



# OROTON



MODERN SLAVERY STATEMENT 2024

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Oroton Group acknowledges the Traditional Custodians of the lands across Australia where we operate. We acknowledge the Gadigal people of the Eora Nation as the Traditional Custodians of the land on which our head office in Chippendale, New South Wales, is located. We pay our respects to their Elders past and present and recognise their enduring connection to land, waters, and culture. We are committed to building meaningful relationships with Aboriginal and Torres Strait Islander communities to deepen our understanding of what sustainability and ethical practice truly mean in the context of Australian fashion.

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The Oroton Group remains committed to a continuous improvement approach and continues to treat our modern slavery response as an integral feature of our broader business strategy.

**PLEASE FORWARD ANY COMMENTS TO:**

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Phone: We are available via 1800 061 047 Chat:

We are available through our chat widget

**OPERATING HOURS:**

Monday - Tuesday 10:00am - 5.30pm AEST

Wednesday - Friday 10:00am - 8.30pm AEST

Saturday - Sunday 12:30pm - 8.30pm AEST

## CEO Statement

Oroton is proud to share its first Modern Slavery Statement, marking an important milestone in our ongoing commitment to transparency, ethical sourcing, and responsible business practices. As a brand with a proud Australian heritage, we understand that how we create is just as important as what we create.

Our collections are designed in-house with care and intention. Each piece reflects our dedication to quality, craftsmanship and thoughtful design. Behind every finished product is a supply chain that spans the globe, involving many people and processes. We recognise that labour exploitation remains a significant risk within the global fashion industry, particularly for vulnerable worker groups, and we are committed to doing what we can to address our modern slavery risks.

From our longstanding manufacturing partners in China and India to the third-party service providers that support our operations here in Australia, we are focused on understanding our impact and strengthening the systems that protect people. This includes enhancing our supplier relationships, expanding our risk assessments, embedding modern slavery clauses into our agreements, and investing in internal governance and staff training.



We have also partnered with organisations such as QIMA, Baptist World Aid Australia, Thread Together and Seamless to support our efforts in ethical sourcing, circular design and community engagement. Our Conscious Consumption Committee plays an active role in guiding our approach, and we are continuing to expand supply chain mapping beyond Tier 2. We are also working towards introducing a Worker Voice program to support safe, fair and respectful conditions across all tiers.

Our goal is to honour the individuals behind our products with the same care and integrity we bring to our designs. We are committed to continuous improvement, and to ensuring that every step we take as a business reflects our values of fairness, accountability and respect. While this statement reflects the progress we have made, it also marks the beginning of a broader journey - one that will evolve as we grow, innovate and deepen our commitment to ethical practice.

*Peter Halkett*

Peter Halkett  
Chief Executive Officer  
OrotonGroup (Australia) Pty Limited

This statement has been approved by the Board of OrotonGroup (Australia) Pty Limited (ABN 31 000 704 129) in their capacity as the principal governing body of Oroton on 11<sup>th</sup> August 2025.



01

# Reporting Entity

**This modern slavery statement is submitted in accordance with the requirements of the Modern Slavery Act 2018 (Cth) ('the Act'). It outlines the steps taken by Oroton Group (Australia) ('Oroton') (ABN 31 000 704 129) during the reporting period 1 July 2023 to 30 June 2024 to identify, assess and address the risks of modern slavery in its operations and supply chains. This statement reflects Oroton's ongoing commitment to ethical business practices, human rights, and responsible sourcing.**

The Oroton Group Limited registered office is 14-16 Buckland Street, Chippendale NSW, Australia.



### Mandatory Reporting Criteria:

In accordance with section 16 of the Modern Slavery Act 2018 (Cth), Orotan has addressed each of the seven mandatory reporting criteria within this statement. The following section outlines each criterion and provides the corresponding page reference:

1. Identify the reporting entity- **Page 7**
2. Describe our structure, operations and supply chains- **Page 10**
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls -**Page 13**
4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes -**Page 20**
5. Describe how the reporting entity assesses the effectiveness of these actions-**Page 28**
6. Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls –**Page 30**

Orotan is committed to continuous improvement and will continue to strengthen its approach to managing modern slavery risks in future reporting periods





## Consultation Process

OrotonGroup (Australia) Pty Limited (ABN 31 000 704 129) is the principal trading entity of OrotonGroup Pty Limited and is a privately owned Australian company. Oroton does not own or control any other entities. As such, there were no entities with which consultation was required in the preparation of this modern slavery statement.

This statement has been prepared solely in respect of Oroton and reflects its operations, supply chains, and modern slavery risk management processes. Should Oroton acquire or control additional entities in future reporting periods, appropriate consultation processes will be established to ensure compliance with section 16 of the Act.



02

## Our Structure, Operations & Supply Chains

### Business Overview

Oroton is a premium Australian fashion brand known for its commitment to craftsmanship, modern luxury, and timeless design. Headquartered in Chippendale, Sydney, Oroton designs and markets a wide range of products including leather handbags, small leather goods, fashion accessories, jewellery, footwear, apparel and sunglasses. The brand is celebrated for blending effortless elegance with a uniquely Australian sense of style, offering products that are refined yet accessible.

Founded in 1938 by Boyd Lane, Oroton began as an importer of luxury European textiles before transitioning into design. The brand transformed the local fashion landscape by introducing woven metallic mesh evening bags - an innovation that quickly became synonymous with Australian glamour and design excellence. These shimmering gold and silver pieces set the tone for Oroton's ongoing pursuit of material quality, style, and functionality.

Today, under the creative direction of Sophie Holt (since 2018), Oroton continues to evolve, drawing on its rich heritage while reimagining classic silhouettes for the modern wardrobe. From supple leather bags and polished hardware to relaxed tailoring and beautiful fabrications, each Oroton collection reflects a sophisticated take on everyday dressing. Current CEO Peter Halkett leads the company, guiding the brand through a new chapter of growth, creativity and global expansion.

### Structure and Operations

As at the end of the 2024 reporting period, Orotan operated 45 retail locations throughout Australia, comprising 20 boutiques, 13 outlet stores, 11 concession stores and one archive store. Orotan also maintains a digital flagship store at [www.oroton.com](http://www.oroton.com), which offers shipping services to customers across Australia and internationally, including markets in the United States, the United Arab Emirates and Europe. Russia is currently excluded from delivery.

Orotan's growing global presence is supported by a strong international wholesale network and a digital-first strategy aimed at enhancing customer access to the brand's collections. In total, the company employs approximately 500 people across its retail and head office operations, with a workforce breakdown of 57 per cent casual, 32 per cent full-time and 11 per cent part-time employees. The head office team, based in Sydney, is responsible for design, marketing, merchandising, planning, product development, production, logistics, finance, IT and e-commerce management.



## PRODUCT SUPPLY CHAIN

Oroton’s supply chain is structured into four tiers.

- **Tier 1** consists of finished goods manufacturers who produce our apparel, handbags and accessories.
- **Tier 2** includes tanneries, fabric mills and trim suppliers.
- **Tier 3** involves raw material processors, such as yarn production and raw hide treatment.
- **Tier 4** encompasses raw material producers, such as cotton farms and bovine farms.

During the 2024 reporting period, Oroton worked with 30 direct suppliers across China, India, Europe and Australia. Our Tier 1 and Tier 2 suppliers include both small businesses with fewer than 50 employees and large-scale factories employing over 1,000 workers. The majority of finished goods production occurs in China and India, with additional specialist inputs sourced from Europe and Australia.

TIER	NUMBER OF DIRECT SUPPLIERS	NUMBER OF PRODUCTION SITES	LOCATION BREAKDOWN BY VOLUME
TIER1ACCESSORIES	17	17	China 99.8%   India 0.1%   Italy 0.1%
TIER1APPAREL	12	12	China 100%
TIER2ACCESSORIES	56	56	China 100%
TIER2APPAREL	31	31	China 96 %  Italy 3%   Japan 1%

## Services We Use

To support our business model, Oroton engages a range of third-party services. These include logistics and fulfilment, warehouse management, cleaning and property maintenance, IT services, photography and creative production, digital marketing, talent engagement, customer service support, recruitment agencies and labour hire providers. While most of these services are provided domestically, they are not without risk, particularly where outsourced or subcontracted labour is involved.



