate and educate
Supplier risk assessments	Policies and procedures	Annual performance reviews and CAP close-out checks	Report against Australia's Modern Slavery Act
Due diligence of potential supplier	Contractual obligations	Worker voice channels and grievance analysis	Ethical sourcing policy
New supplier onboarding program	Site visits	Unannounced spot checks where risk is elevated	Internal training and capacity building
	Annual third-party audits	Escalation pathway up to temporary suspension and offboarding	Supplier training
	Corrective action plans		

Assessment of modern slavery risk

Our 2025 analysis considers various factors, including:

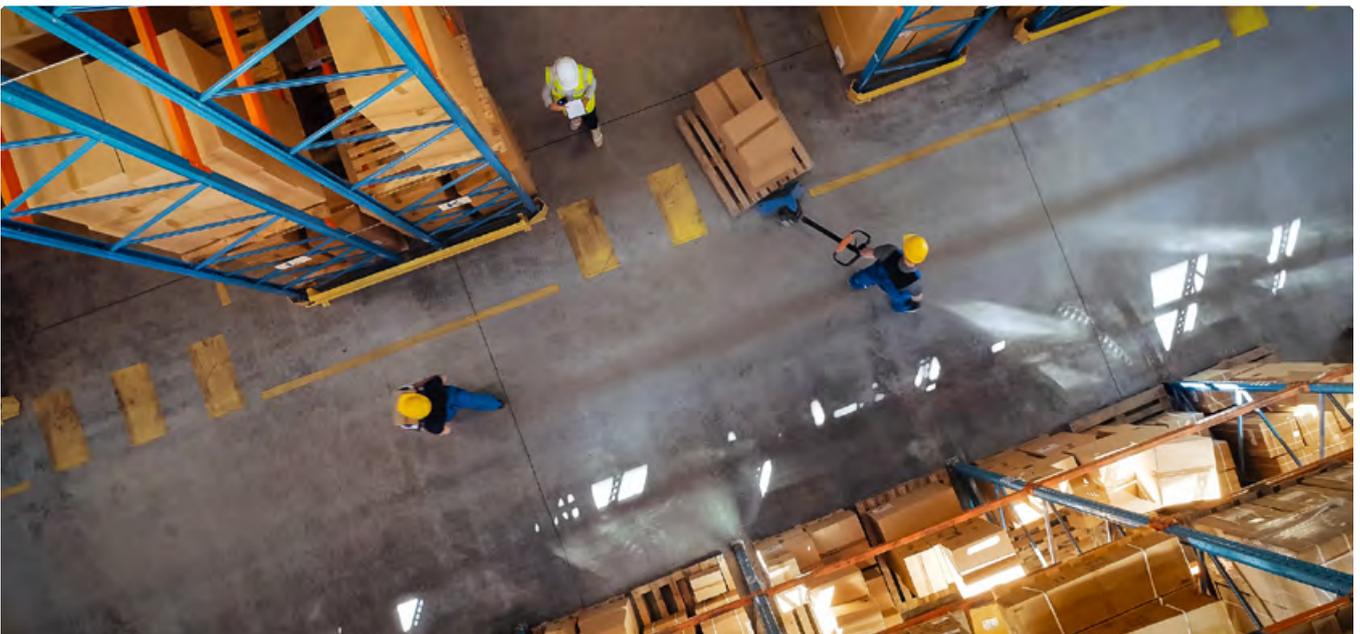
- ♦ **Country risk indicators:** We rely on sources like the Global Slavery Index and SMETA risk profiling to assess the risk of modern slavery in different countries.
- ♦ **Internal data:** including audit findings, CAP ageing, grievance trends, site visit notes, and purchasing practices metrics
- ♦ **Type of risk:** including Forced labour, migrant labour exploitation, bonded labour, harsh or inhumane treatment, excessive overtime, poor working conditions.
- ♦ **Vulnerable groups:** We pay attention to the presence of vulnerable groups within specific countries or regions to better understand the potential risks they face including women and migrant workers.
- ♦ **Visibility:** We consider the level of supply chain visibility that we have as part of our assessment of the potential risk of modern slavery.



