

---

**MODERN SLAVERY STATEMENT**

*Financial Year 2025*

---

# TABLE OF CONTENTS

---

<b>INTRODUCTION .....</b>	<b>3</b>
Progress since our previous Statement.....	3
<b>STRUCTURE, OPERATIONS AND SUPPLY CHAINS.....</b>	<b>3</b>
Buzz's Structure.....	3
Buzz's Operations.....	3
Buzz's Supply Chains .....	4
<b>RISKS OF MODERN SLAVERY.....</b>	<b>4</b>
<b>ACTIONS TAKEN TO ADDRESS RISKS OF MODERN SLAVERY .....</b>	<b>5</b>
Selection of Suppliers .....	5
Supplier Agreements .....	5
Internal Policies .....	5
Training .....	5
Due Diligence and Monitoring .....	6
Inspections and Accreditations.....	6
Remediation .....	6
Memberships .....	6
<b>ASSESSMENT OF EFFECTIVENESS.....</b>	<b>7</b>
<b>CONSULTATION .....</b>	<b>7</b>
<b>FUTURE ACTIONS.....</b>	<b>7</b>

# Introduction

---

This statement provides information about Producto Pty Ltd (ACN 161 263 654) and its subsidiary companies (including Buzz Products Pty Ltd (ACN 091 262 172), Buzz Export Services Pty Ltd (ACN 160 877 592), and Buzz Products Inc) (together, **Buzz**).

Buzz is committed to high standards of conduct and ethical behaviour in all of its business activities, and to promoting and supporting a culture free of human trafficking, slavery and slavery-like practices. We aim to protect against any forms of modern slavery inside our operations and supply chain by monitoring our systems designed to identify and mitigate potential risks.

This modern slavery statement has been published in accordance with the *Australian Modern Slavery Act 2018* (Cth) (the **Act**) and is our second statement under the Act. This modern slavery statement explains our efforts taken during the financial year ending on 30 June 2025 to identify, assess, and address modern slavery risks in our operations and supply chains.

In this statement, the use of the terms “we”, “our” and “us” refer to Buzz.

## Progress since our previous Statement

Since our first statement for the financial year ending on 30 June 2024, we have focussed on strengthening our supply chain visibility through:

- Exploring enhancements to screening practices for new suppliers;
- Reviewing current status of supplier agreements and provisions in such agreements;
- Reviewing internal processes in supplier engagement; and
- Becoming a SEDEX member to assist Buzz in evaluating its supply chain.

For further information on our progress, please refer to pages 5 and 6 of this statement.

## Structure, Operations and Supply Chains

---

### Buzz’s Structure

Producto Pty Ltd is the parent company of trading entities Buzz Products Pty Ltd, Buzz Export Services Pty Ltd, and Buzz Products Inc (a USA entity).

### Buzz’s Operations

Buzz is an Australian design house and product supplier headquartered in Melbourne, Australia. It employs approximately 120 people across its group entities, residing in Australia, the United States, and Dubai, in roles spanning Design, Client Services, Supply Chain, Product Development, Brand Partnerships, Logistics, Finance, Marketing, IT and Project Management. We also manage an e-commerce channel.

Buzz designs and supplies various products, such as luxury amenities, prestige skincare, textiles and loungewear, meal service ware, and children’s products for use within the travel industry, with our main focus being the supply of products to airlines and hotels globally. We collaborate with luxury and iconic brands to develop, design and create products for our customers, so that they can provide those

products to their customers as part of their travel experience. Part of our operations also includes purchasing finished goods from brands to on-sell to our customers.

While our products are designed in-house, we engage third party manufacturers to manufacture our products (and procure the raw materials for the manufacture) and third party logistics providers to warehouse and transport our stock. Buzz does not own any manufacturing or warehousing facilities, however, we have many longstanding relationships with our partners, some in place for more than a decade.

## Buzz's Supply Chains

Buzz's operations require the services provided by contractors, including:

- Sourcing raw materials for our products;
- manufacturing the products that Buzz designs;
- shipping and distribution services to transport products to customers; and
- warehousing services to hold inventory.

Buzz's supply chain also includes the suppliers of finished products that Buzz purchases to on-sell to its customers.

While our supply chain has a global presence, our main factories are located in China. Buzz also sources a majority of its materials from China.

We work closely with our suppliers and service providers to ensure adherence to Buzz's policies and standards.

## Risks of Modern Slavery

---

During this reporting period, Buzz determined that the potential modern slavery risks that may arise in its operations and supply chain are as set out below. We were able to identify that our direct operations, managed by employees engaged under Australian employment standards, present the lowest risk, whereas the greatest exposure to risks lies within our supply chain, where complex global networks and third-party arrangements increase vulnerability.

These key identified risk areas in our supply chain include:

- Outsourcing activities to third parties or engaging subcontractors to manufacture the products;
- Offshore labour arranged by third parties;
- Use of exploited and unskilled labour to meet low-cost targets and accelerated delivery schedules;
- Non-compliance with our standards, policies and procedures, including those standards and policies relating to labour, employment, health and safety and forced labour;
- Difference in employment laws and social, economic and political structures in certain countries, compared to those in Australia; and

- Limited visibility beyond direct suppliers, creating challenges in tracing raw materials and subcontracting practices.

## **Actions Taken to Address Risks of Modern Slavery**

---

### **Selection of Suppliers**

At Buzz, all of our supply partners are carefully chosen. Selection audits are conducted for every new supplier, and we only proceed with suppliers that satisfactorily pass these audits. Our sourcing team assesses reputation, financial stability, cost, and the overall risk profile of each supplier and provides these insights to the Supply Chain Director to support senior leadership decisions.

