

2020  
MODERN  
SLAVERY  
STATEMENT

THE ICONIC



# Acknowledgement of Country

In the spirit of reconciliation THE ICONIC acknowledges the Traditional Custodians of Country throughout Australia and their connections to land, sea and community.

We pay our respect to their elders past, present and emerging, and extend that respect to all Aboriginal and Torres Strait Islander peoples today.



# Contents

04	<b>Foreword</b> Erica Berchtold, THE ICONIC CEO
05	<b>Our Structure, Operations &amp; Supply Chain</b> Governance & Accountability
08	<b>Modern Slavery Risks In Our Operations &amp; Supply Chain</b>
11	<b>Our Actions To Assess &amp; Mitigate Modern Slavery Risks In Our Operations &amp; Supply Chain</b> Our response to COVID-19
21	<b>Evaluating The Effectiveness Of Our Actions To Assess &amp; Mitigate Modern Slavery Risks</b>
23	<b>Future Plans for 2021</b>
24	<b>Appendix</b>



This Modern Slavery Statement is published by Internet Services Australia 1 Pty Limited ACN 152 631 082 (THE ICONIC) in accordance with its obligations under the Modern Slavery Act 2018 (Cth) for the financial reporting period 1 January 2020 – 31 December 2020 (inclusive). THE ICONIC is a wholly owned subsidiary of parent company Global Fashion Group S.A., (GFG) which is headquartered in Luxembourg and listed on the Frankfurt Stock Exchange. The statement sets out the actions taken by THE ICONIC in identifying and addressing risks of modern slavery in its operations and supply chain as well as the effectiveness of those actions.

# Foreword from Erica Berchtold

At THE ICONIC, we fundamentally believe it is every human's right to be treated with dignity and respect. This principle sets the standard of what we expect of each other and those we work with.

Our zero tolerance for any and all instances of modern slavery is shared across our business, as is our commitment to eradicate this practice in all its forms. However commitments must translate to action, and, in this, our first Modern Slavery Statement, we demonstrate those efforts and outline our plans ahead.

Beyond acknowledging our own responsibility to do everything we can to identify and manage potential modern slavery risks, we are also aware of our role in ensuring those we do business with share this commitment in their own operations. Our dedicated teams work hard to engage with stakeholders, both internally and externally, to influence broader action against these practices. We firmly believe

collaboration is key to unlocking the patterns of this hidden crime.

Modern slavery is complex. It is influenced by variables that can be challenging to identify, so we have focused on building a strong and robust due-diligence framework in order to adequately identify and mitigate risks, as well as provide effective remedy for instances where it may be found.

COVID-19 has presented heightened risks for the most vulnerable workers in global supply chains. This saw our commitment to human rights strengthened as we worked to ensure workers' rights and safety, and we will continue our focus on those most susceptible to exploitation.

We know there is much more work to do. We have clear objectives as we move forward to ensure our efforts result in greater supply chain visibility, understanding of conditions on the ground and most importantly that we ensure

workers are at the forefront of our decision making. While we know our stakeholders, from customers and suppliers to our own teams expect this of us, as a responsible business that is leading the way in transforming the retail landscape, we know this is not only the right thing to do, but the only way to do business.

*Erica Berchtold*

**Erica Berchtold**  
CEO of THE ICONIC

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This Modern Slavery Statement has been reviewed and approved by the Board of Directors of THE ICONIC. 24 June 2021





# Our Structure, Operations & Supply Chain

## About THE ICONIC

Launched in 2011, THE ICONIC is Australia and New Zealand's leading lifestyle retailer, home to fashion, sport, kids and beauty.

Stocking a world-class curation of over 1000 international and local brands including 13 of our own brands, THE ICONIC is part of parent company, Global Fashion Group (GFG), the leading fashion and lifestyle retail destination in Asia Pacific, Latin America and CIS.

In 2020, THE ICONIC delivered over five million orders and saw 17 million+ visits per month to its e-commerce platform [theiconic.com.au](https://theiconic.com.au). THE ICONIC also launched Beauty & Wellness in September 2020, as well as THE ICONIC OUTLET – a bespoke shopping destination for price-conscious shopping separate to THE ICONIC's main site.

## About Global Fashion Group

Global Fashion Group (GFG) connects over 10,000 global, local and own brands to more than one billion consumers in 17 countries through four established e-commerce platforms: THE ICONIC

(in Australia and New Zealand), Dafiti (in Brazil, Argentina, Chile and Colombia), Lamoda (in Russia, Belarus, Kazakhstan and Ukraine) and ZALORA (in Singapore, Hong Kong, Indonesia, the Philippines, Malaysia, Taiwan and Brunei). With 17 offices and nine fulfilment centres across four continents, GFG proudly employs a dynamic and diverse team with deep local knowledge and expertise. In the twelve months to 31 December 2020, GFG delivered over 42.0 million orders to 16.3 million active customers.

For more information visit:

[www.global-fashion-group.com](https://www.global-fashion-group.com)

## Our structure & operations

THE ICONIC's operations are headquartered in New South Wales, Australia supported by three hubs: our Head Office, our E-commerce Production Hub and our Fulfilment Centre which are all located in Sydney.

In Australia, as of December 31 2020 we directly employed 798 people including both permanent and casuals throughout our three sites across



IMAGE Staff at THE ICONIC Fulfilment Centre, Yennora, NSW.

1000+

international and local brands

5m+

online orders

17m+

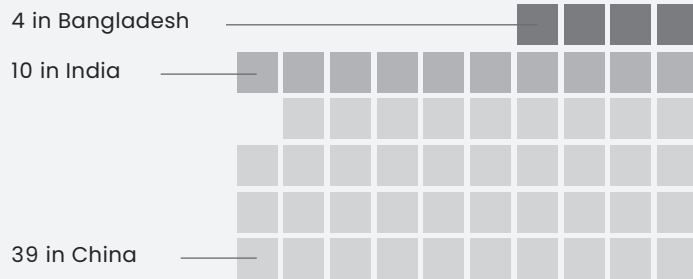
visits/month

3

hubs in Sydney

53

independent supplying factories in 3 countries producing our own-brands.



Our own-brands



11 different business areas including Buying, Fulfilment, Marketing, Finance, IT and Production.

In addition to those we directly employ, THE ICONIC also engages staff indirectly via agency and/or labour-hire solutions to perform work at our Fulfilment Centre.

Furthermore, we have 85 dedicated Customer Support, Finance and E-Commerce Production staff located in Manila, Philippines employed by our sister company ZALORA via an intra-company services agreement.

**Our product supply chain**

Our product supply chain consists of international and local brands as well as our own brands.

THE ICONIC is home to over 1,000 international and local brands with products sourced from brand partners via three business models:

- **Wholesale:** where products sold to customers are owned by THE ICONIC
- **Marketplace:** where brand partners list their products on our shopping platforms
- **Consignment:** Launched in 2020, where brands can store stock at our Fulfillment Centre and capitalise on our delivery and customer experience

In addition to our wholesale services, THE ICONIC also assists its brand partners to develop their e-commerce capabilities

by providing distinct marketing services.

