



MODERN SLAVERY STATEMENT

2025

FOREVER NEW

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INTRODUCTION

Forever New acknowledges the critical importance of eliminating modern slavery, an issue that impacts both the global apparel industry and the lives of families worldwide. This statement reflects our commitment to ensuring fair and safe working conditions across our supply chains and operations.

As part of our ongoing efforts to identify and address modern slavery risks within our business, Forever New has recently undertaken the following initiatives:

1. Expanded our Modern Slavery training to team members located in China, India and South Africa
2. Increase in our completion rates of our modern slavery training in Australian head office and retail teams
3. Educated our franchise partners on modern slavery risks and Forever New modern slavery policies
4. Continued monitoring and commitment to Forever New's Social Audit program

This statement outlines the modern slavery risks identified within our operations and supply chains and details the steps taken during this reporting period to mitigate those risks. It also highlights our ongoing and planned initiatives to address modern slavery within our business.

This modern slavery statement applies to the reporting period 1 July 2024 – 30 June 2025 and is a joint statement submitted by:

- **ADT Group Holdings Pty Ltd**
ACN 144 849 436; and
- **Forever New Clothing Pty Ltd**
ACN 118 100 100 (a wholly owned subsidiary of ADT Group Holdings Pty Ltd)
(collectively referred to throughout this statement as 'Forever New').

This statement has been prepared in accordance with the Modern Slavery Act 2018 (Cth) ('the Modern Slavery Act').

This statement was reviewed and approved by the respective boards of ADT Group Holdings Pty Ltd and Forever New Clothing Pty Ltd on 15 December 2025.



Dipendra Goenka

Director

ADT Group Holdings Pty Ltd | Forever New Clothing Pty Ltd

Our Structure, Operations and Supply Chains

Forever New, founded in Melbourne, Australia in 2006, is a successful womenswear and accessories brand with a presence across global markets.

OUR STRUCTURE

The Board of ADT Group Holdings Pty Ltd is responsible for the overall governance, management, and strategic direction of Forever New, in line with all duties and obligations required by law. This includes oversight of the Forever New Supplier Code of Conduct and other ethical sourcing policies, such as our Young Worker and Child Labour Policy and Forced Labour Policy. ADT Group Holdings Pty Ltd is the parent company of Forever New Clothing Pty Ltd, the primary operating entity in Australia.

The Board has delegated certain responsibilities to the Audit and Risk Committee, including oversight of Forever New's risk management and compliance framework.

The Executive Leadership Team of Forever New is responsible for implementing and executing the company's strategy, as well as managing its risk and compliance framework. Each member of the Executive Leadership Team reports directly to the Chief Executive Officer of Forever New. Within the business, the General Manager of Production and

Quality oversees the management of Forever New's ethical sourcing initiatives, including compliance with modern slavery obligations. Additionally, our Sustainability Team is a dedicated resource responsible for the day-to-day management of all ethical sourcing activities and initiatives.

Our organisational structure remains unchanged from previous statements.

OUR OPERATIONS

Headquartered in Melbourne, Australia, Forever New commenced operations in 2006.

During this reporting period, Forever New's business has focused on the sale of women's apparel and related accessories under the following brands:

- 'Forever New'
- 'Forever New Curve'
- 'Forever New Girls'
- 'Ever New'; and
- 'Ever New Curve'

The 'Forever New', and 'Forever New Curve' brands are used in most markets globally, while Ever New and Ever New Curve are used in the USA, Canada, and the Philippines.

Forever New operates as a global omni-channel business, selling its products through multiple channels during this reporting period:

- Free-standing retail stores in Australia, New Zealand, Singapore, Canada, India, United Kingdom, South Africa, and Namibia
- Concessions ("store-in-store") in department stores across Australia, Singapore, Canada, India, South Africa, United Kingdom, European Union, and the Middle East
- Online via company websites and third-party platforms (e.g., ASOS and The Iconic)
- As a franchisor in the Philippines and Indonesia
- Free-standing retail stores in the Middle East through a joint venture
- Wholesale distribution

Subsidiaries in New Zealand, Singapore, Canada, South Africa, United Kingdom, European Union, and India manage local operations. Forever New also maintains regional offices in Cape Town (South Africa) and Gurgaon (India), along with sourcing offices in Hangzhou, Guangzhou, and Qingdao (China).

Globally, Forever New directly employs approximately 2464 people, including a small number of contract staff. In Australia, where the head office and majority of stores are located, approximately 1197 employees are directly employed.

Our operations encompass design, retail, corporate, customer service, and warehouse functions.

Forever New's in-house design team in Melbourne creates collections for both Northern and Southern Hemisphere markets, which are manufactured by third-party suppliers overseas. The company does not manufacture goods in-house, though a small range of accessories is designed in South Africa.

Our head office houses support functions including finance, marketing, e-commerce, IT, buying, design, quality assurance, store development, operations, supply chain and logistics, legal, human resources, and planning.

Forever New's Australian distribution centre distributes merchandise to stores and fulfills online orders, while third-party logistics and warehouse providers support operations in New Zealand, Canada, Middle East, USA, South Africa, Singapore, and the United Kingdom. During the reporting period, the company closed its Indian warehouse and transitioned to a third-party provider in Haryana.

As of 30 June 2025, Australia has 81 standalone stores and 79 concession stores. In the United Kingdom and European Union, operations included 32 concessions, supported by 91 employees in operational and support roles.

Forever New also operates free-standing retail stores and online sales in the Middle East via a joint venture with Apparel Group. During the reporting period, Forever New operated 3 stores in Kuwait, 1 store in Bahrain, 1 store in Qatar and 1 store in UAE. We employed 38 staff across retail and head office operations. The joint venture uses a third-party logistics and warehouse service provider.

OUR OPERATIONS

24

COUNTRIES

189

PHYSICAL STORES
WORLDWIDE

235

CONCESSIONS
STORES-IN-STORES

2200+

EMPLOYEES

OUR SUPPLY CHAIN

Non-Merchandise Suppliers (goods or services not for resale)

Forever New sources non-merchandise goods and services across a range of categories such as retail fit outs, packaging, freight and logistics, landlords and marketing. Globally, we work with over 1000 non-merchandise suppliers across over 30 categories. These are goods and services not for sale as they are largely employed to aid and support in the operations of our business.