Risk in our operations

Business area	Risk profile
Operations	Low: Predominantly Australian workers directly engaged

- ♦ **Direct Employment Contracts:** All team members are employed directly under full-time, permanent, or casual contracts. These agreements detail minimum pay, hours of work, breaks, deductions, leave entitlements, health and safety protocols, termination procedures, and grievance mechanisms. We verify the right to work in Australia through VIVO checks and conduct thorough reference checks for all employees.
- ♦ **Employee Code of Conduct:** Our Employee Code of Conduct mandates zero tolerance for workplace harassment, bullying, bribery, corruption, discrimination, and serious misconduct. All team members undergo induction training that covers these expectations and receive specific Modern Slavery awareness training. This year 55 staff completed our modern slavery training.
- ♦ **Regular Internal Audits:** We continue to conduct routine annual internal audits of our systems and processes to ensure compliance with policies and legal requirements. Any identified issues are promptly addressed as part of our ongoing due diligence efforts.
- ♦ **Workforce Management System:** We utilise an industry leading workforce management and payroll system to uphold compliance and mitigate modern slavery risk across our direct operations in Australia, New Zealand and Singapore. This system supports automated payroll processing aligned with over 50 pre-configured modern awards and integrates legislative updates from the Fair Work Commission, ensuring employees are paid correctly and in accordance with current legal standards.



Risks within our product supply chain

Based on our risk assessment, ongoing supplier interactions, and this year's supplier social audit reports, Simba has not identified any instances of modern slavery in our supply chain. While we maintain a zero-tolerance policy towards modern slavery, including child labour, forced labour, or bonded labour, we acknowledge the potential risks and have implemented strategies to prevent, mitigate, and manage them.

We intentionally maintain a small Tier 1 supplier base to foster direct relationships and actively oversee any associated risks. These longstanding partnerships, some spanning over a decade, enable fair pricing, realistic production volumes, and dependable delivery expectations managed by our procurement team.

Subcontracting is strictly prohibited unless authorised by the Head of Strategic Sourcing. While unauthorised subcontracting remains a concern, any such instances prompt engagement with factory management to understand the reasons. If deemed unreasonable or posing a significant risk, immediate cessation is required. Non-compliance initiates mediation, and persistent risk leads to divestment from the factory.

The highest risk of modern slavery typically resides deeper within the supply chain. Where our product Tier 1 manufacturers are vertically integrated, where the manufacturers oversee all production stages from ginning to yarn spinning to shipping, this risk is minimised as all our Manufacturers are audited annually.

This year we have continued our program of supplier mapping with 45% of Tier 1 product manufacturers now mapped to Tier 4 and 18% mapped to Tier 5. We will continue to deliver against this mapping project which is due for completion by the end of 2026. In the meantime, we will continue to expand our due diligence program, including extending our audit regime across the tiers.



Risks within our non-product supply chain

Business area	Risk profile
Warehousing and logistics	Low
Labour Hire	
IT and Telecommunications	
Computer hardware	

Regarding our non-product supply chain, we have focused our modern slavery risk assessment solely on Tier 1 suppliers. This decision reflects our prioritisation of the product supply chain, where our influence and impact are most significant. As a result, our exposure to modern slavery risks in these categories is generally perceived to be low.

Our Tier 1 non-product suppliers are primarily located in Australia and benefit from lower risk levels due to their adherence to local laws and ongoing engagement with Simba. However, we acknowledge that certain vulnerable groups, such as migrant workers, face heightened risks related to labour rights issues, including excessive working hours.



Actions taken to mitigate modern slavery risks

This financial year, we continued to embed ethical sourcing into everyday practice, guided by our Building Sustainable Supply Chain Pillar and previous statements, with a deliberate focus on turning policy into practice, building supplier capability, and deepening visibility into the origins of our products. We broadened our governance framework, expanded supplier engagement, and strengthened assurance across Tier 1 and Tier 2 suppliers, improving how we prevent and mitigate modern slavery risks while creating clearer pathways for remediation and more transparent reporting.

