



# MODERN SLAVERY STATEMENT

Reporting period - 52 weeks to 26 July 2025



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and the Interim CEO (Retail) & Premier Retail CFO **3**

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# Joint Letter from Premier's Chairman & the Interim CEO (Retail) & Premier Retail CFO

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**Solomon Lew**  
Chairman

**John Bryce**  
Interim CEO (Retail)  
and Premier Retail CFO

The reporting period was a year of transformation for Premier, following Myer Holdings Limited's (Myer) acquisition of the Apparel Brands business during the year, which completed in January 2025.

This modern slavery statement, Premier's sixth, now focuses on our wholly owned Peter Alexander and Smiggle brands. Peter Alexander is a unique design-led brand that continues to excite our customers, trading from over 140 stores. Smiggle is the ultimate and original destination for school essentials as well as innovative and fun products, trading from over 290 stores.

Although Premier's ethical sourcing program now covers only two brands instead of seven following the transaction with Myer, our focus and commitment to embedding modern slavery risk management into our team's processes and supplier partnerships remains unchanged.

This is evidenced by Premier's continued investment in its ethical sourcing program, including the engagement of newly dedicated ethical sourcing and compliance resources, employed directly by each of Peter Alexander and Smiggle. This investment in our brands also recognises the human rights risks and supply chain challenges differs between those brands.

Our brand teams oversee our response to the human rights challenges posed by complex global economic conditions. The current difficult economic environment, both in Australia and internationally, provides challenges for our supply chains. Despite this, our continued investment in our people, and our ethical sourcing program more generally, is a testament to our commitment.

We are pleased to share this statement.

**Solomon Lew**  
Chairman &  
Non Executive Director

**John Bryce**  
Interim CEO (Retail)  
& Premier Retail CFO

23 January 2026

\*FY25 for Premier is the 52 week period ending 26 July 2025, being the reporting period for the purposes of this modern slavery statement.



# 1 Overview



## About Premier Investments Limited

<b>Company type</b>	Public company limited by shares, incorporated in Australia
<b>Public trading of company shares</b>	Premier's shares are traded publicly on the Australian Securities Exchange (ASX:PMV)
<b>Registered office</b>	Level 7, 417 St Kilda Road, Melbourne VIC 3004 Australia
<b>Company website</b>	premierinvestments.com.au
<b>Principal activities</b>	Premier operates two specialty retail chains within the retail markets in Australia, New Zealand, Asia and Europe. Premier also has an investment in listed securities, property holdings and money market deposits
<b>Premier Retail brands</b>	Peter Alexander and Smiggle
<b>Location of retail operations</b>	Smiggle: Australia, New Zealand, Singapore, Malaysia, the United Kingdom, the Republic of Ireland and online  Peter Alexander: Australia, New Zealand, the United Kingdom and online
<b>Premier's Reporting Entities</b>	<p>Entities report under the Modern Slavery Act if they are an Australian entity with a minimum annual consolidated revenue of \$100 million. For FY25, Premier has chosen to report in relation to its entire operations on behalf of each of the following Australian entities in its group:</p> <ul style="list-style-type: none"> <li>• Premier Investments Limited ACN 006 727 966</li> <li>• Premier Retail Holdings Pty Ltd ACN 682 194 805</li> <li>• Premier Retail Services Pty Ltd ACN 682 195 697</li> <li>• Peter Alexander Sleepwear Pty Ltd ACN 091 296 776</li> <li>• Smiggle Pty Ltd ACN 100 379 226</li> </ul> <p>On 26 January 2025, Myer Holdings Limited ("Myer") acquired Just Group Limited, consisting of the Apparel Brands (Just Jeans, Jay Jays, Portmans, Dotti and Jacqui E). This modern slavery statement has been prepared in respect of the retained Premier group and includes the retail brands Peter Alexander and Smiggle.</p>

## Acknowledgment of Country



This Modern Slavery Statement was written on the lands of the Bunurong and Wurundjeri Woi-wurrung peoples. We recognise the continuing connection to the land, waters and communities of the Traditional Custodians of Country.

## Mandatory reporting criteria: checklist

Criteria under the Modern Slavery Act	Where to read more
Identify the reporting entity	5
Describe the reporting entity's structure, operations and supply chains	5, 9-11
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities owned or controlled by the reporting entity	13-14 18-19
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls to assess and address those risks, including due diligence and remediation processes	16-28
Describe how the effectiveness of such actions are assessed by the reporting entity	30-31
Describe the process of consultation with any entities that the reporting entity owns or controls	5
Provide any other information that the reporting entity considers relevant	3,5-7

## Premier Investments Limited Board Approval

The contents of this statement was approved by the board of Premier Investments Limited ("Premier") on 23 January 2026. The Premier board is in a position to influence or control each of its subsidiaries and the reporting entities within the Premier group covered by this statement.

This statement is issued by Premier jointly on behalf of all reporting entities in the Premier Group. Solomon Lew, a Director of Premier, has signed this statement.

**Solomon Lew**  
Chairman &  
Non Executive Director

23 January 2026

# FY25 Achievements & FY26 Forward Plans



Core Ethical Sourcing Program activities include social compliance audits, corrective action and remediation, worker voice projects, production verification audits and risk assessment tools. The following outlines our additional work program achievements that were completed in the reporting period and our forward plans.

Risk assessment 	Audit, due diligence & worker rights 	Worker Voice 
<p><i>Assessing and analysing modern slavery risk in the supply chains in which we operate</i></p>	<p><i>Assessing the working conditions and transparency of suppliers with which we produce products</i></p>	<p><i>Hearing directly from workers and providing grievance mechanisms which align with the UNGP</i></p>
FY25 Achievements		
<ul style="list-style-type: none"> <li>Strengthened supplier onboarding process by implementing onsite factory visits at nominated sites by team members before production starts</li> <li>Finalised data migration of all Premier sites onto EiQ following separation of the Apparel Brands business acquired by Myer during FY25</li> </ul>	<ul style="list-style-type: none"> <li>Deployed 69 ERSAs audits in strategic factories in China and India</li> <li>Continued monitoring for unauthorised subcontracting, through 8 product verification audits (PVAs) for Peter Alexander and inspection of 33% of orders by local Smiggle team members</li> <li>Extended the Code of Conduct compliance assessment to over 120 identified Tier 2 sites</li> <li>Peter Alexander sourced 92.53 metric tonnes of Better Cotton &amp; continues to range products using organic cotton and dyes made in accordance with the Global Organic Textile Standard (GOTS)</li> </ul>	<ul style="list-style-type: none"> <li>With the sale of the Apparel Brands in FY25 to Myer, our newly appointed brand ethical sourcing teams in Peter Alexander and Smiggle began the process of considering worker voice initiatives relevant to the product categories and sourcing regions for these two brands</li> </ul>
FY26 Forward Plans		
<ul style="list-style-type: none"> <li>Expand scope of EiQ Sentinel to capture all identified Tier 1 and Tier 2 sites</li> <li>Explore effective traceability approach to enhance mapping of Tier 2 sites used by international suppliers</li> <li>Further engage with importers to enhance the mapping and traceability of factory partners within their supply chains</li> <li>Reassess factories based on risk and segmentation utilising the EiQ platform</li> </ul>	<ul style="list-style-type: none"> <li>Integrate mutually recognised audits for Tier 1 (secondary suppliers) and Tier 2 sites into EiQ platform to improve audit insights and visibility across the supply chain</li> <li>Explore the mapping of zero tolerance/critical findings raised against the ILO forced labour indicators</li> <li>Implement open costing on core volume lines</li> <li>Explore living wage data collection and verification approaches tailored to our supply chain</li> </ul>	<ul style="list-style-type: none"> <li>Scope new worker surveys for deployment at supplier sites</li> <li>Explore suitable grievance mechanisms in China and India</li> </ul>



## Remediation & corrective actions



Providing access to remediation and ensuring findings are closed by suppliers through addressing the root cause of issues

## Industry engagement & training



Engaging in collaboration with our peers and capacity building with our stakeholders

## Policies & contractual governance



Setting standards that are in alignment with internationally recognised human rights benchmarks

### FY25 Achievements

- Reduced CAP service completion time from 90 to 60 days to encourage increased supplier accountability and improved CAP closure rate to 61%
- Remediated 100% of zero tolerance findings and 75% of critical findings
- 84% of sites participating in the LRQA CAP service completed all assigned e-learning modules
- Improved audit score in a strategic supplier from a D to a B following unannounced audit visit (see case study on page 24 for details)

- Reaffirmed our commitment as supporter brands of APSCA
- Over 530 team members completed OH&S training
- Over 2,300 team members completed respectful workplace behaviour training

- 93 suppliers re-signed an updated Supplier Ethical Code of Conduct and Key Principles of Ethical Business Conduct
- Following the acquisition of the Apparel Brands business by Myer, all existing Peter Alexander and Smiggle suppliers were re-onboarded to revised supply terms
- Reaffirmed our commitment to the Cotton Pledge

### FY26 Forward Plans

- Strengthen the oversight of CAP remediation with the help of the updated 'EiQ Assess' platform to track progression
- Formalise the modern slavery incident remediation policy to ensure it addresses both internal and external stakeholders and streamlines remediation procedures

- Focus on supporting our partners in China and India to understand the importance of our ethical sourcing program, including full transparency for continuous improvement. We also will present updated modern slavery awareness training to suppliers
- Present refresher Responsible Procurement Practices (RPP) for Premier team members, along with modern slavery awareness training to ensure alignment with our ethical sourcing program requirements
- Develop e-learning modules for ethical sourcing & modern slavery awareness across the business

- Strengthen cotton sourcing strategy with chain-of-custody and traceability controls, including building on our work with third party organisations & certification bodies
- Implement working group process when new sourcing regions are reviewed, ensuring alignment with our ethical sourcing program, policies and risk mapping



# 2

## Our operations



Our retail brands are supported by our leading sourcing and operational capabilities and our 5,000+ valued team members.