03

## Our Modern Slavery Risk

### Products

Oroton acknowledges that modern slavery risks are deeply embedded in global fashion supply chains, driven by complex networks of suppliers, varying legal frameworks, economic vulnerability, and systemic industry challenges. As a brand specialising in premium apparel, leather bags, accessories, footwear, sunglasses and jewellery, we recognise the importance of understanding and addressing these risks at every level of our supply chain.

### Raw Materials-Related Risks

**Cotton** - The global cotton industry has long been associated with forced labour and child labour, particularly in countries where cotton harvesting is carried out through state-mandated systems or unregulated family labour. Cotton sourced from Uzbekistan and Turkmenistan has been linked to state-imposed forced labour, while the Xinjiang region of China has faced global scrutiny due to the alleged use of Uyghur forced labour. Even in countries where these issues are less visible, such as India and Pakistan, low wages, hazardous conditions, and informal labour arrangements are common in the farming and ginning stages. These risks are heightened by the complex nature of cotton supply chains, where fibre from multiple sources is mixed, making traceability extremely difficult.

**Leather** - Leather production involves a high-risk combination of raw material extraction and labour-intensive chemical processing. Tanneries operate at times with limited oversight, using restricted chemicals such as chromium without adequate protective equipment or ventilation. Workers in these environments are frequently migrants who are paid low wages, lack formal contracts, and face long hours in unsafe conditions. The risk of environmental harm and labour exploitation is compounded by the fact that hides are often sourced through local traders, creating distance between the initial sourcing and final supplier.

**Metals and precious materials** -Materials used in accessories and jewellery, such as gold, silver, brass, and copper, often come from artisanal or small-scale mines in countries with weak governance, such as the Democratic Republic of Congo, Myanmar, and Peru. These mining operations are known to involve child labour, hazardous conditions, and links to armed conflict or criminal networks. Even in larger mining operations, there may be a lack of labour protections, and intermediaries in the refining process can obscure the origin of materials. Oroton's use of these components in hardware and jewellery necessitates vigilance in understanding the origin and labour conditions associated with metal extraction and processing.

**Synthetic textiles and blended fabrics** - While synthetic materials such as polyester and nylon are produced in industrial settings, the upstream manufacturing process - including dyeing, weaving, and finishing - often relies on low-paid labour in countries such as China, Vietnam and Indonesia. These facilities may subcontract work to smaller operations that are not subject to audits or formal oversight. Workers in these environments frequently face excessive overtime, unsafe exposure to dyes and chemicals, and are paid by piece rate rather than hourly wage. The water and energy intensive nature of textile production also intersects with environmental degradation, which can exacerbate economic instability and labour exploitation in sourcing regions.



## Geographic Risks

**China** - While China is home to some of the world's most sophisticated manufacturing facilities, it also presents significant modern slavery risks. These include the use of forced labour in politically sensitive regions, particularly Xinjiang, as well as the exploitation of internal migrant workers in factories. Migrants often lack access to social protections, live in employer-provided dormitories, and work long hours under restrictive conditions. The scale of China's manufacturing industry makes unauthorised subcontracting common, and this can obscure the true conditions under which goods are made.

**India** - India's extensive garment and leather manufacturing sectors are underpinned by a large informal workforce. Many workers are employed through verbal agreements, without payslips, contracts, or social benefits. In rural and peri-urban areas, entire families - including children - may be involved in home-based or small workshop production, particularly in embroidery, stitching, and leather processing. The caste system and gender discrimination further entrench vulnerability, particularly for Dalit workers and women in precarious employment.

**Italy** - While Italy is generally considered a low-risk sourcing country, emerging evidence has highlighted exploitative labour conditions in the southern regions, particularly in the textile and leather industries. Migrant workers, often from Eastern Europe, North Africa, or South Asia, may work in subcontracted factories or informal workshops where they are paid below minimum wage, work excessive hours, and are denied legal entitlements. These risks are harder to detect when subcontracting is not disclosed by primary suppliers.

**Japan** - Japan is regarded as a high-compliance jurisdiction with strong worker protections. However, the country's foreign technical intern program has faced international criticism for exposing foreign workers to exploitative conditions, including wage underpayment, contract violations and restrictions on movement. Although Japan's manufacturing sector is less reliant on informal labour, risks may still exist in subcontracted facilities or where imported materials are used without adequate supply chain transparency.



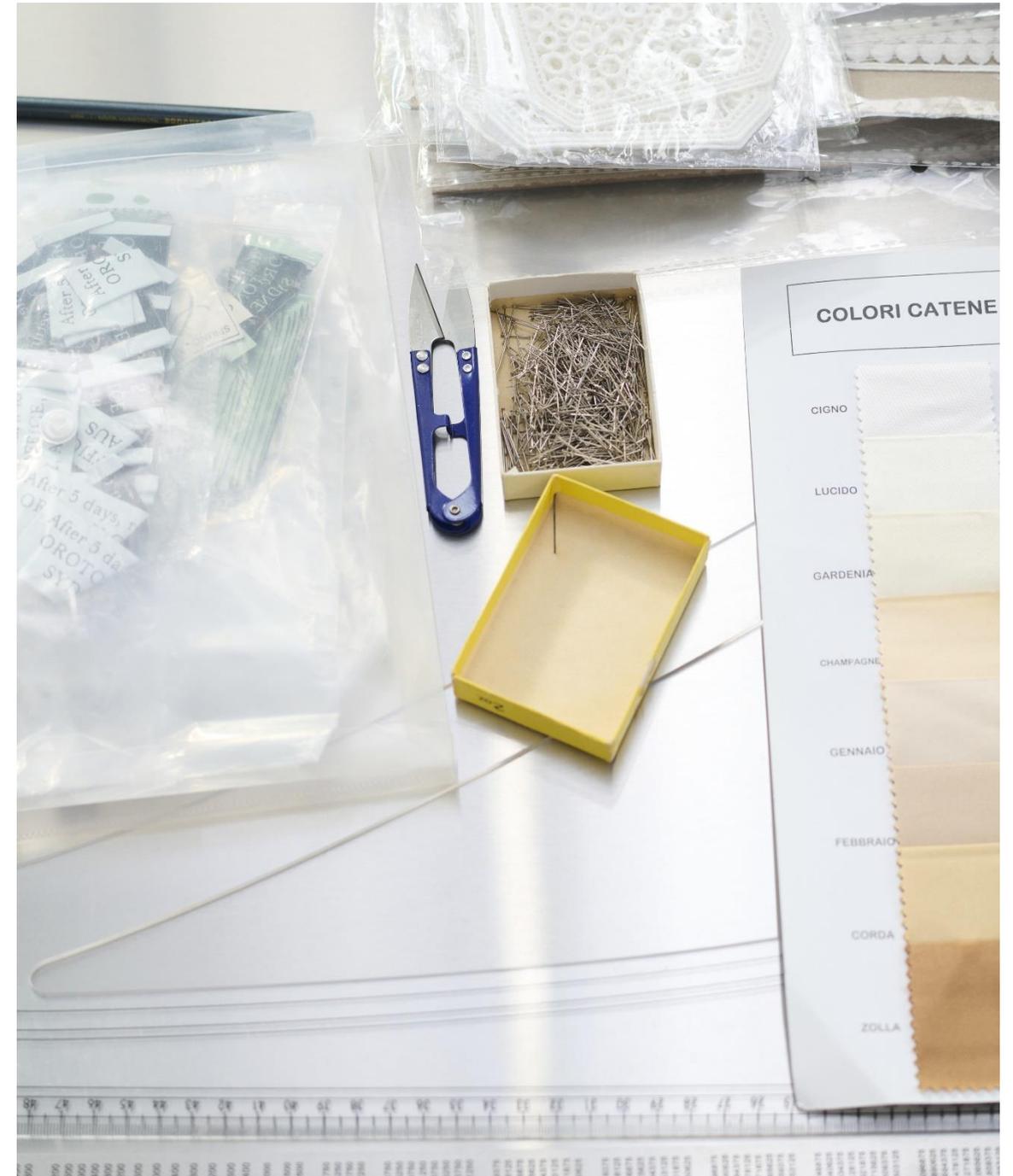
## Vulnerable Worker Groups

**Migrant workers** - Migrants form a significant proportion of the global fashion workforce and are often employed in the most precarious conditions. Many face exploitative recruitment practices, including illegal placement fees that can lead to debt bondage. Without local language fluency or legal knowledge, they may be unaware of their rights, have limited access to remedy, and are at greater risk of coercion and abuse.

