

MECCA

MODERN SLAVERY STATEMENT 2025

MECCA

35-43 Wangaratta Street,
Richmond, Victoria 3121 Australia

W: mecca.com.au, meccabeauty.co.nz

ACKNOWLEDGEMENT OF COUNTRY

We commit to being allies, and to working in solidarity, with First Nations people. We recognise their ongoing connection to this beautiful country, with knowledge and stories that have been handed down over the past 60,000 years. We're inspired by the power and resilience of First Nations women and girls and pay our respects to the strong matriarchal role models who continue to guide them, and to Elders, past and present. We acknowledge that the land on which we live and work always was, and always will be, Aboriginal Land.

To view a copy of MECCA's Reconciliation Action Plan, visit:
www.mecca.com/en-au/m-pact/people/inclusivity



MECCA'S COMMITMENT TO MITIGATE MODERN SLAVERY

At MECCA we're committed to identifying and mitigating any form of modern slavery or exploitation within our value chain, where an individual is exploited by others, for personal or commercial gain.

We also understand that instances of modern slavery can occur across a spectrum, from unfair working conditions to bound labour and can occur in any region of the world. So, while we are committed to upholding human rights and ensuring that our team members, direct suppliers and brand partners work within supportive, fair and safe workplaces, we're also taking steps to identify potential risks of modern slavery further down our supply chain.

This document, our sixth annual Modern Slavery Statement, sets out the steps we have taken during the period from 1 January 2025 to 31 December 2025, and the related policies of our business. This statement is issued jointly by MECCA Brands Pty Ltd, MECCA Brands NZ Pty Ltd and MECCA Brands Distribution Pty Ltd. (together, MECCA) and is made pursuant to the Modern Slavery Act 2018 (Cth) (the Act).

1. ABOUT MECCA

Since opening our first store in Melbourne in 1997, MECCA has grown to become Australia's largest prestige beauty retailer, serving more than 4.5 million customers each year. Across more than 110 stores in Australia and Aotearoa New Zealand and online we offer a carefully curated edit of the world's best beauty, spanning more than 200 brands, including our three owned brands:

MECCA COSMETICA

MECCA MAX

kit:

For 28 years, our purpose has been to help people look, feel and be their best. That means embedding it into how we trade, how we communicate, and how we show up for our people. Today, that purpose sits at the leadership level and is being woven deeply into every part of our business. We're seeing its influence grow, in how our customers connect with us, how our brand partners collaborate with us, and how our external



stakeholders hold us to account. Our sustainability program, and tackling modern slavery, sits within our broader Purpose team, signalling our commitment to ethical and sustainable practices.

At the end of 2025, we had a growing team of more than 7,000, all working towards our shared purpose. Our Support Centre and Distribution Centre are both based on Wurundjeri Country in Naarm (Melbourne), Australia. We also have a Customer Fulfilment Centre based in Aotearoa (New Zealand).

1.1 OUR COMPANY STRUCTURE, OPERATIONS AND SUPPLY CHAINS

MECCA operates not just as a specialty beauty retailer, but also as a distributor and brand owner. Our operations include product retail, importation and distribution; product development and sourcing; product safety and compliance; and team member education. Our operations are supported by a range of departments including procurement, digital, IT, sales, marketing, human resources, legal and finance.