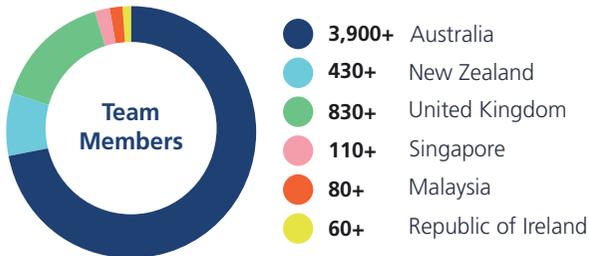
## Our Iconic Brands

peteralexander

**smiggle**  
where a smile meets a giggle

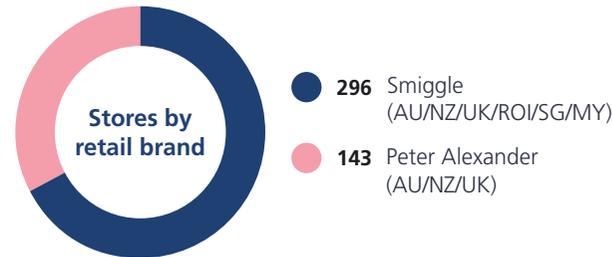
### Team members

We scale up to 5,000+ team members globally at peak trading



### Store & online network

430+ total stores globally, and online



### Support offices

#### Leveraging Centralised Support Functions

During the reporting period, we operated support office locations in Australia, New Zealand, Singapore and the United Kingdom.

The Australian support office houses our key operational functions.

### Distribution centres

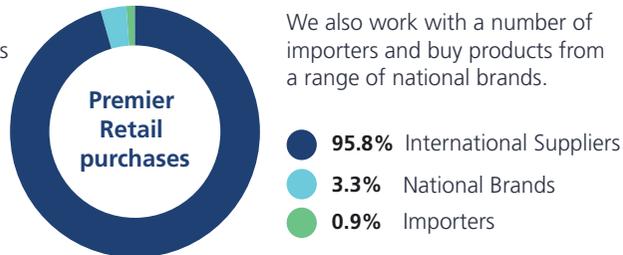
Our distribution centres service all owned retail operations & wholesale customers.

Our product is shipped from our valued suppliers to our six retail markets, wholesale and online channels.

## Sourcing

### Our merchandise offering

Our two iconic brands work with international suppliers with factories located in China and India to manufacture apparel, hard goods, accessories and general merchandise for resale. We also work with a number of importers and buy products from a number of valued national brands. Premier takes pride in its strong direct sourcing strategy, working closely with factories to build strong relationships and collaborate with suppliers on maintaining ethical compliance.



We also work with a number of importers and buy products from a range of national brands.

### Non-merchandise goods and services

We partner with key non-merchandise goods and services providers to support our core operations, including:

- Freight and logistics
- Labour hire
- Financial services, such as banking and insurance services
- Information technology
- Property services
- Creative services, such as advertising and marketing
- Store support goods and services, such as shopping bags, team member apparel and cleaning services



## About our own operations

As reported in previous modern slavery statements, we consider the risk of modern slavery in our operations to be low due to direct employer-employee relationships with our team members, and because we follow all local employment laws. However, we still take precautions by having a strong policy framework, providing team member training, offering accessible grievance mechanisms, and ongoing monitoring and support.

We maintain a strong commitment to upholding human rights and ethical labour practices through the consistent application of our internal frameworks including our Code of Conduct, 'Just Play It Safe' and 'Safety Eyes' programs. These frameworks not only underpin our performance and safety culture but also support our broader responsibility to prevent exploitation and promote dignity in the workplace.

Our frameworks are embedded into the daily operations of our team members, promoting a culture of respect, vigilance, and accountability. In the context of modern slavery, these tools help ensure that our people are empowered to identify and report inappropriate or unethical behaviours, including any practices that may indicate coercion, unsafe work environments, or unfair treatment both within our operations and across our supply chain.

## About our 5,000+ team members

The majority of our team members are employed on a permanent basis, with the balance consisting of fixed term contract or casual team members (the latter in particular with a focus on scaling up our store network to support peak retail trade between October and January each year).

Expectations and rights of our team members and available grievance mechanisms are clearly articulated, and our framework for this is set out to the right, in Table 1.

TABLE 1

<b>Employment terms</b>	Written and signed agreements that set out individual team member obligations and rights including pay and conditions, reviews, grievance mechanisms and requiring supporting verification of information (eg. age, working rights, proof that a team member can operate any machinery relevant to their role). In addition, we recognise the importance of freedom of association and acknowledge team members have the right to collectively negotiate.
<b>Working rights</b>	Compliance with all local laws ensuring team members' legal working rights.
<b>Code of Conduct</b>	Sets out expectations for team members and contractor behaviour. Our Code of Conduct references all parts of our framework including compliance and grievance mechanisms.
<b>Respectful Workplace Behaviour Policy</b>	Sets out obligations to behave appropriately in the workplace and provide guidelines on how to access support and how to resolve a complaint, including guidelines and processes for resolution of concerns in relation to discrimination, harassment and bullying.
<b>Whistleblower Policy</b>	Provides guidance on how concerning misconduct, or an improper state of affairs or circumstances (such as instances of modern slavery) can be confidentially disclosed and how they may be investigated.
<b>Training</b>	<p>Training builds skills consistent across teams, supports long term growth and innovation, and assists in promoting compliance. Premier's resources are shared through the onboarding process and are delivered regularly to existing team members. Areas covered include respectful workplace behaviour, health and well-being, team safety, ethical sourcing and anti-bribery and corruption. Compliance training reinforces expectations and incorporates updated applicable legislative changes.</p> <p>In the reporting period, respectful workplace behaviour training was delivered to over 2,000 team members globally, and over 500 team members attended health &amp; safety related training (H&amp;S induction, H&amp;S Leadership).</p>
<b>Listening &amp; grievance management</b>	Our people support advisory service for team members is our primary grievance channel, ensuring grievances are handled confidentially and impartially. The advisory service receives and records all calls from team members in relation to such matters. We have remediation procedures in place to address and close out grievances as they are reported.
<b>Employee Assistance Program (EAP)</b>	<p>To align with our commitment to identify and mitigate modern slavery risks within our operations, we recognise that supporting the mental health and wellbeing of our workforce is critical to fostering a safe, respectful, and resilient workplace. All team members have access to our Employee Assistance Program (EAP). The steady and consistent uptake of this service underscores its value as a confidential, professional resource for staff. Support available through the EAP includes counselling, psychosocial assistance, grievance management, and critical incident response. These services help our team members navigate personal and professional challenges, reducing the likelihood of vulnerabilities that can lead to exploitation or unsafe working conditions.</p> <p>Recognising the diverse needs of our workforce, the EAP has recently expanded to include a dedicated neurodiversity support line, offering tailored guidance and support for neurodivergent employees. This initiative reflects our ongoing commitment to inclusivity and accessibility, and highlights our proactive approach to creating an environment where all individuals are respected, protected, and empowered.</p> <p>Through programs like our EAP, we continue to reinforce our broader ethical obligations, promoting a culture where team member wellbeing is prioritised and the risks of modern slavery are actively reduced.</p>
<b>Audit &amp; verification</b>	Monthly audits ensure that all employees are paid in full compliance with relevant industrial instruments, including applicable Modern Awards and Enterprise Agreements (EAs). These audits also help us proactively identify and address any discrepancies that may indicate underpayment, unfair labour practices, or potential indicators of worker exploitation.

# Governance & accountability framework

## Our approach

The Premier Board provides critical governance and oversight to our teams. Our Governance and Accountability framework ensures a clear understanding of reporting lines and responsibilities as outlined in Table 2.

This framework ensures decisions around factory selection and compliance are completely independent of everyday commercial decisions made by our product teams. This means product teams, in their day-to-day dealings with suppliers, cannot work outside of the framework and principles of our ethical sourcing program. Product teams in turn receive regular training and are supported by our ethical sourcing team.