Our own-brand business comprises 13 brands across apparel, footwear and accessories categories. In 2020 these brands were Atmos&Here, Spurr, Staple Superior, AERE, Endless, Double Oak Mills, Dazie, H-Wood, St Swim, Mika Muse, Locale, Everloom and Commune, all of which are developed at our Sydney Head Office.

As at December 31 2020, we partnered with 53 independently owned factories based in China (39), India (10) and Bangladesh (4) to produce our own brands. The factories we work with to produce our own brands collectively employ 13,000 people, 50% of whom are women and almost 25% of whom are domestic migrant workers. Our factory list is published on our [website](#) and updated monthly.

**Our non-trade supply chain**

In our non-trade supply chain, we transacted with 423 suppliers during the reporting period which provided goods and services in categories such as logistics, international freight forwarding, marketing, labour hire and cleaning.

Our top 10 categories account for over 90% of spend with logistics, marketing, international freight forwarding, labour hire and production services some of our largest.

**Governance and accountability**

We believe in practicing strong and effective governance and are committed to maintaining a robust human rights due-

diligence system by safeguarding the rights of workers in the production of our products and across our operations.

**THE ICONIC Governance**

Ultimate accountability for our human rights due-diligence efforts, which forms part of our ethical sourcing programme, is held by THE ICONIC Executive Team including ensuring our modern slavery risks are managed as part of the organisation’s Enterprise Risk Management framework.

THE ICONIC Sustainability Committee, chaired by our CEO, meets quarterly and is responsible for governing progressive implementation of our ethical sourcing programme as well as our annual Modern Slavery Action plans.

THE ICONIC Modern Slavery Cross-Functional Team, made up of Ethical Sourcing, Risk, Procurement and Legal personnel, is responsible for ensuring the effective management of modern slavery risks in our operations and supply chain.

Our specialist Ethical Sourcing team implements a programme of work whose objective is to limit social and environmental impacts across our supply chains, and delivers aspects of our modern slavery action plan.

THE ICONIC Enterprise Risk Management (ERM) framework identifies, evaluates, treats and reports quarterly on the most material risks faced by the organisation in the pursuit of its strategic

objectives. Modern Slavery risks are in the scope of this framework due to their materiality to the organisation.

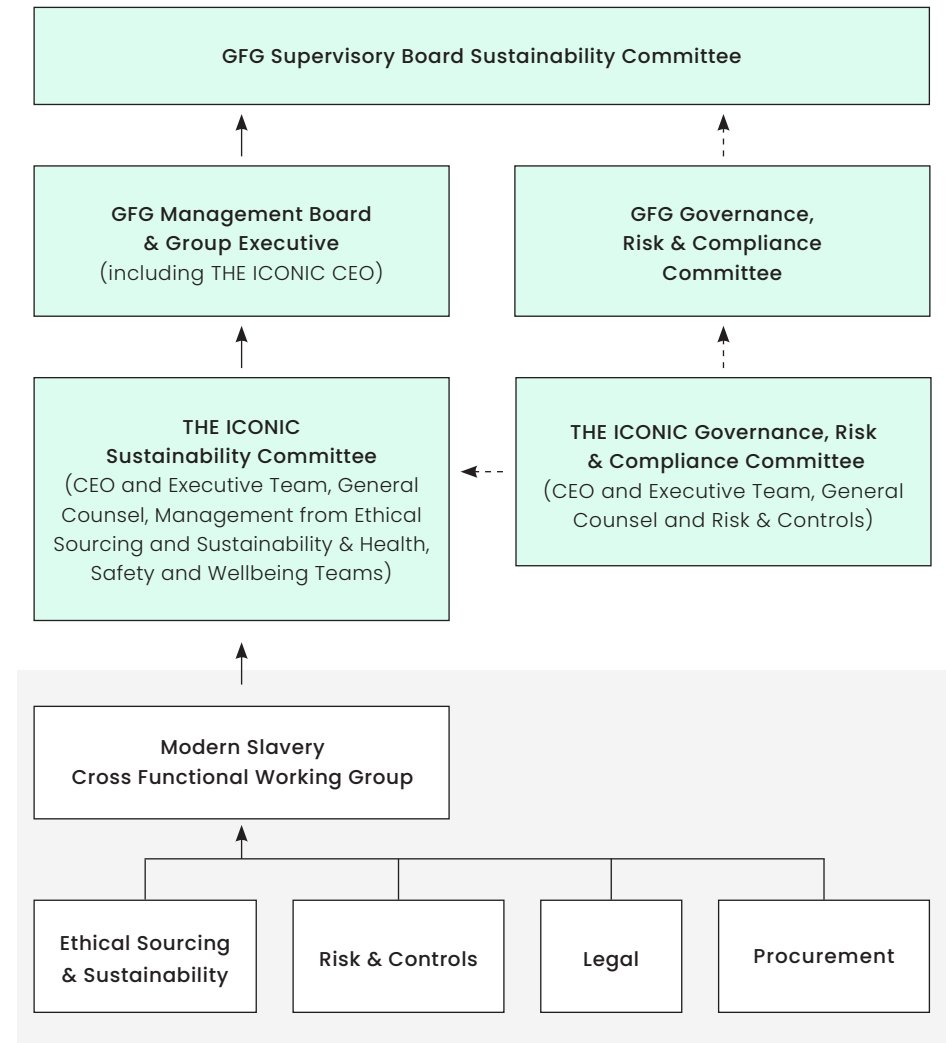
THE ICONIC Governance Risk and Compliance (GRC) Committee meets quarterly and reports immediately prior to the Group’s equivalent committee. It is responsible for reporting on major GRC initiatives and the implementation of additional risk-treatment activities identified through the ERM framework.

**GLOBAL FASHION GROUP Governance**

THE ICONIC, along with the other GFG regions (ZALORA, Lamoda and Dafiti), report up to the Sustainability Committee of the GFG Supervisory Board quarterly on their implementation of the Group’s expectations in relation to sustainability. On a day-to-day basis the Group Co-CEO and Group Chief Sustainability Officer set the overarching ethical trade agenda.

The GFG Global GRC Committee, chaired by one of GFG’s Co-CEOs complements this structure to provide coordinated and forward-thinking strategies to support the growth of our business and to ensure that the Group meets its objectives, whilst maintaining the highest ethical standards and complying with all applicable laws and regulations. GFG operates a risk-management approach anchored to the ISO 31000 standard. Through this approach, modern slavery risks are identified, evaluated, treated and monitored in accordance with the Group’s objectives and obligations.

**THE ICONIC Modern Slavery Governance Structure**



→ Key line of responsibility & accountability  
 - -> Consulted & informed as part of overall Enterprise Risk Management



# Modern Slavery Risks In Our Operations & Supply Chain

THE ICONIC acknowledges modern slavery takes many forms and includes situations of coercion, threats or deception to exploit victims and undermine their freedom including human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage, and the worst forms of child labour.

