



Accent Group Limited

# 2024 Modern Slavery Statement

For the Period 1st July 2023 to 30th June 2024



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This Statement was prepared by the reporting entity Accent Group Limited ('Accent Group', 'the Company') (ABN: 85 108 096 251). Accent Group is an Australian public company listed on the Australian Securities Exchange (ASX code: AX1). The Company's registered office and principal place of business is 2/64 Balmain Street, Richmond, Victoria, Australia. This Statement has been prepared in accordance with the *Modern Slavery Act (Cth) 2018* ('the Act') and outlines the actions taken by Accent Group to identify, assess, and address modern slavery risks across our operations and supply chains for the year ending 30 June 2024.

Accent Group Limited makes this single joint Statement on behalf of all reporting entities in the Accent Group and all other owned and controlled entities.<sup>1</sup> A list of all subsidiaries is included in Appendix A.

<sup>1</sup> In addition to Accent Group Limited, Platypus Shoes (Australia) Pty Ltd, The Athletes Foot Australia Pty LTD, Hype DC Pty Ltd and Accent Lifestyle Pty LTD are also reporting entities under the Act.

# 1. Introduction

At Accent Group, we acknowledge that modern slavery remains a significant challenge within global supply chains, including our own. We are dedicated to responsible operations and take our responsibility to identify and manage modern slavery risks seriously.

This Statement covers the reporting period from July 1, 2023, to June 30, 2024. During this time, our Company has continued to grow, opening 93 new stores across Australia and New Zealand. This expansion reinforces our commitment to identifying and addressing modern slavery risks within our operations and supply chains. In response, we have implemented several initiatives throughout the year to strengthen our modern slavery program.

We are pleased with the progress made, including:

- **Enhancing Supplier Onboarding:** We have continued to embed our supplier onboarding process across all Accent Group-owned brands.
- **Ethical Sourcing Policy:** We distributed our Ethical Sourcing Policy to suppliers, clearly outlining our expectations for social compliance and ethical trade.
- **Training Initiatives:** Ongoing training for teams within Accent Group-owned brands has been implemented to raise awareness of modern slavery risks and equip them to engage effectively with suppliers.
- **Supplier Portal Development:** Our supplier portal has been integrated to manage and record our suppliers, factories, and subcontractors across Accent Group-owned brands, and this will be extended across our business.
- **Audit Processes:** We are focused on enhancing our audit processes to better understand and mitigate modern slavery risks.

While we have made significant strides, we recognize that there is still more work to be done. Key activities planned for the coming year include continued follow-up on corrective action plans within our supply chain and further development of our audit processes. Details of our planned next steps for FY25 can be found in Section 7 of this Statement.

We are committed to advancing our approach to managing modern slavery risks and understand the need for ongoing attention in this area to contribute to the goal of eradicating modern slavery. We look forward to collaborating further with our team members, suppliers, and business partners to enhance our due diligence practices.

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## APPROVAL OF THIS STATEMENT

This Statement was approved by the Accent Group Board on 20<sup>th</sup> November 2024.



**Daniel Agostinelli**  
Chief Executive Officer  
Accent Group Limited

## 2. About Accent Group

### OUR OPERATIONS

In the reporting year FY24, we operated 863 retail stores, 32 online platforms and represent 20 retail brands across Australia and New Zealand.



863

RETAIL STORES



32

ONLINE PLATFORMS



20

RETAIL BRANDS

In FY 24 we had a portfolio of 10 own brand labels along with our store brands and hold the exclusive distribution rights for 15 global brands across Australia and New Zealand.

All our operations are located within Australia and New Zealand, and include the following activities:

#### MULTI-BRAND RETAIL OPERATIONS:

The retail stores and websites through which we sell third-party and own-branded merchandise, including a range of Australian and global footwear and apparel brands.



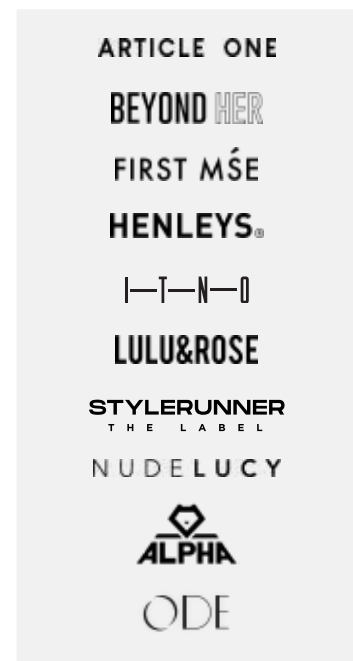
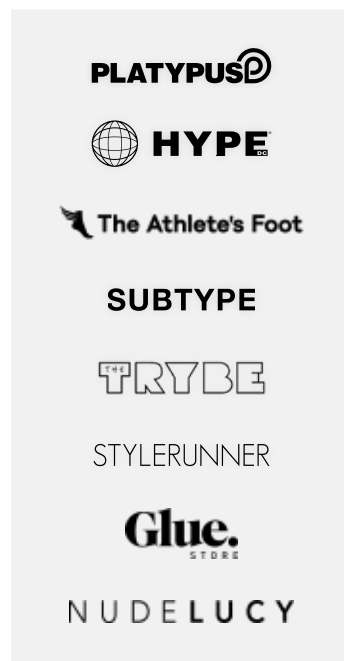
#### DISTRIBUTED BRANDS:

We hold exclusive distribution rights for a range of global footwear brands across Australia and New Zealand. We sell merchandise from these brands in our multi-brand and stand-alone retail operations and online. We also sell merchandise from these brands to other retailers on a wholesale basis.