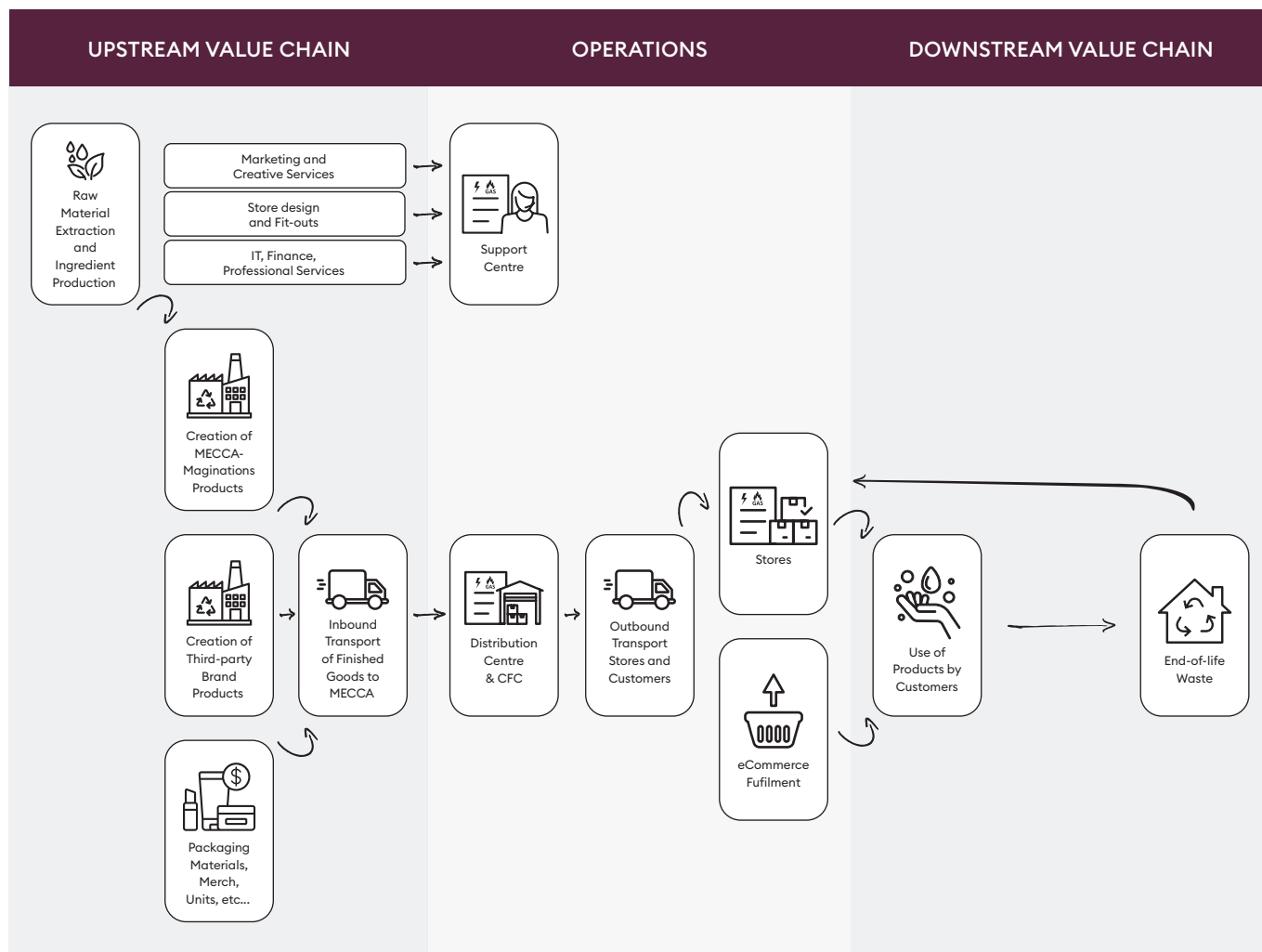
We work with a range of suppliers to support our business operations. These include the brands that we sell, suppliers that are critical in the development of MECCA-owned Brands, as well as the suppliers and services that assist in the day-to-day running of our business.

2. RISKS OF MODERN SLAVERY IN MECCA'S OPERATIONS AND SUPPLY CHAINS

As a retailer, distributor and brand owner, our supply chains are complex and so we require commitment from all parties involved to ensure that we can identify and address modern slavery. This has been our focus, and we'll continue to work towards this in 2026. We're also aware that there is a potential risk of inadvertently contributing to, or being linked with, modern slavery further down the supply chain, and so we're committed to taking action to mitigate these risks as best we can.

When assessing modern slavery risks, we consider the sector or industry of which the supplier belongs and the geographic locations in which its operations exist. This allows us to segment our suppliers into different risk categories and to complete the relevant due diligence, including acquiring documentation of the supplier's mitigation strategies.





2.1 SUPPLY CHAIN RISKS

Some of the possible risks identified within our supply chains include:

- Traceability and transparency of complex lengthy supply chains internationally and within Australia and Aotearoa (New Zealand);
- The supply of raw materials – particularly those sourced from countries more vulnerable to modern slavery risks; and
- Development of our products through our MECCA-owned Brands.

2.2 OPERATIONAL RISKS

Some of the possible risks identified within our operations include:

- Contracting and sub-contracting through direct and indirect third-party suppliers; and
- Provision of products and services, including operational, facilities management and transportation.