We also recognise there are further practices which can act as indicators of the presence of forced labour such as document retention, forced overtime and wage retention.

THE ICONIC takes a holistic approach to managing these risks across our supply chains and operations.

To understand the presence of potential modern slavery risks, in 2019 we commenced with a risk readiness and assessment workshop involving our Executive leadership team. The focus was to gain a thorough understanding of the various risks which exist across different areas of our business, review the status of our existing actions and controls in

place to mitigate these, and identify the gaps within our existing due-diligence commitments.

Risks were assessed by country, inherent sector, commodity and worker group against the breadth of functions in our business operations and tiers in our supply chain.

We utilised sources such as Transparency International's Corruption Perception Index<sup>1</sup>, World Bank<sup>2</sup>, the US Department of Labor's List of Goods Produced by Child or Forced Labour<sup>3</sup> and the Rule of Law Index<sup>4</sup>, to devise our country risk methodology. This methodology looks at seven indicators including legal and regulatory frameworks, corruption, rule of law, risks of child labour, and respect for fundamental human rights. Vulnerable worker groups including contract and temporary labour, female workers, migrant and refugee labour groups were assessed for their vulnerability to modern slavery by country, sector and supply chain tier.

1 <https://www.transparency.org/en/cpi/2020/index/nzl>

2 <https://data.worldbank.org/topic/poverty>

3 [https://www.dol.gov/sites/dolgov/files/ILAB/child\\_labor\\_reports/tda2019/2020\\_TVPRAList\\_Online\\_Final.pdf](https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2019/2020_TVPRAList_Online_Final.pdf)

4 <https://worldjusticeproject.org/our-work/research-and-data/wjp-rule-law-index-2020>



Each business area was then plotted on an axis of likelihood and severity for exposure to these risks and overlaid with spend data. The outcome allowed us to develop a comprehensive risk-assessment framework from which to prioritise our due diligence. This exercise also serves to inform our annual modern slavery action plan to manage and mitigate these risks from occurring in our operations and supply chain.

In order to ensure we are responding to the changing nature of our operations and supply chain, THE ICONIC's Executive leadership team is committed to ensuring that the risk assessment is re-run at least once per annum, with the latest assessment taking place in 2020.

### Risks in our operations

THE ICONIC's operations are based across three Sydney sites – our Head Office, E-Commerce Production Hub and Fulfilment Centre. Consisting of 11 different business areas including Buying, Fulfilment, Marketing, Finance, IT and Production, the overall risk profile of our operations is low. Additional customer service and finance support is provided by a small number of staff located in the Manila office of, and employed by, our sister company, Zalora.

THE ICONIC has robust recruitment and onboarding processes to ensure

that it complies with relevant legislation, and industry codes, and upholds our company's principles and values. This approach is reflected in the comprehensive processes by which we recruit, select and engage staff, both those directly employed, and those employed by third party labour hire agencies. In addition to recruitment and onboarding, THE ICONIC also has a comprehensive policy suite to provide all staff and any third-parties, clarity on expectations in relation to conduct, as well as access to an independent grievance channel.

Where we do recognise higher potential for indicators of modern slavery is in the recruitment of casual labour hired via third-party recruitment agencies at our Fulfilment Centre where personnel may be associated with vulnerable working groups such as migrant labour. Their recruitment via third-party agencies potentially results in lower visibility of the terms of engagement. To mitigate these risks, THE ICONIC is proactive in ensuring that due-diligence controls are in place during the procurement process for third-party agencies.

### Risks in our own-brand supply chain

Our risk assessment identified that our own-brand factories are located in countries with a higher presence of

modern slavery risk indicators.

Accordingly this remains a core focus of our due-diligence efforts as we have visibility of our first tier of manufacturing and can exercise more leverage over working conditions.

To further understand where risks may be heightened in our own manufacturing base, THE ICONIC developed an additional factory-level modern slavery assessment framework for implementation in 2021. Against factory audit data obtained through our ethical sourcing programme, the framework maps the presence of risk indicators per factory such as the use of agency and migrant labour, the availability of grievance mechanisms and union participation, as well as the International Labor Organisation (ILO) Indicators of forced labour such as excessive overtime<sup>5</sup>.

This additional layer of analysis will allow THE ICONIC to engage in targeted capacity building, control audits and tailored remediation initiatives to deliver improved outcomes for workers.

Our sourcing model uses a combination of direct-to-factory relationships as well as sourcing agents. We recognise trading with sourcing agents who select our manufacturing partners can translate to a lower ability to influence conditions than our direct factory relationships. In 2020 we commenced the development

of a supplier scorecard to assess social, environmental and commercial performance with the aim to drive greater overall accountability from both sourcing agents and factories alike.

We recognise some of the most egregious practices of modern slavery can occur further up the supply chain in the raw materials and fibre-processing tiers. Whilst we have limited visibility of our upstream suppliers, our traceability data obtained to date demonstrates that inputs and materials for the majority of our own-brand products are sourced indirectly from fabric markets rather than directly from mills. With the growth of our preferred materials programme which prioritises more sustainable materials, our visibility is increasing, as are direct relationships with fabric mills through nomination and certification requirements. As this visibility increases, so will our our ability to identify and mitigate modern slavery risks in this tier of the supply chain.

### Risks in our wholesale product supply chain

We have lower visibility and understanding of risks in the supply chains of our wholesale and marketplace partners which has resulted in the conclusion that this area of our product supply chain carries a high inherent risk rating.

<sup>5</sup> [https://www.ilo.org/global/topics/forced-labour/publications/WCMS\\_203832/lang--en/index.htm](https://www.ilo.org/global/topics/forced-labour/publications/WCMS_203832/lang--en/index.htm)

According to the Global Slavery Index<sup>6</sup>, over 70% of Australia’s imported clothes are sourced from countries where the apparel industry is considered at risk of using modern slavery. We can determine a significant proportion of products are produced in countries and industry sectors with high inherent risk ratings given the range of international brands we offer.

As with our own brands, we recognise that commodities commonly used in the apparel industry, particularly cotton, have

a prevalence of modern slavery risk factors including forced, child and bonded labour.

Whilst the risks on the ground may be similar to our own-brand supply chain, we place responsibility on our brand partners to mitigate these and seek to engage key partners on the systems and policies they have in place to manage them.

**Risks in our non-trade supply chain**

Predominantly comprising service-based suppliers in broad-industry categories

including Marketing, Logistics and Freight Forwarding, Creative Services, Cleaning, Security and IT, the nature of modern slavery risks in our non-trade supply chain are variable.

Ranging from low to high risk when assessed against spend data and existing controls, our assessment determined local and international logistics and freight-forwarding carriers as having the highest risk.

Inherent risk factors in this industry

category include a reliance on low or unskilled, migrant labour and the use of subcontracting. This higher risk of exploitation of vulnerable workers coupled with a lower level of transparency of labour arrangements has informed the prioritisation of our due-diligence activities.