#### ACCENT OWNED BRANDS:

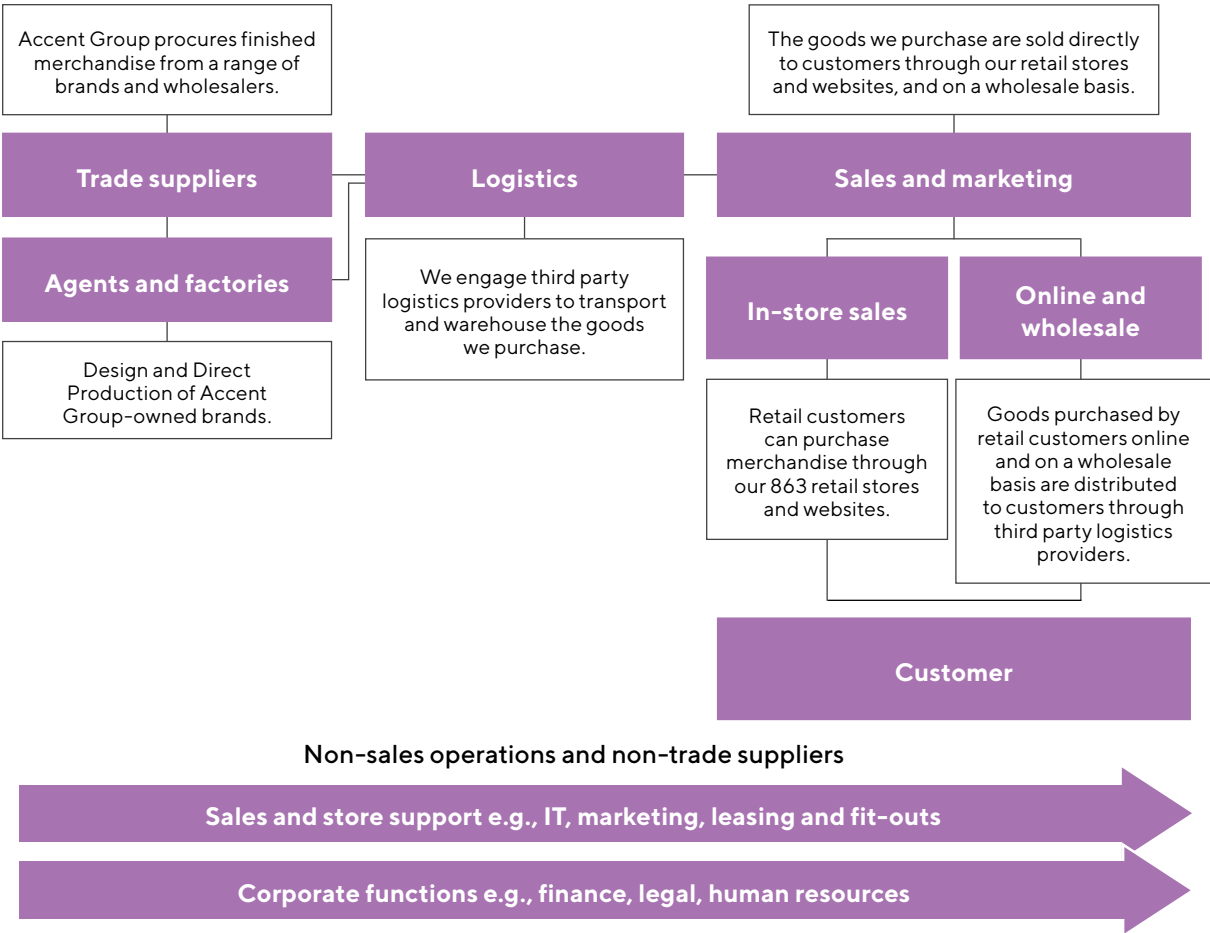
We source finished merchandise across footwear, apparel, and accessories, created specifically for Accent owned brands that we source directly from third party agents and factories for direct retail and wholesale distribution.



## 2. About Accent Group

### Our value chain

Figure 2 – Accent Group value chain



### Our workforce

Accent Group employs 7,900 team members across Australia and New Zealand<sup>2</sup> in a variety of roles across our retail stores and support operations, including our support centers, warehousing, wholesale, and shared services. The majority of our workforce is employed on a casual basis and primarily works in our retail locations.

During the reporting year, we maintained a female-to-male ratio of 66:34, and we continue to expand our female-focused brands such as Nude Lucy and Stylerunner.

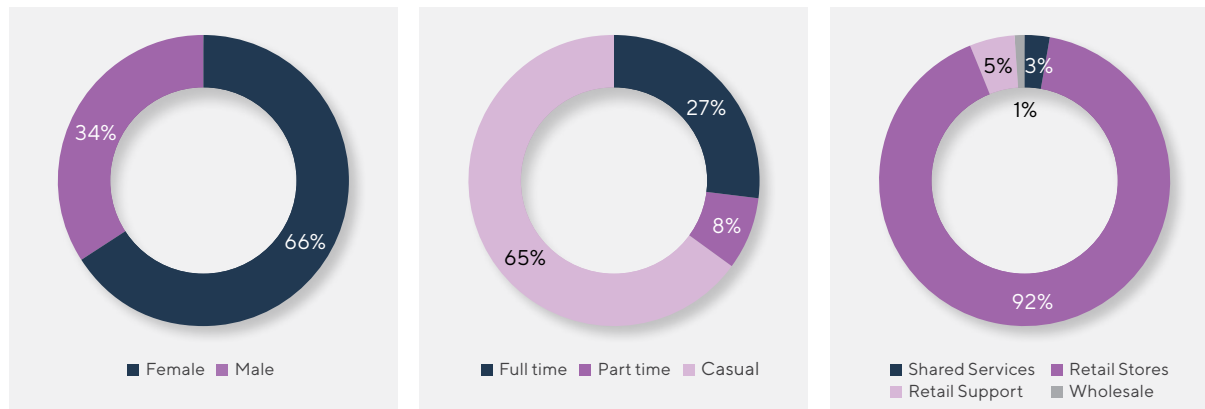
Our [Diversity and Inclusion Policy](#) and [Code of Conduct](#) reflect our commitment to fostering diversity and inclusivity throughout the group. Accent Group promotes an environment of mutual respect, dignity, and openness to different cultures, valuing the richness of our differences. Our approach to diversity encompasses various dimensions, including age, gender, race, national or ethnic origin, learning and physical abilities, disabilities, religion, language, family or marital status, and sexual orientation.

2 As at 30th June 2024

## 2. About Accent Group

A breakdown of our workforce is provided below:

**Figure 3 – Accent Group workforce**



### OUR SUPPLY CHAIN

Our primary operations focus on the retail and wholesale of merchandise. This involves sourcing finished goods from trade suppliers, as well as designing and directly producing products for Accent Group-owned brands through agents and factories. Our ongoing emphasis on brands such as Nude Lucy and Stylerunner has led to the continued expansion of our apparel design and direct production capabilities within our supply chain. The variety of trade and non-trade goods and services that support our business operations has remained constant over the past year.

Table 1 below summarises the key types of trade and non-trade goods and services we procured in FY24.