**Women** - Women are disproportionately represented in lower-wage, low-skill jobs across the garment, textile, and footwear sectors. They may experience gender-based discrimination, be paid less than male counterparts, and face sexual harassment or abuse in the workplace. Women working in home-based settings are also less likely to have legal protections, childcare support or access to grievance mechanisms.

**Child labourers** - Children are particularly at risk in informal sectors such as agriculture, home-based manufacturing, and artisanal mining. In cotton farms, family-based labour arrangements may normalise child participation in work, while in beading or hand-finishing, children may be employed to perform intricate work due to their dexterity. These environments often lack education access and health safeguards.

**Subcontracted workers** - Workers engaged through third-party labour providers or informal subcontracting chains are often excluded from formal protections. They may receive lower wages, work without contracts, and be unaware of who their actual employer is. These workers are also more likely to experience hazardous working conditions, wage theft, and retaliation for raising concerns.



## Subcontracting and Informal Labour Risks

**Undisclosed subcontracting** - Subcontracting is often used to manage seasonal spikes or deliver specialised production. However, when subcontracting occurs without prior disclosure, it undermines audit and compliance mechanisms and increases the likelihood of modern slavery. These third-tier and fourth-tier factories may operate outside legal frameworks, lack labour protections, and employ vulnerable workers under exploitative terms.

**Home-based work** - Frequently used for intricate detail work, such as embroidery, hand-finishing or assembling components, home-based work is often informal and unregulated. Workers are typically paid per unit, leading to low, inconsistent incomes, and may lack access to clean water, ventilation, or personal protective equipment. These risks are compounded by isolation from the broader workforce and lack of visibility to external monitors.

## Sector-Specific Risks and Challenges

**Short lead times** – Fast fashion production cycles and seasonal collection deadlines exert pressure on suppliers to deliver quickly. To meet brand demands, suppliers may push workers into excessive overtime, outsource work to unapproved facilities or bypass standard labour practices, increasing the risk of forced or unpaid labour.

**Low pricing pressure** – Brands' efforts to maintain affordability and profit margins may lead suppliers to cut corners, reduce wages, or employ undocumented or informal labour. This cost pressure trickles down the supply chain, forcing compromises in labour standards. Opaque lower-tier sourcing - While Tier 1 and Tier 2 suppliers are often subject to audits and contracts, the same cannot be said for Tier 3 and Tier 4 suppliers, where raw materials are sourced or processed. These deeper tiers are often inaccessible and operate without consistent oversight, leaving significant risk exposure.

**Limited leverage with suppliers** - As a mid-sized brand, Orotton may work with suppliers that also serve much larger clients. This can limit our ability to influence upstream practices, demand full traceability, or dictate corrective actions if concerns are identified. Shared supply chains complicate accountability and require multi-brand collaboration to drive improvement.

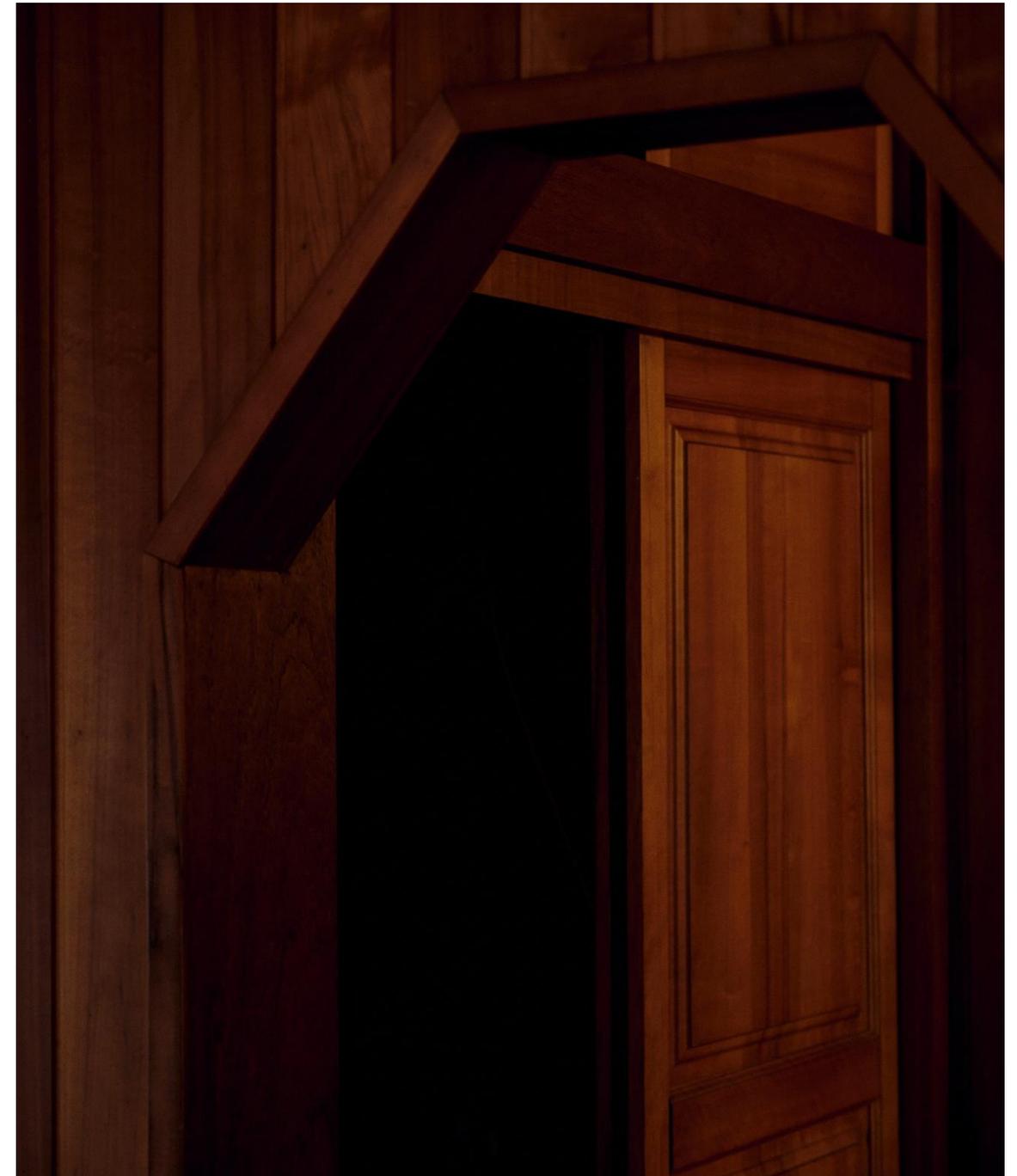
Orotton recognises the multi-dimensional nature of modern slavery risk and remains committed to addressing it through meaningful, practical action. We are strengthening our supplier onboarding and monitoring processes, increasing investment in traceability tools, engaging in multi-stakeholder initiatives, and embedding human rights considerations across all levels of our procurement practices. By continuing to expand transparency and accountability in our supply chain, we aim to ensure that the individuals who contribute to our products are treated fairly, ethically and with dignity.

## Services

In addition to the risks associated with physical product sourcing and manufacturing, Oroton recognises that modern slavery risks may also arise within the services that support our Australian business operations. As a fashion company headquartered in Sydney with national retail coverage and a growing e-commerce presence, Oroton engages a range of third-party service providers. These include logistics and warehousing, cleaning, maintenance, recruitment, marketing, event coordination and IT support services.