Merchandise Suppliers (goods for resale)

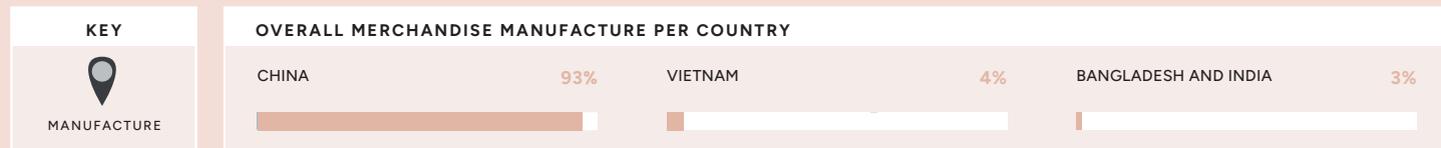
In this reporting period, we worked with 85 suppliers across apparel, accessories and footwear. Less than 1% of these were through agents with the rest being sourced by us directly. This allows Forever New to have direct relationships and greater oversight of our suppliers.

By working directly with our suppliers, our Social Audit Program allows us to capture data and information on working groups including those which are most vulnerable, such as women and domestic migrant workers. Domestic migrant workers are people who have moved to another in-country region to work on a temporary basis. Similarly, international migrant workers are people who work temporarily in a country of which they are not a national or permanent resident. Thus, their temporary status as migrant workers could subject them to greater modern slavery violations.

In this reporting period, there were approximately 17,000 workers in our Tier 1 supply chain where 56% were women and 33% were domestic migrant workers. There were no international migrant workers recorded amongst our Tier 1 supply chain.



OUR SUPPLIER MAP



Tier Definition

Forever New categorises our supply chain into five distinct tiers to capture the complexity inherent in the apparel industry. Each tier presents unique risks and challenges, often influenced by varying degrees of visibility. A comprehensive understanding of these risks, along with the nature of Forever New’s engagement with each tier, enables a more focused and effective approach to our compliance initiatives. For further details on our tracing initiatives, please see page 13.

The tiers and the nature of our relationships with them are described as follows:



TIER 1 STITCHING, ASSEMBLY AND KNITTING

Tier 1 suppliers include manufacturers, sub-contractors, and agents. Forever New has direct contact with Tier 1 suppliers, with the relationship governed by our Merchandise Supply Terms. The country-of-origin statement on our care label refers to location of the relevant Tier 1 manufacturing facility. Forever New has traced all of its Tier 1 suppliers. Any sub-contracting by a Tier 1 supplier requires Forever New’s prior written approval. Our compliance team reviews any requests to commence sub-contracting to ensure Forever New can assess any modern slavery or other ethical supply risks before approving any sub-contracting arrangement.



TIER 2 DYEING, PRINTING AND EMBROIDERY

Tier 2 suppliers work with finishing untreated fabric rolls and works with dyeing, printing, and embroidery. This tier is not always present in the supply chain as some Tier 1 suppliers also handle material production. Forever New does not necessarily have any direct legal ties to Tier 2 suppliers.



TIER 3 FABRIC MILLS

Tier 3 suppliers make untreated fabric rolls from yarn through weaving and knitting. Forever New has direct contact with some Tier 3 suppliers, with the relationship governed by our Merchandise Supply Terms.



TIER 4 YARN MILLS

Tier 4 suppliers spin yarn from raw material. An example is cotton ginning and spinning to create cotton yarn. Forever New has limited to no contact with Tier 4 suppliers and no contractual ties with Tier 4 suppliers.



TIER 5 RAW MATERIAL PRODUCTION

Tier 5 refers to production of raw material, including but not limited to farms and forests who grow our cotton and viscose. This stage also includes facilities producing synthetics from fossil fuelled based sources such as polyester. Forever New does not have any direct contact or contractual ties with Tier 5 suppliers.

Forever New Conscious

Forever New Conscious comprises five pillars, covering responsible fibres, environment, ethical supply, community, and diversity and inclusion. Within the Ethical Supply pillar, we strive to uphold the rights of workers within our supply chain through our robust supplier onboarding process and social audit program. We also take a holistic approach in minimising our environmental footprint, and continuously review our business practices against the Forever New Conscious strategy to drive positive change for our stakeholders.



Further details about Forever New Conscious are available on our website.



Identifying Risks of Modern Slavery

In order to identify and address potential instances of modern slavery in our business, we must be diligent in identifying the risks associated within our operations.

RISKS IN OUR OPERATIONS

Modern slavery remains a pervasive and hidden threat within global retail and Head Office operations, affecting vulnerable workers and undermining ethical business practices. In Australia, New Zealand, and Canada, retail businesses face increasing scrutiny over their exposure to forced labour, child labour, and exploitative working conditions, with particular focus on offshore manufacturing and sourcing operations. However, due to the controls implemented by Forever New, the risk remains low. In Australia, steady and low unemployment, along with the ongoing cost of living crisis, has created greater socio-economic instability. New Zealand has also been operating in a challenging economic environment, presenting potential risk of unethical business practices.

As the leading industry of employment in globally, retail may carry a risk of Modern Slavery. In line with our previous reports, modern slavery within our retail and head office operations in Australia, New Zealand,

Canada, South Africa, India, the EU, and Singapore, remain low as most of the workforce continues to be employed by Forever New directly in these markets.

Distribution centre operations continue to be an area of focus for ongoing due diligence, and across all locations, including Australia, New Zealand, Canada, the Middle East, the United Kingdom, Spain, and Singapore, the risk of modern slavery is assessed as low. In Australia, most distribution centre staff remain directly employed by Forever New, with a labour hire provider engaged under a contract containing a modern slavery compliance clause. All third-party logistics and warehouse providers across our global distribution network are either already operating under contracts that include modern slavery compliance provisions or will have these clauses incorporated as contracts are renewed. Forever New continues to monitor all distribution centre operations closely to ensure appropriate controls remain in place.



RISKS IN OUR SUPPLY CHAIN

Non-merchandise suppliers

As a global retailer, we engage with a broad network of suppliers spanning more than 30 categories, each presenting distinct risk factors. These risks include the use of third-party labour, employment of young or migrant workers, limited visibility within supplier networks, and in some cases, a lack of understanding of modern slavery and how such risks may manifest within their operations.