Governance and policy updates

Early in the year, we formalised a Human Rights Policy to set out our expectations for fair treatment, safe work, and freedom from forced labour. We complemented this with a Corruption and Anti-Competitive Behaviour Policy to reinforce integrity and transparency across commercial decisions. To support day-to-day implementation, we refreshed our Supplier Manual and Ethical Sourcing Policy, bringing them into line with international good practice and clarifying requirements for self-assessment, third-party audits, corrective actions, and worker voice. We also launched an upgraded Whistleblower Policy, opening confidential channels to employees, suppliers, and workers in our supply chain.

Policy rollout included internal training for employees, direct communication to suppliers, and publication on our website. Version control and ownership are recorded, and policy effectiveness is measured through employee acknowledgment and sign off, training completion, supplier acknowledgements, and audit outcomes.

Indicator	FY24 Baseline	FY25 result	FY26 target
New or updated policies approved and published	2	5	Maintain and review
Employee acknowledgment of the new our updated policies	86%	90%	≥95%
Tier 1 supplier acknowledgment	100%	100%	≥90%

Building capability through supplier education

To support implementation, we hosted a live supplier webinar that set out the refreshed expectations and introduced the updated Supplier Manual, updated Ethical Sourcing Policy and the new supplier scorecard and its criteria. Forty supplier companies joined, with 80 individual participants engaged throughout the session. We walked through requirements in the updated Supplier Manual, explained how the scorecard is assessed and weighted, and provided practical examples of modern slavery risk indicators and effective remediation. The webinar was hosted in English with live Mandarin translation so that all jurisdictions could participate.

Following the webinar, we circulated a recording and slides in both English and Mandarin, and our Country Managers responded to queries received in the first month. The session created a shared understanding of our standards and the evidence suppliers need to provide, while also signalling our preference for continuous improvement over punitive disengagement.

Measure	FY25 result
Individual participants	80
Supplier companies	40



Supplier scorecards to drive improvement

We implemented supplier scorecards to provide consistent, comparable feedback on social and environmental performance.

Scores are informed by self-assessments, third-party audits, site observations, certifications, and incident reports. Suppliers that fall into emerging or developing categories receive improvement plans with clear time frames, while proficient and leading suppliers are recognised and, where appropriate, prioritised for ongoing business.

During the year, we completed pilot scorecards for several priority suppliers and used the results to focus assurance activities where risks were higher. The program will be fully rolled out in 2026.

