



**HALLENSTEIN
GLASSON** HOLDINGS
LIMITED

Modern Slavery Statement 2025

INTRODUCTION

MODERN SLAVERY STATEMENT

Hallenstein Glasson Holdings Limited (HGH) publicly commits to respecting human rights and to opposing exploitation in all its forms. This commitment extends to identifying, assessing, and addressing risks within our operations and supply chain.

Modern Slavery is the exploitation of other people for personal or commercial gain. For HGH it encompasses the risks posed by forced labour; child labour; prison labour, servitude; debt bondage and deceptive recruitment. It also includes situations where a worker may be deprived of personal freedom and cannot refuse or cease work because of coercion, threats, or deception.

Addressing modern slavery risks can be complex and challenging, we support systematic change to deliver better outcomes and will continue to strive to deliver on our commitment.

Our statement has been prepared in accordance with the reporting requirements of Australia's Modern Slavery Act 2018 (Cth) (the Act). This statement covers the reporting period from 2 August 2024 -1st August 2025.

You can report a suspected incident of modern slavery linked to HGH's brands - Glassons and Hallensteins - (HGH Brands) via the channels below:
reportingrisk@hallensteinglasson.co.nz
Ph: +64 9 306 2500

Our headquarters are based in Newmarket, Auckland, New Zealand:
Hallenstein Glasson Holdings Limited
Level 3, 235-237 Broadway
Newmarket, Auckland 1023

This is a joint statement (pursuant to section 14(1) of the Act), prepared by HGH on behalf of its two Australian subsidiaries:

- Glassons Australia Pty Ltd (ABN 15 074 774 637) (Glassons Australia) (the Reporting Entity)
- Hallenstein Australia Pty Ltd (ABN 53 613 811 902) (Hallenstein Australia) (not a reporting entity, but voluntarily complying with the requirements of the Act per s 6 of the Act)

This statement was prepared by HGH in consultation with Glassons Australia and Hallensteins Australia. Senior management representatives of Glassons Australia sit on the Group Sustainability Committee, which supervises the Group's modern slavery risk management and disclosure processes. The Group Sustainability Committee reports to the HGH Board. Outcomes of sustainability committee meetings are shared and discussed with Hallensteins Australia management to ensure their awareness of the content and development of this statement.

This statement has been reviewed and approved by the Board of Directors of Hallenstein Glasson Holdings in its capacity as the principal governing body of Hallenstein Glasson Holdings on 30 July 2026.



James Glasson
Director
Hallenstein Glasson Holdings Limited
NZBN: 9429040315324

OUR COMPANY

Hallenstein Glasson Holdings Limited (HGH) is a retailer of menswear and womenswear, listed on the New Zealand Stock Exchange (NZX:HLG).

Our origin stories are steeped in New Zealand family history and entrepreneurial spirit. Two distinct families, Hallenstein and Glasson, established retail and manufacturing businesses that would go on to transform the Australasian fashion retail scene. Both founders instilled common guiding principles into their companies: integrity, authenticity, creativity and quality.

Hallenstein Glasson Holdings Limited was formed in 1985 on the merger of Hallensteins - an iconic menswear retailer first established in 1873, and Glassons - a women's fashion retailer founded in 1918.

The company has offices in Auckland and Sydney and operates 121 stores across Australasia, currently this includes 45 stores in Australia and 76 stores in New Zealand.

HGH BRANDS - AUSTRALIA

Our individual brands continue to have their own identity and a very different customer base.

Glassons' main activities include the design and sale of women's clothing, swimwear, footwear and accessories. Glassons Australia employs 239 full time, 155 permanent part-time and 1092 casual employees as at 1 August 2025. The majority of our employees work in our stores within Australia. Glassons also operate 4 online websites, servicing New Zealand, Australia, Singapore and the United States. Glassons Australia Ltd (ABN 15 074 774 637)

Hallenstein Brothers' main activities include the design and sale of men's clothing, footwear and accessories. Hallenstein Australia employs 12 full time, 22 permanent part-time and 24 casual employees as at 1 August 2025. The majority of our employees work in our retail stores. Hallensteins also operate 3 online websites, servicing New Zealand, Australia and the United States.