Our ethical sourcing framework is aligned to the following internationally recognised human rights charters and principles:

- The United Nations' Universal Declaration of Human Rights;
- The International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work, and Core Conventions;
- United Nations Guiding Principles on Business and Human Rights (UNGPs).

We are committed to addressing new and emerging risks within our supply chain and operations and adapt our program where required.

## Due diligence

Modern slavery risks are inherently higher in operations we do not own or control. Our ethical sourcing program encompasses both our direct and indirect operations.

Our approach is segmented and based on inherent risk, with a primary focus on those areas where we can make the most impact. This does not mean that we disregard risk in other areas (as further set out in this statement). A detailed analysis of the scope of our program in relation to direct suppliers, where our impact is most significant, is set out in Table 5 on page 17.

TABLE 2

<b>Governance</b> Program direction & oversight	<b>Premier Board</b>	Guidance and approval of Premier's ethical sourcing strategy, including approving this modern slavery statement.
	<b>Premier Audit &amp; Risk Committee</b>	Oversight of due diligence and risk management practices and overall ethical sourcing work program.
	<b>Premier Retail Board</b>	Monitoring progress of commitments made in ethical sourcing work program.
<b>Accountability</b> Program delivery	<b>CEO &amp; Executive Team</b>	Progressing the ethical sourcing work program, reporting and risk management.
	<b>Premier Retail Brands &amp; Operational Support Functions</b>	Consulting on approach, and accountable for operationalising agreed frameworks.
<b>Program Development &amp; Analysis</b> Program insights	<b>Smiggle &amp; Peter Alexander's Ethical Sourcing Teams</b>	Leading Premier's ethical sourcing work program and bringing together insights from it.



# 3

## Risks

# Risks of modern slavery in Premier's operations and supply chains

## Approach

We continue to monitor the risk of modern slavery occurring in our operations and supply chains through a combination of actions, including utilising risk assessment tools, and the implementation of an embedded audit program and corrective action plan monitoring - see our framework outlined on page 16.

TABLE 3

	Risks which may <b>cause</b> modern slavery practices	Risks which may <b>contribute</b> to modern slavery practices	Risks which may be <b>directly linked</b> to modern slavery practices
<b>Description</b>	Operational risks that may directly result in modern slavery occurring.	Operational risks and/or actions in supply chains that may contribute to modern slavery. This includes acts or omissions that may facilitate or incentivise modern slavery.	Operational risks, products or services that may be connected to modern slavery through third parties with whom one transacts.
<b>Remediation</b>	An adverse impact is caused in relation to human rights, with an expectation that impact should cease, be prevented, and remediated.	Through contributing to a human rights breach, it is expected to cease, prevent and remedy the impact(s) to the extent of the contribution. It is also expected to exercise leverage over the supplier to mitigate any remaining impact.	There is a direct link to the human rights breach and therefore leverage should be used or sought to mitigate the adverse impact.
<b>Example</b>	As a retailer that employs up to 5,000+ team members in our peak season, it is our responsibility that all workers have a legal right to work and have signed an employment contract. If we did not ensure due diligence to these controls, workers could be exploited in areas such as not being paid minimum wage, unfair working hours, leave entitlements and termination procedures.	We could contribute to modern slavery and/or human rights violations with our supply partners through our practices. Late changes to specifications, unfair delivery dates, negotiating on the labour cost component are all ways in which this could contribute to workers rights being breached.	There is complexity to the multiple tiers in our supply chain as well as the goods and services we procure not for resale (GNFR). With this comes exposure to a number of modern slavery risks.  A reason for the heightened risk is that gaining visibility of further tiers in the supply chain and with our GNFR suppliers can be challenging. Using leverage with strategic suppliers is a key piece of this work.

We align with the theory that decent work can only be achieved if a proactive approach is taken, to ensure minor issues do not worsen into major issues which can result in modern slavery. The ILO's continuum of exploitation in Table 4 highlights that the mitigation of risks improves working conditions. This is what our ethical sourcing program seeks to achieve with our suppliers in order to reduce the chance of risks worsening.

## The Continuum of exploitation

TABLE 4





## Exposure to modern slavery risk

Modern slavery thrives on exploitation, inequality and worsening labour conditions. Its risk and prevalence vary by country, laws, industries and social factors. No business is immune.

## Risk assessment tools and Sentinel findings

To assess these risks, our ethical sourcing team uses LRQA's EiQ platform and Sentinel technology, which analyse data from 25,000 audits conducted annually, together with global risk. These tools help us rate risks by region and product. We also gather risk data through our wider ethical sourcing program including audits, industry memberships and factory visits.

Sentinel analyses data online across international databases, news outlets and regulatory bodies. The wide range of sources include, but are not limited to: global sanctions lists, regional and local news sources, third party public compliance databases and human rights press sites.

In the reporting period, eight incidents relating to Premier's sites were flagged by Sentinel that we would otherwise be unaware of as they were all found through local media. All incidents were investigated and closed after being raised. For the breakdown of the incidents by risk rating refer to Chart 1.

Finally, during the reporting period, Premier sites were migrated to its own EiQ platform and will begin reviewing sites based on risk and leverage segmentation in the next reporting period.

Risk rating of Sentinel findings

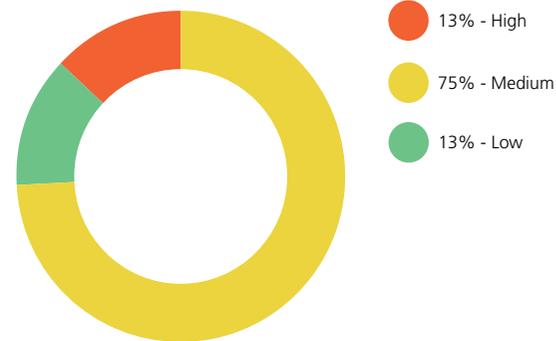


CHART 1

## Supply chain modern slavery risk

The risk rating of countries we source from remains the same compared with the previous reporting period. Whilst each country has different drivers to these results, there is a combination of both increased data on factory profile risk coupled with supply chains putting increased pressure on workers which ultimately leads to a higher risk of labour violations.

Through our assessment of risk using our tools and our due diligence, we have identified a number of key drivers that contribute to the heightened level of risk in the supply chain, as identified in Diagram 1. These drivers are caused by a number of factors including economic, political and societal malaise in relation to improving labour rights. These results only highlight the importance of having robust due diligence controls in place and ensuring transparency in supply chains.