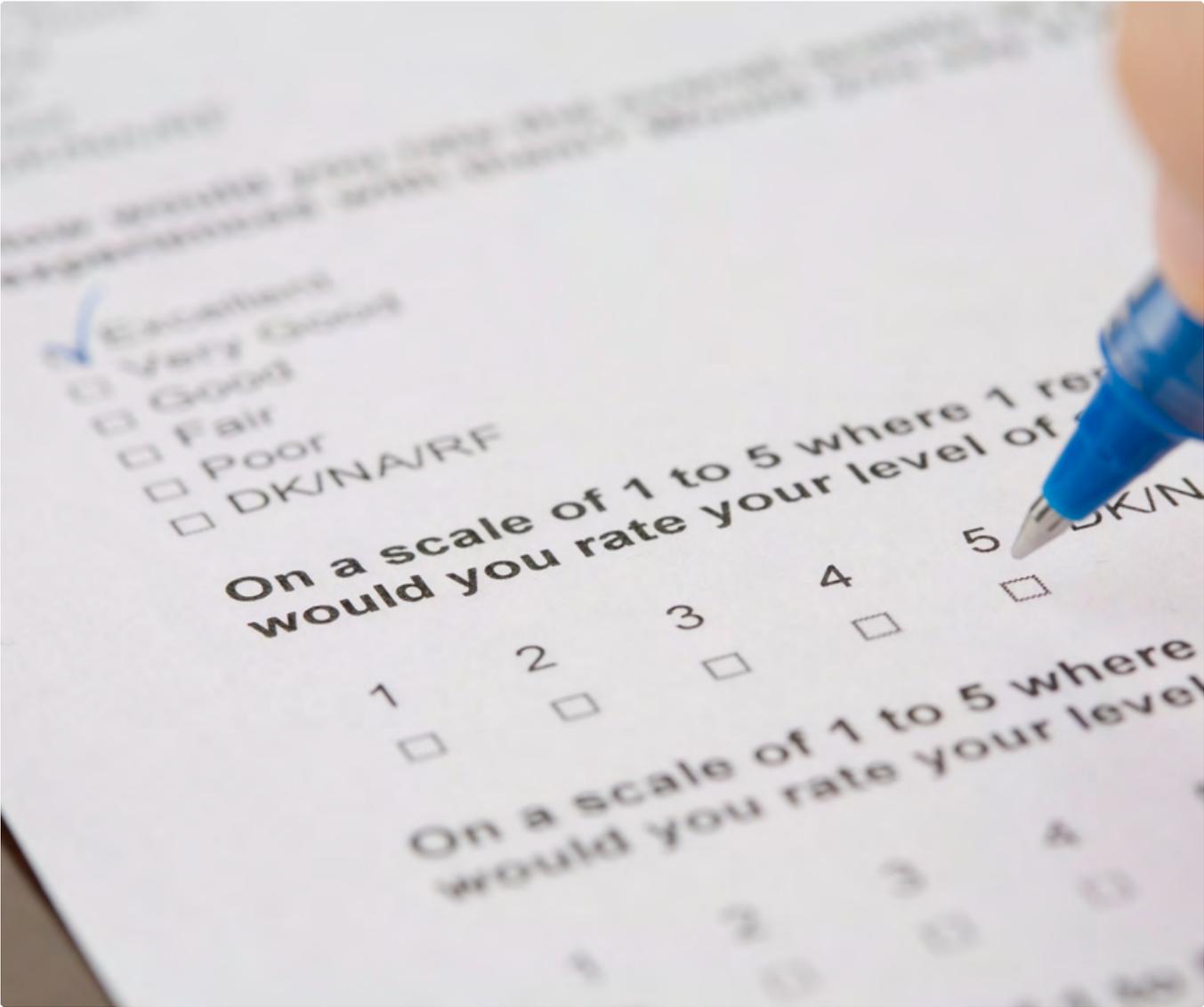


Self-assessment to establish a consistent baseline

We introduced supplier self-assessment questionnaires to capture a consistent baseline on employment practices, recruitment, working hours, grievance mechanisms, union access, health and safety, and key environmental controls.

Completion reached 85% across invited suppliers, with strong coverage in Tier 1 and growing coverage in Tier 2. We compared responses with SEDEX and BSCI audit results to identify discrepancies and prioritise follow-up where declarations did not align with independent findings.

This triangulation strengthened our confidence in the data and allowed us to focus support on suppliers that need it most. It also set a clear foundation for year-on-year comparisons as we track progress in closing gaps.



Mapping our supply chain, including raw materials

We advanced our supply chain mapping to improve line of sight beyond Tier 1. We now have completed mapping to Tier 4 for 45% and to Tier 5 for 18% of our supply chain.

This means we have visibility to our spinning mills. This work, critically, has given us line-of-sight that we did not have before. It has created the foundation for structured oversight of Tier 2 and Tier 4 suppliers, and it is already shaping the program we are now building for deeper-tier engagement, assurance and remediation. Over the coming period, we will complete mapping for the remaining 55% of our supply chain as well as work to map to the Ginners (Tier 5). This staged approach lets us expand visibility, test what works, and lock in improvements that are practical for suppliers and meaningful for workers.



Weekly site visits

Our quality team continued to visit our Class 1, Tier 1 suppliers on a weekly cycle to verify finished goods and observe working conditions firsthand. Inspectors are trained to recognise indicators of modern slavery and poor labour practices, and to escalate concerns directly to the Head of Strategic Sourcing. Over the financial year we completed 1223 site visits. These visits resulted in 43 formal reports to the Head of Strategic Sourcing.