Other industry categories which share a reliance on vulnerable working groups, such as cleaning and security, were assessed as medium priority due to a lower expenditure.

**Modern Slavery Risk Assessment**

Country of service provision	THE ICONIC business area	Example industries or business area	Example of modern slavery risk & or indicator	Risk rating applied against spend data
China, Bangladesh, India	Supply chain own brands	Apparel, footwear, accessories	Forced labour, child labour, lack of freedom of association, bonded labour, deceptive recruitment practices	High
Global	Supply chain third-party brands	Apparel, footwear, accessories	Forced labour, child labour, lack of freedom of association, bonded labour, deceptive recruitment practices	High
Global	Operations logistics & transport	International / local freight and logistics	Reliance on low, unskilled, migrant labour, subcontracting	High
Australia	Operations labour hire	Delivery fulfilment	Third-party labour, short term contracts, reliance on low, unskilled, migrant labour	Medium
Australia	Supply chain non-stock products	IT products, stationery, packaging	Lack of supply-chain visibility, potential high risk raw material sourcing country	Medium
Australia	Supply chain non-stock services	Cleaning, security, building maintenance	Reliance on low, unskilled, migrant labour, subcontracting, deceptive recruitment practices	Low

6 <https://www.globallslaveryindex.org/2018/findings/country-studies/australia/>



# Our Actions To Assess & Mitigate Modern Slavery Risks In Our Operations & Supply Chain

THE ICONIC recognises our responsibility to effectively manage and mitigate the social and environmental impacts of both our operations and supply chain, including potential modern slavery risks. Our commitment to effective governance, transparency and capacity building are central tenets of our approach to reduce and respond to these risks. Ethical Sourcing is one of four key focus areas within THE ICONIC's sustainability strategy where we recognise our accountability and need to act.

To support our strategic objectives, our governance structure and reporting framework ensures our strategy is effectively implemented through the monitoring of progressive targets and action plans.

## Cross-functional ownership and accountability

Our Ethical Sourcing and Commercial Buying teams have a high level of direct engagement, meeting regularly to discuss the trading and compliance status of incumbent factories, order forecasts for existing suppliers and new

sourcing opportunities. Likewise, where factory remediation plans are entered into, Buying teams are engaged to ensure cross-functional ownership of our trading relationships and consistency in approach to our supplier relationships.

## Resourcing

THE ICONIC's specialist Ethical Sourcing team is responsible for implementing our programme on a day-to-day basis with support of THE ICONIC Head of Sustainability. With deep subject-matter expertise and strong cross-functional relationships, they foster key stakeholder relationships to deliver on our commitment to mitigate our modern slavery risks.

Further support is provided by the Chief Sustainability Officer of GFG with frequent touch points to ensure a consistent approach across the Group.

## Minimum expectations

Across our operations and supply chain, clearly communicating our expectations to our suppliers is one of the first steps we take to ensure those we trade with not only meet our own standards but comply

with all applicable modern slavery, human trafficking, anti-bribery, anti-corruption and anti-slavery laws.

THE ICONIC's Supplier [Code of Conduct](#) outlines our environmental, human rights, labour, health and safety standards and underpins our human rights due-diligence system. These minimum expectations are based on international standards and regulations, apply to all supply-chain tiers and are referenced in our supplier contracts including with non-trade suppliers.

The Code prohibits instances of modern slavery such as forced, child and bonded labour and addresses indicators of forced labour such as excessive overtime, unauthorised subcontracting, identity document retention and intimidation. Whilst not all of these practices may constitute modern slavery, where identified, they can trigger further investigation for the existence of forced labour.

Throughout the reporting period, we have consistently developed new systems and strengthened existing processes to ensure we are effective at identifying and managing our risks. In 2020 we included modern slavery, human

trafficking and anti-slavery clauses into product and service supplier contracts and purchase orders, applicable to subcontractors and sub-suppliers. This includes those issued to our wholesale partners and non-trade suppliers.

Our terms go beyond legal compliance and require due diligence in the form of the development and maintenance of policies and procedures to manage modern slavery risks in our suppliers' own operations and supply chains. In 2020, we issued this clause addendum to our existing own-brand suppliers with 100% acknowledgement and acceptance.

Our contractual expectations are further supported by relevant policy suites. This includes the GFG Guiding Principles for Recruitment & Employment of Labour Service Provider Staff.

## Actions taken in our operations

Risks in our operations are managed by a robust governance framework, reporting regime, risk-assessment process and policy suite. These controls govern decision-making and accountability to

ensure the risk profile in this area of our business remains low.

Policies, which apply to all staff and contractors, communicate our standards and expectations regarding responsible business practice and include:

- THE ICONIC Code of Conduct
- Business Conduct & Ethics Policy
- Health, Safety and Wellbeing Policy
- Discrimination, Harassment and Bullying Policy
- Anti-Bribery and Anti-Corruption Policy
- Contractor Management Policy
- Insider Trading Compliance Policy
- Sanctions Policy

In 2020, an overarching Governance Policy, Procurement Policy and accompanying training module was developed to be rolled out in 2021.

### Grievance mechanisms

THE ICONIC firmly believes in a workplace culture which encourages open dialogue, giving our staff and contractors the confidence to raise any concerns relating to misconduct or violations of our Code of Conduct without the fear of retaliation, discrimination or intimidation.

Whilst we encourage concerns to be raised directly to relevant departments, we acknowledge there are instances where staff and contractors may not feel comfortable to do so. Since 2018, we have provided access to the Speak Up referral

line run by an independent third party, EthicsPoint, as a mechanism by which anonymous grievances can be made. This is accessible by phone as well as our intranet and promoted on posters throughout all hubs. Reports made to this line are managed in confidence and escalated to appropriate team members appointed to receive and investigate referrals. Speak Up is an integral way of ensuring we conduct ourselves to a high ethical standard. There were no calls relating to human rights or modern slavery violations during the reporting period.

### Agency due diligence framework

Respect for fundamental human rights at work for people not directly employed by us is of no less importance than our own employees or those in our supply chain.

Where there is a higher proportion of migrant workers engaged via agencies, they may be more vulnerable to issues such as retention of identity documents, payment of recruitment fees and non-payment of due wages. By virtue of these workers being engaged and paid by a third party, we have lower direct oversight of their employment conditions and therefore have developed a Labour Service Provider Framework, which provides more information about the reality on the ground and ultimately confidence in conditions for agency staff.

At its core is a policy which specifies our expectations of agencies and covers non-discrimination, worker representation, non-payment of recruitment costs by staff, non-retention of passports, employment contracts, wages and provision of safe and decent working, living and transport conditions. The framework also provides THE ICONIC with a structure for conducting due diligence including tools and templates.

With the framework originally developed in 2018, in 2020 our parent company GFG conducted a review to assess the extent to which it remains fit for purpose and provides a robust and consistent way to ensure we only work with agencies aligned to our values. In 2021, THE ICONIC will commence implementation of the refreshed Group-wide framework including conducting a risk assessment of all providers with labour as a service, not only labour-hire agencies.