The potential for risk increases when these factors intersect with higher geographical risk—such as operating in countries where governance over employee rights and immigration is less robust. For example, in the Philippines and Indonesia, where Forever New partners with franchise operators, elevated risks exist due to differences in labour law standards compared with Australia. In such circumstances, our position as brand owner places us one step removed from their non-merchandise suppliers, making oversight more complex.

It is important to note that elevated risks are not limited to regions with weaker regulatory frameworks. Even in countries with stronger governance, such as Australia, Canada, and the UK, risks remain in sectors like warehousing and logistics, where the nature of the workforce and the occasional reliance on third-party labour create additional vulnerabilities.

Merchandise suppliers

Our Risk Register uses data from trusted third-party sources like the International Labour Organization (ILO), Walk Free Global Slavery Index (GSI), the US Government's List of Goods Produced by Child or Forced Labour, and Trafficking in Persons (TIP) reports.

This helps us assess risks in our merchandise and non-merchandise supply chains, as well as our operations. The Register includes a risk scorecard for each country where Forever New operates, based on this third-party data. All risk ratings are updated annually in line with the most recent data. This reporting period, the risk register has been expanded to include World Justice Project (WJP), Rule of Law: Fundamental Rights. WJP Rule of Law: Fundamental Rights is a measurable risk indicator that suggests a potential weakening or failure of law within a country. Examples of indicators include restrictions on freedom of speech, assembly and religion. The addition of these third-party indices did not change any existing risk ratings; rather, they support the current rating.

The Risk Register supports us to:

- Understand and identify our key risks across regions by country, industry, and product type

- Spot vulnerable worker groups
- Focus our risk management and due diligence efforts according to the level of risk
- Shape our approach to remediation

Since our first modern slavery statement in FY19/20, we've consistently identified the following groups as the most vulnerable in the apparel industry:

- Female workers
- Migrant labour
- Subcontracted labour
- Agency and temporary/contract workers
- Young or child workers

Our risk assessments also continue to highlight these potential modern slavery issues as most relevant to the apparel sector:

- Forced labour
- Bonded labour
- The worst forms of child labour
- Deceptive recruitment practices



INDUSTRY RISK

The apparel industry has a complex supply chain, with different risks at each tier, often related to how much visibility we have into those tiers. The industry's reliance on low-cost production, low-skilled labour, and short-term contracts adds to the risk of modern slavery. We recognise that modern slavery often arises from site-specific risks common in the apparel sector.

Some key warning signs of modern slavery in this industry include:

- Unauthorised subcontracting
- Excessive overtime
- Use of migrant, low-skilled workers
- Restrictions on freedom of association
- Temporary labour contracts
- Lack of effective grievance processes
- Gender inequality and gender-based violence in the supply chain



COUNTRY RISK

Risk levels in the apparel supply chain vary by country and supply chain tier. Countries with weak laws, poor enforcement, or high social inequality often present greater risks of modern slavery. We manage these risks through our Ethical Supply Framework and other initiatives outlined in this statement.

The Risk Register helps us understand the risk profile of each country. If we identify significant risks in a new market, we may decide not to source there or implement targeted actions to address those risks.



MATERIAL RISK

Some materials used in apparel production carry higher risks of modern slavery. For example, cotton is listed by the US Department of Labor as a commodity frequently linked to child and forced labour. Cotton picking and processing often involve low-skilled workers, a group we have identified as vulnerable.

Visibility is often limited beyond the fourth and fifth tiers of the supply chain. Because brands typically have less influence and oversight at these levels, the risk of modern slavery is higher and harder to detect.



Actions Taken to Address Modern Slavery Risks

GOVERNANCE

The Board, together with the Audit and Risk Committee, continues to share responsibility for overseeing Forever New's risk management and compliance framework, with the Executive Leadership Team responsible for its implementation and execution. This arrangement remains unchanged from our last statement and continues to operate effectively.

The Forever New cross-functional and regional Modern Slavery Working Group continues to report to the Audit and Risk Committee as a standing agenda item. Verbal updates on the group's activities and progress are provided at each meeting. The group is primarily responsible for ensuring that key actions and future priorities identified in our modern slavery statements are implemented, monitored, and completed, as well as preparing annual statements in accordance with Australian, United Kingdom, and Canadian law.

OPERATIONS

Our policy framework remains the cornerstone of our operations, establishing minimum standards for both team members and suppliers. Key policies include:

- Forever New Supplier Code of Conduct
- Anti-Discrimination and Equal Employment Opportunity Policy
- Diversity, Equality and Inclusion Policy

(See page 20 for a full list of our policies.)

Our whistleblower policy and independent hotline continue to play a critical role in reporting concerns, allowing issues to be investigated and resolved promptly. Reports can be submitted anonymously and in multiple languages or formats to improve accessibility.

For concession arrangements, we continue to work collaboratively with department stores to address modern slavery risks in line with contractual obligations. We have also distributed modern slavery awareness posters to be displayed across retail stores in Australia, New Zealand, Singapore, Canada,



Spain and the UK, detailing the different forms of modern slavery and the actions to take when an instance of modern slavery has been identified.

RESOURCING

Forever New's dedicated in-country representatives remain the primary point of contact for compliance with merchandise suppliers. They oversee onboarding, audits, site actions, and corrective measures as required.

Our Modern Slavery Working Group, together with the dedicated Sustainability Team, continues to oversee modern slavery compliance, reporting obligations, and all ethical sourcing and environmental initiatives for Forever New.

VISIBILITY AND TRACEABILITY

Merchandise Supply Chain

Maintaining strong visibility across our supply chain is essential for identifying potential modern slavery risks and managing them effectively if they arise. While we have full transparency of our Tier 1 factory base, we recognise that risks often lie deeper in the supply chain. As such, ongoing mapping beyond Tier 1 remains a key focus area and long-term commitment.

We continue to have full visibility of our Tier 1 supply chain, focusing on tracing facilities in Tier 2 and 3. Consistent with previous reporting periods, we have traced more than 80% of our Tier 3 and their respective dyeing, printing and embroidery mills. We also have visibility of all our core trim suppliers across both apparel and accessories.

We have continued our work in obtaining up-to-date third-party certificates and social or environmental assessments from current and newly traced facilities and consequently validating these against Forever New's Code of Conduct, social audit program and wider environmental standards and requirements. In line with last reporting period, facilities beyond Tier 1 have some environmental assessments and/or certifications, but lack social assessments, with only a small number of facilities with a valid social audit, beyond HIGG FSLM or SLCPs assessments. This is quite common, as brands don't always have any direct or legal ties to dyeing, printing or embroidery mills.