Third-party supplier audits - Tier 1 and Tier 2 suppliers

Independent social audits remained a central part of our assurance program. This year, we completed 29 audits across Tier 1 and Tier 2 suppliers, focusing on management systems, working hours and wages, recruitment practices, and worker voice mechanisms.

Findings were categorised as minor or major to ensure a proportionate response. Auditors identified 65 minor and 11 major human or labour rights issues.

All non-conformities resulted in corrective action plans with defined owners and time-bound milestones. Major issues were contained immediately and verified by follow-up, and all corrective actions were delivered within 2 months on average.

Measure	FY25	Target FY26	Commentary
Audits completed	29	≥40	
Sites with zero major findings	22	Increase year on year	
Minor findings raised	65	Track trend	
Major findings raised	12	Reduce year on year	
CAP on time completion rate	90%	≥95%	



Communicating actions

We continued to improve how we communicate risks, actions, and results to our stakeholders. Internally, we briefed leadership on trends and made audit insights available to buying teams to inform sourcing decisions.

Over the next period, we will add a simple dashboard that tracks year-on-year trends in site visits, audits, corrective actions, and remediation.

This statement will continue to explain the steps we are taking to prevent and mitigate modern slavery risks, and how we assess defectiveness. Over the next period, we will have all updated policies on our website to create greater transparency.



How we assess the effectiveness of actions taken

We continue to implement and utilise measures to ensure the effectiveness of the actions we take to address modern slavery. These measures include:

	Activity	Measure	2025
Governance	Board oversight	Presentations to the Board	2
	Policy reviews	Twice Yearly Operational Strategy Sessions	
	Team Member training	Ongoing policy review Number of training sessions held and number of participants	
Risk Management	Regular risk assessments	Annually	
	Supplier onboarding	All new stock suppliers	
	Regular review of risk matrix	Quarterly	
Monitoring	Third-party audits	Audits conducted per tier; quantum of non-compliance	
	Supplier Corrective Action plans	Number of CAPs in place and time to implement	
	Worker engagement	Number of worker engagements	
	Site visits	Number of site visits	



Consultation Process

We prioritise continuous consultation across the business to address modern slavery risks in a practical way. Staff engagement is coordinated through the Simba Conscious Committee, chaired by the Executive Chair and including representatives from operations, procurement, quality, people and culture, and finance. We maintain regular dialogue with procurement to secure fair negotiated pricing that aligns with our Ethical Sourcing policy and supports responsible labour practices in our supply chain.

The Board receives routine updates on progress against the Simba Conscious strategy and the effectiveness of actions taken. This year we also engaged customers through quarterly co-design sessions to complete materiality assessments and confirm their requirements on issues such as modern slavery, worker rights, and supply chain visibility. Insights from these engagements informed our policy updates, supplier guidance, and the design of our deeper tier assurance program.

Audience	Purpose	Mechanism	Cadence	Typical outputs
Board	Oversight of strategy and risks	Simba Conscious update in Board papers	Quarterly	Progress dashboard, risk insights, decisions and approvals
Simba Conscious Committee	Cross-functional coordination and issue escalation	Committee meeting, action tracker	Monthly	Policy updates, remediation reviews, training plan
Procurement and Quality	Fair pricing and supplier performance	Work meetings, supplier reviews	Fortnightly	Negotiation parameters, scorecard follow-up, CAP tracking
Staff	Awareness and feedback	Briefings, intranet updates, training	Ongoing	Training completions, feedback items, improvement ideas
Customers	Materiality and requirements	Co design sessions and surveys	Quarterly	Materiality map, specification inputs, reporting expectations

Focus areas for 2026

We are shifting from building tools to demonstrating outcomes. In 2026, we will ensure workers understand and can safely use grievance channels, we will measure effectiveness rather than activity, and we will extend assurance across the supply chain.