Hallenstein Brothers Australia Ltd (ABN 53 613 811 902)

Hallenstein Glasson Holdings do not own or operate any factories, and the manufacturing of our clothing is outsourced to selected suppliers, outlined below.

ASSESSMENT OF MODERN SLAVERY RISK IN OUR SUPPLY CHAIN

We are committed to mitigating the risk of Modern Slavery across all our operations and within our supply chain. We act to ensure all our suppliers are aware of and understand their obligation under our Code of Conduct policy.

During this reporting period, we undertook a modern slavery risk assessment across our operations and supply chains to better inform areas of vulnerability within our operations. We concluded our potential modern slavery risks are associated with undisclosed sub-contracting factories, migrant workers and workers in the raw materials sector. The specific potential modern slavery risks we have identified include the risks of forced labour, child labour, excessive working hours, low representation of independent unionised factories and vulnerabilities associated with a migrant workforce and female workers.

It is estimated 49.6 million people globally are currently in modern slavery according to the Global Slavery Index. No country or industry supply chains are unaffected.

It is estimated 59 percent of the global total of people in modern slavery live in the Asia- Pacific region.

Our supply chain spans four Asian countries with a workforce of approximately 27,000 individuals at the end of the reporting period. Female factory worker numbers make up approximately 15,100 of the total workforce at this time.

Hallenstein Glassons currently source our products from the following countries:

- **China** - 61 Tier 1 factories
- **India** - 14 Tier 1 factories
- **Bangladesh** - 10 Tier 1 factories
- **Vietnam** - 1 Tier 1 factory

Effectively addressing the risks of modern slavery is challenging, as modern slavery is inextricably linked to challenges such as gender inequality, ethnicity, conflict, poverty migration and climate degradation. Supply chains are complex and achieving 100% transparency into the second and third tiers of global supply chains continues to be an industry wide challenge. In support of our commitment to mitigating the risk of Modern Slavery, we look to identify tools to manage the risk. We maintain an independent auditing program; an independent grievance hotline and we regularly travel to all our offshore manufacturers.

In 2023, we fully integrated our new 'supply chain software platform' into the business, capturing and storing information in one central location. This provides improved efficiencies in accessing and reporting on data related to modern slavery risks within our supply chain.

SETTING HIGH STANDARDS IN OUR SUPPLY CHAIN

OUR SUPPLY CHAIN

This is our 5th Modern Slavery Statement having released our first statement in 2021. We continue the work to assess and improve our practices to protect workers from modern slavery risks in our supply chain.

We are a retailer, so we do not own or manage the factories that create our garments. But we want to make sure that our suppliers meet our high ethical and quality standards. We choose our suppliers carefully, seeking transparency, close working relationships and a joint dedication to high standards.

At present our primary relationships are with the suppliers who are at the final stage of our manufacturing. Our supplier factories range from small sized facilities employing on average 60 people to larger scale factories employing more than 1000 workers.

TIER 1 - These factories make the products we import and sell.

We visit these factories regularly, and they must participate in our independent auditing programme. We expect full visibility of our Tier 1 suppliers. We have a robust process in place to alert us to undisclosed factories which may be sub-contracting to our Tier 1 suppliers.

TIER 2 - These suppliers are the textile processing facilities: mills, dye houses and laundries.