While Australia has strong legal protections for workers, modern slavery risks are not entirely absent from the services sector, particularly where outsourced or subcontracted labour is used. These risks often arise in lower-paid, high-turnover or insecure roles, which are more likely to be filled by vulnerable workers such as international students, recent migrants, or temporary visa holders. In some cases, these individuals may have limited understanding of their rights, experience language barriers, or fear losing employment if they raise concerns - making them less likely to report exploitation.

**Cleaning services** - Cleaning in both head office and retail environments is typically performed by outsourced contractors. This sector is known for high levels of casualisation and complex subcontracting arrangements, which can obscure the employment relationship between worker and ultimate client. Risks in this sector include underpayment of minimum wages, unpaid overtime, denial of entitlements, and coercive conditions. Some workers may be expected to pay recruitment or placement fees, work excessive hours, or perform duties without formal contracts. Oroton is aware that vulnerable workers in cleaning roles - particularly those on student visas or with limited English proficiency - may be at greater risk of exploitation.



**Logistics and warehousing** - The movement and storage of inventory, especially in a high-volume fashion business with seasonal fluctuations, is another area where labour risks may emerge. Orotan engages third-party logistics providers for warehouse and distribution functions. Labour hire arrangements within the warehousing sector may result in reduced visibility over working conditions, especially where workers are hired through multiple layers of subcontractors. Risks in this sector include unsafe working conditions, excessive overtime during peak retail periods, lack of access to breaks, and inconsistent pay. Migrant or visa-dependent workers may feel pressure to accept exploitative terms out of fear of losing their livelihood or residency rights.

**Maintenance and trades** - Maintenance of store locations and corporate premises - including services such as plumbing, electrical, security and repairs - can also carry risks when contractors engage workers on an informal or short-term basis. Some small trade service providers may operate without sufficient internal oversight or fail to comply with fair work obligations when engaging casual or subcontracted workers. Recruitment and labour hire - Third-party recruitment agencies are often used to fill casual, seasonal or specialised roles in both head office and retail stores. While many agencies operate responsibly, risks can emerge where due diligence is not performed on labour hire practices. Workers may be subject to deceptive recruitment processes, wage withholding, unreasonable deductions or lack of access to contracts. Visa-dependent employees may be more vulnerable to coercion, particularly if their right to work is linked to a specific employer or role.

**Marketing and promotional services** - External agencies and short-term event staff may be engaged for campaign execution, retail activations or brand events. Risks may arise where short lead times and temporary arrangements result in informal contracts or lack of compliance with Fair Work regulations. This is particularly relevant in instances where staffing is arranged through intermediaries or gig platforms, which may not provide adequate protections for workers.

**IT support and digital services** - While risks are lower in skilled technical sectors, the outsourcing of digital and IT services - including web development, digital security and e-commerce platform support - to offshore providers may expose the business to hidden risks if those providers operate in jurisdictions with weaker labour laws or unregulated outsourcing models.

Orotan recognises that service-related risks - like those in physical product supply chains - are often exacerbated by subcontracting, casualisation and lack of transparency. Where third-party service providers are used, the direct line of accountability may be weakened, increasing the potential for workers' rights to be overlooked.

Orotan is committed to ensuring that our modern slavery prevention efforts extend beyond our product suppliers to encompass all areas of our operations. To mitigate these risks, Orotan is taking steps to improve oversight of its service providers. This includes embedding modern slavery clauses into new and renewed service agreements, undertaking due diligence on high-risk service categories, and building internal awareness of ethical procurement practices across our corporate and retail teams. Orotan also plans to strengthen its approach to contract management by including expectations around worker protections, fair wages and compliance with the Fair Work Act for all vendors.

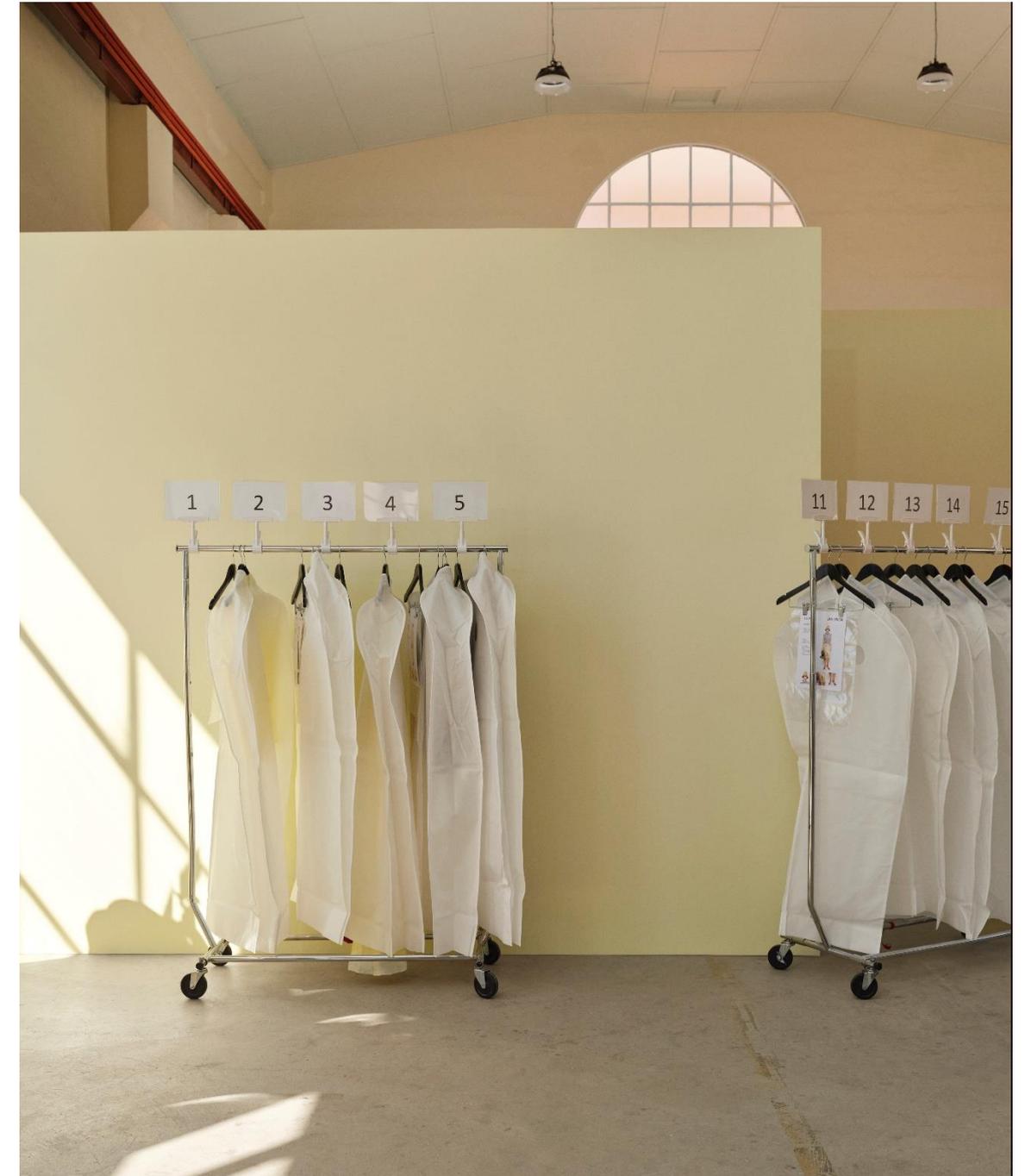
04

## Actions Taken to Assess & Address Modern Slavery Risks

As part of our broader commitment to ethical business practices, Oroton continues to integrate modern slavery risk management into both our product and service procurement strategies. We understand that prevention requires a holistic view of our entire operations, including those activities that take place within Australia and support the delivery of our brand to customers nationwide. Modern slavery refers to situations where coercion, threats or deception are used to exploit individuals and deny them their freedom. The term encompasses eight types of serious exploitation as defined under Australian law: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruitment for labour or services, and the worst forms of child labour. Freedom from slavery is a fundamental human right, and Oroton is committed to ensuring that all individuals connected with its business are treated with dignity and respect.