2.3 ONGOING WORK AND POLICIES IN PLACE TO MITIGATE MODERN SLAVERY RISKS

As a retailer

It's important to us that all our suppliers adhere to our principles to prevent modern slavery. We want to work with suppliers that hold at least the same quality, sustainability and ethical standards, and who govern their supply chain to eliminate modern slavery regardless of the local regulatory standards they operate under.

Across our general procurement, our central agreement templates, managed through our Procurement and MECCA-Maginations teams, include modern slavery provisions. In 2025, we engaged a total 1,972 suppliers across the business to support our operations, with more than 80% of suppliers operating within Australia and Aotearoa (New Zealand).

Our Timber Products Procurement team aims to eliminate the risk of illegal logging through our operations or those of our suppliers. As such, this statement confirms the requirements to source timber-related products, which are legally logged and recognises that credible, independent certification and verification of forest management and chain of custody can significantly reduce the risk of illegally harvested timber. This statement confirms that regulated timber products imported by MECCA are ethically and sustainably sourced.

As a distributor

MECCA's distribution agreements with brands include modern slavery provisions seeking to ensure that third-party brands and their potential subcontractors, do not engage in modern slavery practices. These agreements also require brands to:

- a. notify MECCA promptly upon becoming aware of any incident, complaint, allegation or risk, that they, or any entity in their supply chain or connected to its business operations, has engaged in, contributed to, or is, or may be connected with, modern slavery; and
- b. cooperate with all requests from MECCA relating to modern slavery, including reporting requirements and relevant audit requests.

MECCA has set up contractual processes in pursuit of ensuring that brands agree to this provision. Non-compliance with the modern slavery provisions may result in termination of the relevant contract and/or an indemnity claim.



As a brand owner

Across our MECCA-owned Brands, in 2025 we continued to run our new supplier approval process, which includes completing our supplier questionnaire, allowing MECCA to assess each supplier's quality standards, sustainability practices and compliance with ethical sourcing expectations.

We also request all product suppliers for MECCA-owned Brands commit to our Ethical Sourcing Code. This Code reflects our commitment to environmental, sustainability and responsibility, integral working practices; adherence to work standards established by the International Labour Organization; and the maintenance of consumer protections.

As of December 2025, 100% of our direct, active product suppliers for MECCA-owned Brands have committed to our Ethical Sourcing Code or an equivalent recognised industry code.

As an employer

At MECCA, training and education are fundamental to how we uphold our commitment to legal compliance and ethical conduct. We have a series of workplace policies in place to support our team members and reduce the risk of modern slavery.

We encourage everyone to speak up. Team members can report concerns through several channels outlined in our Whistleblower Policy and Complaints Resolution Policy, including Stopline, an independent and confidential reporting service.

Our core policies include:

- **Whistleblower Policy:** provides a safe, confidential environment for team members and other MECCA personnel to raise concerns about legal compliance or standards of behaviour, including anything related to modern slavery, without fear of reprisal.
- **Complaints Resolution Policy:** encourages early resolution of workplace issues through open communication, with a focus on constructive outcomes.
- **MECCA Brands Code of Conduct:** outlines MECCA's obligations to its team members alongside the standards and behaviours expected in return, including our commitment to Equal Employment Opportunity.
- **Respect in the Workplace Policy:** affirms both MECCA's commitment and each team member's responsibility to maintain a workplace free from discrimination, bullying, harassment, and victimisation.



Workplace Health and Safety Policy: sets the standard for health and safety across our business and reflects the important role every team member plays in maintaining safe, healthy workplaces.

All new team members complete mandatory education modules as part of induction, covering Whistleblowing, Respect in the Workplace, and Privacy and Confidentiality. These modules help our people understand their rights and responsibilities – and build a culture of collaboration, care, and accountability across our teams, supplier relationships, and brand partnerships.

3. MECCA'S 2025 ACTIONS

In 2025, we continued to deepen our knowledge and understanding of modern slavery risks within our operations and supply chains, taking actions to reduce these risks where possible.

MECCA's ethical procurement approach has three pillars:

- Clear expectations for suppliers and partners
- Risk-based due diligence to prioritise action where it matters most
- Ongoing governance and engagement to drive improvement over time

In 2025, our priority was to establish practical systems and processes that can be embedded into existing commercial and procurement activities, while remaining flexible enough to evolve as requirements change.