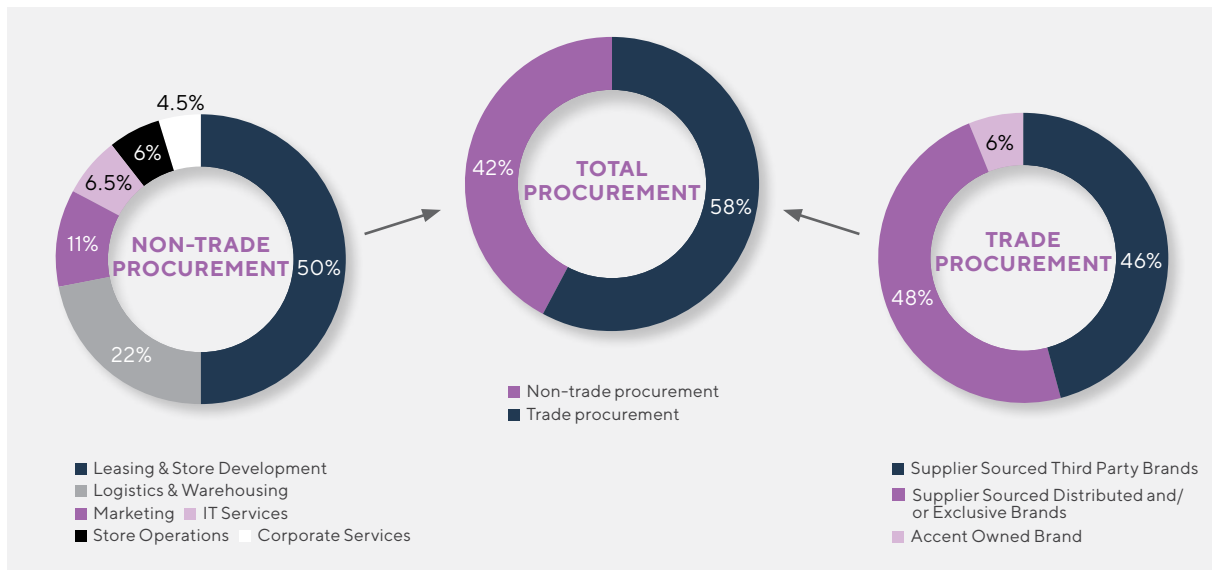
**Table 1 – Main categories of goods and services procured in FY24**

Supply chain segment	Category	Description
Trade suppliers – merchandise for sale and distribution	Supplier sourced distributed and/or exclusive brands	Footwear and apparel merchandise that we source for direct retail and wholesale e.g. Skechers, Vans, Dr Martens.
	Supplier sourced third party brands	Footwear and apparel merchandise that we source solely for direct retail e.g. Nike, Adidas.
	Accent Group-owned brands	Merchandise across footwear, apparel and accessories designed and directly produced for Accent Group-owned brands that we source from third party agents and factories for direct retail and wholesale e.g. Platypus-branded socks, Nude Lucy, Stylerunner the Label and brands under Glue stores such as First Mse and Article One.
Non-trade suppliers – goods and services not for resale	Logistics and warehousing	Freight and warehousing services used to transport purchased goods to our warehouses, store goods prior to sale and transport sold goods to customers.
	Leasing and store development	Leasing of retail stores from landlords as well as store design and fit out.
	IT services	IT hardware and software used in retail stores and websites, and in the retail support services.
	Marketing	Advertising and marketing services and products, including printing.
	Corporate services	Professional services, corporate office operational services, employee recruitment, and banking.
	Store Operations	Store operations such as electricity, cleaning, security and repairs and maintenance, and store consumables



## 2. About Accent Group

**Figure 4 – Accent Group supply chain spend in the 2024 reporting period**



During the FY24 reporting period, we procured over \$1 billion in goods and services, collaborating with more than 2200 suppliers. A significant portion of our supply chain expenditure—58%—is attributed to trade suppliers, with our top 20 suppliers in this category accounting for 70% of total trade spending. These suppliers include both distributed brands with whom we partner on exclusive and non-exclusive terms, as well as third-party brands. The value of our Accent Group-owned brands continues to grow each year, aligning with our strategy to expand this channel, which will enhance our ability to oversee supplier activities more effectively.

### GOVERNANCE AND CONSULTATION

Accent Group owns and operates several entities both in Australia and internationally. A complete list of all subsidiaries as of June 30, 2024, can be found in Appendix A. In addition to Accent Group Limited, the following entities also qualify as reporting entities under the Act: Platypus Shoes (Australia) Pty Ltd, The Athlete's Foot Australia Pty Ltd, Hype DC Ltd, and Accent Lifestyle Pty Ltd.

All entities within Accent Group operate under a unified central governance framework and a common management system. The individuals responsible for managing modern slavery risks represent both Accent Group Limited and all subsidiaries listed in Appendix A. In preparing this Statement and addressing modern slavery risks across our operations and supply chain, these representatives actively engaged with all owned or controlled companies to develop this document. The reporting requirements of the Modern Slavery Act 2018 have been discussed with the subsidiaries including the actions we plan to take to meet these obligations.

The Audit and Risk Committee of Accent Group has been delegated the responsibility by the Board to monitor the Group's risk management framework and ensure that our obligations regarding modern slavery are effectively managed. The Committee reports to the Board, which is ultimately accountable for overseeing the management of modern slavery risks. Throughout the reporting period, the Board has supported Accent Group's commitments to combating modern slavery.

The Accent Group ESG Framework is used to drive the ESG agenda through the business and focuses its commitment on three key pillars: people, responsibilities, and a commitment to the environment.