Oroton is expected to describe the actions it has taken to assess and address the risks of modern slavery within its operations and supply chains. This includes outlining the due diligence and remediation processes in place to identify, prevent, mitigate and respond to such risks.

The following section details the actions taken by Oroton during the relevant reporting period. It outlines the steps undertaken to strengthen internal systems, enhance supplier engagement, and improve governance frameworks aimed at managing modern slavery risks. Where relevant, it also highlights improvements made to training initiatives, risk assessment tools and reporting processes.



## (a) Ethical Sourcing and Risk Management

### Ethical Commitment

Oroton is committed to upholding internationally recognised labour standards, respecting and protecting human rights, and promoting ethical and environmentally sustainable business practices across its operations and supply chains. This commitment is embedded in Oroton's Ethical Sourcing Code and supported by a clear governance framework and risk-based approach to identifying and addressing modern slavery risks.

### Governance and Policy Framework

To guide our ethical sourcing practices, Oroton has implemented a suite of internal policies that apply to staff and vendors. These are provided during onboarding and throughout the business relationship to ensure that all parties uphold the same high standards. Policies directly relevant to modern slavery and ethical sourcing include our Modern Slavery Policy, Child Labour Policy, Gender Equality in the Supply Chain Policy, Unauthorised Subcontracting Policy, Responsible Sourcing Policy, Ethical Sourcing Policy which is contained in the Supplier Code of Conduct, and our Supplier Agreement. These documents set out our expectations regarding fair labour practices, transparency, and compliance with human rights obligations.

### Risk Assessment Approach

Oroton recognises the modern slavery risks associated with the fashion industry, including those arising from the nature of our products, the locations of our manufacturing partners, and the complexity of global supply chains. The Walk Free Foundation has identified that the garment industry is notorious for poor working conditions, with workers often vulnerable to forced labour, wage theft, hazardous conditions, and illegal overtime. In response, we have adopted a multi-faceted risk assessment approach. This includes regular overseas factory and supplier visits by our production and design teams, desktop-based supply chain mapping and research, and engagement with our audit partner QIMA to carry out independent audits and risk assessments of Tier 1 and Tier 2 suppliers. We also operate a formal audit program to assess social compliance annually, based on risk levels. All Tier 1 and Tier 2 suppliers are required to undergo these assessments and must be signatories to Oroton's Supplier Code of Conduct via a questionnaire.

### Internal Oversight and Engagement

Internally, we have established a dedicated Conscious Consumption Team to lead due diligence processes, drive stakeholder engagement, and integrate ethical sourcing practices across the business. This team meets intermittently to evaluate emerging risks, assess progress against ethical sourcing goals, and share information and insights from across the industry. We also maintain an operational risk register to ensure that modern slavery risks are documented, monitored, and appropriately addressed as part of our wider risk management processes.

### Ongoing Focus and Commitment

Oroton acknowledges that risks of modern slavery can exist at various stages of the supply chain, including the sourcing of raw materials, hardware production, garment manufacturing, subcontracting arrangements, and the payment of living wages. While we have taken meaningful steps to improve transparency and strengthen controls, we recognise that managing modern slavery risks is an ongoing process. Ethical sourcing and the protection of human rights will remain a key area of focus for Oroton in future reporting periods.

Ethical Sourcing and Risk Management

**(b) Actions Taken to Address Operational Risks**

Oroton has undertaken a thorough assessment of its direct operations, including its retail stores and head office, to evaluate the potential for modern slavery risks. Based on this assessment, we consider the risk of modern slavery within these areas to be low. Our operations are located entirely in Australia, a country with strong labour laws and regulatory oversight.

**Employment Practices and Conditions**

All Oroton employees, including those working in retail roles, are employed under contracts that are aligned with the General Retail Industry Award and all relevant Australian workplace legislation. These contracts clearly outline employee rights, entitlements and expectations, ensuring that all team members are engaged under lawful and fair working conditions.

Each team member is also required to comply with Oroton's Employee Code of Conduct, which sets out expectations for ethical behaviour and responsible workplace practices. The Code was most recently updated in April 2025 and is subject to regular review as part of Oroton's commitment to continuous improvement and ethical operations.

**Engagement with Third Party Providers**

Although the majority of Oroton's workforce is directly employed, we engage third party labour providers in some circumstances, such as for the recruitment of temporary or specialist staff. We also engage subcontracted service providers for logistics and cleaning functions. Oroton acknowledges that indirect employment arrangements may present a higher risk of modern slavery where oversight is insufficient or unclear.

To mitigate these risks, Oroton requires all third-party providers to comply with Australian labour laws and to ensure that all workers receive the rights and protections afforded to employees in Australia, regardless of the nature of their employment or visa status. These requirements are communicated clearly and are subject to ongoing monitoring.

**Strengthening Oversight and Accountability**

As part of our commitment to continuous improvement, Oroton is seeking opportunities to strengthen its oversight of third-party labour arrangements. This includes reviewing and enhancing due diligence processes, formalising expectations within supplier contracts, and developing clear mechanisms for addressing concerns or instances of non-compliance.

Through these actions, Oroton aims to ensure that its operational practices continue to reflect the values of fairness, respect and integrity, and that the risk of modern slavery in our direct operations remains low.

### (c) Actions Taken to Address Supply Chain Risks - Products

Oroton acknowledges that modern slavery risks are significantly more prevalent in our supply chain than in our directly controlled operations. While our products are designed in Australia by teams based in Sydney and Melbourne, all manufacturing is carried out overseas through a trusted network of long-standing suppliers, primarily located in China. These suppliers have been carefully selected for their commitment to ethical practices and the quality of their craftsmanship.

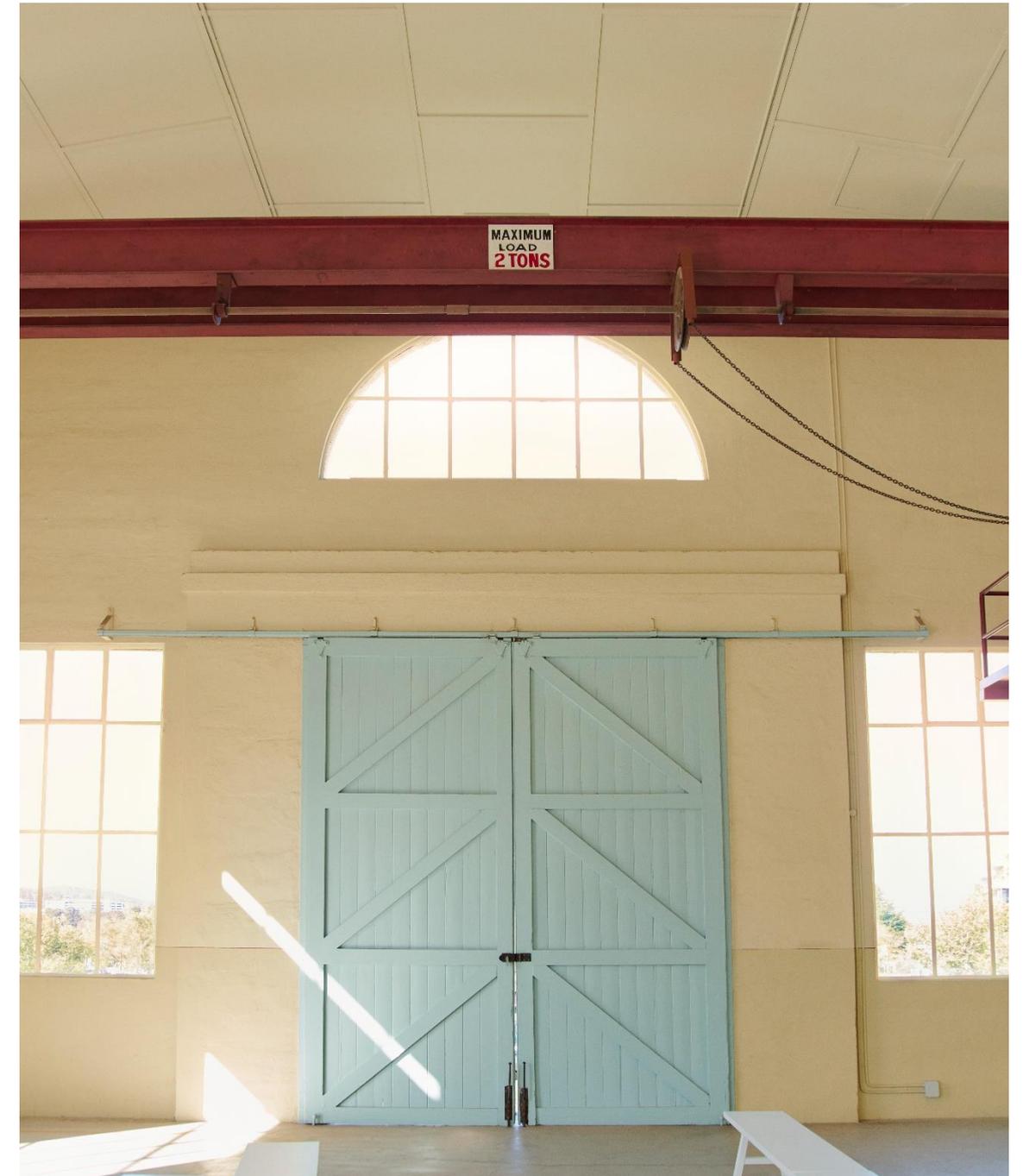
To address our identified modern slavery risks, Oroton has implemented a comprehensive governance framework, ethical sourcing policies, and ongoing due diligence processes.