Through our tracing initiatives, we know that many of our fabric mills (**Tier 3**) work with the same dyeing and printing mills (**Tier 2**). Last reporting period, we identified two dyeing and printing

mills in China where our production volume was significant and so decided to send our own compliance team to conduct a social audit. Similarly, this year, another two mills have been audited in line with Forever New's social audit program.

Material Visibility and Traceability

Certain raw materials and fibres are more vulnerable to modern slavery risks, particularly where traceability beyond Tier 1 is limited and brand oversight is minimal. To address these challenges, Forever New is working to improve supply chain transparency through increased sourcing of independently certified fibres and materials. These certifications play a key role in helping us verify environmental, chemical, and social standards further down the supply chain, including at the raw material level. Wherever feasible, our preference is to use certified fibres and fabrics that align with our responsible sourcing goals. Our Responsible Sourcing and Fibre Policy reinforces this approach by strengthening our due diligence requirements. Under this policy, suppliers must assess material sourcing practices to ensure raw materials do not originate from areas associated with:

- Conflict or war
- The worst forms of child labor
- Forced labour and human trafficking

- Gross human rights violations (such as widespread sexual violence), or
- Other reasonably objective high-risk activities, including severe health and safety risks and negative environmental impacts

Cotton

Forever New is a committed signatory to the Turkmen Cotton Pledge, which affirms our stance against the use of forced labour in the production of Turkmen cotton. In support of our goal to transition to 100% more sustainable cotton, we continue to partner with and endorse Better Cotton's efforts to improve global cotton farming practices.

SUPPLIER ENGAGEMENT

Ethical Supply Framework

We pride ourselves on maintaining strong, transparent relationships with our supply partners. Exploitation or mistreatment of any kind is unacceptable within our supply chain. We require all suppliers to fully commit to our ethical sourcing values and policies.

Our sourcing values are outlined in our Ethical Supply Framework, which sets the minimum standards

for compliance. This framework includes:

- The Forever New Supplier Code of Conduct and Ethical Supply policies
- Our Social Audit and Corrective Action Plan (**CAP**) Remediation program
- Factory management training initiatives

New suppliers

Forever New employs dedicated in-house compliance teams who conduct physical site visits in our main sourcing countries before approving new suppliers for production. These visits assess conditions against the Forever New Supplier Code of Conduct, all relevant laws, and universal human rights principles.

Where our team cannot conduct on-site visits, suppliers must provide a reputable third-party audit from the past 12 months for assessment against our Ethical Supply Framework. Our compliance team also verifies the validity of these audits.

Suppliers found with zero-tolerance (**ZT**) violations are not approved for production. All ZTs must be fully remediated before onboarding. Starting in 2025, this requirement will also extend to all critical-failure-points (**CFPs**).

Social Audit Program

Forever New's auditors are highly experienced and qualified to conduct audits using BSCI, SA 8000, ICS, ERSA, and SMETA standards. Our internal audit program follows the SMETA methodology. We aim to audit all factories annually.

Audits typically include:

- An opening meeting with factory management and worker or union representatives
- A factory tour
- A review of relevant documents and policies
- Confidential interviews with workers (both groups and individuals)
- A closing meeting with factory management and worker or union representatives

Supplier Compliance Rating

After each social audit, factories receive a rating based on a traffic light system from 'green' to 'dark red'. Ratings reflect audit performance, considering both the number and severity of non-compliances. Ratings are updated once issues are remediated.

Starting in 2025, suppliers rated 'green' will have their audit frequency extended from 12 to 18 months to reduce the risk of audit fatigue.

Corrective Action Plans and Remediation

At the audit closing meeting, findings are reviewed, and a preliminary corrective action plan (**CAP**) is issued. As detailed in the Supplier Compliance Rating table, non-compliances are classified by severity—from minor issues to zero-tolerance violations. This classification determines remediation deadlines, which can range from immediate action to up to 120 days, and the method of verification (desktop review or on-site follow-up).

Forever New expects all suppliers to pursue continuous improvement, prioritising remediation and taking proactive steps to prevent future non-compliances.

