

OVERLAND GROUP (AUSTRALASIA) PTY LTD
MODERN SLAVERY STATEMENT/ POLICY
FISCAL YEAR 2025



Overland Group (Australasia) Pty Ltd (ABN 57 071 178 393)

Year 1: 1 July 2024 – 30 June 2025

This Modern Slavery Statement is prepared and issued by Overland Group (Australasia) Pty Ltd (Overland Group) and is made pursuant to the *Modern Slavery Act 2018* (Cth).

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Introduction

This is our first submission under the *Modern Slavery Act 2018* (Cth). We do not tolerate modern slavery in our operations or our supply chains in any form. Our operational business employs team members in Australia and New Zealand where we comply with the legal obligations in relation to employee rights and entitlements obligations. The majority of this report focuses on our how we manage the modern slavery risks relating to our external suppliers as this is where we must be diligent. We pride ourselves on having a strong understanding of who our suppliers are and how they operate. This is particularly important for us as footwear and apparel supply chains can bring modern slavery risk if not managed actively. It is for this reason we must take great care in selecting supply partners that hold appropriate values and standards and have processes in place to evaluate their performance accordingly. Overland Group is a SEDEX (Supplier Ethical Data Exchange) member.

Message from the Managing Director

At Overland Group we do not accept or tolerate modern slavery in any supply chain touch point in the business. We fully support the efforts of our employees, suppliers and indeed customers to eliminate exploitation in any form. On a personal level, I have visited all our factories (including many suppliers to those factories) to work with them and review how we can continuously manage and improve all aspects of our supply chain. This statement was approved by me, William Tyson as Sole Director of Overland Group (Australasia) Pty Ltd, on 25 October 2025.



William Tyson
Managing Director
Overland Group (Australasia) Pty Ltd
Signed 25 October 2025



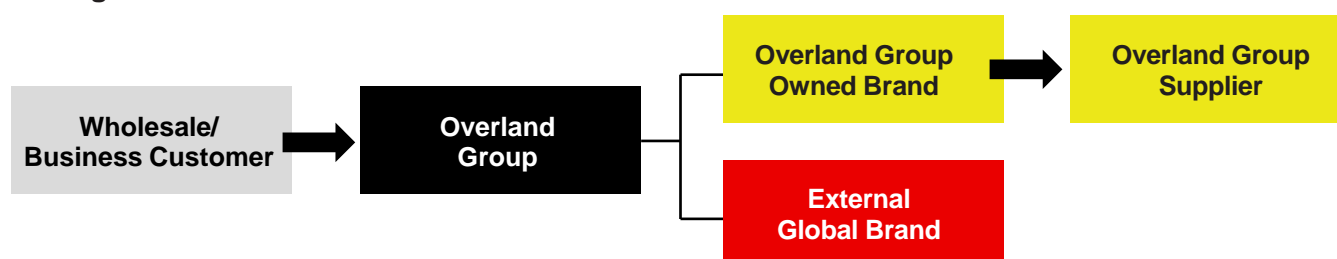
Reporting Criteria 1 & 2: Structure & Operations

Overland Group is an Australian Private Company, limited by shares, and was first registered in 1995. Overland Group has a head office at 87 Indian Drive, Keysborough VIC 3173 and currently trades in Australia and New Zealand supplying and distributing protective and occupational footwear, apparel and accessories (products).

We directly source products from manufacturers under our own brands as well as procure products from global brands for distribution. We also have a private label business where we manage the manufacture of a product under our customer's brands. For simplicity, in this report we have included the private label products as part of the 'Overland Group Owned Brand' silo given the same supply network is involved.

At Overland Group we are committed to ensuring that our company conducts business in a socially and ethically responsible fashion, balancing the needs of the business with our impact on the environment, the people involved in our supply chain, and the communities in which we operate. Our company has a long-standing commitment to conduct business only with business partners who share that commitment.

Sourcing Structure



New Zealand Subsidiary

Overland Group NZ Limited (NZBN 9429046938350) is a New Zealand Private Company, limited by shares, and was first registered in 2018. All shares are owned by Overland Group (Australasia) Pty Ltd and the Director of the New Zealand entity is identical to the Australian entity. The Sourcing Structure as shown above applies to Overland Group NZ Limited. For the purpose of construing this document, any reference to Overland Group encompasses both the Australian and New Zealand entities.

Reporting Criteria 3: Modern Slavery Risks in Operations and Supply Chains

Operational Risks:

Overland Group employs team members in both Australia and New Zealand. We meet all our worker rights and entitlements obligations. We do not use external labour hire agencies for our own distribution centre / warehouse staffing. Our operating business in Australia and New Zealand is low modern slavery risk.

Supply Chain Risks:

Overland Group's overseas supply chain is actively managed for modern slavery risks.

We use external third-party audits to assess compliance with International Labour Organisation (ILO) and local law requirements. These assessments take the form of audit visits (usually annually) by qualified third parties – announced or semi-announced – to measure conformance with the audit requirements or progress on Corrective Action Plans addressing any Non-Compliances. Some Corrective Action Plan Non-Compliances may also be reviewed by a Desktop Audit (also conducted by the same qualified third-party) should that Non-Compliance relate to a documentation issue.