#### Governance and Policy Framework

Oroton has established a strong governance structure to monitor, manage and mitigate modern slavery risks. Our **Supplier Code of Conduct** clearly outlines our expectations in relation to labour rights, ethical practices, and safe working conditions. This Code is periodically reviewed and updated, and suppliers are required to sign and adhere to each revised version.

We have incorporated modern slavery clauses into our supplier agreements to ensure that contractual commitments align with our human rights standards. Oversight of our ethical sourcing practices is provided by **Oroton's Conscious Consumption Committee**, which regularly reviews associated risks and progress. A representative from this committee reports to the Board, ensuring leadership visibility and accountability.

In 2024, we implemented a scoping process for the introduction of a **Worker Voice program**, which is scheduled to launch in 2025 in collaboration with an independent third-party partner, QIMA. This initiative aims to enhance transparency and support worker empowerment across our supply chain.



## Due Diligence and Risk Assessment

We conduct regular due diligence across our supply chain, with a focus on Tier 1 and Tier 2 suppliers. All Tier 1 sites undergo at least one surveillance audit annually (or extended periods depending on certification's currency). These audits are supported by site visits and corrective action plans where non-compliance is identified.

Oroton is also committed to improving traceability beyond Tier 2, particularly in relation to high-risk materials such as cotton and leather. Our **supply chain mapping** efforts are ongoing and aimed at increasing visibility and reducing risk further upstream.

In addition to direct audits, Oroton accepts audit reports commissioned by other organisations, provided they meet our criteria, including audit recency, methodology, and transparency. We use these assessments to inform our risk mitigation plans and to guide engagement with suppliers.

## Collaboration and Continuous Improvement

### Our Partners include:



### Our additional partnerships with:





Oroton collaborates with a range of stakeholders to enhance its modern slavery response. We are members of key global initiatives, such as **Baptist World Aid** and we continue to engage with NGOs, industry bodies and ethical sourcing experts to improve our approach and align with global best practice.

We understand that complex supply chains require continuous monitoring and improvement. As part of our commitment to ethical sourcing, we will continue to strengthen supplier engagement, increase transparency, and expand the scope of our due diligence to better detect and address risks of modern slavery throughout our operations.

As part of our commitment to transparency and continuous improvement, Oroton participates in Baptist World Aid Australia’s (BWAA) **Ethical Fashion Project**, which seeks to promote human rights and environmental sustainability in global supply chains. The organisation’s **Ethical Fashion Report** is a key industry benchmark that evaluates fashion brands on their efforts to uphold worker rights and minimise environmental harm. The report is informed by BWAA’s biannual **Ethical Fashion Guide**, which invites brands to respond to a set of 46 questions covering three tiers of the supply chain. Participating brands are then scored out of 100 and ranked relative to their peers.

In the 2024 Ethical Fashion Report, Oroton received a score of **36**, placing us within **the top 60 per cent** of participating brands. This marks a measurable improvement from our 2022 score of **27**, reflecting our progress in strengthening our ethical sourcing program and supply chain transparency. We continue to maintain regular engagement with BWAA and value their role in supporting brands to drive positive change across the fashion industry.

Collaboration and Continuous Improvement



Oroton has partnered with QIMA since 2019 to enhance the quality, safety, and compliance of our products and supply chain operations. Established in 2005 in Hong Kong, QIMA has grown into a leading global provider of supply chain compliance solutions, employing over 5,000 people across 60 offices and laboratories, and operating in more than 100 countries.

Through our partnership, QIMA supports Oroton across several key areas:

- **Product Testing** - QIMA conducts physical fabric testing to assess the characteristics, safety, and performance of materials used in our products.
- **Production Inspections** - Regular inspections are carried out across apparel and accessory manufacturing to verify product quality, consistency, and order fulfilment.
- **Social and Environmental Audits** - QIMA visits Oroton’s manufacturing suppliers to assess their systems for quality management, social compliance, and alignment with sustainability and governance expectations.
- **Certification Services** - QIMA provides certification services aligned with global standards, helping to verify that specific products, sites, or processes meet defined criteria.
- **Technical Advisory and Professional Support** - Oroton also accesses QIMA’s technical advisory services, including research and development support, training, and consulting to enhance internal capabilities.
- **Digital Tools and Platforms** - QIMA’s software solutions offer Oroton visibility and control over inspection outcomes, audit schedules, and compliance data throughout the supply chain.

This partnership plays a critical role in strengthening Oroton’s ESG and sustainability performance. It also supports our commitment to continuous improvement in supplier engagement, product quality, regulatory compliance, and employee training across the business.



**Seamless** is Australia’s national clothing stewardship scheme, developed to transform how clothing is designed, consumed and recycled. The program is built on the principle of product stewardship, recognising that brands placing garments on the market share responsibility for the entire lifecycle of those products—from design to disposal.

The scheme aims to create a truly circular clothing economy in Australia by 2030. One of its key goals is to significantly reduce the approximately 200,000 tonnes of clothing that currently end up in landfill each year.

Seamless is funded through a garment levy contributed by participating brands. These funds are strategically invested across four priority areas:

- **Circular design** - encouraging the creation of garments that are durable, repairable and recyclable
- **Circular business models** - including reuse, repair, rental and remanufacturing
- **Closing the material loop** - by improving collection and sorting systems to keep clothes in use longer and enable effective recycling
- **Consumer behaviour change** - by educating the public on sustainable clothing choices, care and disposal practices

Seamless enables the fashion industry to collaborate in ways that no single organisation could achieve alone. Oroton supports the objectives of the scheme and is committed to contributing to a more sustainable and circular future for clothing in Australia.



Oroton proudly partners with **Thread Together**, a not-for-profit organisation established in 2012 to address both fashion waste and clothing insecurity across Australia. The initiative operates on a simple yet powerful idea—to donate brand-new, end-of-line clothing from fashion retailers rather than sending it to landfill. With the help of volunteers, garments are sorted and distributed through a national network of charities and social service agencies, ensuring that high-quality clothing reaches people in need.

Oroton commenced its partnership with Thread Together in 2022, aligning with our commitment to environmental responsibility and social impact. In 2024, Thread Together's founder was invited as a guest speaker at Oroton's company-wide two-day offsite event. This inspiring engagement strengthened the connection between our teams and the organisation's mission. Following the event, a group of team members from Oroton's Sydney support office volunteered at the Thread Together distribution centre, spending an afternoon preparing donations for distribution to communities across Australia.