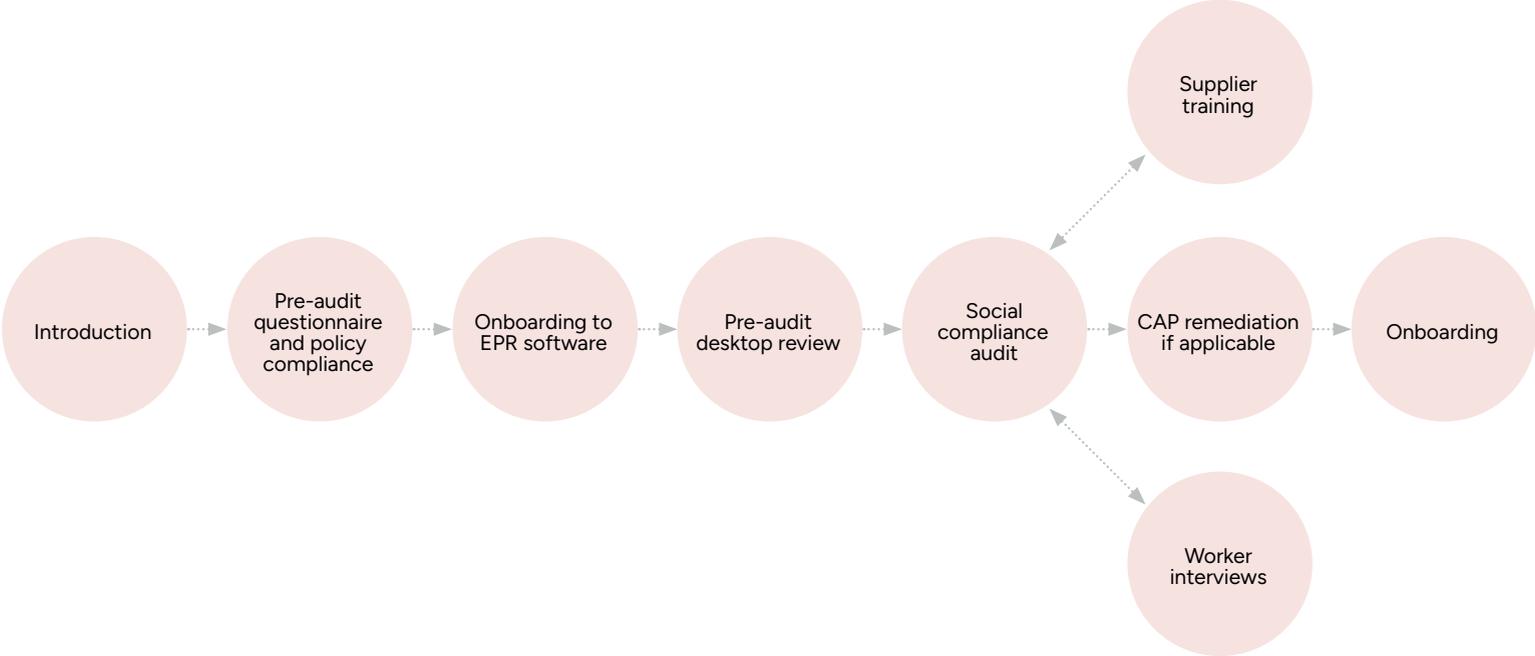
Supplier Manual

This reporting period, to continue to support a seamless onboarding process and boost accountability, we collated all information regarding our social compliance standards, in an updated Supplier Manual. The Supplier Manual has been shared with all current Suppliers and is sent to new Suppliers at onboarding stage. The manual has also been translated to both Mandarin and Vietnamese.

SUPPLIER COMPLIANCE RATING TABLE

RATING	RATING REQUIREMENT
Red Critical	Factory has one or more Zero Tolerance findings
Red	Factory has one or more Critical Failure Point findings
Amber	Factory has one or more Major Non-Compliance findings
Yellow	Factory has one or more Minor Non-Compliance findings
Green	Factory has some Best Practices in place that go beyond the minimum standards

ONBOARDING AND SOCIAL AUDIT PROGRAM



Supplier Training

Forever New is committed to delivering factory management training on an annual basis. This training, developed by our in-country ethical compliance team, is designed to raise awareness of Forever New’s Code of Conduct as well as relevant local laws. The sessions are conducted face-to-face and are scheduled independently of the annual social audit.

Merchandising Training

In our statement last reporting period, we featured a case study where we identified the need for additional training for our buying and merchandise team on Forever New's minimum social compliance standards and policies. As outlined in the original case study, having upskilled team members on the topic of ethical supply can assist alleviate modern slavery risk from the outset.

As our Merchandise department in China is often the main point of contact between Suppliers and Forever New, we decided to arrange face to face training for this department as a priority. The training took place in December 2024 and was hosted by Forever New's in-house social compliance auditor and covered the following aspects:

- Basic knowledge on social compliance with a focus on legal standards in the country vs social responsibility standards
- Forever New's minimum requirements
- Different stages of a social audit and common non-compliances
- In-depth training on Forever New's social compliance platform incorporating Modern Slavery and Anti-Bribery and Corruption Training

We are hoping to extend this training to our Australian Head Office next.



POLICY AND CONTRACTUAL PROVISIONS - SUPPLY CHAIN

Forever New requires all suppliers to comply, where applicable, with our comprehensive supplier policy suite, which includes the Forever New Supplier Code of Conduct. This Code specifically addresses forced labour risks, including child labour and debt bondage. Together with our ethical sourcing policies, the Code establishes the minimum requirements for our trading relationships with suppliers.

The Forever New Supplier Code of Conduct incorporates the principles of the United Nations Declaration of Human Rights, the Ethical Trading Initiative (ETI) Base Code, and relevant ILO Conventions. To support understanding and compliance, the revised Code is issued in local languages for our primary sourcing countries, China and Vietnam. Supplier adherence to the Code and policy suite is monitored through our social audit program.

All policies are issued during supplier onboarding and are available on our social compliance

software. Employees also have access via shared company folders, and selected policies are published on our website.

The Forever New Merchandise Supply Terms continue to govern the supply of merchandise. These Terms require suppliers to comply with the Code of Conduct and ethical sourcing policies and explicitly outline modern slavery obligations.

If a supplier identifies instances of modern slavery within their operations, Forever New works with the supplier to resolve the issue, prioritising the welfare of affected individuals and addressing the root causes. It is not Forever New's policy to immediately terminate agreements, as doing so could discourage suppliers from reporting such issues. However, if reasonable attempts to mitigate modern slavery risks fail, the supplier will be considered in breach of the Merchandise Supply Terms, and Forever New will terminate all supply arrangements. This approach remains consistent with previous statements.

During this reporting period, Forever New has not terminated any merchandise suppliers for reasons related to modern slavery.



POLICY	PURPOSE
Forever New Supplier Code of Conduct	Outlines our minimum standards for compliance and ethical sourcing.
Young Worker and Child Labour Policy	Intended to ensure all organisations involved in the manufacture or supply of goods and services to Forever New understand their responsibilities in preventing instances of child labour and where suspected or identified, the remediation processes they must undertake. In addition, this policy outlines our expectations in relation to the protection of young workers and compliance with ILO conventions on child labour as well as applicable laws and regulations.
Forced Labour Policy	Intended to ensure all organisations involved in the manufacture and supply of goods and services to Forever New understand their responsibilities in preventing forced labour and where suspected or identified, the remediation processes they must undertake.
Living Wage Commitment	Forever New is committed to providing living wages for all workers within our supply chain, a requirement which forms part of our Code of Conduct, agreed to by all suppliers.
Responsible Sourcing and Purchasing Policy	Outlines our approach to responsible purchasing practices and is supported by Responsible Sourcing & Purchasing Guidelines.
Ban on Cotton Harvested from Uzbekistan and Turkmenistan	As a signatory to these pledges, we are stating our firm opposition to the use of child and adult forced labour in the harvest of cotton.
Environmental Protection	All suppliers are required to comply with relevant environmental laws and regulations, including obtaining necessary permits and licences. Environmental Management Systems, which consider water treatment, waste reduction and disposal, air pollution, carbon emissions and the management of chemicals must be maintained.
Gender Equality in the Supply Chain Policy	Outlines Forever New's commitment and minimum requirements to gender equality in the supply chain.
Responsible Fibre & Sourcing Policy	Outlines Forever New's preferred materials and material specific requirements in a conscious effort to minimise the environmental impact our material choices have.
Animal Welfare Policy	Outlines our expectations that all animals within the Forever New supply chain are treated humanely and with respect and our conditions of supply of animal derived materials.
Chemical Management and Restricted Substance List (RSL)	Details the chemical restriction limits for Apparel, Accessories and Footwear.
Packaging Policy	Outlines Forever New's preferred materials and material specific requirements for packaging to ensure that the sourcing of raw materials used in our packaging is procured in a responsible and sustainable way.

