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# Modern Slavery Statement

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For the reporting period ended  
30 June 2022

CETTIRE

**CETTIRE LIMITED**  
**ACN 645 474 166**  
**Modern Slavery Statement**  
**For the reporting period ended 30 June 2022**

This statement is published by Cettire Limited (ACN 645 474 166) (Cettire) and its subsidiaries (collectively, Cettire), in compliance with Australia's Modern Slavery Act 2018 (Cth).

Cettire will continue to work with suppliers and distribution and logistics partners who have the same core values and similar approaches to Cettire. This statement outlines Cettire's approach to assessing modern slavery risks within its operations and supply chain.

Modern slavery is described as the recruitment, movement, harbouring or receiving of children, women and or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation.

Cettire respects ethical labour practices and has zero tolerance to any form of human rights abuses, including in its operations and supply chain, and we expect that all our employees, suppliers, contractors and agents uphold these values. Cettire is committed to respecting human rights throughout its business and will make every effort to operate the business and source products and services ethically and responsibly.

This statement has been approved by the Board of Cettire Limited.



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**Kerry Robert East**  
**Chair**  
**Cettire Limited**  
**23 December 2022**

# **CETTIRE**

## **Modern Slavery Statement**

**For the reporting period ended 30 June 2022**

### **Structure, Operations, Supply Chain**

Launched in 2017, Cettire Limited (“Cettire”, the “Company”) is a global online retailer, offering a large selection of in-demand personal luxury goods via its website, cettire.com. Cettire has access to an extensive catalogue of more than 2,500 luxury brands and 400,000 products of clothing, shoes, bags, and accessories.

Cettire generates revenue through online sales of third-party fashion and accessories products to a global customer base.

The Company operates via a drop ship model whereby products are sent directly to customers from our suppliers, enabling us to offer a vast selection without the need to hold inventory and also enabling rapid delivery times.

The Company procures a range of products and services from a wide network of suppliers to facilitate our business operations including IT support services, logistics and transport, marketing, warehousing (3PL) and professional services. Our procurement initiatives are global in nature.

At 30 June 2022, Cettire employed approximately 40 team members globally.

Cettire’s registered office and principal place of business is located in Melbourne, Australia. Cettire Limited is listed on the Australian Securities Exchange under the code CTT and was listed on 18 December 2020.

### **Modern Slavery Risks**

As an online retailer, Cettire’s operations extend globally.

The Company recognises that risks of modern slavery may exist within its supply chain and distribution networks. Cettire also acknowledge the potential for these risks to be heightened during the Covid-19 pandemic.

Cettire’s operations comprise a direct workforce. In addition, the Company purchases finished goods from third parties for re-sale on its platform and purchases packaging and other raw materials for distribution via third party service providers. There is a risk that these third-party suppliers may have modern slavery practices in their own operations or in the operations of their supply chains.

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Cettire recognises that its direct employees must be treated fairly and with respect, and paid in accordance with applicable legislation. Cettire's practices and controls throughout the business manage and mitigate the risk of causing or contributing to modern slavery within our direct workforce.

Cettire also contracts with third parties for services in connection with the operation of its business, such as marketing, advertising, logistics or specialist advisors.

When engaging with third parties, the Company engages with reputable suppliers and service providers who are located in OECD countries. All procurement arrangements are underpinned by arms-length contracts.

### **Actions taken to address Modern Slavery Risks**

The Board is committed to and promotes the highest standard of corporate practice and business conduct. The Company has adopted a Code of Conduct that applies to all Directors, employees and contractors and outlines the obligations of the Directors, employees and contractors in performing their duties in compliance with all laws and regulations. Responsibilities include acting ethically, with honesty and integrity, in good faith and in a manner which is in the best interests of the Company. The Company's core values are inherent and displayed in its business practices.

Cettire is committed to conducting its business and operations with honesty, integrity and the highest standard of ethical behaviour with zero tolerance for bribery and corruption in any form. The Code of Conduct together with the Anti-Bribery Corruption Policy establishes the parameters for how Cettire conducts its operations, including adopting a zero-tolerance approach to bribery and corruption.

Further, whistleblower channels provide a safe way for Cettire's employees, suppliers and contractors to raise concerns about improper conduct, including conduct relating to modern slavery.

The Board, through the Audit and Risk Committee, ensures that Cettire has an effective risk management system in place to manage key risk areas. The Committee is governed by the Audit and Risk Committee Charter approved by the Board.

Cettire's executive team is responsible for ensuring that systems, processes and controls are in place to minimise identified potential risks to an acceptable level. Emerging risks and

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opportunities are assessed and considered by the Board and the Audit and Risk Committee. All team members are responsible for reporting any new potential risks or changes to existing risks, to management as soon as they become aware of the risk.

Cettire is committed to addressing any instances of modern slavery identified in its supply chain. The Company works with reputable suppliers and takes a collaborative approach to working with suppliers including to develop and improve mutual understanding of modern slavery risks within the operations of the Company's suppliers.

### **Assessing effectiveness**

Cettire's current focus is to improve its understanding of the modern slavery risks associated with its supply chain. The Company's assessment program is at an early stage of maturity.

The Board and the Audit and Risk Committee provide the forum for periodic review of the Company's risk profile and material business risks including, where relevant, modern slavery risks.

The Company will continue to monitor its procedures against best practices as well as other operators in our industry. This includes continuous improvement of the processes for assessing and onboarding new suppliers.

### **Consultation within the Group**

Cettire consulted with relevant team members within the business for the purpose of this Modern Slavery Statement. It was not considered necessary to consult with owned and controlled entities which exist principally for corporate reasons and do not have active business operations.