This collaboration reflects Oroton's broader efforts to reduce clothing waste, contribute to a more circular fashion economy, and support those experiencing vulnerability. Through our ongoing engagement with Thread Together, we continue to take meaningful steps towards a more ethical and inclusive industry.



Since 2023, Oroton has partnered with **Rntr.**, an Australian start-up dedicated to promoting circular fashion through innovative rental and resale solutions. This collaboration forms part of our broader commitment to environmental sustainability and responsible consumption.

Rntr. offers a full-service platform that enables fashion brands to engage directly with customers through re-commerce, allowing garments to be rented or resold with ease. As one of the select brands working with Rntr., Oroton is proud to offer customers the opportunity to rent select pieces from our collection. This service not only increases accessibility to our timeless designs but also supports a shift toward a more circular fashion economy by encouraging garment reuse and reducing textile waste.

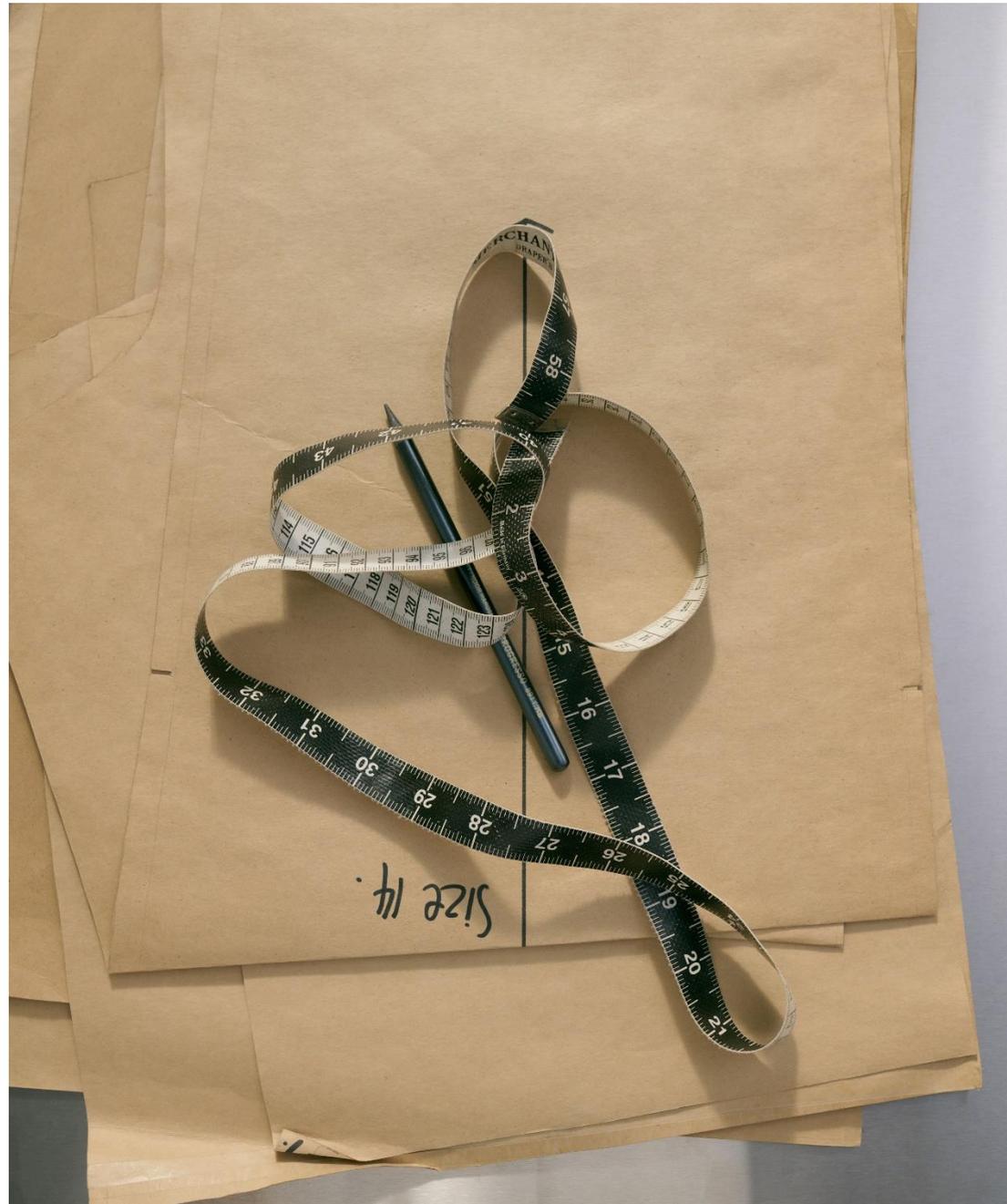
Through this partnership, Oroton is embracing a future-focused model that reflects the quality, durability, and lasting appeal of our products. By extending the life of each item through multiple wears and uses, we aim to reduce the environmental footprint of our collections and contribute meaningfully to a more sustainable Australian fashion industry.



Oroton has partnered with **eBay** to support the growing movement toward circular fashion and extend the life of our products beyond their first wear. This collaboration is designed to empower customers to resell their pre-loved Oroton items, making quality fashion more accessible while reducing waste and encouraging mindful consumption.

By promoting the resale of Oroton pieces through eBay, the initiative supports a more sustainable approach to fashion - one that values longevity, reuse and reduced environmental impact. Customers are encouraged to participate in this circular model by listing their gently worn Oroton items for others to enjoy, helping to extend each product's lifecycle and reduce the volume of clothing that may otherwise contribute to landfill.

This partnership reflects Oroton's continued investment in circularity and responsible retail, and aligns with our broader sustainability goals to reduce overproduction and foster a culture of conscious, considered fashion choices.



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## Measuring the Effectiveness of Our Actions

### Audits and Assessments

Oroton evaluates the effectiveness of its actions to address modern slavery through regular supplier audits and targeted re-audits for sites where elevated risks or previous non-compliance have been identified. In addition to conducting our own audits, we accept external audit reports commissioned by other organisations, provided that the reports are no more than 12 months old, the audit framework aligns with Oroton's ethical and operational standards, and full access to audit findings and corrective action plans is granted.

We are committed to ensuring that all suppliers meet the expectations outlined in our Supplier Code of Conduct. This includes providing a safe, fair, and respectful working environment for all workers involved in our supply chain. Where non-compliance is identified, Oroton responds promptly and works collaboratively with the relevant supplier to implement corrective actions within an agreed timeframe, which is determined by the nature and severity of the issue.

Progress is monitored through ongoing tracking of key performance indicators, including supplier transparency, audit completion rates, responsiveness to corrective actions, and continued compliance with our ethical sourcing standards. Over the past year, Oroton did not identify any confirmed cases of modern slavery within its operations or supply chain. Nonetheless, we remain vigilant and committed to continuous improvement in our audit and assurance processes.

**RISK INDICATORS MONITORED**

INDICATOR
% Foreign migrant workers
% Of female workers
Age youngest worker employees
Any incidents of forced labour, inhumane treatment, treatment of freedom of association.
Grievance mechanism for their workers
Workers average hours per week
Onboarding training program for new workers
Traceability of some of our running fabric qualities, linens, cottons, silk dupion, silk twill etc
Traceability of some of our running metal base, fabrics, hardware, etc

Oroton’s internal analysis of modern slavery risk indicators has identified working hours, particularly excessive overtime, as a key area of concern across our operations and supply chain. In response, we have prioritised engagement with our supply chain partners, including suppliers and factory management, to ensure that working hours are effectively monitored and managed in line with local labour laws in the countries where our products are manufactured.

Within our own operations, we are focused on ensuring that our internal teams adhere to Oroton’s critical path for purchase order management. We also conduct regular reviews of capacity planning across the supply chain to help prevent production delays that may otherwise contribute to excessive working hours.