Premier sourcing country risk profile

DIAGRAM 1



### China

**Risk: High**

▲ 14.6% 5 yr change

#### Key drivers of risk:

- Domestic migrant workers
- Wages
- Transparency



### India

**Risk: High**

▼ 10.9% 5 yr change

#### Key drivers of risk:

- Building safety
- Air emissions
- Freedom of association

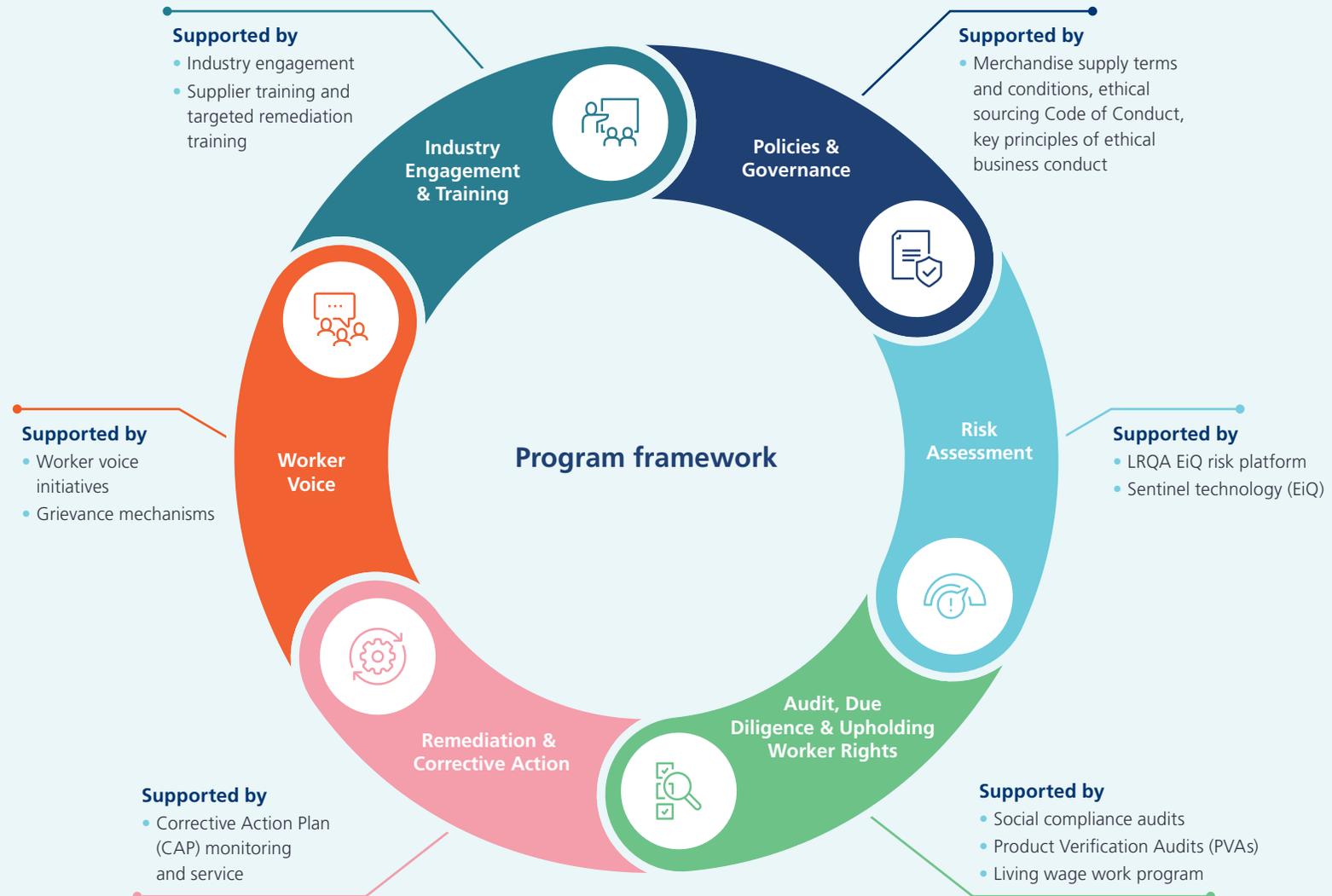


# 4 Actions

# Program framework: from engagement to action



Our ethical sourcing framework is built on core pillars, each with programs that drive action, and uses a cycle of measuring, reassessing and improving. This helps us address human rights risk, meet stakeholder expectations and adapt to changing laws.



# Program framework in detail

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A detailed analysis of our program framework in relation to our direct suppliers is set out in Table 5 below. In the pages that follow we set out more detail on the actions we have taken to assess & address modern slavery risks.

Engagement point	Supported by	Overview/Nature of engagement	TABLE 5
 <b>Risk assessment</b>	LRQA EiQ risk platform	EiQ draws on proprietary audit data and publicly available risk indices to then assign a level of risk to regions across the world. This score can then be used to guide sourcing strategy and our approach to the region.	
	Sentinel technology (EiQ)	Sentinel monitors the web for key supply chain Environmental Social Governance (ESG) risks and media controversies related to suppliers and vendors, including human rights, environment, bankruptcy, layoffs, wages, working hours and health and safety. Sentinel scans in over 100 languages and uses machine learning to filter and categorise results. This helps detect reputational risks in near real-time and to action supply chain incidents.	
 <b>Audit, due diligence &amp; worker rights</b>	Social Compliance Audits	All primary factories are audited by LRQA to the Responsible Sourcing Assessment Standard (ERSA). ERSA is a globally recognised audit standard that has a heightened focus on human rights and transparency. The ERSA audit covers the following areas: transparency & business integrity, labour, health & safety, environment and management systems.  Secondary factories which account for less than 0.9% of purchases are initially assessed according to a mutual recognition audit. As business with such factories grows, they may be promoted to primary status which would then require an ERSA audit (see page 20).	
	Product Verification Audits	Our PVA program identifies unauthorised subcontracting in any location in which we source. In addition to PVAs, our team members in-country also conduct product inspections which serve the dual purpose of monitoring for unauthorised subcontracting and maintaining product quality.	
	Living wage work program	Our living wage commitments (see page 26) aim to close the gap between a minimum or legal wage and a living wage which is actually linked to the true cost of living in each country or region.	
 <b>Remediation &amp; corrective action</b>	Corrective Action Plan (CAP) monitoring and service	Our ethical sourcing team manage the remediation of zero tolerance and critical issues directly with suppliers, and with the support of LRQA oversee the CAP service for less severe issues to ensure they are remediated in a timely manner. Mutual recognition CAPs are monitored primarily for any zero tolerance or critical issues.	
 <b>Worker Voice</b>	Grievance mechanisms	In our own operations, team members have a people support line available to access support and resolve issues. Following the sale of the Apparel Brands, our newly appointed brand ethical sourcing teams in Peter Alexander and Smiggle began the process of considering worker voice initiatives relevant to the product categories and sourcing regions for these two brands.	
 <b>Industry engagement &amp; training</b>	Industry engagement	We collaborate with industry peers and organisations to gain insights and improve worker conditions.	
	Supplier training and targeted remediation training	Supplier e-learning modules support upskilling of suppliers in relation to human rights issues in the supply chain. Targeted training is aimed at ensuring suppliers have sufficient remediation plans in place to capture any issues that arise.	
 <b>Policies &amp; contractual governance</b>	Our suite of supplier policies and terms which set out our expectations	Our package of contractual terms and conditions, supported by our policies, are one part of our external governance framework. <ul style="list-style-type: none"> <li>• Sign Terms &amp; Conditions and Premier's Supplier Ethical Code of Conduct</li> <li>• Acknowledge Key Principles of Ethical Business Conduct</li> </ul> We also recognise that policies must be supplemented and supported by other mechanisms as set out above.	



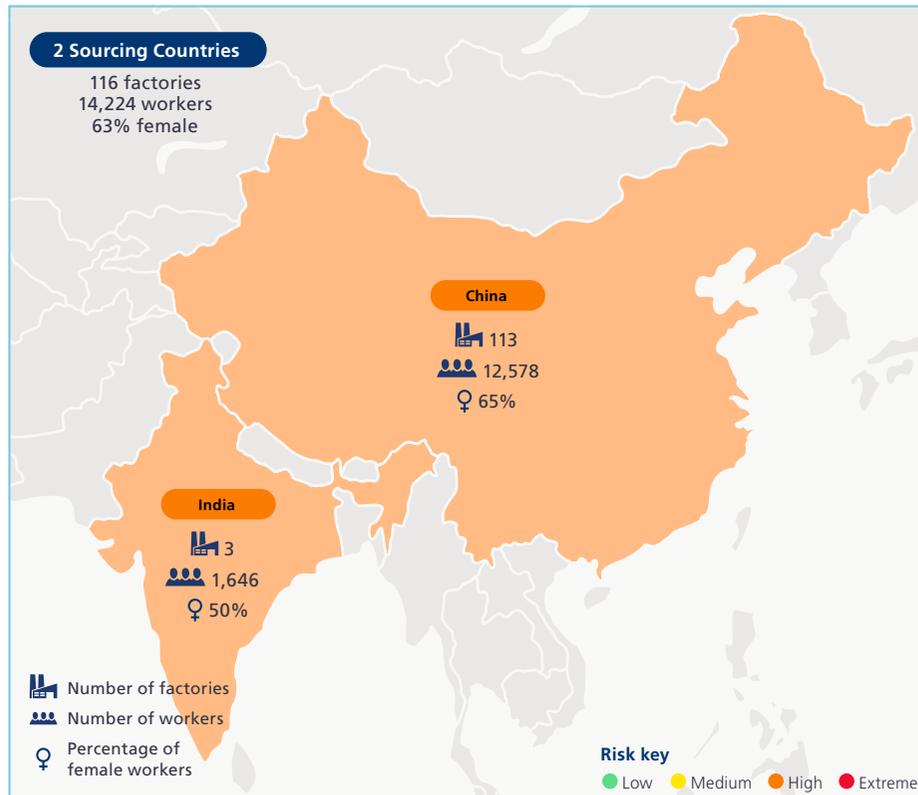
## Traceability of our supply chain

Through EiQ, we actively monitor the inherent human rights risk rating for each tier in our supply chain, given the risk profile changes based on product source, we have depicted two of our most common products and their risk profile in Table 6. We have also illustrated our interpretation of tiers in the supply chain and our mapping and tracing efforts, with our goal to achieve mapping of all tiers in our supply chain.

Production tier	Product inherent risk rating		Mapping & traceability – international suppliers
Tier 1 – Final stage production	Clothing: <span style="background-color: #D9534F; color: white; padding: 2px;">EXTREME</span>	Backpacks: <span style="background-color: #F79646; color: white; padding: 2px;">HIGH</span>	Complete – 100% mapped*
Tier 2 – Fabric, trims and componentry	Textile: <span style="background-color: #F79646; color: white; padding: 2px;">HIGH</span>	Textile: <span style="background-color: #F79646; color: white; padding: 2px;">HIGH</span>	Work in progress - 144 sites mapped
Tier 3 – Raw materials	Cotton: <span style="background-color: #D9534F; color: white; padding: 2px;">EXTREME</span>	Polyester: <span style="background-color: #F79646; color: white; padding: 2px;">HIGH</span>	Mapping has not begun

TABLE 6

*\*mapping percentage is based on total annual supplier spend*



### Tier 1 – Final stage production

We monitor human rights risks to drive action and reduce violations across the supply chain. To that end, we have fully mapped our international final stage production (tier 1) supply chain.