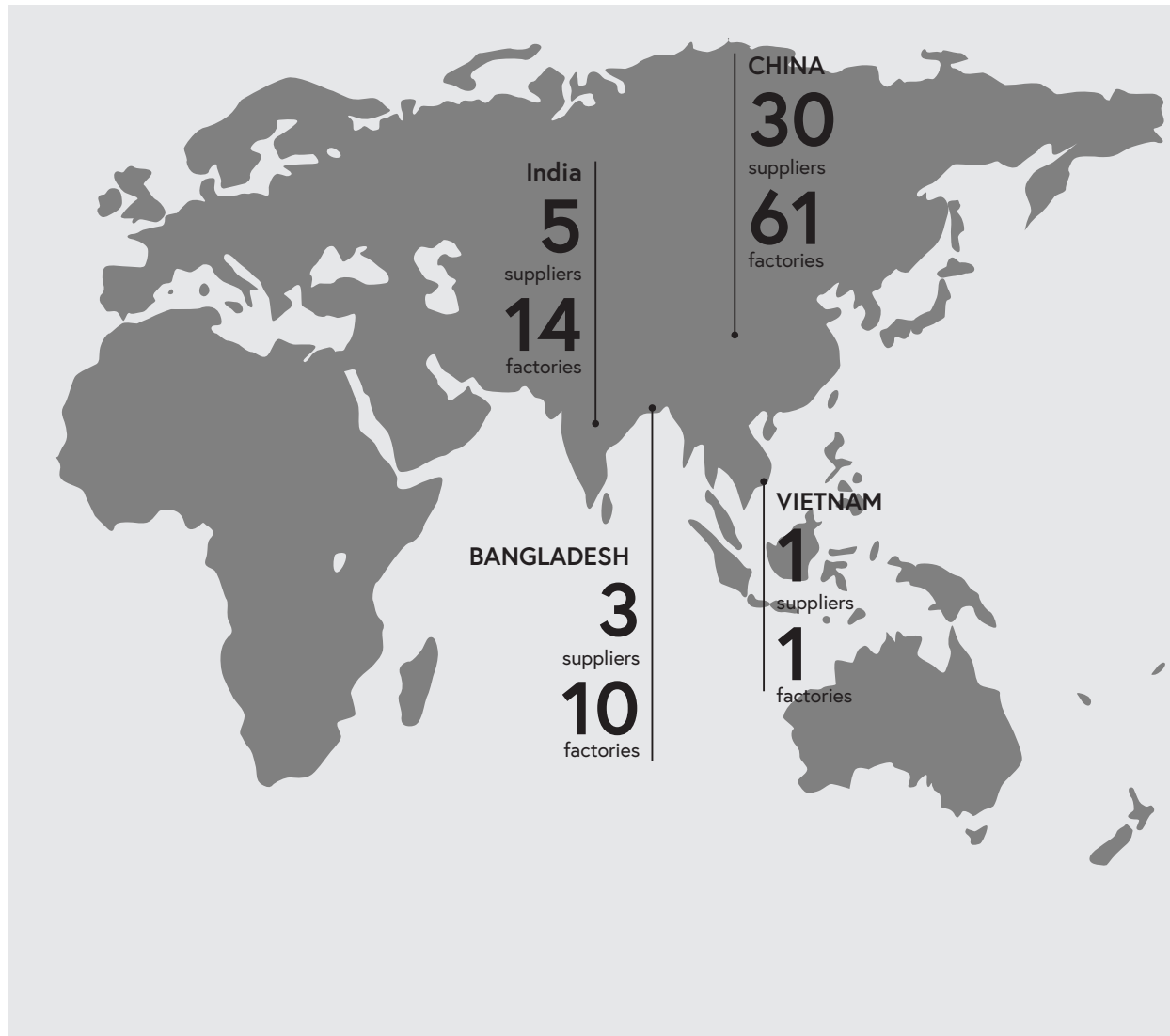
We have made significant improvements in tracing our Tier 2 suppliers and now have much more data giving us a bigger (and clearer) picture. We now have 384 Tier 2 factories traced. This means we have their name, address and textile certification status on file.

We calculate transparency by recording the number of facilities which we have a record of an audit or certification for (this means the facility has been visited by an independent auditor to check for environmental and social compliance). In the 2025 period, we have independently audited 4 facilities. Over the 2026-2027 period we have a target of auditing a further 12 Tier 2 facilities.

TIER 3 - These suppliers provide the raw materials.

Tier 3 continues to be challenging to get the visibility we would ideally like to have. We continue to review textile certification programmes that could provide further verification of raw material origins. We do not currently have a specific target set in relation to our Tier 3 suppliers, but we are currently exploring options for sustainable sourcing certification as a pathway to improve traceability in this area.

OUR SUPPLY CHAIN



RISK ASSESSMENT OF MANUFACTURING COUNTRIES

Across our supply chain, country-level risk assessments identify a range of heightened social and labour risks that are influenced by local economic conditions, labour systems, gender inequality, migration patterns, and regulatory environments. China, India, and Bangladesh remain classified as high-risk sourcing regions due to the prevalence of vulnerable worker groups and broader modern slavery risks identified within the garment sector.