Joining SEDEX as a buyer member will give us better visibility of risks and corrective actions, while the scorecard will be rolled out to all Tier 1 suppliers so performance expectations are consistent. A structured training program will equip suppliers to meet our Ethical

Sourcing policy, and a defined audit pathway will allow us to verify conditions and close gaps. Together, these steps strengthen prevention, make remediation faster and more worker-centred, and create comparable data for year-on-year improvement.

Focus area	Why it matters	2026 deliverables	Accountable owner	When
Worker communications on whistleblower mechanisms	Workers need safe, trusted ways to raise issues so harm can be prevented or remedied	Publish plain language guidance in priority languages, display posters in supplier sites, add QR code access, run worker briefings in high-risk clusters, track use and resolution times.	Head of Strategic Sourcing with People and Culture	Q1 to Q4
Effectiveness and improvement metrics	We need to measure outcomes, not just activity	Automate monthly dashboard, link metrics to sourcing decisions and CAP triggers, report quarterly to Board	ESG Lead with Data Analyst	Q1 Framework, Q2 pilot, Q3 to Q4 BAU
Audits along the supply chain	Verification beyond Tier 1 closes critical blind spots	Risk-based plan covering Tier 1 and Tier 2, sample Tier 3 in priority categories, align follow-ups responsible recruitment and worker voice expectations	Head of Strategic Sourcing with SEDEX	Plan Q1, execute Q2 to Q4
SEDEX buyer membership	Shared data and CAP tracking improve efficiency and comparability	Join as a buyer member, onboard Tier 1 suppliers, map existing audit data, set data completeness rules, integrate CAP tracking	Head of Strategic Sourcing	Join Q1, onboard Q2 to Q3
Scorecard rollout to all Tier 1 suppliers	Consistent expectations drive improvement	Apply scorecard to 100% of Tier 1, require minimum performance level, link to renewal decisions, publish aggregate results	Head of Strategic Sourcing	Q2 rollout, Q3 to Q4 enforcement
Supplier training program	Capability building reduces repeat findings	Launch modular training on labour standards, responsible recruitment, worker voice, grievance handling, timekeeping and wages, environment basics, translate for priority countries	Head of Strategic Sourcing	Design Q1, Launch Q2, Refresh Q4

Approval of statement

Simba is committed to the spirit and intent of the Modern Slavery Act.

On 15 December 2025, based on the recommendations of the CEO of Simba and its controlled entities, in consultation with the senior leadership and management teams, including the general managers of Commercial, Retail and Business divisions, the Board of Directors of Simba – the principle governing body of the Australian reporting entity, unanimously resolved and approved the Simba FY24-25 Modern Slavery Statement pursuant to the Modern Slavery Act 2019 (Cth).

The Board authorised Ahmed Ebeid, a Director, and the Chief Executive Officer, as the responsible member of Simba and its controlled entities, to sign this Statement in accordance with the Act.



Ahmed Ebeid

Director and CEO, Simba Global Pty Ltd
ACN 613 005 039

Date: 15 December 2025

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Modern Slavery Act (2018) Requirement			Page	
1.0	Identify reporting entity	Name of reporting entity	2	
2.0	Describe structure, operations and supply chain	Describe Structure - legal and organisational form	Legal Classification and ACN/ ABN	2
			Provide the details of the reporting entity's registered office.	2
			Indicate the approximate number of workers employed by the entity and any entities it owns or controls	6
			Explain the general structure of the entity.	6
			If the entity is part of a larger group, explain the general structure of the overall group (both upstream and downstream from the entity).	6
			Whether it owns or controls other entities.	6
			If the entity does own or control other entities, explain what these entities do and where they are located	6
			Identify any trading names or brand names associated with the reporting entity and entities it owns or controls.	6
		Describe Operations	Explain the nature and types of activities undertaken by the entity and any entities it owns or controls.	6
			If the entity's activities involve investments or financial lending, explain the type and nature of the entity's investments or lending.	
			Identify the countries or regions where the entity's operations are located or take place.	6
			Provide facts and figures about the entity's operations, such as the total number of employees, factories, and/or stores.	6
			Explain in general terms the type of arrangements the entity has with its suppliers and the way these are structured (are they often short-term and changeable or stable longer-term relationships).	9
			Explain the types of business relationships the entity has in addition to suppliers, such as joint venture partners.	N/A
		Describe supply chain	Identify the countries or regions where the entity's suppliers are located.	9
			Explain the main types of goods and services the entity procures.	
			To the extent possible, identify the source countries for these goods and services.	9
			Link to any disclosures by the entity about the identity of their suppliers (such as a public supplier list).	