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## Looking Ahead

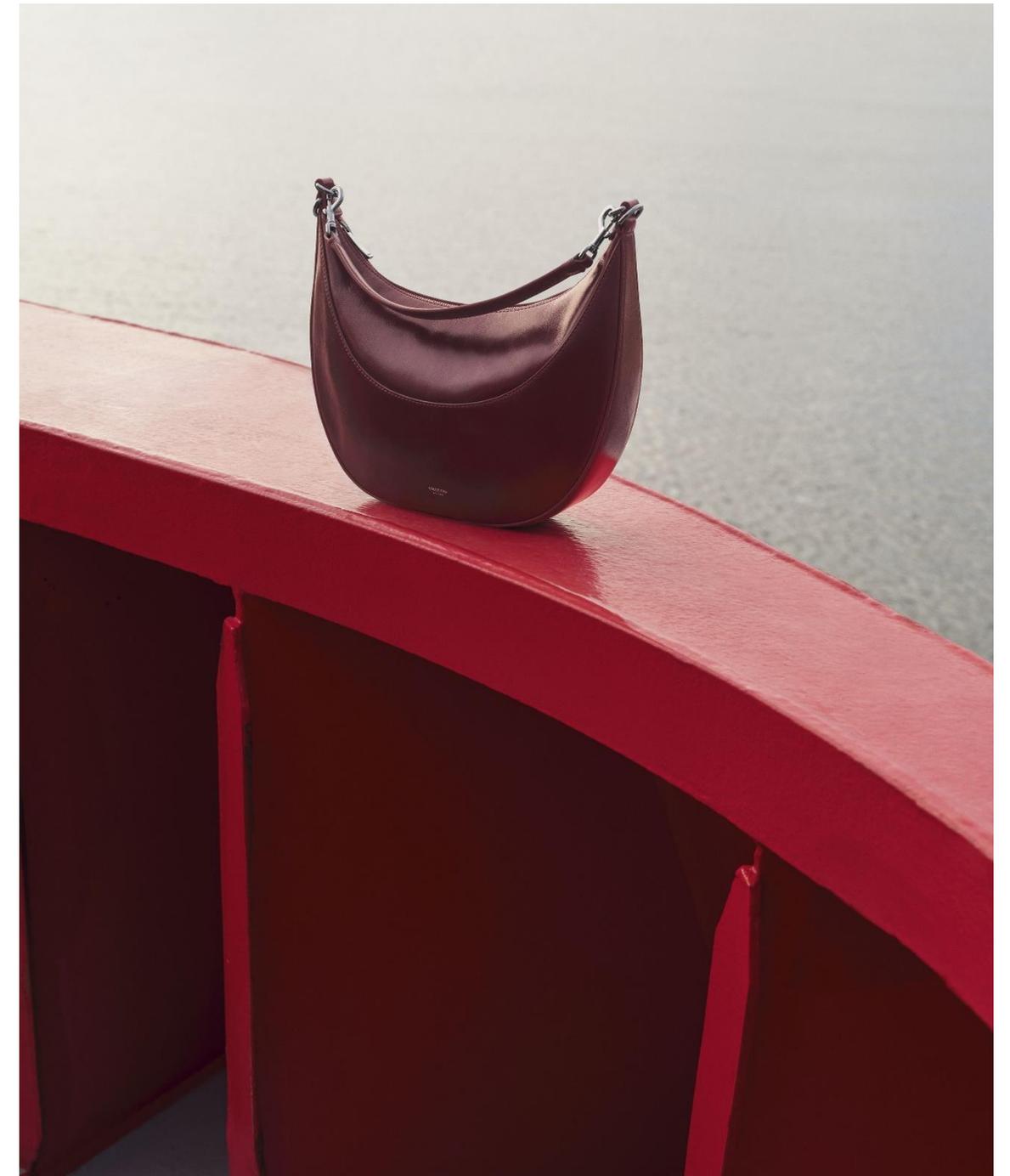
Oroton is committed to continuous improvement in how we identify, assess and address modern slavery risks across our operations and supply chains. The following initiatives have been identified as strategic priorities for the next reporting period and are aimed at strengthening ethical sourcing practices, protecting vulnerable workers, and ensuring ongoing compliance with the Modern Slavery Act 2018 (Cth).

### Executive Oversight

Oroton will continue regular board-level reporting on modern slavery risks. This will enhance leadership accountability and ensure ethical sourcing remains a strategic business priority.

### Supplier Mapping

Oroton will maintain our Tier 1 and Tier 2 supplier mapping and expand our efforts to include Tier 3. Mapping beyond Tier 2 provides visibility into areas where modern slavery risks are often highest, such as raw material production and subcontracted services. This initiative supports our long-term goal of full traceability across our supply chain and enables targeted risk assessments.



### Code of Conduct Execution

We are targeting 100 per cent execution of our Supplier Code of Conduct for all Tier 1 apparel and accessories suppliers, and 80 per cent execution for Tier 2 suppliers. Extending this requirement to all Australian-based labour and service vendors will ensure consistent expectations around human rights, working conditions and ethical behaviour across our entire business network.

### Third-Party Audits

Oroton will continue to engage third-party partners to conduct annual (or as necessary depending on report currency) audits of all Tier 1 suppliers. These audits are essential for identifying non-compliance, evaluating workplace conditions and verifying alignment with our ethical sourcing standards. We will also explore extending these audits to examine wage practices and review the methodology used by suppliers to determine fair pay.

### Grievance Mechanism and Worker Voice

In 2025, we will introduce a formal grievance mechanism in partnership with an independent third-party provider. This Worker Voice program will enable safe, confidential reporting of concerns and ensure that factory workers have access to remediation processes. Grievance mechanisms are critical in uncovering hidden risks and empowering vulnerable individuals. This will complement the current Whistleblower Policy in place, which allows employees, suppliers, customers and other third parties to confidentially report any concerns. Reports can be submitted via [whistleblower@orotongroup.com](mailto:whistleblower@orotongroup.com).



### **Fair Wage Review**

Oroton will examine wage practices across Tier 1 suppliers in China with the goal of understanding baseline wages, identifying wage gaps and reviewing calculation methods for fair or living wages. This initiative is part of our broader focus on ensuring that all workers in our supply chain earn a wage that meets basic living needs and allows for discretionary income.

### **Training and Awareness**

We will continue to enhance modern slavery awareness training for staff and suppliers, ensuring it is tailored to Australian and New Zealand legal requirements. Training will focus on identifying risk indicators, reporting mechanisms and real-life case studies to deepen understanding and strengthen our prevention efforts.

### **Industry Collaboration**

We will build on our relationships with industry peers and civil society organisations to support joint action on systemic risks. Through collaboration, we aim to influence improvements in sourcing practices, working conditions and transparency across the broader fashion industry.

### **Remediation Framework**

A formal remediation framework is being considered to guide our response to any identified modern slavery risks or breaches. This framework will provide a consistent and transparent process to ensure that affected workers receive appropriate support and remedy.



### **Policy Development and Review**

Oroton will review and expand our ethical sourcing and modern slavery policy framework. These policies work collectively to ensure that our values are embedded into every stage of our sourcing and operations.

### **Supply Chain Risk Assessments**

We will continue conducting detailed risk assessments to identify high-risk suppliers, countries, sectors and products. This includes reviewing contract terms, onboarding procedures and supplier practices to ensure alignment with ethical sourcing requirements.

### **Supplier Engagement**

Engagement with suppliers remains a priority. Oroton will continue to support suppliers in understanding our expectations, provide capacity-building where required and promote ongoing collaboration to mitigate risks.

### **Stakeholder Reporting and Communication**

We will continue to improve how we communicate our efforts to customers, investors and regulators. Transparent reporting builds trust and supports accountability, demonstrating our commitment to operating responsibly and ethically.

By implementing these initiatives and strengthening our governance, Oroton aims to lead by example in creating a transparent, ethical and sustainable supply chain. We remain steadfast in our commitment to identifying and mitigating modern slavery risks and ensuring the dignity, safety and rights of all workers in our operations and global supply network.



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Oroton remains steadfast in its commitment to ethical practices and human rights. This statement reflects our dedication to identifying, mitigating, and remediating modern slavery risks across our operations and supply chains, ensuring a sustainable and just future for all stakeholders.

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# OROTON



MODERN SLAVERY STATEMENT 2024

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