The map and data points on Table 6 illustrate the location of our tier 1 supply chain including the number of factories from which we source and the percentage of female workers. We note that although Premier does not own the factories from which it sources product, and our share of supplier's production capacity therefore varies over time, we ensure that every location operates in accordance with our program regardless of the size of business.

### Tier 2 – Fabric, components and trims

Our brands source fabrics and trims from tier 2 factories, some of which are nominated suppliers, but the majority of which do not have a direct relationship with Premier, as the tier 1 supplier owns the contractual relationship. However, our tier 2 factory partners are held to the same standards as outlined in our Code of Conduct. Traceability and transparency are critical to Premier being able to effectively assess and mitigate modern slavery risks.

### Tier 3 – Raw materials

The raw materials in our supply chain include any unprocessed material or commodity used to produce finished goods, like cotton (for clothing), stainless steel (for drink bottles) and polyester (for clothing and backpacks). Since these processes are further down the supply chain, the inherent human rights risk is high to extreme. Mapping this part of the supply chain is complex.

To assist in our efforts, we are working with certification bodies and experts to improve labour rights in this sector. As supply chain traceability tools are still developing, we continue to scope and analyse the most suitable tools to collect data for this tier.



### Traceability of our supply chain

#### Tier 3 – Raw materials (continued)

Increased demand globally for responsibly sourced materials has led to an uptake of certifications which have a focus on human rights and environmental requirements. Peter Alexander's Better Cotton membership began in 2022, and we sourced 92.53 metric tonnes of cotton through the Better Cotton program in FY25.

Our commitment to expand the program will ensure that a growing percentage of Premier's cotton procurement will be driving demand for and use of responsibly sourced cotton.

In addition, Peter Alexander continues to range a small number of products using organic cotton and dyes made in accordance with the Global Organic Textile Standard (GOTS). The aim of GOTS is to ensure organic status - from harvesting of the raw materials, through to environmentally and socially responsible manufacturing. In the reporting period, 10% of infant, 3% of junior and 14% of women's (maternity) ranges were sourced globally to the GOTS standard.

Finally, Premier does not condone the sourcing of cotton harvested from any region where state sanctioned forced labour regimes or practices exist. Peter Alexander and Smiggle are signatories to the Cotton Pledge which prohibits sourcing of cotton from Turkmenistan.





# Audit, due diligence & worker rights

## Approach to audit requirements

Partnering with LRQA to implement our audit program has given us a greater understanding of transparency levels within our primary factory partners operations, whilst also verifying that our sites adhere to our Code of Conduct. Premier's audit program targets all tier 1 factories that produce for our brands. These factories are divided into two categories, allowing us to focus on improving working conditions more effectively with those where we have established or stronger relationships.

- Primary factories ≈ 99.5% of our annual purchases with suppliers (includes suppliers that we spend >US\$100K)
- Secondary factories ≈ 0.5% of our annual purchases with suppliers (includes suppliers that we spend <US\$100K)

## Social compliance audit findings

LRQA's ERSA standard has a heightened focus on transparency, business integrity and assessment of vulnerable worker groups, with key primary factories undergoing the assessment within the reporting period.

The ERSA audit covers five key pillars:



LRQA conducted 69 audits throughout the reporting period. Non-compliances are categorised into five severity ratings. The below table outlines the most common non-compliance that were found in LRQA audits for each severity rating during the reporting period.

Severity Rating	Most common non-compliance
Minor	Monthly overtime exceeded the legal limit, but not considered excessive
Moderate	Chemicals were not stored in secondary containers, to avoid leakage
Major	In more than one instance, needle guards were not equipped to sewing machines
Critical	Factory concealed records, therefore wages and working hours could not be verified
Zero tolerance	Factory representative attempted to bribe auditor

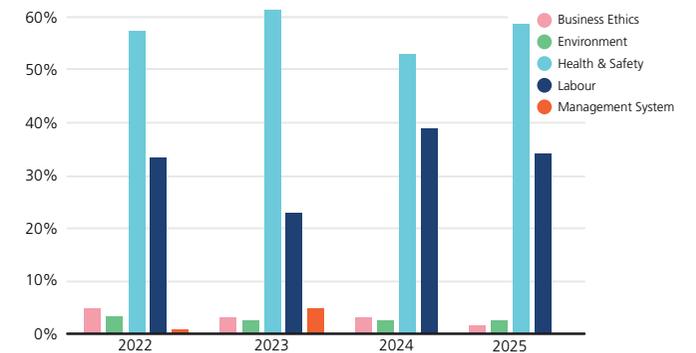
Throughout the reporting period, we continued to assess the compliance status of our secondary factory partners through the review of mutual recognition audits. Commissioned by another brand or by the factory themselves, mutual recognition audits allow us to assess compliance against our Code of Conduct. We also extended this review process to our identified tier 2 sites, reviewing over 120 mutually recognised audit reports. During the reporting period our ethical sourcing team reviewed a range of audits including SMETA 2 pillar, SMETA 4 pillar, BSCI, ICTI and WCA audit conducted by APSCA accredited auditing firms.

We have analysed the total LRQA audit findings over the past four years, which has shown that there has been a small decrease of total non-compliances identified each year. As shown in Chart 2 and 3, during the reporting period close to 60% of non-compliances found related to health & safety,

followed by labour issues. While there was a slight year on year increase of moderate and minor findings, pleasingly we have seen a year on year decrease of zero tolerance, critical and major findings. This demonstrates that there is beginning to be a shift in some of the severity ratings of issues found in audits. When considered against the ILO's continuum of exploitation graphic outlined on page 13, this is an indicator that our ethical sourcing program activities are having an impact on conditions improving in factories, whilst also reducing our supply chain risk.

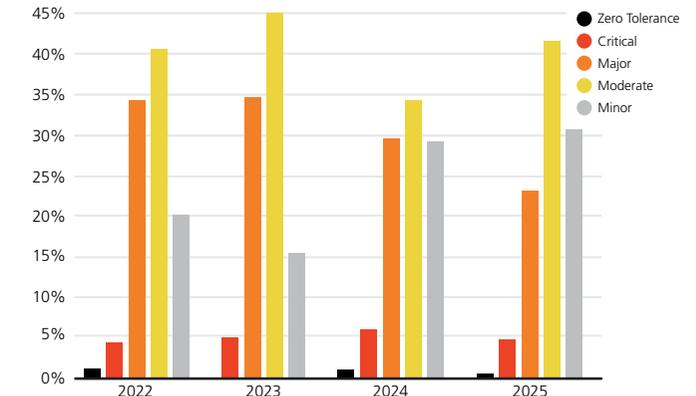
Total audit findings by pillar

CHART 2



Total audit findings by severity

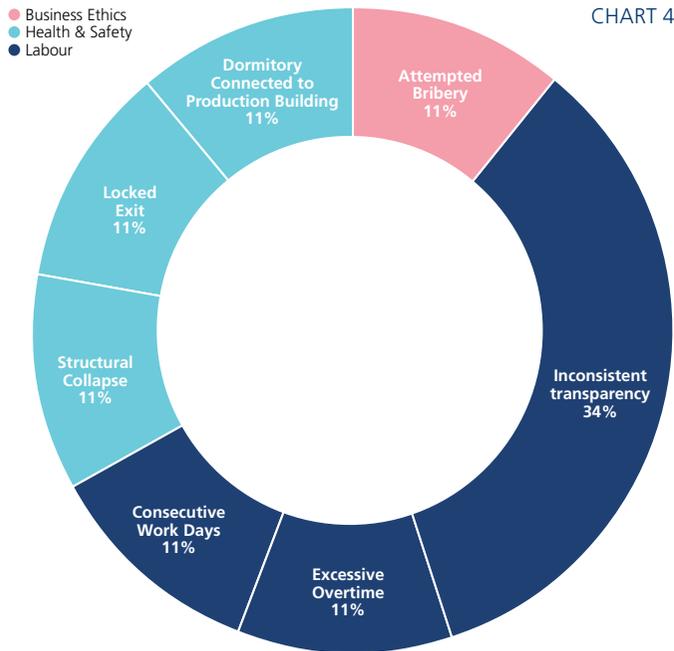
CHART 3



**Zero tolerance and critical audit findings**

Both zero tolerance and critical non-compliances found across LRQA were closely monitored by the ethical sourcing team to ensure the severity of these issues were understood by suppliers and factories and remediated appropriately. In the reporting period, two zero tolerances and eight critical issues were identified through the audit program. These findings are summarised in Chart 4. The zero tolerance incident identified was an allegation of attempted bribery, whilst inconsistent transparency was the most common critical non-compliance found, being 34% of total critical issues found in the reporting period.