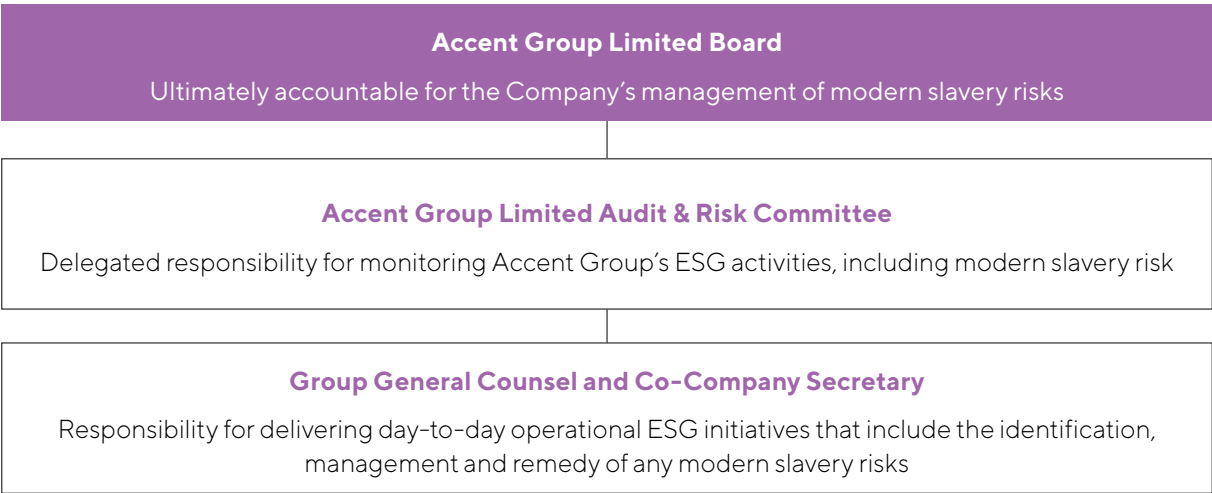
- **Our People Come First** – Accent Group recognizes that our success is built on the dedication of our team members.
- **Our Responsibilities** – We uphold a corporate responsibility to act with integrity and maintain an ethical purpose in all our endeavors.
- **Our Environment** – We are committed to caring for the environment and implementing initiatives that reduce our impact on the planet

## 2. About Accent Group

Figure 5 – Accent Group ESG Framework



Figure 6 – Modern Slavery governance at Accent Group





### 3. Risks of modern slavery in our operations and supply chain

#### COMMITMENT TO ETHICAL OPERATIONS

Accent Group is committed to operating responsibly and upholding the highest standards of ethics and integrity. We recognize that modern slavery risks may exist deeper within our supply chain, and we will continue to explore ways to identify, manage, and, when necessary, remedy these risks.

In our own operations, while the risks of modern slavery are lower, they are not entirely absent. We are dedicated to ensuring that our team members, customers, and community members are not subjected to any form of exploitation.

During the reporting period, Accent Group operated in Australia and New Zealand. While we acknowledge the potential for operational risks, we believe that our existing processes, along with the legal and regulatory frameworks in these regions, are sufficient as we concentrate on higher-impact areas.



### 3. Risks of modern slavery in our operations and supply chain

#### RISKS IN OUR SUPPLY CHAIN

We recognize that there are risks of modern slavery within our supply chain. The complexity, multi-tiered nature, and global reach of our industry make it challenging to pinpoint where these risks may arise. As a relatively small player in the global apparel and footwear sector, our ability to influence third parties is limited. Nevertheless, we are continuously looking to enhancing the quality of our supplier data, allowing us to conduct a more comprehensive inherent risk assessment and target our due diligence activities more effectively.

In the footwear and apparel sector, modern slavery risks permeate the entire value chain. These risks range from the harvesting and processing of certain commodities, such as forced labor in cotton and leather supply chains, to exploitative conditions in manufacturing processes. Additionally, within our retail operations, modern slavery risks can arise during new store development (e.g., construction materials) and operational activities (e.g., cleaning and security services). Activities that require low-skilled, labor-intensive work often attract more vulnerable workers, making them potential sources of modern slavery risk. We remain focused on these areas.

We have greater leverage and access to information when sourcing products for Accent Group-owned brands, which is why we will continue to concentrate our efforts here, as we can create a more significant impact. We also recognize our responsibility extends to our distributed or exclusive brands and will work directly with these brands to ensure their sourcing practices align with our expectations.

Table 2 below outlines the inherent risks of modern slavery in our primary procurement categories, the level of inherent risk identified through our assessments, and how we have prioritized these categories for further due diligence.

**Table 2 – Indicative risk factors by supply chain segment**

Supply chain segment	Category	Inherent risk rating	Identified risk factors
Trade suppliers – merchandise for sale and distribution	Supplier sourced distributed and/or exclusive brands  <i>Representing approximately 28% of total spend and 2% of total suppliers by number</i>	High	<p>Our trade procurement encompasses finished footwear, accessories, and apparel merchandise, all of which are industries at a heightened risk for various forms of modern slavery, including child labor, forced labor, and human trafficking. The labor-intensive manufacturing processes and low-skilled nature of the work increase the likelihood of excessive hours and deceptive recruitment practices.</p> <p>The inherent risk in this category is particularly high due to a significant portion of sourcing from suppliers in regions like Vietnam and China, where labor laws are less strictly enforced. Given our exclusive distribution rights for brands in this sector, Accent Group is closely linked to these risks and has a greater opportunity to influence supplier performance. Additionally, this category accounts for a substantial portion of our overall procurement spend, concentrated among a limited number of suppliers.</p> <p><b>Priority for action: High – continued due diligence to be actioned in the next 12 months.</b></p>

### 3. Risks of modern slavery in our operations and supply chain

Supply chain segment	Category	Inherent risk rating	Identified risk factors
Trade suppliers – merchandise for sale and distribution (continued)	Supplier sourced third party brands <i>Representing approximately 27% of total spend and 10% of total suppliers by number</i>	High	<p>As noted above, inherent risks of modern slavery are present in the footwear and apparel manufacturing sector. Again, the higher inherent risk identified is due to the high-risk production locations of our suppliers in countries such as Vietnam, Brazil and China. Unlike our distributed brands, there is a less direct relationship to the risk. The vast majority of suppliers in this category are major International and Australian brands, generally with a good understanding of their supply chains and established due diligence and risk mitigation practices in place. This category represents a large proportion of our overall procurement spend, spread across a relatively large number of suppliers and is therefore considered a secondary priority.</p> <p><b>Priority for action: Medium – continued due diligence to be actioned in the next 12 months.</b></p>
	Accent Group-owned brands <i>Representing approximately 3.5% of total spend and 2.5% of total suppliers by number</i>	High	<p>As noted above, inherent risks of modern slavery are present in the footwear and apparel manufacturing sector. This category is rated high overall due to the volume of sourcing from high-risk locations, such as China. The nature of Accent Group's relationships with suppliers of Accent Group-owned brands differs to those of other trade suppliers, as we generally purchase this merchandise directly from factories or from third party agents. Given that we have a closer relationship to these risks we continue to prioritise our due diligence activities here.</p> <p><b>Priority for action: High – due diligence activities remain focused here.</b></p>
Non-trade suppliers – goods and services not for resale	Logistics and warehousing <i>Representing approximately 9% of total spend and 2% of total suppliers by number</i>	Low to Moderate	<p>Inherent risks of modern slavery are associated with transport, warehousing, and distribution activities. Although our suppliers are in Australia and New Zealand, these risks often stem from the use of labour hire services which have been linked to deceptive recruitment and forced labour of vulnerable populations, including migrant and low-skilled workers. This category represents a small proportion of spend and total suppliers. We will continue to engage with suppliers in this category (especially landlords and our warehousing partners) to assess any changes to our risk assessment.</p> <p><b>Priority for action: Low – continue with current approach to supplier monitoring.</b></p>
	Leasing and store development <i>Representing approximately 21% of total spend and 12% of total suppliers by number</i>	Moderate	<p>Inherent risks of modern slavery are associated with store fit outs, repairs and maintenance and the construction materials used in them. Although all suppliers are in Australia and New Zealand, risk factors include the frequent use of migrant or lower-skilled labour, and poor or dangerous working conditions. This category represents a large amount of total spend and total suppliers.</p> <p><b>Priority for action: Medium – continued due diligence to be actioned in the next 12 months.</b></p>