3.1 SUPPLIER RISK ASSESSMENT

In 2025, we assessed our suppliers against a clear and quantifiable criteria to determine high-risk suppliers in relation to modern slavery risk, to better understand what work we need to do to clarify the level of risk across our supply chain.

MECCA applies a risk-based due diligence approach, which recognises that not all suppliers present the same level of ethical risk. In 2025, we established a supplier risk framework that considers factors including:

- Supplier type and category
- Geographic risk
- Nature of goods or services provided
- The supplier's exposure to known high-risk issues such as modern slavery, raw material extraction or labour-intensive manufacturing

As a result of this review, we have a better understanding of which of our suppliers' products and services have the highest risk. We continue with a heightened due diligence process for these suppliers, which will continue



to be informed by the Modern Slavery guidance in Australia.

MECCA also uses software EcoVadis IQ Plus, a supply chain sustainability risk intelligence product, part of the broader EcoVadis Sustainability Intelligence Suite. IQ Plus uses AI-powered, evidence-based risk analysis to provide a robust risk classification of an entire supply base, to identify and prioritise suppliers based on inherent environmental, social and ethical risk. This helps us to screen suppliers using external risk indicators and focus our engagement with them on areas where risk likelihood and severity is higher.

3.2 SUPPLIER CODE OF CONDUCT

MECCA asks all product suppliers of MECCA-Maginations brands to commit to MECCA's Supplier Code of Conduct, which establishes a clear baseline for the responsible business behaviour we expect from our partners.

The Code sets expectations across five key areas:

- Human rights and labour standards, including prohibition of forced labour, child labour and unsafe working conditions
- Ethical business conduct, including anti-bribery, corruption and fair competition
- Environmental responsibility, including compliance with environmental laws and impact reduction
- Health, safety and wellbeing
- Transparency and cooperation, including participation in due diligence processes

In 2025, we began extending the Supplier Code of Conduct to brand suppliers and non-trade (not-for-resale) suppliers, and embedding the Code into MECCA's contracting, onboarding and supplier engagement processes. This provides a consistent foundation for ethical expectations across MECCA's broader supplier ecosystem.

3.3 USING ECOVADIS TO ASSESS AND ENGAGE WITH SUPPLIERS

We are also building capability to assess selected suppliers using a range of EcoVadis assessment tools, depending on the level of risk and our supplier relationship.

This includes:

- EcoVadis Vitals, a free entry-level assessment for selected suppliers
- Full EcoVadis ratings, where suppliers have already completed, or are invited to complete, a full assessment



EcoVadis assessments provide independent insight into supplier practices across labour and human rights, ethics, environment and responsible procurement, supporting us in consistent supplier evaluation and ongoing engagement over time. From utilising EcoVadis IQ, a risk mapping and monitoring tool we were able to assess our supplier database for inherent risk. The below risk breakdown was determined across our supplier network:

Inherent risk of MECCA's suppliers:

- Very low 7.6%
- Low 35.6%
- Medium low 45.1%
- Medium high 11.4%
- High 0.3%

In 2025, we invited suppliers that were already actively using EcoVadis to share their scorecards with us, for review. The scorecards rate businesses across a range of categories, including environment, labour and human rights, ethics and sustainable procurement.

Of the suppliers that have been rated:

- 50% received a good rating score (score 45-64) indicating a structured and proactive sustainability approach, policies and tangible actions on major issues and basic reporting on actions or performance indicators.
- 28.6% received an advanced rating score (score 65-84) including silver or gold medals, indicating their top 5% and 15% rating status, respectively.
- 14.3% received an outstanding rating score including platinum badges (score 85-100), indicating the companies' recognition for best practice through EcoVadis.
- 7.1% received a partial rating score (score 25-44)

3.4 RAW MATERIAL EXTRACTION

Certain raw materials used in our MECCA-owned Brands' products, and commonly found in cosmetics more broadly, carry a higher risk of modern slavery in their production and supply chains. Because sourcing these materials is often labour-intensive, workers can be exposed to heightened exploitation risks. Understanding where these materials come from is an important part of how we identify and manage human rights risks across our supply chain.

Ingredients we consider higher risk tend to be:

- Grown in developing countries on small-scale farms, or in areas linked to illegal land clearing;
- Sourced from regions affected by weak governance, conflict, geopolitical instability, widespread poverty, or discrimination, where workers' rights are less protected and vulnerable people are at greater risk of exploitation; or



- Produced using hazardous chemicals or low-skilled, labour-intensive processes, often in low-cost labour markets or by migrant and vulnerable workers who may be susceptible to abusive practices.