WORKER VOICE AND ACCESS TO REMEDY

Grievance Mechanisms

A social audit alone does not provide a complete picture of actual working conditions. Providing a variety of channels for workers to raise concerns is essential to ensure they have effective and trusted access to remedies and feel comfortable and confident using them. Forever New continues to explore and enhance these channels to better identify and address potential modern slavery risks within our Tier 1 supply chain.

During the previous reporting period, we rolled out an ethics hotline across all Tier 1 factories in Vietnam. This hotline is promoted through posters displayed in multiple visible locations within each factory. The posters explain Forever New's Code of Conduct, the types of issues that can be reported, and how to make a report.

Workers can submit reports anonymously, without fear of retaliation, and their identities will be kept confidential unless disclosure is legally required. All grievances or breaches of our Code of Conduct are managed directly by Forever New's ethical sourcing team and relevant in-country representatives. Reports may be made in the local language.

In China, we continue to evaluate the effectiveness of existing grievance mechanisms and other available channels within our Tier 1 factories.

Forever New is a member of the RMG Sustainability Council (**RSC**). As such, all factories in Bangladesh have a confidential health and safety complaints mechanism that operates independently from the factory. This mechanism also forwards any non-health and safety complaints to brand owners for further investigation and response.

Whistleblowing Policy

As in previous statements, Forever New's whistleblower policy and accompanying anonymous, independent hotline continue to provide a mechanism for suppliers, workers, or their family members to raise concerns for investigation. Our hotline is externally managed to allow reports to be made on a confidential or anonymous basis (if required) and reports can be accepted in multiple languages. In this reporting period, we provided toll-free numbers to our retail operations in Spain, in addition to the toll-free numbers in Australia, New Zealand, Canada, Singapore, and the UK.

INTERNAL CAPACITY BUILDING

Responsible Sourcing and Purchasing

Forever New is committed to the ethical sourcing of goods and recognise the shared responsibility we have with our suppliers to uphold and maintain the rights of all workers along the supply chain. We remain committed to the responsible procurement of goods in line with our Responsible Sourcing and Purchasing Policy.

Our team members are guided by our Responsible Sourcing and Purchasing Policy and other supporting guidelines to engage with new and existing suppliers. By doing so, we can ensure that the rights of all workers are upheld, and the business remains committed to our ethical supply pillar. The Policy addresses all responsible purchasing behaviour and management processes in the buying cycle of Forever New products. This includes factory capacity, forecasting and lead times, cost and payment terms, purchase order efficiencies and responsible exit guidelines. A copy of our policy is available on our website.

Daily responsibility for adherence with the Responsible Purchasing and Sourcing Policy lie with relevant Managers and overall accountability for compliance rests with Heads of Department.

Training

A key part of Forever New's compliance program is to equip our team members with essential knowledge about modern slavery, including in our international markets. In this reporting period, we developed a two-pronged approach to inform and educate our teams on Modern Slavery.

Continuing from the last reporting year, our interactive and comprehensive training was distributed to all head office staff in Australia as part of both the onboarding process and as an annual module for all team members to complete.

The module consists of content describing modern slavery and the different forms it can take, what to look for and how to take action if it occurs.

To ensure comprehension and completion, embedded assessments were placed throughout the module, reinforcing key concepts and verifying knowledge with a passing score of 80%.

For team members located in our retail stores and warehouses, a Modern Slavery Information Statement was developed, outlining what modern slavery looks like and what to do in the event there is a concern.

The Information Statement was sent to our global network of stores to be displayed for all team members to read. It has also been posted on all internal communication boards within Head Office.

Training on Modern Slavery Awareness was also extended to head offices in China, India and RSA where head office team members completed the training in face-to-face briefings. Team members were educated on the types of conduct which could fall under Modern Slavery, how to identify potential signs and the correct internal channels for reporting any concerns. These sessions also encouraged team members to educate their peers, upholding a culture of vigilance and accountability within the wider organisation. Furthermore, retail team members in India were able to complete the training via an online module, allowing for greater accessibility within store teams.

Additionally Anti-Bribery & Corruption training has been aligned to those team members who manage supplier relationships. As with our modern slavery module, this training educates and reinforces ethical standards and consequences of non-compliance.