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Modern Slavery Act (2018) Requirement			Page	
3.0	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Caused, contributed or directly linked to	Describe risks that the entity, and entities it owns or controls, causes, contributes to and/or is directly linked to modern slavery	12
			Should identify the general types of modern slavery risks that may be present in the operations and supply chains	
			Include sector/ industry risks; product and services risks; geographic risks; entity risks	16
			Must include sufficient detail to clearly show the types of products and services in the entity's operations and supply chains that may involve risks of modern slavery	
4.0	Describe what actions over the past 12 months, the reporting entity, and entities it owns or controls, is talking to assess and address the risks of modern slavery	Due diligence	How the entity has identified and assessed actual and potential human rights impacts : eg	12,18,19, 20,21,22 23,24,27
			Reviewed existing information such as Human Rights Impact Assessments; WH&S inspections, Social Impact Assessments	
			Mapped key parts of your operations and supply chains	
			Assessed the risk through risk matrix	
			What tools, systems, policies and personnel does the entity have in place to monitor high risk suppliers and mitigate associated risks eg supplier and employee codes of conduct, Human Rights policy, complaints mechanism available.	
			Are these tools, systems, policies available publicly, if so where	
			How is the entity taking appropriate action to address impacts eg staff and supplier training, incident reporting, working directly with high risk suppliers	
			How is the entity is tracking performance eg credible audits, using existing traceability processes	
		How the entity is publicly communicating what you are doing		
		Remediation processes	What is in place for the entity to respond to complaints of modern slavery	
	What is the process for remediation			

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Modern Slavery Act (2018) Requirement			Page		
5.0	Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks		Explain what the reporting entity is doing to check whether its actions to assess its modern slavery risks are working. How will it know whether it is appropriately identifying and evaluating its modern slavery risks?	26	
			<p>Explain what the reporting entity is doing to check whether its actions to address modern slavery risks are working. How will it know if its actions are making a difference?</p> <p>Could include</p> <ul style="list-style-type: none"> • Establishing a regular review process • Regularly checking your risk assessment processes • Setting up a process to provide for regular engagement and feedback between key departments • Conducting internal and external audits • Tracking actions you have taken and measuring impact • Working with suppliers to check their progress • Looking at trends reported through the complaint's mechanism • Partnering with an industry group, or trusted NGO to undertake an independent review 	26	
6.0	Describe the process of consultation with any entities the reporting entity owns or controls	Not needed if no other entities owned or controlled	The level of consultation you undertake should reflect your relationship with the other entity and the risk profile of that entity. Your consultation should be sufficient to ensure that the modern slavery risks relating to the other entity have been appropriately identified, assessed and addressed and that other entity is aware of what actions they need to take.	27	
7.0	Any other relevant information	Only if relevant	<p>May include</p> <ul style="list-style-type: none"> • How the reporting entity has supported the development of legislation on modern slavery in another country • Whether the reporting entity has participated in external forums on modern slavery to help improve awareness • How the reporting entity has partnered with a civil society organisation or industry body • How the reporting entity has contributed to addressing the root causes or structural factors that contribute to modern slavery, such as poverty, forced migration, and education • If you reported on a situation of modern slavery in a previous statement, any updates on how the situation has been addressed 		
			Approved by principal governing body	The statement must say that it has been approved by the principal governing body for the reporting entity; name that governing body; and specify the date that governing body approved the statement	29
			Signed by a responsible member of the reporting body	Usually a Director or the Board	29