Labour-hire service providers are required to comply with our policy suite as well as all laws, regulations and industry codes with training provided to all casual workers hired via these providers. Our Fulfilment Centre offers the opportunity for labour-hire casuals to become permanent employees to further their job security both within the Fulfilment Centre as well as in Head Office functions.

## Actions taken in our in our own-brand supply chain

### Own-Brand Ethical Sourcing Programme

Our first priority when introducing new suppliers and factories to our own-brand supply chain is to establish our ethical trade expectations, relative to THE ICONIC Supplier Code of Conduct.

To ensure we have a comprehensive understanding of the working conditions in the factories manufacturing THE ICONIC's own brands, we provide a detailed Ethical Sourcing Manual and policy suite during the onboarding process. This manual outlines our expectations in relation to both social and environmental standards in the supply chain, including the provision of associated audit and remediation requirements. Our Supplier Code of Conduct sets the baseline for our trading relationship and is incorporated in all contracts.

All new factories are required to have undergone an independent, third-party audit within the 12 months prior to commencing trade. For approved factories, full audits are then required every 24 months. Follow-up third-party audits are required every 6-18 months, depending on factory grade, to verify any issues uncovered during the full audit have been rectified. We consider these follow-up audits critical to driving continuous improvement in working conditions and ensuring our standards are maintained.

To reduce audit fatigue, we exercise a mutual-recognition audit programme and accept third-party audits, provided they meet our requirements. At a minimum, all on-site audits must include independent worker interviews, review wage and working-hour documentation, cover a broad spectrum of working and environmental conditions in the factory and be conducted against THE ICONIC Supplier Code of Conduct or equivalent. Audits which do not meet our standards are rejected.

THE ICONIC grades audit findings as minor, major, critical and highly critical. These grades inform overall factory ratings and their subsequent approval to trade. We do not trade with new factories with critical audit findings. Where follow-up audits of existing factories result in critical findings, factories must partner with us on time-bound remediation plans to successfully close issues. To ensure the quality of audits are as robust and credible as possible, during the reporting period an additional requirement was implemented for all audits to be conducted by APSCA member audit firms.

APSCA (Association of Professional Social Compliance Auditors) is an industry association, whose members represent a substantial majority of the social-compliance audit industry. The aim of APSCA is to enhance the consistency and credibility of the individuals and organisations performing independent

## CASE STUDY

# Labour Agency Fulfilment Centre Tender

As identified in our risk assessment, the use of third-party labour-hire agencies for the recruitment of casual labour at our Fulfilment Centre was identified as having the potential for a higher proportion of the agency workforce in this sector coming from vulnerable worker groups such as low-skilled or migrant labour.

In 2019, a comprehensive tender process was launched for third party labour-hire services. The process involved a comprehensive due-diligence project implemented

over many months including the assessment of a capability questionnaire and document review to assess the bidders' management of key modern slavery risks including deceptive recruitment practices such as the payment of recruitment fees, retention of identity documents, right-to-work visa verification and subcontracting.

The tender-rating tool assessed bidders' performance on these topics with success in the tender process directly tied to performance on these risk indicators.

IMAGE Staff at THE ICONIC Fulfilment Centre pick and pack customer orders.



social-compliance audits. Each audit is checked against the latest APSCA-member list to ensure only audits conducted by current member firms are accepted.

The greater confidence we have in the integrity of information we collect allows us to adopt additional strategies to further safeguard the rights of workers. At certain strategic suppliers we overlay third-party audits collected via the mutual-recognition programme with audits conducted by our preferred provider. This gives us a further layer of assurance and in some instances has led to partnering with factories on remediation programmes based on the additional information collected.

During 2020, we assessed 36 full audits and 14 follow-up audits. Overall 45% of all minor and major issues raised have been remediated, with 15% of issues raised in 2020 remediated within the year. Seven factories were not approved for production until conditions were improved and verified as such by a new audit. The most common issues we encounter are related to health and safety, non-payment of social insurance and overtime levels. No issues raised during the period were indicative of forced labour. Our preference is to always resolve the issues that have been raised to ensure the rights of the workers involved are upheld; however we will responsibly exit factories unwilling to meet our standards or decline to work with others for the same reason.

Whilst we did not exit any factories for failure to comply with our requirements during the reporting period, we issued one breach notice for unapproved subcontracting.

THE ICONIC considers factory transparency a critical component of our supplier relationships and places a high level of importance in gaining full and accurate visibility of all factories conducting final-stage manufacturing (also known as 'first-tier traceability'). This is inclusive of subcontracting locations manufacturing whole or parts of our order and product, irrespective of which factory took the original order. Suppliers are required to notify THE ICONIC whenever a situation of subcontracting is required in order for the factory audit to be reviewed and approval provided before production is allowed to commence. Suppliers are required to ensure all approved manufacturing facilities understand their subcontracting obligations.

Purchase orders must include the nominated factory with our ordering system only recognising approved factories.

#### **Commitment to continuous improvement**

We acknowledge the limitations of the standard auditing approach and risks associated with factories not accurately reflecting working conditions or workers' viewpoints. During the reporting period, we strengthened our mandatory requirements to further ensure the integrity of the information we collect.

#### **CASE STUDY**

## **Corrective Action Remediation**

During early 2020, a key supplier to THE ICONIC underwent an additional audit with our preferred provider which demonstrated inconsistent record keeping due to a lack of systems and processes. This meant gaining a true picture of the hours worked and wages being paid was not possible.

Following a thorough review and close engagement with the supplier, we entered a three month remediation programme to ensure the issues were addressed and resolved. Monthly progress reports were requested with an outcome resulting in the installation of an electronic time-recording system and new payroll process which were verified by a follow-up audit.

In the second half of 2020, THE ICONIC underwent a comprehensive internal audit of our own-brand ethical sourcing programme.

Policies, procedures, agreements, controls and reporting were assessed for their adequacy and effectiveness in managing our ethical-trade risks. This process served to provide confidence that our programme is being implemented with rigor and identified opportunities for improvement of our control mechanisms.

The review identified additional social-audit formats, which do not align with our Supplier Code of Conduct and therefore are no longer able to be accepted. In 2021, these recommendations will continue to be implemented including a review of aged non-compliances to address their systemic recurrence.

The internal audit also triggered a comprehensive review of the group's grading protocol for classifying non-compliances, including those which are systemic in nature, resulting in a tightening of standards.

Approximately 15% of findings were given a higher criticality across a range of areas which assess forced labour indicators including freedom of movement and association, entitlement to work, regularity of work, agency labour and debt entrapment.

### Supplier capacity building

THE ICONIC believes by going beyond compliance and investing in direct engagement with its suppliers, we are in a better position to identify and address modern slavery risks, ultimately improving conditions for workers in our supply chain.

Prior to the impacts of COVID-19, our Ethical Sourcing team regularly visited our factories, with the last of those taking place in February 2020. We see visits as critical in understanding our factories' operations, building relationships on-ground and ensuring the integrity of our ethical sourcing and sustainability program. During visits, we engage factory management on audit findings and discuss remediation challenges.