### 3. Risks of modern slavery in our operations and supply chain

Supply chain segment	Category	Inherent risk rating	Identified risk factors
Non-trade suppliers – goods and services not for resale (continued)	IT services <i>Representing approximately 3% of total spend and 3.5% of total suppliers by number</i>	Low to Moderate	Inherent risks are associated with IT equipment manufactured offshore, particularly forced labour. Limited inherent risks were identified in IT support services provided by Australian-based suppliers. This category represents a small proportion of spend and total suppliers. We will continue to refine our risk assessment of this category.  <b>Priority for action: Low – continue with current approach to supplier monitoring.</b>
	Marketing <i>Representing approximately 4% of total spend and 27% of total suppliers by number</i>	Low	Limited inherent risk factors identified. Accent Group source primarily Australian based services.  <b>Priority for action: Low – continue with current approach to supplier monitoring.</b>
	Corporate services <i>Representing approximately 2% of total spend and 27% of total suppliers by number</i>	Low to Moderate	Accent Group primarily source Australian based services, however the nature of the work can attract a vulnerable workforce required for lower skilled, labour intensive work like catering and waste removal.  <b>Priority for action: Medium – continued due diligence to be actioned in the next 12 months.</b>
	Store operations <i>Representing approximately 2.5% of total spend and 14% of total suppliers by number</i>	Moderate	Inherent risks of modern slavery are associated with migrant and vulnerable workers in cleaning and security services. These include debt bondage, forced labour and human trafficking. Although total spend is relatively low, a large proportion of the suppliers here are often smaller businesses.  <b>Priority for action: Medium – continued due diligence to be actioned in the next 12 months.</b>



## 4. Our approach to managing risks of modern slavery

### RISKS IN OUR OPERATIONS

Through an internal review of our operations, we have determined that the risk of modern slavery is low. Our operations span across Australia and New Zealand, requiring us to comply with all relevant industrial relations laws in these regions. As detailed in Section 4 below, the majority of our team members are employed under employment Awards, primarily the General Retail Industry Award. Additionally, we have a robust policy framework in place that governs our corporate conduct.

We recognize that 65% of our workforce is employed on a casual basis, which does carry a higher inherent risk. However, in Australia and New Zealand, casual employees are protected by the same industrial relations framework as their permanent counterparts.



At Accent Group, we are dedicated to fostering sustainable business practices across our operations, aiming to be an employer of choice for our team members, meet customer expectations, and deliver long-term value to our shareholders. We also believe that individuals working for our suppliers deserve to be treated with respect, work in safe environments, and have their human rights protected.

To support this commitment, we expect our employees to adhere to the highest legal, moral, and ethical standards in our responsible operations. Additionally, we expect our suppliers to take proactive steps to minimize any negative impacts their operations may have on their people and the environment.

Throughout the reporting period, we have reviewed our existing policies and procedures, taking several steps to raise awareness of modern slavery risks, engage directly with our suppliers, and hold our partners accountable for their practices.

## 4. Our approach to managing risks of modern slavery

### CONDUCTING DEEPER DUE DILIGENCE OF SUPPLIERS

During the reporting period, our primary focus has been on enhancing our supplier due diligence practices. We have continued to undertake a range of activities to engage with our trade suppliers and gain a deeper understanding of their practices in managing modern slavery risks. These activities have differed between suppliers of Accent Group-owned brands and those of distributed, exclusive, and third-party brands.

#### Suppliers of Accent Owned Brands

Across our operations, Accent Group-owned brands utilize a tailored onboarding process for new suppliers and manufacturing facilities. This process involves a formal, staged approval procedure that includes assessing the suitability of suppliers to manufacture or supply products for Accent Group. Once an assessment is satisfactorily completed, the relevant entity's General Manager must approve the onboarding request before proceeding.

Before onboarding, suppliers are required to sign and return a copy of the Accent Group Ethical Sourcing Policy and provide evidence of a valid social compliance audit, which must be conducted by an independent third party within the last 12 months. Once received, we conduct an internal assessment of the audit.

In addition to the Ethical Sourcing Policy, we provide suppliers with our Manufacturing Agreement, which outlines the terms and expectations they must adhere to in order to manufacture and supply products to Accent Group, including full compliance with our Ethical Sourcing Policy.

This Manufacturing Agreement applies to all suppliers of Accent Group-owned brands, and we expect it to be signed and returned by all such suppliers.



As we collaborate with our suppliers to gather the results of their social audits, we ensure that suppliers of Accent Group-owned brands provide valid audit information. We accept a variety of social compliance audits all of which adhere to the SA8000 standard, requiring organizations to establish, maintain, and apply socially acceptable practices in the workplace.

We continue to train to empower our team members to effectively analyze the various audit report formats, ensuring they are well-equipped to engage with our suppliers in identifying risks and developing corrective action plans.

Suppliers are assigned a risk rating of High, Medium, or Low. Those with a high-risk rating are required to develop a corrective action plan and may need to undergo further investigation to meet our compliance expectations. If a supplier refuses to address compliance issues, we reserve the right to terminate our engagement with them.

#### Corporate Services

Accent Group has continued to expand its engagement with its providers of skilled customer service and finance services beyond Australia. A key aspect of onboarding these suppliers has involved conducting due diligence on their work practices and employee management. We reinforced our expectations by sharing our policies and performing several site visits to conduct our own audits of their facilities. This ongoing process has heightened awareness of our ethical trade requirements and facilitated open dialogue about creating safe and respectful work environments for those working on behalf of Accent Group.