In China, key risks include the vulnerability of internal migrant workers and concerns relating to forced labour, particularly involving Uyghur and other Muslim minority groups in the Xinjiang region. Our assessment identified migrant workers, female workers, and the risk of unauthorised subcontracting as key focus areas within our supply chain.

In India, the garment sector continues to face elevated risks relating to precarious employment, migrant labour, bonded labour, and child labour within informal sectors. The Sumangali scheme, a form of bonded female labour linked to dowry payments, remains an area of specific concern within parts of the textile industry.

In Bangladesh, risk assessments identified gender inequality, child labour risks within informal sectors, and restrictions on freedom of association as key concerns. Recent labour unrest and concerns regarding worker representation and wage disputes have further highlighted the importance of protecting freedom of association rights within the sector.

These country-level assessments help inform our broader approach to responsible sourcing and addressing modern slavery risks and human rights risks.

RISK ASSESSMENT OF MANUFACTURING COUNTRIES

PREVENTATIVE ACTIONS

To address these risks, we maintain due diligence and responsible sourcing programs across all sourcing regions. These include independent third-party auditing, regular factory site visits, capacity assessments to identify potential unauthorised subcontracting, and remediation processes where issues are identified. Audits provide critical visibility into working conditions and allow us to monitor indicators such as wages, working hours, social insurance, recruitment practices, migrant worker representation, grievance mechanisms, dormitory conditions, gender equality, union participation, and environmental performance.

We also continue to strengthen worker engagement and protection mechanisms across our supply chain. This includes the use of grievance platforms, child labour and forced labour remediation procedures, and encouraging suppliers to engage with local NGOs to support worker welfare and labour rights training. In 2025, HGH also joined the Bangladesh Employment Injury Scheme, providing injury protection coverage for ready-made garment workers in Bangladesh.

Through these ongoing due diligence activities, we continue to strengthen supply chain transparency, improve worker protections, and support responsible and ethical sourcing practices across our global manufacturing network.

Key preventative actions -

Visibility & Transparency – continual improvement of visibility across all our Tiers; 1, 2 and 3.

We continue to work on our approach to address these challenges. Managing a supply chain is complex and we work to improve visibility and accountability across every layer. To help improve supply chain transparency, we rely on trusted third-party audits and recognised industry certifications. These audits are carried out by our independent, globally accredited audit partner, Qalspec SgT (ISO 9001 certified), who have now been reporting to us for 10 years. Their role is to ensure that our suppliers are meeting the standards set out in our Supplier Code of Conduct.

Audits – review non-compliances identified in audits in our high-risk countries.

We run a Social & Ethical Compliance Auditing programme across our Tier 1 and 2 suppliers, which includes regular 'ethical factory' audits. These audits are carried out by our independent, globally accredited audit partner, Qalspec SgT (ISO 9001 certified), who have now been reporting to us for 10 years. Their role is to ensure that our suppliers are meeting the standards set out in our Supplier Code of Conduct. Every factory audit we receive is reviewed and documented by our Ethical Compliance Manager alongside Brand Production Managers. All non-compliances are discussed directly with the supplier, and the Corrective Action Plan is managed internally. Annually, we internally review the status of our supply chain including a labour rights risk assessment for each country we manufacture in.

POLICIES, PROCESSES AND CONTROLS

Responsibility and oversight for our ESG strategy falls directly to our Sustainability Committee, who provide direction and governance to our Sourcing and Ethical Teams. The HGH Board retains oversight of modern slavery and human rights risks and is responsible for ensuring the business maintains appropriate governance, compliance, and risk management processes across our operations and supply chain.

Our policies and practices reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to mitigate modern slavery risk in our supply chains.

Our approach is supported through a framework of policies, operational procedures, and supplier engagement processes, including:

- Code of Conduct
- Supplier Onboarding Processes
- Responsible Sourcing Manual
- Buyer Responsible Purchasing Practices
- Functioning Grievance Mechanisms
- Auditing and Due Diligence Programs
- Supplier Performance Scorecards

These systems work together to support ongoing supplier monitoring and responsible sourcing practices.