To further support our suppliers in meeting our expectations, we are committed to regular training sessions. Our supplier-training agenda is informed by a combination of issues detected in audits, inherent risks in the apparel sector and feedback from suppliers. Our focus is providing our partners with the knowledge and tools to implement systems that meet our standards and ensure conditions are safe and worker rights respected.

Our original plan for supplier training in 2020 involved face-to-face sessions in sourcing countries, building on similar sessions conducted in previous years where we have hosted training on topics including modern slavery and ethical recruitment – a plan hampered by

COVID-19. Instead, in collaboration with our sister company, ZALORA in South East Asia, we pivoted to deliver online training.

Breaking down the content into segments suitable for digital format, we delivered five 90-minute sessions in Mandarin and English, attended by 24% of our active factories and 66% of our own-brand sourcing agents. Designed and delivered by internal specialists with many years of in-factory experience, they covered a combination of our ethical trade requirements and deep-dives into issues identified in factory audits.

Training topics covered in 2020 included:

- An introduction to the GFG Ethical Trade Program
- Working hours
- Wage & benefits including social insurance

### Access to remedy – grievance mechanism

Many of our factories have established grievance channels already operating, such as worker committees, local unions or raising concerns directly with management. The ideal outcome is that those in-factory channels are the first port of call to efficiently and effectively deal with workers' concerns. However, if those channels are not functioning well, or at all, unresolved concerns may escalate over time. Therefore we see

the opportunity to introduce additional independent mechanisms accessible to workers, and seek to support factory management to improve their understanding of worker perspectives, identify any gaps in their in-factory channels and respond more effectively.

### Internal capacity building & responsible purchasing practices

Building capacity across the business is paramount in ensuring cross-functional ownership of ethical trade risk management and maintaining adherence to our standards.

In 2020, we engaged our buying and senior management teams in four training sessions on the following topics:

- Modern slavery indicators and risk
- Responsible purchasing practices
- Onboarding responsibilities for own-brand suppliers
- Preferred material sourcing and material certifications

Our Responsible Purchasing Policy supports our teams by outlining our commitment to behaving with integrity in dealings with suppliers and ensuring our purchasing behaviours align with our business values.

In 2021, further teams will be trained on how to identify modern slavery indicators and risks and their role in ensuring effective mitigation.

**Visibility of our tier 2 materials supply chain**

Whilst historically we have had limited visibility of our upstream supply chain

given the indirect nature via which many of our materials are sourced, our Preferred Materials Programme, which transitions our own-brands to more sustainable materials,

also provides us greater traceability. In 2020 we conducted quarterly traceability exercises to obtain as much information as possible about the supply chain of

non-certified materials. This has provided baseline data to inform next steps towards gaining greater supply-chain traceability.

In respect of modern slavery risks associated with specific materials, we know that approximately 30% of products contain cotton, making it our second most used fibre after polyester. Aware of the inherent modern slavery risks in the cotton sector, in particular bonded, forced and child labour, our Preferred Materials Programme is one way we are striving to manage both the visibility of our cotton supply chain and the standards in which our cotton is grown and processed. The standards we accept such as the Global Organic Textile Standard (GOTS) and Global Recycled Standard (GRS) include social metrics aligned with International Labor Organisation (ILO) core principles as part of their certification process. In 2021, further cotton certifications will be evaluated for inclusion in our Preferred Materials programme and benchmark to ensure we are providing our Buyers to the greatest opportunity to buy products sourced via standards which prioritise working conditions.

**Preferred-Materials Benchmark**

	More sustainable materials			Conventional materials	
	A	B	C	D	Unrated
Apparel	Recycled Wool	Recycled Cotton	Recycled Polyester	Polyester	Elastane
	Organic Wool	Organic Cotton	Recycled Nylon	Cotton	Nylon
	LENZING™ ECOVERO™Viscose	FSC / PEFC Modal	Recycled Acrylic	Viscose (Wood-based)	Acrylic
	TENCEL™ Modal	FSC / PEFC Viscose	Organic Silk	Silk	
	TENCEL™ Lyocell	Lyocell	Alpaca Wool		
	RWS / ZQ / Sustainable Cape Wool	Wool	Hemp		
Shoe & accessories		Linen (Organic & Conventional)	Ramie		
			Viscose (Bamboo-based)		
			Leather Working Group Certified Leather		
	Organic Cotton	Recycled Polyester	Leather Working Group Certified Leather	PU	Plastics
	Recycled Cotton	Linen (Organic & Conventional)	Solvent-Free PU (Water-based PU)	Leather	Metals
	Plant-Based		Vegetable-Tanned Leather	Cotton	Nitrile, Natural or Typical Footwear
Leathers			Polyester	Rubber	
Kangaroo Leather				TPU	
Jute					

RWS: Responsible Wool Standard; FSC: Forest Stewardship Council; PEFC: The Programme for the Endorsement of Forest Certification; ZQ: ZQ Merino



## CASE STUDY

## Grievance Mechanism Helpline Roll-out

In 2020, we identified Bangladesh as a priority country for the roll-out of an independent helpline. Not only are the majority of the workers in our own-brand supply chain located there, historical concerns about working conditions placed garment workers at a heightened risk during the pandemic for exposure to modern slavery risk indicators. The helpline service, facilitated by an established provider and civil society organisation, is available to workers 24 hours

a day and has protocols in place for protecting workers anonymity, managing investigations as well as reporting and escalation.

Originally intended to be rolled out in person with our partner on the ground, due to COVID-19 restrictions we worked together with one of our most strategic factories to design a 'Train the Trainer' approach for in-factory training, complemented by a digital roll-out of messages via workers' mobile phones to provide information about the helpline.



IMAGE Workers heading for lunch during factory visit in Dhaka Bangladesh, July 2019.



LEFT Quality control team at a factory in Dhaka, Bangladesh, July 2019.

The implementation process was considerable and relied upon the assistance and commitment of our direct supplier and factory management during challenging and unprecedented times. More than 1400 workers received training on how to use the helpline, including test calls and scenario settings. To ensure the helpline is accessible at all times, factories place posters throughout the factory, make frequent PA announcements and provide workers with individual lanyard cards with call number information.

Since its implementation, workers have begun using the service to raise issues including termination procedures, compensation and benefits. Calls are categorised by topic and severity with regular communication with worker and factory management to ensure swift resolution, with all issues to date promptly resolved by the factory. To ensure the helpline's ongoing efficacy, we will be deploying various methods including push notifications for new starters, refresher training, factory newsletters and worker surveys.

**“More than 1400 workers received training on how to use the helpline, including test calls and scenario settings.”**

## Actions taken in our wholesale supply chain

Although we have much greater ability to influence our own-brand supply chain, we recognise we also have a responsibility to influence the way our third-party brand partners manage and mitigate their own modern slavery risks. Due to the lower visibility, our approach is one of direct engagement and capacity building.