## 4. Our approach to managing risks of modern slavery

### DEEP DIVE: INHERENT MODERN SLAVERY RISKS IN ACCENT OWNED BRANDS

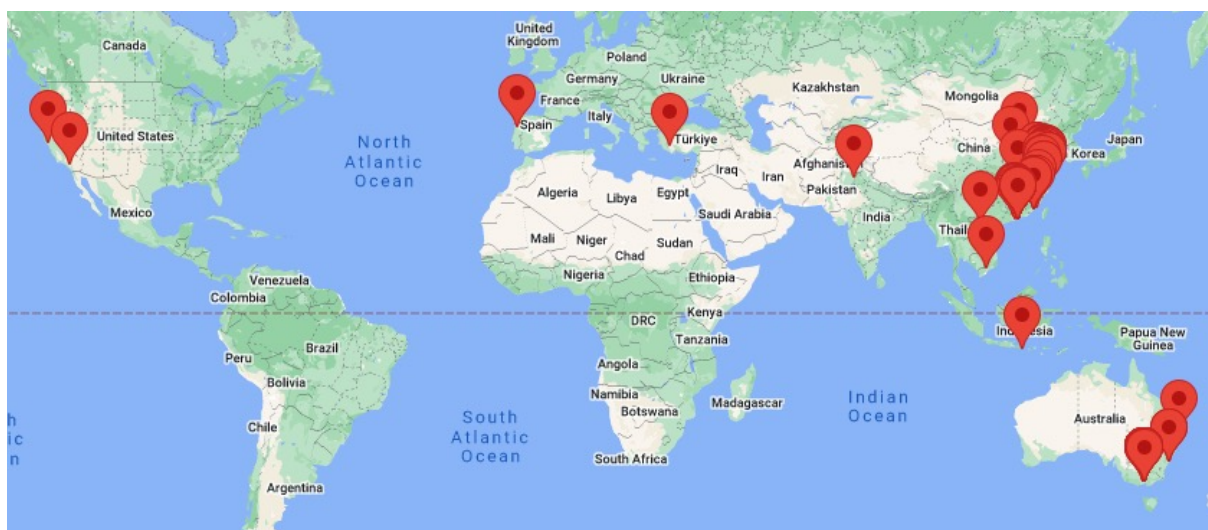
Throughout the reporting period, the Accent Group-owned brands category has remained a priority as the business plans for continued growth. Most of our suppliers in this category were rated with inherently high risks of modern slavery, primarily due to the countries of manufacture and the nature of the products produced (footwear and apparel).

In light of the risks associated with modern slavery, we have built upon key activities undertaken in the previous reporting year to maintain robust risk assessment and due diligence processes. These activities included:

- **Supplier Onboarding Process:** We have continued to have this process in place to identify factories that present higher levels of risk than we are willing to accept for Accent Group-owned brands, allowing us to redirect our business as necessary.
- **Training for Team Members:** We organized workshops for our Accent Group-owned brands team members focused on reviewing audit documentation, assessing risk levels, and creating corrective action plans. Additionally, we engaged an external consultant to ensure our team stays informed about industry practices related to Modern Slavery, including risk areas and mitigation strategies.
- **Investment in Technology:** We have continued to invest in an online software platform (Our Supply Chain or OSC) that has enhanced our management of supplier and factory records and improved traceability. This platform enables our team to better analyze factory audit outcomes and collaborate with factories on corrective action plans.
- **Travel to China:** We have increased our visits to key suppliers and factories associated with brands such as Nude Lucy, The Athlete's Foot, and those under the Accent Lifestyle division. Additionally, we expanded our travel to engage with suppliers across shared services, including Store Design and Development. These visits have strengthened our relationships with key suppliers and enabled us to assess the facilities and working conditions at the factories producing our branded merchandise, as well as those involved in store fit-outs and fixtures.

Figure 7 – Location of Factories used across Accent Owned Brands

### Location of the Factories Used Across Accent Group Owned Brands



Key outtakes as at the end of FY23 for Accent owned brands:

- We have **59 approved suppliers** who have passed through the Accent on-boarding process
- Of these suppliers, we work across **78 approved factories**; of which **92%** are in China
- **85% of factories are Tier 1** (Cut, Make, Trim) and **all of these** have submitted a social compliance audit



## 4. Our approach to managing risks of modern slavery

### STORE DESIGN AND DEVELOPMENT

In the past year, we have successfully embedded the Accent Group-owned brands ethical sourcing practices into the Store Development team, enhancing our commitment to responsible sourcing throughout our operations. The team now actively visits our Chinese partners, requests factory audit information, and conducts thorough due diligence to ensure compliance with our ethical standards. This proactive approach demonstrates how Accent Group is “broadening its reach” with its ethical sourcing practices, reinforcing our dedication to transparency and accountability within our supply chain while fostering strong relationships with our suppliers.

### SUPPLIERS OF DISTRIBUTED AND/OR EXCLUSIVE BRANDS

We recognize that our responsibility extends beyond our own operations to include the brands we distribute or have exclusive agreements with. This area requires further attention and focus. Our Brand Managers, who manage relationships with our global brand partners, are tasked with collaborating closely with their respective partners’ Ethical Sourcing or Compliance Managers. As part of this responsibility, Brand Managers are asked to gather essential documentation from these partners including;

- Ethical Sourcing Policy or Statement
- Cotton Sourcing Policy or Statement on Cotton Sourcing
- Animal Welfare Policy
- Restrictive Substances List
- Supplier Code of Conduct
- Carbon Emissions statement
- Packaging Policy





## 4. Our approach to managing risks of modern slavery

### CASE STUDY: OUR SUPPLY CHAIN (OSC) PORTAL

We have enhanced our understanding of our end-to-end supply chain through the implementation of a software platform called Our Supply Chain (**OSC**), which allows us to record and manage information from Accent Group suppliers, factories, and subcontractors in greater detail.

A key feature of OSC is its ability to record and measure our level of traceability across all stages of production. The system enables us to store important supplier and factory information, including social compliance audit reports, corrective action plans (**CAPs**), certifications, environmental attributes, and chain of custody requirements.

Internally, our teams have received periodic training on using the OSC platform, along with additional training on social compliance that covers how to interpret various audit documents and input that data into OSC.

We recognize that our journey is ongoing and that there is still more work to be done. As we continue to learn, we are leveraging OSC to identify traceability gaps across different tiers of manufacturing and stages of production within our entire supply chain.