ASSESSMENT

IDENTIFYING RISKS

We use a combination of country risk assessments, supplier due diligence, audit findings, factory visits, worker grievance mechanisms, and supplier performance monitoring to identify actual and potential modern slavery and labour-rights risks within our supply chain.

INVESTIGATING RISKS

Where indicators of elevated risk or non-compliance are identified, these findings are reviewed by our Ethical and Sourcing teams to determine the severity, root cause, and potential worker impact.

Investigations may include:

- Follow-up audits or verification assessments
- Management and worker interviews
- Factory site visits
- Assessment of production capacity and subcontracting arrangements

Red Flags – Identified 'red flags', investigated and actions taken.

After each factory audit we identify any 'red flags' within the factory and investigate further. We escalate to Brand Production Managers if any major concerns are identified. Where further action is required, this is addressed as part of a broader review with Management to determine the appropriate response.

Grievance Mechanism – we assess the effectiveness of our actions based on engagement of workers in the grievance mechanism over a 12-month period.

Following internal review of the actions we have taken to assess and address our modern slavery risks during the reporting period, HGH has identified opportunities to strengthen worker engagement and grievance mechanism accessibility across parts of our supply chain. We are also currently evaluating additional worker voice and engagement tools to enhance visibility into worker conditions, which will enhance our ability to review and assess the effectiveness of the steps we are taking.

REMEDIATION AND CONTINUOUS IMPROVEMENT

Where issues are identified, we work with suppliers to implement corrective action and remediation plans where appropriate, aimed at addressing root causes and improving worker protections and labour practices.

Depending on the nature of the issue, remediation actions may include:

- Improving working hour management and wage compliance
- Improving worker grievance mechanisms
- Addressing workplace health and safety concerns
- Supporting supplier training and capability building

Suppliers are expected to demonstrate progress against corrective actions within agreed timeframes, with follow-up monitoring conducted where required.

KPI'S

HGH assesses the effectiveness of its modern slavery risk management processes through audit outcomes, corrective action tracking, supplier engagement levels, grievance mechanism utilisation, and supplier reviews. Findings from these processes are used to identify recurring issues, strengthen due diligence controls, and inform the improvement of our actions to assess and address modern slavery risks.

OUR PARTNERSHIPS AND COLLABORATIONS

We value our partnerships with key organisations helping to support our efforts to identify, assess, and address risks of modern slavery within our operations and supply chain. This commitment requires collaboration on a wide scale to help support the industry and the people in it.

QUALSPEC SGT

Our external audit partner, Qualspec SgT, audits factories on our behalf to ensure our suppliers follow our Code of Conduct. Qualspec audits meet the highest professional standards, using ISO 19011 principles to determine Ethical, Social, Cultural (ESC) framework compliance. In 2019, Qualspec joined Worms Safety, the first global alliance in quality management composed solely of product and industrial specialists.

WORMS SAFETY SGT

Hallenstein Glassons have partnered with Worms Safety's global textile and apparel specialist division SgT, to oversee our Remediation Plan to manage any issues related to modern slavery or human rights.

ETHICAL FASHION REPORT (BWA)

The Ethical Fashion Report was created in 2013 after the tragic Rana Plaza collapse in Bangladesh, which exposed worker conditions in the garment industry. The biennial report examines the way the fashion industry engages with worker rights and environmental practices throughout supply chains. Organised by the charities Baptist World Aid Australia and Tearfund NZ, it's become an industry benchmark in Australasia. HGH have been involved since 2015, and we've found it to be a valuable tool to independently measure our performance within our People and Planet pillars.

BANGLADESH EMPLOYMENT INJURY SCHEME (EIS)

Hallenstein Glassons are proud to be part of an initiative addressing compensation for injured workers in Bangladesh in the textile industry – the Employment Injury Scheme (EIS) pilot programme. EIS is the first such national social insurance of its kind in Bangladesh, offering injury protection for ready-made garments (RMG) workers. It's a tripartite initiative bringing together the International Labour Organisation (ILO), Bangladesh government and Bangladesh garment and knitwear manufacturers and exporters associations