We have developed minimum due-diligence criteria from which to analyse our most commercially important brands. An in-house developed, points-based system, the analysis assesses the policies, systems, strategies and memberships detailed by a brand and uses their disclosure as a proxy to assess their overall performance.

Following the development of this criteria, we identified a need to provide support and facilitate knowledge-sharing of sustainability more broadly, and modern slavery risks in particular, to ensure we are partnering with brands that align with the core sustainability values that we have as a business.

THE ICONIC 2022 Sustainability Strategy makes a commitment to engage the top 50 existing brands who don't meet the minimum criteria to support them to improve their performance, enabling us to provide customers with even more transparent and meaningful information about the conditions in which their products are made.

Whilst COVID-19 delayed the roll-out of the criteria and our direct engagement plans, during 2020 we facilitated two modern-slavery training sessions for wholesale partners. The sessions shared information about the different forms of modern slavery as defined by the Australian Modern Slavery Act, examples and case studies from the apparel industry to demonstrate how and where these practices may be identified as well as global modern slavery and transparency legislation their businesses may be required to comply with.

During 2020, we also conducted a gap analysis of our contractual agreements with wholesale partners to identify those requiring a modern slavery clause addendum or new contract. In 2021, we will begin closing this gap.

### Considered Edit

Coupled with the development of minimum onboarding criteria and ongoing capacity building, one of the most compelling ways we can influence our brand partners to address the material human rights in their own supply chains is to demonstrate customer demand for more responsible products.

Considered – our destination page and filter system that highlights products with sustainability credentials and enables customers to shop by their values – plays an important role in influencing this demand.

### CASE STUDY

## Forced-Labour Risk Assessment

Approximately a quarter of the workers in our own-brand factories are domestic migrants. Our risk assessment recognises the migrant workforce as vulnerable to a variety of forced-labour indicators and modern slavery. This can take the form of deceptive recruitment practices including the payment of deposits, retention of identity documents as well as human trafficking.

In 2020, THE ICONIC undertook a project to assess forced-labour risks for migrant workers in our final-stage manufacturing factories.

While the project did not identify the presence of forced labour in these factories, it provided useful information on worker origins as well as factory employment and recruitment practices. In 2021, this information will be overlaid against existing audit data to inform where further due diligence may be required.



IMAGE Workers at a factory in Guangdong, China, March 2018.

## Our Considered Product Sustainability Credentials



### Sustainable materials

Product made of materials with lower environmental impact than conventional alternatives.



### Eco-production

Product made in a location or using a process that is associated with lower environmental impact than other alternatives.



### Fair production

Product made in location holding an accreditation associated with decent working conditions.



### Animal-friendly

Product made using non-animal alternatives or using methods that are associated with good animal welfare.



### Community engagement

Product made by a brand or using a method associated with positive community benefit, including donations.

Pillars such as Fair Production and Community Engagement elevate in our assortment the products manufactured or sourced in a location certified for ethical working conditions, such as Fairtrade certified and products made by brands committed to community benefit such as those that donate 1% or more of profit to a charitable cause or have B Corp certification.

The number of brands represented in Considered continues to grow, having doubled since April 2019 when the functionality was launched.

### Actions taken in our non-trade supply chain

All high-value procurement tenders incorporate social and environmental, quality, innovation and commercial criteria.

A long-form capability questionnaire is issued to those bidding for tenders in medium and high risk categories as determined by our annual modern slavery risk assessment. Through rigorous ethical trade and modern-slavery related questions, it seeks to gauge the bidders' understanding and management of human rights risks in their operations and how this is implemented via policy and process controls.

Our ethical-sourcing specialists are part of the evaluation process to ensure consistent and effective assessment of the controls in place. Once suppliers are

successful, those in high-risk categories undergo risk assessments to inform whether further engagement is required.

In 2020 a risk assessment was also conducted of logistics carriers to understand their policies, systems and procedures related to recruitment, right to work and identity verification, compliance with employment laws as well as risks of subcontracting. This assessment will take place on an annual basis with areas of concern directly addressed with each supplier.

During the year we also continued to strengthen our procurement protocols by investing in internal capacity building measures. A formal Procurement Policy containing sections on sustainable sourcing and modern slavery risks, an accompanying step-by-step 'how to' guide, as well as online training module will be rolled out to all staff in 2021. A pre-procurement risk checklist will also serve to identify any labour-based services with inherent modern slavery risks for referral to procurement.

### Response to COVID-19

#### The impact of COVID-19 on our own-brand supply chain

COVID-19 has had significant impacts on our factory partners and our supply chain more broadly, with many factories closing temporarily at the peak of the pandemic, and when reopening was



possible, doing so with more limited capacity under COVID-19 restrictions.

Our focus from the beginning was to maintain an updated picture of the exposure of our factories to the health impacts of COVID-19, including to understand the impact of the pandemic on our factories' ability to operate, the extent to which standard wages were being paid and whether or not existing social protection mechanisms and/or ad hoc government support were available within each of our production countries.

THE ICONIC honoured all own-brand orders placed prior to the COVID-19 crisis where production had commenced or was completed, and paid in full for these orders. Where production had not commenced for orders placed, these orders were rephased where possible in order to honour commitments to suppliers and factories while adjusting for factory production capacity, as well as customer demand reduction. If suppliers had purchased materials for orders and production had not commenced, THE ICONIC ensured these materials were used for rephased production so that suppliers and factories were not out of pocket. In no cases were force majeure clauses enforced.

As an added demonstration of this commitment, in March 2020, via our parent company Global Fashion Group,

THE ICONIC endorsed the 'COVID-19: Action in the Global Garment Industry'<sup>7</sup> which commits us to a range of actions to limit the effect of COVID-19 in the supply chain that we control. These actions include ensuring manufacturers are paid for finished goods and goods in production, maintaining open lines of communication with suppliers and advocating for the introduction of social protection measures where they do not exist.

In addition to audit findings, we also implemented an additional layer of information gathering regarding payments to workers, providing us more detailed and real-time visibility. This, combined with analysis of where social protection mechanisms exist, enabled us to fully assess the situation in our supply chain.

Throughout the pandemic, we maintained communication with our suppliers to ensure the immediate safety risks to workers were managed by safe practices including temperature checks, social distancing and the provision of PPE. Where external audits continued, worker interviews and sentiment surveys were conducted in a socially distant manner.

The crisis delayed the commencement of certain strategic initiatives such as in-person worker training and the physical roll-out of the grievance mechanism in Bangladesh to all of our factories there. Despite this, as noted we

pivoted to online training and a digital roll-out of the helpline to one of our most strategic factory partners via a train-the-trainer approach and mobile phone push notifications to workers.

### The impact of COVID-19 on our operations

A COVID-19 taskforce, reporting to the GFG global taskforce, was immediately formed to ensure we moved swiftly to implement safeguards for our staff at all sites and those in our extended supply chain.

Remote working provisions were implemented for all staff not required to be on site with additional support provided to facilitate safe working from home.