**FY25 Zero Tolerance & Critical Findings**



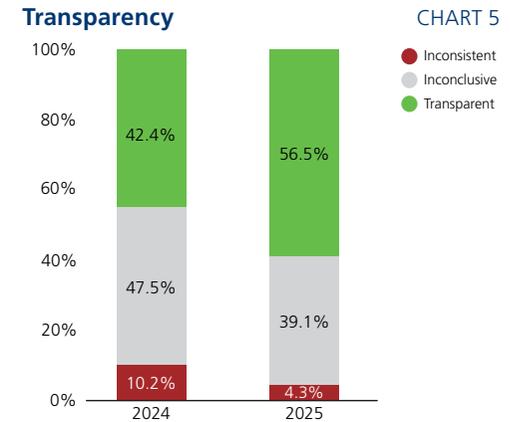
**Transparency in ERSA audits**

Transparency remains a key part of our ethical sourcing program, helping us understand the real conditions of the factories that make our products. We emphasise transparency in all interactions with suppliers and factories, but particularly those audited by LRQA where transparency of records are assessed and verified to an audit standard. LRQA assessments ensure the integrity of shared records, unlike most other audit standards, which don't assess transparency of records.

As shown in Chart 5, during the reporting period 56.5% of LRQA audits were transparent, covering factories across China and India. However, 4.3% of factories were found to have concealed records relating to working hours and wages. Pleasingly, overall inconsistent audit findings have decreased.

These results demonstrate that further capacity building is required on transparency and business ethics. In FY26, we will continue to focus on supporting our partners to understand the importance of full transparency for continuous improvement.

- TRANSPARENT** Site was transparent in sharing all wages and working hours records
- INCONCLUSIVE** Auditor observed incomplete data or wages and working hour records that prevent conclusive audit results being reached
- INCONSISTENT** Evidence was found showing the site had concealed or falsified wages and working hour records





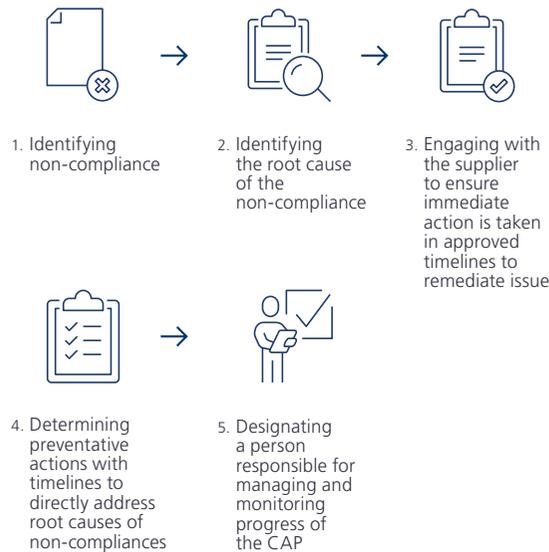
# Remediation & corrective action



## Remediation of audit findings through LRQA CAP service

Premier is committed to working with supplier and factory partners to improve conditions in the factories that make our products. Throughout the reporting period, we continued to monitor audit findings closely and ensure that effective CAPs were implemented within factories.

There are a number of key elements to consider when implementing a CAP with all steps being crucial to ensure effective action is taken to remediate non-compliances. These elements are outlined below.



The LRQA CAP service runs when factories undergo an audit by LRQA, giving factories an opportunity to implement improvements ensuring root causes are identified so issues are remediated in a way where they won't repeat in the future. During the reporting period the ethical sourcing team made an update to the CAP process to shorten the remediation timeframe from 90 to 60 days. This was implemented to ensure CAP closure dates were top of mind for suppliers immediately after an audit. As part of this update, suppliers were communicated that they had to close their CAP in less time and if they did not, then the CAP service would be extended at their cost.

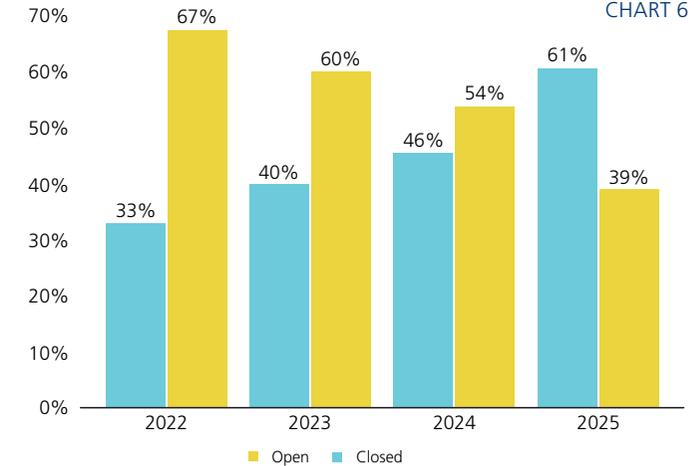
We have observed the positive results from this initiative with CAP closure rates increasing from 46% in FY24 to 61% in FY25 as identified in Chart 6.

The findings that remain open are mainly major, moderate and minor non-compliances related to health and safety. Some of the unremediated issues related to occupational health checks, needle guards, correct fire drill records and lack of hygienic worker facilities. These are considered rudimentary issues that factories should not allow to be unresolved. Therefore we will further engage with our factory partners to improve these less severe issues to ensure they do not worsen. Given the update of our CAP service rules in this reporting period, we expect to see further improvement of the CAP closure rate.

The zero tolerance and critical issues identified in the reporting period were remediated outside of the CAP service directly by the ethical sourcing team, which is detailed in the case studies on page 24.

Open & closed non-compliances year on year

CHART 6



### Supplier e-learning training modules

Sites that participated in the LRQA CAP service were assigned e-learning modules for completion, to provide support to address site specific audit findings. Of those sites, 84% completed all modules assigned to them in the reporting period.

### Remediation of zero tolerance and critical findings

The ethical sourcing team closely monitored the remediation status of the zero tolerance and critical findings identified in the reporting period. Given the severity of these issues, suppliers were engaged with a strong level of urgency to ensure appropriate corrective action was being taken to reduce risk and to improve the factory conditions for workers.

The percentage of incidents closed or in remediation is set out in Table 7, along with further information relating to remediation plans. Two case studies have been detailed on page 24 relating to the remediation required in Taiwan and China.

Remediation plans of open zero tolerance and critical findings

TABLE 7

Severity	Pillar	Sub pillar	Remediation plan
<b>Zero Tolerance</b> 100% Closed	<b>Business Ethics</b>	<b>Attempted bribery</b>	Sites received a first and final warning letter, undergo external business ethics and anti bribery training and complete a re-audit at their cost which may be unannounced.
		<b>Inconsistent transparency</b>	Sites must provide explanation for concealing records, Premier's ethical sourcing team conduct call to re-iterate transparency expectations and site must commit to re-audit at their cost and be fully transparent with all wage and working hour records.
<b>Critical</b> 75% closed 25% open - existing site	<b>Labour</b>	<b>Working hours</b>	Sites to complete root cause analysis and overtime action plan. Must commit to providing monthly updates on overtime and progress to reduce working hours.
		<b>Consecutive working days</b>	Sites to complete root cause analysis and overtime action plan. Must commit to providing monthly updates on progress to reduce consecutive working days and to ensure workers have one day off every week.
	<b>Health &amp; Safety</b>	<b>Building safety</b>	Site must commit to engaging with third party engineering firm immediately to rectify matter and provide timeframe for closure as soon as possible.
		<b>Locked fire exit</b>	Site immediately unlocks exit during audit which auditor confirms and must complete e-learning on fire safety.
		<b>Dormitories</b>	Dormitory must be made separate from any production and or storage of goods immediately. Site to undergo re-audit at own cost to verify the closure of this issue.



## Case study: Remediation in Taiwan

In our FY24 modern slavery statement, we identified two issues in factories in Taiwan relating to the retention of worker identity documents and the payment of recruitment fees, in breach of our Code of Conduct.

As reported in our FY24 statement, we suspended sourcing out of Taiwan and exited our relationship with those factories. We will maintain this position in relation to Taiwan until such time as inherent risks are better understood and managed.

In relation to issues identified in those factories, worker identity documents were returned and workers were provided with lockers to store personal belongings. Evidence was sent to ensure completion of this remediation. In relation to recruitment fees, factory management was briefed to ensure it was understood that payment of such fees was in breach of our Code of Conduct. We also engaged LRQA to provide a report on the issue, and we arranged to pay remediation-in-kind by donating the allocated remediation payment to a Taiwanese charity One-Forty. One-Forty is an NGO that supports migrant workers in Taiwan.

### Learnings & next steps

Whilst both suppliers had signed our Code of Conduct which has clauses regarding prohibition of retention of identity documents and recruitment fees, we will ensure that any future updates to the Code of Conduct are explicitly called out and communicated to suppliers.

Any future sourcing will ensure that new regions continue to have a thorough risk assessment to ensure the risks are understood.