For further information on the OSC platform visit [www.oscdata.com](http://www.oscdata.com).



- |                           |                          |                                  |
|---------------------------|--------------------------|----------------------------------|
| ➤ Supplier Information    | ➤ Follow Up Tasks        | ➤ Supplier/Factory Relationships |
| ➤ Audit Management        | ➤ Factory Information    | ➤ Collaboration                  |
| ➤ Corrective Action Plans | ➤ Supply Chain Reporting | ➤ Sustainability                 |

### USING THE OSC PORTAL TO MANAGE SUPPLIER CORRECTIVE ACTION PLANS

This year, we have continued to utilize the OSC system to develop corrective action. Our focus has been on evaluating our factories' social compliance audit reports and ensuring that the findings identified in these audits are actioned and resolved in a timely manner.

The OSC system has been instrumental in supporting this effort. The most frequently identified issues in our corrective action plans have included working hours, machinery guards, and safety signage.

Analyzing factory audits remains a crucial step in assessing our suppliers' overall social and ethical performance, serving as a clear reminder that we at Accent Group are committed to our social responsibility.

## 4. Our approach to managing risks of modern slavery

### OUR POLICY FRAMEWORK

Our policies and procedures reflect our values, operational practices, and the expectations we hold for our team and suppliers.

#### The Accent Group Ethical Sourcing Policy

At Accent Group, we prioritize ethical sourcing and are committed to maintaining a responsible supply chain.

During the reporting period, we continued to distribute our Ethical Sourcing Policy to our suppliers and brand partners. Our Accent Group-owned brand suppliers are required to return a signed copy of the Policy, confirming their commitment to our standards. This policy is guided by international guidelines and encompasses four key expectations for our suppliers:

- **Business Integrity and Ethics:** Suppliers must comply with all applicable laws and regulations and operate in an ethical manner.
- **Labour Standards and Human Rights:** Suppliers and factories are responsible for safeguarding workers' rights. Employees should have the freedom to choose their employment and receive fair and lawful compensation. We strictly prohibit child labor, discrimination, and any inhumane treatment of workers.
- **Healthy and Safe Working Conditions:** All workplaces must ensure safety, minimizing occupational hazards through emergency preparedness, training, and protective measures.
- **Environmental Protection:** Suppliers and factories are expected to continually strive to reduce their environmental impact and enhance their performance over time.



You can view our [Ethical Sourcing Policy and Modern Slavery Statement](#) on our website.

Our existing policies collectively outline the expected standards of behavior for our team members, the working conditions they are entitled to, and the mechanisms available for reporting concerns. These include:

- **Code of Conduct** – This document details the expectations we have for our employees and business partners regarding lawful and ethical behavior, including fair treatment, non-discrimination, and ensuring a safe work environment.
- **Whistle-blower Policy** – explains the protections afforded to employees that raise concerns about misconduct and provides guidance on communicating these concerns to Accent Group. We aim to ensure that individuals feel supported to come forward if they have information or concerns about serious misconduct.
- **Diversity Policy** – confirms Accent's commitment to establishing and actively encouraging diversity in its workforce and to provide employees with a safe workplace environment free from unlawful discrimination, bullying or harassment.



We also maintain bullying and harassment, and grievance policies. All team members are provided with these policies, as well as the employee Code of Conduct and our standard conditions of employment in a Team Member handbook when they commence employment with us. We have zero tolerance for harassment (including sexual harassment), bullying, discrimination and any other act or omission which deviates from our Code of Conduct.

## 4. Our approach to managing risks of modern slavery

### Adherence to Employment Awards

Accent Group is committed to meeting the standards and protections outlined in Employment Awards. Our retail store, warehouse, and shared services team members are generally employed under the relevant Award that corresponds to their role. Most of our employees are covered by the General Retail Industry Award, while a smaller number are engaged under the Cleaning Services Award, Storage Services and Wholesale Award, and the Clerks – Private Sector Award.

### Training and Development

At Accent Group, our commitment to the ongoing training and development of our team members is essential for our success and sustainability as an organization. Our goal is to offer training opportunities that enhance our ability to attract, develop, retain, and support our employees.

We have made substantial progress in developing our foundational training modules, which are designed to raise awareness and educate our team on workplace safety, compliance, and legislative requirements. These modules are digitally integrated into our online learning management system and cover:

- Bullying & Sexual Harassment framework
- Safety
- Customer Aggression

Additionally, this year we introduced a new **Respect at Work** training module in light of the changes resulting from the Anti-Discrimination and Human Rights Legislation Amendment (Respect at Work) Act 2002 (Cth). This training module is designed to emphasize the positive duty on prevention of incidents and promote a respectful workplace environment.

In the reporting period, Accent Group dealt with 2 claims raised through the Fair Work Commission. These incidents have all been reviewed and did not relate to any indicators of modern slavery.





## 5. Assessing the effectiveness of our actions

While we have made progress in enhancing our due diligence procedures during the reporting period, we acknowledge that there is still more to do in evaluating the effectiveness of our initiatives. We understand that this is essential to ensure that our efforts are producing the intended results.

To evaluate the effectiveness of our initiatives, we have taken the following steps:

- **Implementation of OSC (Our Supply Chain):** We have continued to use a software platform that allows us to record and manage audit data for our suppliers and factories associated with Accent Group-owned brands. This system generates “status reports,” enabling us to track the progress of audit reports and their corresponding corrective action plans.
- **Supplier Communication:** We have continued to monitor and inform suppliers that our central Ethical Sourcing email serves as a direct line of communication for inquiries related to ethical sourcing or to raise any grievances.
- **Engagement with the Audit and Risk Committee:** Our annual report is presented to the Accent Group’s Audit and Risk Committee for review, ensuring continued oversight and a strong focus on our due diligence activities throughout the business.

Throughout the year, we did not receive any notifications of grievances or complaints regarding potential modern slavery incidents via any of our escalation channels, including the Whistleblower channel, ethical sourcing inbox, or through the reviewed audit reports. We will continue to monitor our activities and implement processes to assess the effectiveness of our approach to identifying and addressing the risks of modern slavery within our operations and supply chains.





## 7. Future actions

Accent Group has embraced a continuous improvement approach to managing modern slavery risks. This strategy is supported by the Act and aligns with our ESG Framework commitments to fostering sustainable business practices. We recognize that tackling modern slavery risks is a complex challenge, and we are dedicated to enhancing our approach over time. We will continue to identify areas for improvement and seek collaboration opportunities with other organizations in our industry.