For frontline teams required to remain on site, continued vigilance was maintained throughout the period via:

- NSW Health COVID-19 safe plans including PPE provision, hand sanitisation and hygiene training across all sites
- Implementation of physical distancing protocols and split shifts
- Enhanced cleaning schedules with breaks for deep cleaning
- Appointment of hygiene and safety supervisors at all sites
- Compulsory daily health declarations for all on and off site workers to monitor hotspot exposure

- Development of transparent risk matrix to guide us on appropriate Health & Safety protocols in line with both GFG Group Policy and local health authorities

All staff were provided pandemic leave if required to test and isolate as instructed by NSW Health, and supported to access our Employee Assistance Programme (EAP) service for mental wellness assistance.



ABOVE THE ICONIC staff following COVID-19 safe plans.

<sup>7</sup> [https://www.ilo.org/global/topics/coronavirus/sectoral/WCMS\\_742343/lang--en/index.html](https://www.ilo.org/global/topics/coronavirus/sectoral/WCMS_742343/lang--en/index.html)

# Evaluating The Effectiveness Of Our Actions To Assess & Mitigate Modern Slavery Risks

We recognise the importance of delivering outcomes over outputs and maintaining a focus on driving positive impact for those in our supply chain and operations.

Our commitment to conducting regular process reviews, delivering quarterly programme updates to executive leadership and partaking in internal audits is an important way in which we continue to evaluate the effectiveness of our actions. This gives us the opportunity to analyse outcomes and determine if our efforts remain fit for purpose.

## Emerging human rights risks

We anticipate the impacts of COVID-19 on our factory partners, and supply chain more broadly, to continue for some time.

We will continue to evaluate our response in partnership with our suppliers to ensure we are meeting our obligations to those most vulnerable to its impacts as well as the expectations of our stakeholders. We also continue to

monitor broader human rights risks to ensure we can respond in a timely manner.

## Factory audit programme

Whilst there are non-negotiable fundamentals to our due-diligence approach, we are committed to going beyond a baseline compliance mindset to ensure we are creating change in the livelihoods of workers and delivering targeted responses to modern-slavery risks.

Compliance with our auditing requirements is one such non-negotiable with all factories having valid audits as a prerequisite to trade. Throughout 2020 we achieved the following:

- 50 third-party audits conducted
- Closed 98 corrective actions, 24 of which were raised in the reporting period

Whilst we are confident our audit remediation programme is driving





continued progress in the quality of the working conditions of our own-brand factories, we also commission control audits, conducted by our preferred provider, at our most strategic factories to test this programme and its efficacy.

As highlighted by our internal audit we have work to do on assessing aged non-compliances and strengthening our onboarding requirements to reduce the timeframes for outstanding systemic issues.

### Internal audit

We have a robust internal audit function whose policies and procedures ensure our risk management, governance and internal control processes are operating effectively. This is in service to Management, the Management Board, and the organisation as a whole, with the team reporting directly to the Group Audit Committee.

As mentioned, our own-brand ethical sourcing programme underwent an internal audit during 2020, the findings

of which must be addressed through time-bound action plans to ensure any identified root causes of process deficiencies are remediated and internal controls strengthened.

### Supplier capacity building

Our factory training programme delivers targeted sessions on key topics. Attendance is required by both factory management and sourcing agents with sessions provided in Chinese and English. Feedback surveys are provided after each session to evaluate how well the content is understood, its relevancy and to identify further topics which suppliers would like support on.

### Grievance mechanisms

Since the roll-out of our helpline in Bangladesh, we have conducted monthly assessments of call volume, topics and resolution rates to monitor its effectiveness. This has involved regular engagement with our supplier, factory management and service provider to understand the factors which influence workers' utilisation of this service. In 2021, further measures to ensure its efficacy will be implemented.

### Stakeholder engagement and transparency

We believe our strategic objectives can be inclusive to all only if we comprehensively understand and address our stakeholders' expectations of our business. Their voices contribute not only to shaping and evolving our focus within each area but also to identify opportunities to improve and mature our strategy.

Our actions are communicated to all stakeholders via our annual progress reports and dedicated section on our website where we share the fundamentals of our programme. Additionally, we partake in industry assessments and research projects to help inform and contribute to industry change. More detail on GFG's stakeholder engagement can be found in the [GFG People & Planet Positive Report 2020](#).

### Internal capacity building

At an operational level, our online training modules include mandatory questions to test knowledge before completion. Employees of THE ICONIC must achieve a minimum score of 100% in all assessments to pass. This method ensures that our employees maintain a high level of understanding of each policy and its practical application and also identifies areas where further training and development may be required.



LEFT Photoshoot at E-Commerce Production Hub, Sydney, 2019



# Future Plans For 2021

THE ICONIC is committed to ensuring human rights are at the forefront of our business practices and remaining transparent in our efforts to identify the root causes of modern slavery and eliminate its occurrence.

Our commitment to continually gain greater visibility of the modern slavery risks across our operations and supply chain is underpinned by our annual Modern Slavery Action Plans which progress our greater agenda.

In 2021 we will be setting the next phase of our ethical sourcing journey with the development of our 2025 Strategy. This process will entail a thorough review of current and future plans via a comprehensive stakeholder engagement process to ensure we remain focused on deliverables which drive positive outcomes for those in our supply chain and operations.

## Approach for 2021 – 2022:

For 2021 to 2022, we are taking a multi-layered approach underpinned by key activity covering our internal and external stakeholders.

### Internal capacity building

- Extend modern slavery training for internal employees via the development of dedicated training module
- Re-run responsible purchasing practices training

### External capacity building

- Deliver modern slavery training to own-brand suppliers
- Engage top wholesale brands to build their capacity on managing modern slavery risks
- Expanding our ethical sourcing team to China to enable on-the-ground factory engagement and support for worker training initiatives

### Process improvements

- Re-run risk assessment on logistics carriers and conduct further engagement where required
- Run risk assessment on cleaning service providers and conduct further due diligence where required
- Develop process to analyse age of open non-compliances & scope revised onboarding guidance to prevent open issues being carried over
- Continue traceability of Tier 2 own-brand supply chain
- Develop forced and child labour remediation guidelines

# Appendix

This Modern Slavery Statement was prepared in accordance with the mandatory reporting criteria set out in the Modern Slavery Act 2018.

Mandatory criteria	Statement section	Page numbers
1. Identify the reporting entity	Contents	03
2. Describe its structure, operations and supply chains	Our Structure, Operations & Supply Chain	05
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	Modern Slavery Risks In Our Operations & Supply Chain	08
4. Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	Our Actions To Assess & Mitigate Modern Slavery Risks In Our Operations & Supply Chain	11
5. Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Evaluating The Effectiveness Of Our Actions To Assess & Mitigate Modern Slavery Risks	21
6. Describe the process of consultation with any entities the reporting entity owns or controls	N/A no controlled or owned entities	N/A
7. Provide any other relevant information	Future Plans for 2021	23





THE ICONIC