## Case study: Remediation in China

During the reporting period, an annual ERSA audit was conducted at one of our strategic sites in China. It was alleged that a representative of the factory attempted to offer a bribe in connection with an audit. Such conduct is considered to be a zero tolerance issue in breach of our Code of Conduct. On receiving this zero tolerance alert, our ethical sourcing team engaged with the supplier directly in relation to the allegations raised.

During the same audit, it was alleged that the supplier also provided inconsistent working hour records, which we considered to be a critical transparency non-compliance.

We required the supplier to complete the following steps:

- Factory management to actively and fully participate in anti-bribery training with LRQA at their own cost
- Supplier to provide a detailed CAP following that training, to articulate how the factory will fix their internal policies and procedures to ensure bribery never takes place again and ensure this is communicated to any other supplier in the supply chain providing materials for Premier's products
- Supplier to commit to an unannounced re-audit at their cost

Four months from the original audit date, our ethical sourcing & sustainability manager attended the factory in person in China with LRQA auditors to conduct an unannounced re-audit. Factory management participated in the unannounced audit, and provided all working hour and wage records during the re-audit. On this re-audit, the factory scored a B (when the original score was a D), which demonstrated significant improvement and understanding of our ethical sourcing program requirements and Code of Conduct.

### Learnings & next steps

Engaging with suppliers to remediate issues requires commitment from both the supplier and our teams.

However, through clearly articulating our expectations on calls and in person with the supplier, it is now genuinely committed to improvement and ensuring issues relating to business ethics does not occur in the future.

**Monitoring for unauthorised subcontracting**

Premier is committed to addressing the risk of unauthorised subcontracting in the final stage of our product supply chain. In order to manage this risk, we have comprehensive monitoring in place within our tier 1 supply chain, whilst also ensuring transparent and robust relationships are upheld with our suppliers.

**PVAs**

We continued to carry out PVAs with LRQA during the reporting period to ensure that our products were manufactured in factories that meet the standards of our ethical sourcing program. In each PVA, a sample set of Premier purchase order data is reviewed at a selected factory where our supplier has previously confirmed selected orders have been produced. LRQA audits the factory records to verify that the processes listed below were completed at the approved factory.



**Cutting**



**Sewing**



**Pressing**



**Finishing**



**Packing**



**Warehousing**

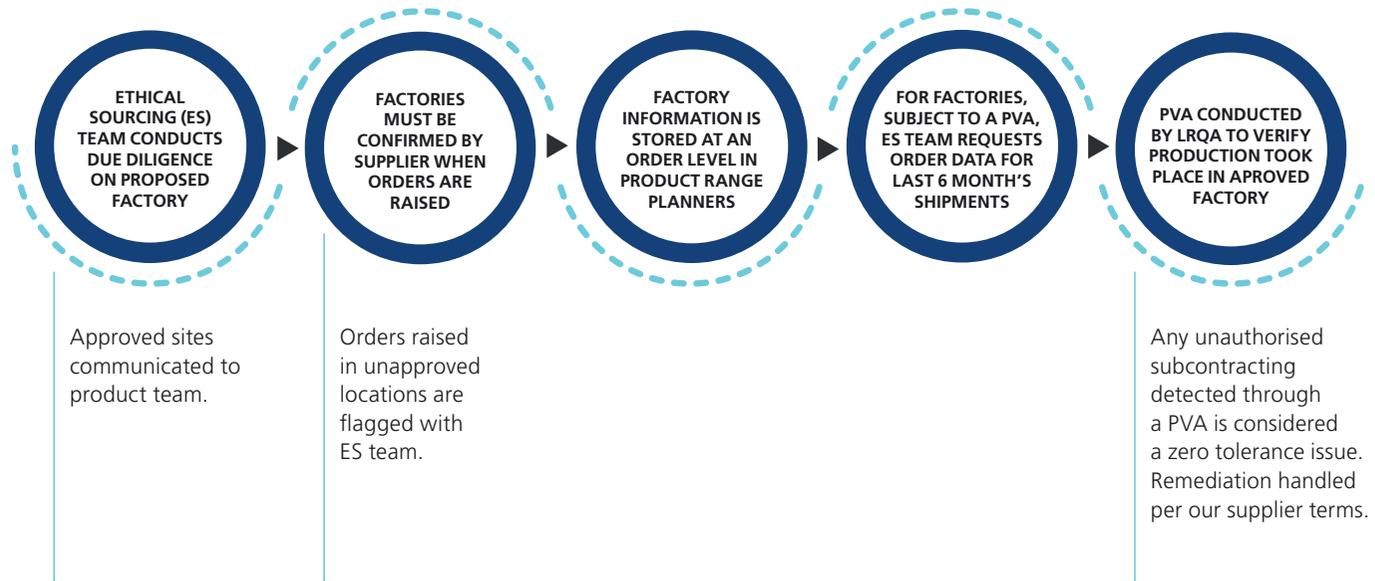
To ensure the success of the PVA program, the tracking of approved factories at a purchase order level is embedded in our product team's day to day process, per the process outlined in Diagram 2.

Our supplier terms and conditions mandate that all suppliers are in scope for a PVA to be conducted at the tier 1 factories they use to make goods for Premier. In the reporting period, 8 PVAs were conducted at Peter Alexander factories in China. All records were verified, and no cases of unauthorised subcontracting were found.

**Production inspections by our teams in-country**

In addition to our work with LRQA, we also continued to conduct further production inspections. Our quality and merchandise team members located in China visit factories on a regular basis to ensure planned production is being conducted in the relevant approved tier 1 factories. Our team in China was able to verify 33% of Smiggle orders through production inspections. Through these production inspections, no unauthorised subcontracting was identified.

DIAGRAM 2



### Living Wage

Premier's [Living Wage Position Statement](#) which also includes a series of commitments and activities, in an effort to progress in the gap between minimum wage and living wages. Further details can be seen in Table 8.

### Due diligence on suppliers of goods and services not for resale

Premier acknowledges that our risk related to modern slavery goes beyond the supply chains of our products. We work with a range of GNFR suppliers that play key roles in the operations of our business. Our team will re-engage with GNFR suppliers on their codes of conduct to assess alignment with our own in the next reporting period.

Areas of Focus	Completed in reporting period (FY25)	Future Plans (FY26)
Responsible purchasing practices (RPP) training	<ul style="list-style-type: none"> <li>Updated RPP training delivered to 15% of product team members</li> <li>To date 14% of team members have completed anti-bribery training</li> </ul>	<ul style="list-style-type: none"> <li>Continue RPP training for all Premier team members who work closely with suppliers</li> <li>Develop e-learning module on RPP topics for relevant internal stakeholders</li> </ul>
Modern slavery training	<ul style="list-style-type: none"> <li>Ethical sourcing and modern slavery awareness training continued, training 22% of product team members</li> </ul>	<ul style="list-style-type: none"> <li>Develop training for China and India based factories with a focus on transparency as well as wage and working hour insights and learnings</li> </ul>
Wage gap analysis	<ul style="list-style-type: none"> <li>Analysed sites based on transparency of working hour and wage data</li> </ul>	<ul style="list-style-type: none"> <li>Explore living wage data collection and verification approaches tailored to our supply chain</li> </ul>

TABLE 8

## Worker voice

With the sale of the Apparel Brands to Myer in FY25, our newly appointed brand ethical sourcing teams in Peter Alexander and Smiggle began the process of considering worker voice initiatives relevant to the product categories and sourcing regions for these two brands. As Peter Alexander and Smiggle did not source in Bangladesh in the reporting period, our scope and requirements for these initiatives has changed.

Our focus in future periods will be to scope new worker surveys for deployment at supplier sites, and to explore suitable grievance mechanisms in China and India.

Regardless of external initiatives, we note that we continue to have grievance mechanisms available to team members in our own operations. This gives our team members a safe way to raise concerns, resolve issues early, build trust and improve our culture.





# Industry engagement & training

Overview

Our operations

Risks

**Actions**

Measuring effectiveness



Premier works with and values collaboration with the following organisations, to uphold human rights, ethics and provide greater transparency in supply chains.

Due diligence initiatives	About the initiative	Our involvement
	LRQA (formerly ELEVATE) is a leading global assurance partner providing (among other things) compliance, supply chain and ESG specialist services to companies globally, with a view to anticipating, mitigating and managing risk. Our work with LRQA has driven an increasing level of transparency along with effectiveness of our ethical sourcing audit and compliance programs - through data, analysis and review.	2021 – commenced our strategic partnership
	APSCA is a professional standards body for social compliance audits. We will only accept third party social compliance audit reports from APSCA member firms.	2022 – Peter Alexander and Smiggle became supporter brands
Industry initiatives	About the initiative	Our involvement
	Better Cotton trains farmers to use water efficiently, care for soil health and natural habitats, reduce use of the most harmful chemicals and respect workers' rights and wellbeing. Better Cotton is sourced via a chain of custody model called mass balance. This means that Better Cotton is not physically traceable to end products, however, Better Cotton farmers benefit from the demand for Better Cotton in equivalent volumes to those we 'source'.	2022 – Peter Alexander became a member of Better Cotton
Global Organic Textile Standard (GOTS)	GOTS is an internationally recognised organic textile standard. Products carrying GOTS certification contain an assurance of organic cotton, as well as environmentally and socially responsible processing, as clothing produced under GOTS certification must use a minimum of 95% organic cotton.	2020 – Peter Alexander has sourced a range of products to the GOTS standard for 5 years

## Advocacy

We support policy and broader industry initiatives which look to improve human rights in the supply chains in which we operate. We welcome active engagement and collaboration with our peers in our work to improve working conditions in factories. Our engagement continued with other organisations and NGOs in a collaborative manner including Baptist World Aid and Oxfam.