We do not allow our suppliers to use sub-contractors for our purchase orders.

We grow our business through long-term relationships with suppliers that are committed to our strict standards of sustainability, compliance with local laws, continuous improvement and human rights. Our sourcing strategy involves getting to know our suppliers well, visiting them frequently as well as establishing a cost and sourcing relationship that means all involved in the supply chain can receive an appropriate living wage.

We aim to be an easy partner for our suppliers to work with and are committed to aligning with them on a longer-term basis which allows for us to work with them on continuous improvement and assist them with any Non-Compliances. We do our best to minimise ancillary costs that would otherwise be borne by the supplier (sampling, testing, tooling) by paying for these costs directly. By doing so, and by paying our suppliers a fair price for our products, we reduce the likelihood that any resources will be directed away from supporting the supplier's social, ethical and environmental framework and processes. We also purchase goods on realistic lead times, knowing that pressuring a factory into an unrealistic lead time brings with it the risks of excessive overtime and a poor-quality product. We endeavour to provide our suppliers with purchasing forecasts so they can better manage their labour resources.



Reporting Criteria 4: Actions to Assess and Address Risk

We have structured our Product and Compliance departments as one singular team so all supplier relationships, product development and purchasing plans are managed with a social and ethical responsibility understanding. We have found this alignment to be the simplest way to achieve our corporate responsibility goals as ultimately, in our experience a supplier that provides good conditions for its employees is also one that produces high quality product.

Our Head of Product & Compliance reports directly into the Managing Director, who also personally visits suppliers for a first-hand review of factory conditions and worker well-being as per our internal policy to visit suppliers at least annually.

Actions to Manage Supply Chain Risk

- Supplier audits performed by qualified third-parties;
- Working with the supplier on any Non-Compliances through a Corrective Action Plan;
- Knowing our supply chain and only working with supply partners that have shown they treat their employees well and hope to continuously improve;
- Overland Group team members routinely visiting suppliers including broader Tier Two visits;
- No supplier use of sub-contractors;
- Paying a fair price for the product;
- Ordering products on a reasonable timeframe and holding sufficient inventory to reduce the risk of urgent orders and providing purchasing forecasts; and
- Be an 'easy partner' for our suppliers to work with – no sample fatigue, no pushing costs unnecessarily onto the supplier.

Accepted Audits:

Sedex Members Ethical Trade Audit (SMETA): SMETA is a social audit methodology that assesses all aspects of responsible business practice. It combines the requirements of the Ethical Trading Initiative (ETI) base code – which is based on the International Labour Organisation's (ILO) Core Conventions guidance, as well as relevant local laws.

We accept both Two Pillar and Four Pillar audits.

Two Pillar audits consists of the following aspects:

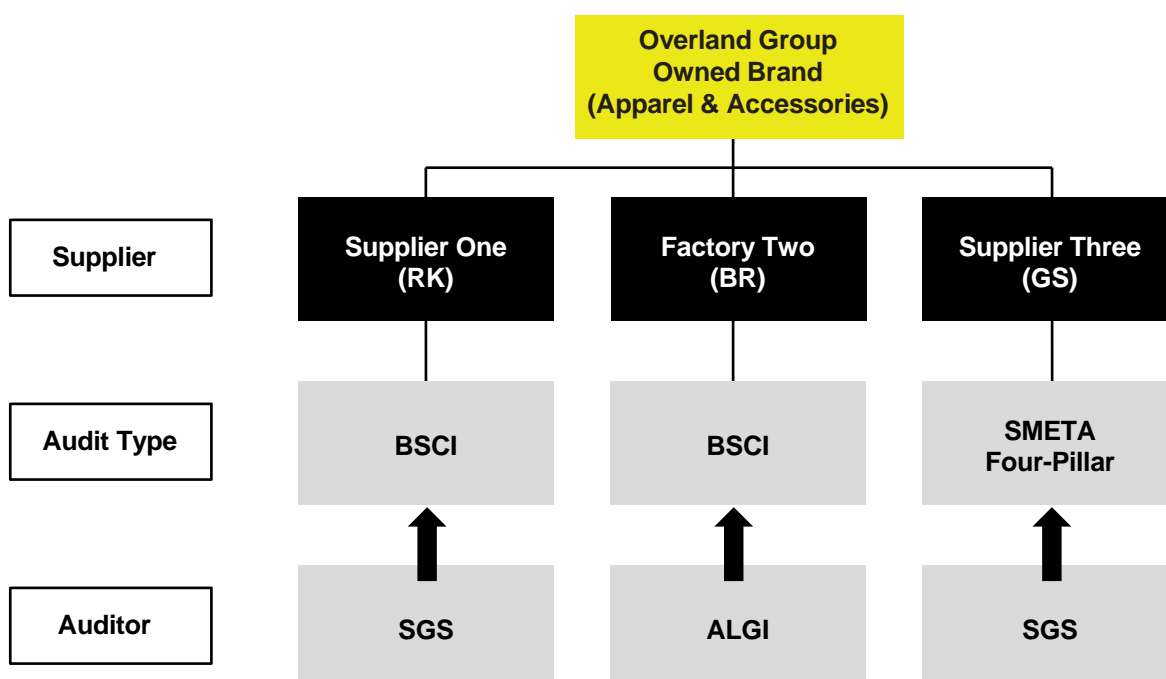
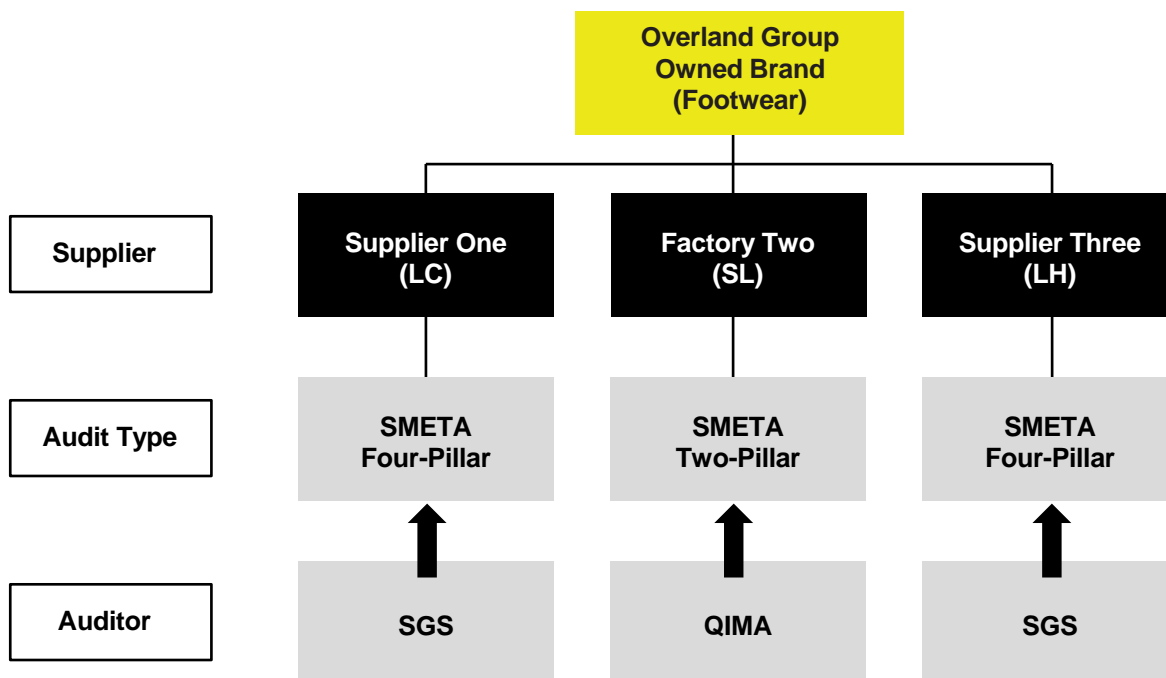
- Labour Standards
- Health & Safety
- Environment

A Four Pillar audit is a Two Pillar plus an additional review of Environmental Practices (more in depth) and Business Ethics.

Amfori Business Social Compliance Initiative (BSCI): The BSCI audit reviews 13 performance areas including fair remuneration, occupational health and safety, decent working hours and ethical business behaviour. Where the BSCI audit differs from the SMETA audit is that the BSCI audit provides a grade reflecting how the factory has performed in each of the 13 performance areas. The performance areas are similarly coming from the principles of the ILO as well as relevant local laws.

Our suppliers for owned brand footwear/apparel/accessories must be able to provide us with a current SMETA or BSCI audit.

Reporting Criteria 5: Effectiveness Assessment



Reporting Criteria 5: Effectiveness Assessment

External Brand (New Balance) – New Balance's Modern Slavery Statement is published on the Modern Slavery Statements Register.

External Brand (Bekina) – Belgium made product (low risk), industry leader in relation to social and ethical compliance as well as sustainability

Audit Results:

There have been no zero-tolerance non-compliances found during the respective audits of the supplier facilities. Any minor non-compliances have addressed through a Corrective Action Plan and either a third-party Desktop Audit (for documentary non-compliances) or re-audit (both conducted by the qualified third party). The most common non-compliances (minor) found during the audit processes relate to workers not wearing their PPE properly (ie. workers wearing a mask not covering their nose/mouth or not wearing ear-plugs) and missing sewing machine guards. These non-compliances are addressed on the Corrective Action Plan through re-training of employees and provision of PPE. There have been no instances of modern slavery found in our supply chains or in our business.

The above relates to Tier One supplier facilities. We have visited and reviewed Tier Two suppliers for some key components however we understand it will take time to further map and review Tier Two and Tier Three suppliers. To assist with this process, we intend to consolidate Tier Two suppliers in accordance with our Preferred Suppliers listing as a means to ease oversight management. Our goal over the next reporting period is to further review and provide a detailed account of the social and ethical compliance status of our key Tier Two suppliers.

This Statement has been published on the Australian Government's Modern Slavery Statements Register.