We are pleased to report progress made on our commitments of FY24 and we also acknowledge that there is still work ahead.

**Table 3 – Progress against commitments in FY24**

FY23 Commitment	Our Progress in FY24	Our FY25-26 Commitment
<i>Formally setting expectations with our suppliers</i>	We distributed the updated Accent Group Ethical Sourcing Policy (available in English and Chinese) and prioritise suppliers of Accent Group-owned brands.	We will continue to distribute the Accent Group Ethical Sourcing Policy to suppliers, prioritizing those of Accent Group-owned brands. Additionally, we will regularly review the policy to assess whether any changes are necessary.
<i>Undertaking a deep dive assessment of higher risk supply chain categories</i>	We have utilized the OSC system to refine our Supplier Register across Tier 1 and, where possible, Tier 2 suppliers.	Our focus will be to leverage the audit data to enhance our risk assessments and develop corrective action plans in collaboration with our suppliers.  We will continue to train and support our team members in this area.
<i>Implementing targeted due diligence activities in higher risk supply chain categories</i>	We have conducted workshop training sessions for our team on how to assess audits, determine risk and develop corrective action plans with suppliers.	We will continue to collaborate closely with suppliers to implement and track these corrective action plans.
<i>Gaining a deeper understanding of the activities of brand partners</i>	We have held only a few discussions on modern slavery with our exclusive and non-exclusive brand partners. We will be placing greater emphasis on this issue in FY25-26.	We will provide training for key team members in our Distribution Brands to ensure they are equipped to effectively engage in discussions with suppliers across the Accent Group.
<i>Delivering training for our people</i>	During the reporting year, we hosted a Modern Slavery workshop focused on current industry trends. We also worked with the Accent Group-owned brands team on how to develop Corrective Action Plans for our suppliers.	We will develop a Modern Slavery and Ethical Sourcing training module and make it available to team members via the newly developed Accent Group Learning Management System.

## 7. Future actions

FY23 Commitment	Our Progress in FY24	Our FY25-26 Commitment
<i>Developing our grievance mechanisms and approach to remediation</i>	Upon reviewing our grievance mechanism, we identified the need to recommunicate to suppliers to ensure its effectiveness.	We will reset our grievance mechanisms with suppliers.
<i>Adjusting our due diligence process to formally consider modern slavery before entering into any significant supply contracts</i>	We shared our Modern Slavery Statement and Ethical Sourcing Policy with suppliers when we entered or expanded our distribution agreements.	We will continue to integrate the formal assessment of modern slavery into our due diligence process, ensuring that potential risks are identified before entering into new distribution agreements or significant supply contracts.



## 8. Appendix A – list of Accent Group subsidiaries

Name	Principal place of business/ Country of incorporation
The Athlete's Foot Australia Pty Ltd	Australia
TAF Constructions Pty Ltd <sup>(a)</sup>	Australia
RCG Brands Pty Ltd	Australia
RCG Retail Pty Ltd	Australia
TAF eStore Pty Ltd <sup>(a)</sup>	Australia
TAF Partnership Stores Pty Ltd <sup>(a)</sup>	Australia
TAF Rockhampton Pty Ltd <sup>(b)</sup>	Australia
TAF Eastland Pty Ltd <sup>(b)</sup>	Australia
TAF The Glen Pty Ltd <sup>(b)</sup>	Australia
TAF Hornsby Pty Ltd <sup>(b)</sup>	Australia
TAF Hobart Pty Ltd <sup>(b)</sup>	Australia
TAF Booragoon Pty Ltd <sup>(b)</sup>	Australia
Accent Group Ltd <sup>(c)</sup>	New Zealand <sup>(g)</sup>
Platypus Shoes Ltd <sup>(d)</sup>	New Zealand <sup>(g)</sup>
Accent Footwear Ltd <sup>(d)</sup>	New Zealand <sup>(g)</sup>
Hype DC Ltd <sup>(d)</sup>	New Zealand <sup>(g)</sup>
TAF New Zealand Ltd <sup>(d)</sup>	New Zealand <sup>(g)</sup>
Accent Brands Pty Ltd <sup>(c)</sup>	Australia
Platypus Shoes (Australia) Pty Ltd <sup>(c)</sup>	Australia
42K Pty Ltd <sup>(e)</sup>	Australia
Accent Store Development Pty Ltd	Australia
RCG Accent Group Holdings Pty Ltd	Australia
Hype DC Pty Ltd	Australia
Subtype Pty Ltd	Australia
Pivot Store Pty Ltd	Australia
Accent Lifestyle Pty Ltd	Australia
Accent Active Pty Ltd	Australia
Subtype Limited <sup>(d)</sup>	New Zealand <sup>(g)</sup>
Accent Active (NZ) Limited	New Zealand <sup>(g)</sup>
Accent Lifestyle (NZ) Limited	New Zealand <sup>(g)</sup>

(a) Indirectly held through The Athlete's Foot Australia Pty Ltd

(b) Indirectly held through TAF Partnership Stores Pty Ltd

(c) Indirectly held through RCG Accent Group Holdings Pty Ltd

(d) Indirectly held through Accent Group Ltd (New Zealand)

(e) Indirectly held through Accent Brands Pty Ltd

(f) The functional currency of these foreign subsidiaries is NZD

## 9. Appendix B – Mandatory Reporting Criteria

The below table identifies the location of material aligned to the mandatory reporting criteria in the Act within this Statement:

MRC#	Mandatory Reporting Criterion	Section	Page Number
MRC1	Identify the reporting entity	Introduction	Inside Front Cover
MRC2	<i>Describe the structure, operations and supply chain of the reporting entity.</i>	About Accent Group	2
MRC3	<i>Describe the risks of modern slavery across the operations and supply chain of the reporting entity.</i>	Risks of modern slavery in our operations and supply chains	7
MRC4	<i>Describe the actions taken by the reporting entity to assess and address these risks, including due diligence and remediation processes.</i>	Our approach to managing risks of modern slavery	11
MRC5	<i>Describe how the reporting entity assesses the effectiveness of its actions.</i>	Assessing the effectiveness of our actions	18
MRC6	<i>Describe the process of consultation with any entities that the reporting entity owns or controls.</i>	About Accent Group: Governance and Consultation	5
MRC7	<i>Provide any other information that the reporting entity considers relevant.</i>	Not Applicable	







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