## Training

### Modern Slavery training team members

Ensuring team members understand the human rights risks of sourcing in supply chains is fundamental in our ethical sourcing program. To date 22% of product team members have participated in modern slavery awareness training.

### Anti-bribery and Corruption Training

During the reporting period, we continued anti-bribery and corruption training for relevant team members. This training helps everyone in our organisation understand and follow policies to prevent unethical practices. To date, 14% of team members have received in-person training. Additionally, our existing e-learning module on this topic has been revised and will be rolled out in the next reporting period.



# Policies & contractual governance



## Policies

Our core policies are set out below.

	Supplier Ethical Code of Conduct
<b>Supply chain policies</b>	Key Principles of Ethical Business Conduct
	Cotton Pledge
<b>Operational policies</b>	Safety and quality assurance manuals
	Operations Procedures Manual
<b>Team member policies</b>	Team Member Code of Conduct
	Respectful Workplace Behaviour Policy
	Electronic Equipment & Communication Policy
	Whistleblower Policy

### Contractual governance: supplier onboarding

Premier has a non-negotiable supplier and factory onboarding process, to ensure all tier 1 and selected tier 2 factories are captured in the ethical sourcing program.

The onboarding process includes:

- 1. Social compliance audit review:** review by the ethical sourcing team of a valid factory social compliance audit conducted by a member firm of APSCA that has been conducted within the past 12 months. An ERSA is required for all factories for any supplier that exceeds US\$100k in spend by Premier annually.
- 2. Sentinel:** complete search of supplier and factory being onboarded via LRQA's Sentinel system.
- 3. Approval:** approval by the ethical sourcing team is required in writing before the accounts registration team can create a supplier number in the system.
- 4. Policies and contractual governance:**
  - Review and acknowledgement of Premier's Key Principles of Ethical Business Conduct;
  - Sign Code of Conduct;
  - Sign Terms and Conditions.

During the reporting period we onboarded 44 factories across our two brands, located in China and India. All new suppliers were supported through the onboarding process to ensure compliance to the ethical sourcing program. Furthermore, we offboarded 18 sites in the reporting period for product related sourcing issues (rather than any ethical sourcing and compliance issues). Further, following the acquisition of the Apparel Brands business by Myer, all existing Peter Alexander and Smiggle suppliers were re-onboarded to revised supply terms specifically covering those brands.





# 5

## Measuring effectiveness

# Assessing Premier's actions: our effectiveness framework

A summary of our effectiveness framework is set out in Table 9 below, against which we have set out the outcomes in the reporting period. We have also continued with a self assessment scorecard of our actions and projects as to where they are in their level of progress.

## Our framework for measuring effectiveness:

TABLE 9  
Progress against commitments

Engagement point	Action	Objective	Reporting period outcomes	Progress against commitments
 <b>Risk assessment</b>	Supplier on-boarding	To identify any modern slavery risks prior to commencing supplier registration process	Successfully commenced migration of all Premier sites to its own EiQ platform Implemented onsite factory visits at nominated sites by team members before production starts	
 <b>Audit, due diligence &amp; worker rights</b>	ERSA audits conducted in tier 1 primary factories	To identify key human rights risks and indicators of modern slavery in the supply chain	No evidence found of child or forced labour No instance of auditors being refused access to sites No evidence found of workers being prevented from attending interviews 69 ERSA audits conducted to a 57% transparency rate	
 <b>Remediation &amp; corrective action</b>	Non-compliance remediation	To ensure issues raised in audits that may be indicators of modern slavery are remediated appropriately	Retention of worker identity documents and the payment of recruitment fees by workers (indicators of possible forced labour), as outlined on page 24, were remediated Remediation of attempted bribery by a supplier of an LRQA auditor through anti-bribery training and unannounced audit Six additional critical non-compliances remediated with one site currently being exited Remediation of 61% of non-compliances that could be closed via desktop review through the LRQA CAP service 84% of sites participating in the LRQA CAP service completed all assigned e-learning modules	
	Monitoring for unauthorised subcontracting	To monitor and identify any instances of unauthorised subcontracting by factories. Sites not approved by Premier are at higher risk of modern slavery indicators	8 PVAs undertaken in primary factories 33% of Smiggle products produced in the reporting period were inspected by local Smiggle teams	



Engagement point	Action	Objective	Reporting period outcomes	Progress against commitments
 <b>Worker Voice</b>	Scope brand appropriate initiatives	To have a channel where workers can raise concerns for remediation	With the sale of the Apparel Brands in FY25 to Myer, our newly appointed brand ethical sourcing teams in Peter Alexander and Smiggle began the process of considering worker voice initiatives relevant to the product categories and sourcing regions for these two brands	
 <b>Industry engagement &amp; training</b>	Premier team member modern slavery training	To continuously educate and create awareness in our own teams of modern slavery risks and improve the quality of that training year on year	To date 22% of product team members have completed ethical sourcing and modern slavery awareness training	
 <b>Policies &amp; contractual governance</b>	Maintaining policies & procedures	To adapt and update policies and procedures to reflect human rights issues in the supply chain	Successfully onboarded 44 factories in line with our program policies and procedures Offboarded 18 sites through our program Re-onboarded all Peter Alexander and Smiggle suppliers to new brand specific supply terms, following the sale of the Apparel Brands	

Note: The self assessment is against our FY25 commitments, but we recognise at every engagement point and stage of our program there is room for further improvement.

Scorecard key



Scoping or planning



Work commenced



Increased focus



Well advanced



Complete



Sustained



# Glossary



<b>Apparel Brands</b>	Just Jeans, Jay Jays, Portmans, Dotti and Jacqui E
<b>APSCA</b>	Association of Professional Social Compliance Auditors
<b>AU</b>	Australia
<b>BC</b>	Better Cotton
<b>CAP</b>	Corrective Action Plan
<b>Code of Conduct</b>	Premier Retails Supplier Ethical Code of Conduct
<b>EAP</b>	Employee Assistance Program
<b>EAs</b>	Enterprise Agreements
<b>EiQ</b>	LRQA ESG due diligence platform
<b>ERSA</b>	Responsible Sourcing Assessment Standard
<b>FY25</b>	The reporting period
<b>GNFR</b>	Goods and services not for resale
<b>GOTS</b>	Global Organic Textile Standard
<b>H&amp;S</b>	Health and Safety
<b>ILO</b>	The International Labour Organization
<b>Importers</b>	Suppliers to Premier that import finished goods into Australia, principally on a free-in-store (FIS) basis
<b>International factory or factory</b>	A manufacturing facility that is in a location (premises) outside of Australia that manufactures product for Premier, principally on a free-on-board (FOB) basis
<b>International supplier or supplier</b>	A supplier of product to Premier that is located outside Australia, principally on a free-on-board (FOB) basis, that may own or act as an agent for one or multiple factories
<b>LRQA</b>	LRQA Group Limited (formerly ELEVATE)
<b>Modern slavery</b>	a comprehensive term used to describe certain offences and other prohibited conduct, including forced labour, child labour, slavery, people trafficking, deceptive labour, recruitment practices, forced marriage and debt bondage
<b>MY</b>	Malaysia
<b>Modern Slavery Act or the Act</b>	Modern Slavery Act 2018 (Cth)
<b>National Brand</b>	Third party branded product sold in Peter Alexander or Smiggle stores, but that is not sourced or developed by Peter Alexander or Smiggle
<b>NGO</b>	Non-governmental organisation



<b>NZ</b>	New Zealand
<b>Premier</b>	Premier Investments Limited
<b>Premier Retail</b>	Premier's brands, being Peter Alexander and Smiggle
<b>PVA</b>	Production Verification Audit
<b>raw materials</b>	an unprocessed material or commodity used to produce finished goods. For Premier Retail's products, this includes natural fibres such as cotton (eg. used in apparel), and man-made and synthetic material such as stainless steel (eg. used in water bottles) and polyester (eg. used in apparel and in backpacks and other school supplies)
<b>reporting period</b>	28 July 2024 to 26 July 2025 (being FY25 for Premier)
<b>ROI</b>	Republic of Ireland
<b>RPP</b>	responsible purchasing practices
<b>SG</b>	Singapore
<b>UNGP</b>	United Nations Guiding Principles on Business and Human Rights
<b>UK</b>	United Kingdom
<b>we, our or similar expressions</b>	Premier, including Premier Retail