When it comes to raw materials, our focus is on how we can improve the visibility of the supply chains and understand how and where any high-risk ingredients may be used. In 2025, we continued to review the most at risk ingredients within our MECCA-owned Brands and began traceability of these ingredients.

3.5 TRACEABILITY AND ASSURANCE OF CLAIMS

We continue to work with brands to conduct a risk assessment into the extraction of palm oil and mica. These are two raw materials used extensively in beauty that have a higher risk of modern slavery and environmental damage. Ultimately, our goal is for these ingredients to come from certified sustainable sources, such as the Roundtable on Sustainable Palm Oil and the Responsible Mica Initiative.

It's important to note that the farming or mining of palm oil and mica provides access to work and income for many communities, so completely stopping the use of these two ingredients could negatively impact workers' livelihoods. Instead, our intention is to support the safety of these communities during collection and processing and protect the environment, while contributing to long-term positive change for these communities.

We also work closely with our brands to review any claims made around sourcing and harvesting of ingredients and raw materials, which can include links to more sustainable practices protecting both people and planet. We ask our brands to provide evidence behind all claims to ensure they are true, accurate and can be verified.

3.6 DIVERSITY AND INCLUSION

Inclusive thinking is critical in identifying and addressing any modern slavery risks related to human rights and creating awareness of communities that may be more vulnerable to modern slavery. During 2025, we partnered with external experts with lived experience to drive progress across many diversity and inclusion sectors. By way of example, see details below:

MARDI GRAS PARTNERSHIP WITH MINUS18

MECCA has a strong, ongoing partnership with Minus18, Australia's largest youth-driven charity for LGBTQIA+ inclusion, particularly through its MECCA MAX brand. MECCA supports Minus18 to help create safer, more empowering spaces for LGBTQIA+ youth.



In 2025, for the third year, MECCA MAX partnered with Minus18 for the Sydney Gay and Lesbian Mardi Gras, with 10 percent of proceeds from the limited-edition Shade Parade Marbled Eyeshadow Duo donated to the charity. Through the “Let Love Shine” Campaign: MECCA donated \$5 from every candle sold towards supporting LGBTQIA+ youth across Australia. We also partnered with Minus18 Young Leaders in creating content for the Midsumma Pride March, highlighting themes of belonging and community.

WHAT WE ACHIEVED IN THE REFLECT RAP

Our first ‘Reflect’ Reconciliation Action Plan (RAP) was published in 2023, which outlined how MECCA will support First Nations peoples and work towards national reconciliation. In 2025 we took a number of steps to deepen our team’s understanding of reconciliation and be part of impactful RAP initiatives.

Supporting First Nations artists and creatives

As part of the 2025 MECCA Holiday campaign, we proudly collaborated with First Nations model Tatyana Perry, showcasing her across Australia and New Zealand. Through extensive visibility across social media, in-store motion in all 100+ stores, billboards and tram wraps as we strengthened our commitment to increasing First Nations representation and amplifying First Nations talent within our sphere of influence.

Raising awareness for First Nations people and cultures through education and celebration

In 2025, we strengthened our commitment to making sure a Welcome to Country or Acknowledgement of Country sits at the heart of our major internal and external events. At the opening of MECCA Bourke Street, our largest store to date, Wurundjeri woman Chenile Chandler performed the traditional Call to Country, followed by a Welcome to Country from Wurundjeri Elder Aunty Joy Murphy Wandin. Their leadership and generosity formally opened our flagship in a way that honoured the land and its custodians, grounding a milestone moment for our business in respect and cultural recognition before more than 20,000 attendees and media.

Evolve Communities Partnership

We’ve continued to drive education through our partnership with Evolve Communities, launching our first ‘7 Steps to Reconciliation’ course created by Aunty Munya and Carla, which was shared with our entire workforce. Beyond this course, we’ve been committed to providing practical and reliable learning resources to our team members, sharing Evolve’s online webinars at



key historical moments throughout the year, to recognise National Reconciliation Week and NAIDOC week.