Case Study

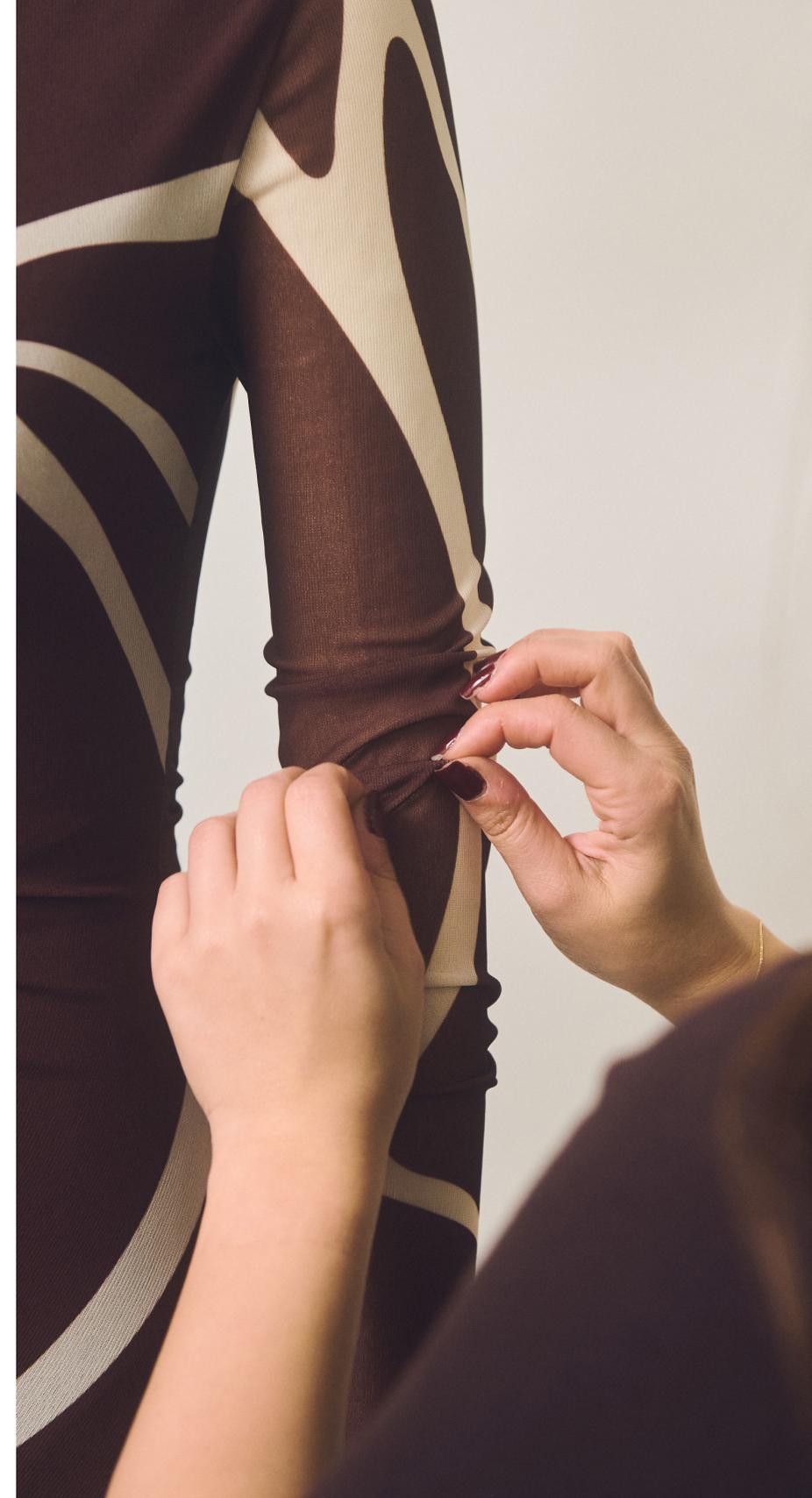
Modern Slavery Awareness Webinar for our franchise partners

In our last reporting period, one of our future priorities identified was to educate our franchise partners in Indonesia and Philippines and their employees on modern slavery and measures to address any risks within their own businesses.

Due to a combination of socio-economic, governance and labour-related factors, countries like Indonesia and Philippines are at greater risk of modern slavery. Through further engagement, we also found a lack of understanding around modern slavery and its key indicators.

As a result, Forever New hosted a Modern Slavery Awareness webinar for our franchise partners in Indonesia and the Philippines, reinforcing our commitment to ethical and responsible business practices. The webinar, which ran for approximately one hour, was developed and delivered by Forever New's internal Modern Slavery Committee, with contributions from our Sustainability Manager, Legal Counsel, GM of People & Culture, and Risk department.

Attendees from our franchise partners included representatives from their HR, procurement, and supply chain teams. The session aimed to educate our Partners on the risks and indicators of modern slavery, Forever New's obligations under various modern slavery regulations, and the steps we have taken to address and mitigate these risks across our supply chains and operations. As part of the session, participants were also guided through a modern slavery training module developed in-house, ensuring consistent understanding and alignment with Forever New's expectations and ethical standards.



STAKEHOLDER ENGAGEMENT AND PARTNERSHIPS

Forever New remains actively involved in industry benchmarking initiatives, training programs, and webinars led by NGOs. These collaborations offer valuable guidance, promote knowledge sharing, and help build a shared understanding of modern slavery risks and stakeholder expectations. Such engagement strengthens our ability to identify, respond to, and manage ethical supply chain risks effectively. In addition, insights from our wholesale and concession partners play a key role in shaping our priorities and ensuring our practices remain aligned with broader industry standards.

INDUSTRY PARTNERSHIPS

PARTNER	PURPOSE	RISK/INDICATOR ADDRESSED
RMG Sustainability Council (RSC) (formerly the Bangladesh Fire and Safety Accord)	Forever New has been a member of the Bangladesh Fire and Safety Accord (now RMG Sustainability Council or 'RSC') since 2013. Our factories in Bangladesh remain members of the RSC.	Safe working conditions
Better Cotton	During the reporting period, we continued our membership with Better Cotton. Our aim is to have 100% of our cotton sourced from more sustainable sources including Better Cotton and Global Organic Textile Standard (GOTS).	Forced labour in the raw materials and processing tiers of our product supply chain
Responsible Sourcing Network	Forever New is signatory to the Company Pledges Against Forced Labor in the Cotton Sector of Uzbekistan and Turkmenistan. As a signatory to these pledges, we are stating our firm opposition to the use of forced labour in Uzbekistan and Turkmenistan's cotton production and require all suppliers to comply with this requirement.	Forced labour in the raw materials tier of our product supply chain

Assessing the Effectiveness of Our Actions

GOVERNANCE

As previously noted, the Forever New Modern Slavery Working Group oversees all aspects of this statement, including research, data collection, drafting, obtaining approvals from the Audit and Risk Committee and the Board, and submitting the statement to the Australian Border Force. Following each statement, we conduct a review to assess the effectiveness of the working group and ensure appropriate representation across participants.

The working group reports to the Audit and Risk Committee, whose charter includes oversight of the framework and reporting process to identify and address modern slavery risks and approve statements prior to Board approval. Modern slavery is a standing agenda item for the Audit and Risk Committee. We consider this governance structure effective in managing modern slavery risks and reporting obligations.

ETHICAL SUPPLY FRAMEWORK – COMPLIANCE

Social audit program

Under our ethical supply framework, we have developed internal key performance indicators (KPIs) to assess the effectiveness of our social audit program. This program allows us to collect data on policy compliance, volume of social audits conducted in line with audit schedule, and corrective action plans issued and remediated, including completion timeline of these.

This reporting period, a total of 76 audits were completed including two of our Tier 2 suppliers. An average of 5.97 non-compliances were found in each site, ranging from minor to major. Of all non-compliances, less than 1% were critical failure points and all of these were resolved within the reporting period. Furthermore, 86% of all corrective action plans issued were remediated within the same reporting period.