During this reporting period, Buzz reviewed its current internal procedure for engaging finished-goods suppliers. This review enabled us to determine key areas for improvement. Accordingly, we formalised our internal process on who is involved in the selection of such suppliers, including initial risk screening and contractual controls.

### **Supplier Agreements**

Buzz requires that all our suppliers sign our stringent Supplier Code of Conduct. Our Supplier Code of Conduct strictly prohibits modern slavery and requires suppliers to use reasonable efforts to eliminate modern slavery within their operations, in their subcontractors operations and within their supply chains, including raw material producers. Our suppliers, including their subcontractors, must at all times comply with Buzz's Supplier Code of Conduct.

Buzz also requires that suppliers sign our supplier agreement or product supply terms. Such terms prohibit the supplier (and its subcontractors) from sourcing any raw materials from any supplier that has sourced, produced or supplied such materials in breach of any applicable laws (including any modern slavery legislation) or human rights (including using forced or involuntary labour).

In this reporting period, we commenced a comprehensive review of the current status of our supplier agreements to identify opportunities to strengthen our approach to modern slavery risk management. This review includes mapping the presence of contractual provisions within our current supplier base, ensuring it cascades to all supplier subcontractors. We plan for this review to be finalised in the next reporting period.

### **Internal Policies**

Buzz has a Whistleblower Policy which is accessible to all staff as well as publicly available on its website. The policy outlines the processes and protections given by Buzz to persons who raise concerns about suspected (or actual) acts of misconduct within our business practices or our supply chain.

### **Training**

All Buzz staff are trained about Buzz's modern slavery obligations and our Supplier Code of Conduct and Whistleblower Policy, and are encouraged to report any non-compliances they may come across. The supply chain team at Buzz undergo training on ethical sourcing and human rights issues.

Buzz has continued to provide induction training on modern slavery obligations for all new employees. During this reporting period, Buzz collected FY24 training completion rates and prepared a report to support ongoing performance evaluation.

## Due Diligence and Monitoring

Buzz cares about continuous improvement, so we regularly assess our facilities and have a constant presence for quality assurance too. Buzz conducts selection and social audits on its factories which consists of questions covering topics such as payment of wages, labour laws, working hours, overtime, forced labour, and working conditions. Our facilities are also audited regularly against our Supplier Code of Conduct as described above.

Buzz staff visit each of its manufacturers on a regular basis to assess their compliance with their supplier agreement and Buzz's Supplier Code of Conduct.

## Inspections and Accreditations

All of our suppliers are either BSCI or SEDEX accredited. Modern slavery is assessed in the inspection process, and certification is awarded only when the supplier meets all audit criteria.

BSCI audits address modern slavery risks through:

- Performance areas covering forced and bonded labor, and secure employment contracts.
- Code alignment with ILO/UN/OECD frameworks.
- Additional guidance linking to modern slavery laws and best practices.

SEDEX's ethical framework systematically addresses modern slavery by:

- Embedding forced labour checks in SMETA audits (2-pillar & 4-pillar).
- Providing resources to spot indicators of coercion or trafficking.
- Supporting members in producing legally compliant modern slavery statements.

## Remediation

If a supplier becomes aware of slavery (or any other breach of Buzz's Supplier Code of Conduct) within their supply chain it must notify Buzz immediately. Buzz's remediation process requires the supplier to co-operate with Buzz and implement all measures necessary to resolve the issue. Buzz reserves the right to take any action against a supplier for any breach of the Supplier Code of Conduct. During the reporting period, Buzz did not identify any breaches, including modern slavery breaches, that required remediation steps to be taken.

## Memberships

In FY25, Buzz became a registered member of SEDEX, an online tool that helps companies improve environmental, social, and governance (ESG) outcomes by providing data-led insights and expert guidance to identify, assess and manage environmental and social risks in their supply chain. SEDEX allows Buzz to further evaluate its supply chain through the SEDEX self-assessment feature.

## Assessment of Effectiveness

---

Buzz's developed frameworks and processes ensured we were able to monitor the effectiveness of our actions to assess and address modern slavery risks in our operations and supply chains.

Such frameworks and processes include:

- Regular review of our internal policies and procedures by the legal department and senior management.
- Regular reviews of the risks faced by Buzz.
- Quantitative measures including the number of our suppliers who have signed our supply agreement and supplier code of conduct, both of which include modern slavery clauses, the number of suppliers who have been audited against our supplier code of conduct, and the number of ethical and human rights issues identified.
- Regular training for Buzz's staff, particularly its supply chain team.
- Investigating any concerns or complaints received from employees, customers and suppliers to indicate modern slavery risks.

As our supply chain expands and the risk landscape evolves, we understand the importance of adapting our actions accordingly. As such, we are committed to continuously monitoring the effectiveness of the measures above.

## Consultation

---

This statement has been prepared through consultation with senior management, the directors, and executives of Buzz. This consultation included sharing information about practices and requesting information about identified risks and mitigation measures.

## Future Actions

---

Buzz remains dedicated to detecting and mitigating the risks of modern slavery in our operations and supply chains.

This statement was approved by the board of Producto Pty Ltd in their capacity as principal governing body of Producto Pty Ltd on 22 December 2025. This statement is signed by Barry Gold, in his role as Managing Director of Producto Pty Ltd and each of its subsidiaries on 22 December 2025.

  
\_\_\_\_\_

Barry Gold  
Managing Director

22 December 2025