Lunch and Learns

Our learning journey continued into 2025, when we hosted Jane Vadiveloo, the CEO of Children's Ground for a National Reconciliation Week Q&A with our Support Centre team. Children's Ground is an organisation dedicated to supporting and empowering First Nations children, women, families and communities bringing valuable perspective to our ongoing education.

Māori Education

In 2025 we continued to work closely with the support of Māori cultural expert, Janelle Riki-Waaka, to help us support better incorporate traditional customs and the Māori language into everyday practices within our stores and wider New Zealand teams. We also ensured we brought this to life with our customers and the wider community. Māori team members, customers and community.

During Māori Education Language Week (Te Wiki o te Reo Māori), we provided opportunities for our team to build their te reo language skills through a short Māori language course created in house and with the support of an external cultural consultant. The courses supported teams across retail, support centre, customer care and the CFC learn more about the language, pronunciation skills, history and place names and share these with each other. We have also embedded important Māori cultural ceremonies traditional practices in our ways of working, including having mihi whakatau blessing ceremonies at store and office openings.

3.7 SUPPORTING GENDER EQUALITY THROUGH MECCA M-POWER

At MECCA, we believe beauty is emboldening and can advance gender equality by reshaping restrictive and disempowering social norms and stereotypes. Our vision is to see gender equality in our lifetime, because waiting over a century – the current global trajectory – simply isn't good enough. To propel this forward, we use our business and brand as a force for positive change and partner with inspirational social changemakers working to advance gender equality. Several of our partners support women at the intersection of climate change and gender, both here in Australia and in the Pacific.

MECCA M-POWER provides financial support to not-for-profit partners to undertake their work and a significant platform to raise awareness of their advocacy campaigns and programmatic work, including those addressing modern slavery practices.



And our commitment extends well beyond financial support – through storytelling, purpose-led campaigns, creative collaborations and the way we show up as a business every day, we work to shift culture and advance gender equality from the inside out.

Since 2022, MECCA has committed more than \$35 million to gender equality initiatives through M-POWER, and our team has raised a further \$300,000 through grassroots fundraising. In 2024, Philanthropy Australia recognised MECCA as Australia’s leading gender-wise philanthropist, an important external signal that the work is being taken seriously beyond our own walls.

To read more about M-POWER’s impact in 2025, visit www.mecca.com/m-power.

4. ASSESSMENT OF ACTIONS

Throughout 2025, we have built on our work from previous years to generate awareness of modern slavery among our team, brands and suppliers and taken actions to further mitigate modern slavery within our supply chains.

While we acknowledge that we still need to better understand the risks of modern slavery in our supply chains, in 2025, we took positive steps towards this by increasing our risk assessment processes, improving onboarding processes for our suppliers and brands, and growing the visibility of our complex supply chains.

With all the aforementioned policies, codes and compulsory education modules in place, we have built a network of more educated and aware team members, brands and suppliers.

We are committed to continuing to understand risks of modern slavery in all aspects of our business and supply chains, with a view to mitigating these risks through education and awareness.





5. LOOKING FORWARD TO 2026

We'll continue to build on our progress from 2025, deepening our understanding of modern slavery risks and strengthening our ability to respond to them. As part of our evolving ethical sourcing and procurement strategy, we remain committed to embedding responsible business practices across all aspects of our supply chain. Transparency and accountability remain at the core of our efforts to combat modern slavery.

We continue to define a collective MECCA strategy relating to ethical procurement, sourcing and supplier partnerships with a strong focus on modern slavery. Throughout 2026, our focus will include:

- Embedding our internal risk framework into the procurement process to better identify high-risk suppliers and regions, enabling more targeted supplier engagement to better understand suppliers' practices and risk mitigation;
- Reviewing all supplier documentation to ensure our expectations of protecting human rights are clear;
- Working towards better traceability of ingredients and raw materials across our supply chain



FURTHER INFORMATION

If you have any questions about this statement, please contact us via m-pact@mecca.com.au.

ADOPTION BY THE BOARD

Principal Governing Body Approval

This statement was approved by the Board of Directors of MECCA Brands Pty Ltd in their capacity as principal governing body on 12 June 2026 and is signed by responsible members of MECCA Brands Pty Ltd as defined by the Modern Slavery Act 2018 (Cth)



Joanna Horgan
Founder and Co-CEO, MECCA Brands Pty Ltd
On 12 June 2026



Peter Wetenhall
Co-CEO, MECCA Brands Pty Ltd
On 12 June 2026