Most instances of non-compliance are often related to living wages and working conditions being safe and hygienic. Issues surrounding living wages are often systemic and difficult to remediate as many



workers are unwilling to participate in social insurance due to associated costs as well as conflicts with other schemes which offer similar benefits with a lower cost. Lack of safety mechanisms on machinery is also a non-compliance which is prevalent but often remediated within the prescribed timeframe once corrective action plans are issued.

In line with reporting periods, there have been no instances of modern slavery found, and no suppliers have been offboarded due to non-compliance.

Social Audit beyond Tier 1

As outlined in our previous report, we are working on expanding our social audit program beyond Tier 1 where possible. This reporting period, two dyeing and printing mills where Forever New has significant production volume has been audited. A total of 7 NCs at each facility was identified, ranging from minor to major. Each mill was issued a Corrective-Action-Plan (**CAP**) upon completion of audit. Both audits were announced, due to the nature of our relationship, or lack thereof, as Forever New does not hold any direct relationships with dyeing or printing mills.

Both mills had valid HIGG FSLM assessments,

and the social audits confirmed the management processes, policies and working conditions originally reported in these self-assessments.

WORKER VOICE AND ACCESS TO REMEDY

Grievance Mechanisms

Consistent with last reporting period, Forever New did not receive any reports of grievances or breaches through the ethics hotline in Vietnam. We have continued to monitor visibility and accessibility of the hotline by ensuring posters remain prominently displayed in all factories. In parallel, our local social compliance representative has used annual audits to verify that workers are aware of the hotline and understand how to use it. It is important to note that these factories already operated established grievance mechanisms overseen by other brand partners before the implementation of our own system.

In China, most Tier 1 factories provide workers with internal grievance processes, the effectiveness of which is reviewed during our annual audit cycle.

In Bangladesh, we remain an active member of the RMG Sustainability Council (**RSC**). As part of this membership, any non-health and safety complaints are referred

directly to the brand for action. No such grievances were reported through this channel in any Forever New Tier 1 facility over the course of the reporting period.

Whistleblower Hotline

A key initiative this reporting period was increasing awareness of Forever New's whistleblower policy and hotline. As a result:

- 12 reports were received from Australia and overseas, a significant increase from the previous period.
- Reports made were largely workplace grievances, with no whistleblower complaints. This will be addressed in the next reporting period through communication surrounding the purpose of the whistleblower hotline.
- Summaries of all reports were provided to the Audit and Risk Committee for review and monitoring.

CAPACITY BUILDING

Training

Our mandatory Modern Slavery training modules continue to be a vital part of educating head office in Australia, and this year the training was extended to

India and RSA the form of in-person training sessions.

As stated in last year's modern slavery statement, increasing participation in the modules was a strategic priority for this report with the target KPI being 90% completion rate. Within the Australian head office, there was a 95% completion rate for the reporting year, emphasising the importance of compliance and engaging in mitigating modern slavery practices throughout all areas in the business. We were able to exceed our goal of 90% completion rate within head office by increasing communication about modern slavery awareness both directly to team members as well as to relevant managers to drive completion rates.

The training was also extended to team members in RSA and India in group settings. In India, we saw an 88% completion rate for team members in head office and warehouse, and a 98% completion rate for RSA head office staff.

In the next reporting period, we plan to roll out the training to retail team members in RSA as well.

For team members with less risk of exposure to the different forms of Modern Slavery a Modern Slavery Information Statement was developed.

The Information Statement was sent to our global network of stores to be displayed for all team members

to read, including local toll-free numbers to report any incidences of modern slavery. It has also been posted on all internal communication boards within Head Office.

Our responsible purchasing and sourcing training remains as an online module for the reporting period, allowing us to deploy the training in an engaging and efficient manner. This has proven to be successful over the years as we have captured high head counts across all relevant team members required to complete the module. It also allows us roll out the training to new team members at onboarding stage, ensuring that they are made aware of our responsible purchasing and sourcing policy at the commencement of their employment.

In the next reporting period, we plan to roll this out to Planning teams to ensure they have a full and comprehensive understanding of our responsible purchasing requirements.

Stakeholder Assessment

During the reporting period, Forever New actively collaborated with NGOs and contributed to a range of industry initiatives centred on human rights and worker wellbeing. These engagements provide meaningful insights that support our ongoing efforts to strengthen practices and assess our impact. We value the opportunity to receive feedback from industry

stakeholders and see it as a vital part of our journey toward continuous improvement. As we advance our strategic goals, we remain dedicated to transparency and to protecting the rights of those most at risk within our supply chain and broader operations.

Consultation With Controlled Entities

As previously stated, this is a joint statement of ADT Group Holdings Pty Ltd and its wholly owned subsidiary, Forever New Clothing Pty Ltd, a reporting entity under the Modern Slavery Act, together with its global subsidiaries. Each subsidiary operates under a common governance framework overseen centrally by the board of ADT Group Holdings Pty Ltd. The directors of Forever New Clothing Pty Ltd are also directors of ADT Group Holdings Pty Ltd. ADT Group Holdings Pty Ltd, as the holding company, does not conduct operations itself; all trading and operational activities are conducted via its subsidiaries.

Our consultation process remains consistent with previous statements. All controlled entities operate within the same sector or in a supporting role. In preparing this statement, input was sought from key management personnel of Forever New Clothing Pty Ltd across central functions, including production, finance, operations, human resources, legal, and logistics. This process was coordinated and overseen by the modern slavery working group, which identified

modern slavery risks and devised plans to address them. This statement reflects the outcomes of that process.

The Audit and Risk Committee of ADT Group Holdings Pty Ltd reviewed and approved this statement before its approval by the respective boards of ADT Group Holdings Pty Ltd and Forever New Clothing Pty Ltd.



Future Priorities

Forever New prioritises continuous improvement in all aspects of its business, including ethical sourcing initiatives, as outlined in our modern slavery reports.

Our priorities for the next reporting period and beyond include the following:

- Continue to audit beyond Tier 1 suppliers and expand our social audit program to enhance supply chain visibility
- Extend annual online training modules to teams in China, India and South Africa
- Worker Sentiment Surveys: Continue engaging with suppliers through worker sentiment surveys, as per our pilot project in FY24
- Non-merchandise suppliers to receive and complete SAQs as part of the onboarding process, in line with merchandise suppliers
- Continual promotion of our whistleblower hotline and social compliance standards



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