



**RODD & GUNN®**  
NEW ZEALAND

# MODERN SLAVERY STATEMENT

FY25

*FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT,  
SC 2023, C 9*

*AUSTRALIAN MODERN SLAVERY ACT 2018, (CTH)*

*UNITED KINGDOM MODERN SLAVERY ACT 2015*

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## INTRODUCTION

This statement outlines the continued approach that Rodd & Gunn has taken to identify, address, and mitigate the risks of modern slavery across our supply chain and business operations. Throughout this statement, the term "modern slavery" is used as an umbrella term referring to all forms of exploitation, including forced labor, child labor, human trafficking, and bonded labor.

This statement has been prepared in accordance with the requirements set out in the following legislation:

- *Australian Modern Slavery Act 2018, (Cth)*
- *Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, SC 2023, c 9*
- *United Kingdom Modern Slavery Act 2015*

In accordance with the Canadian Fighting Against Forced Labor and Child Labor in Supply Chains Act, a French translation of this statement is available on our website. This is a joint statement, prepared on behalf of and approved by the Board of Directors of Rodd & Gunn New Zealand Limited (NZBN 9429034100141) Level M, 17 Albert Street Auckland 1010. The statement applies to the following subsidiaries for the financial year ending 30 June 2025:

- Rodd & Gunn Australia Pty Ltd
- Rodd & Gunn USA Inc
- Ross & Gunn Canada Limited
- Rodd & Gunn UK Limited
- Rodd & Gunn France
- Rodd & Gunn Netherlands BV
- Rodd & Gunn Italy SRL
- Rodd & Gunn Denmark Aps
- Rodd & Gunn (Singapore) Pte Ltd
- Rodd & Gunn Hong Kong Limited
- Rep. Office of Rodd & Gunn New Zealand Limited Ho Chi Minh City

Consultation and guidance for this report was provided by Go Well Consulting Ltd, Auckland, New Zealand. This statement has been reviewed and approved by the Rodd & Gunn Board of Directors and signed by Michael Beagley on 26 November 2025. Michael Beagley is a Director of the Board and the Chief Executive Officer of Rodd & Gunn New Zealand Limited and has the authority to bind Rodd & Gunn New Zealand Limited and the reporting entities listed above.



## A WORD FROM THE CEO

Rodd & Gunn's Modern Slavery Statement reaffirms our commitment to ethical conduct, responsible sourcing, and the protection of human rights across our global operations. All forms of modern slavery contradict our core values. Our reputation is built on a foundation of integrity, authenticity, and transparency. As a global company with an extensive supply chain, we take seriously our responsibility to ensure that the human rights of all people working throughout our value chain are respected and upheld.

We also acknowledge the complexities and limited visibility that can exist within global supply chains, and recognize that our business operations may have caused, contributed to, or been directly linked to modern slavery risks. This is why we remain committed to continuous improvement, education, and collaboration that supports meaningful and lasting change.

After three years of voluntary reporting, Rodd & Gunn now meets the mandatory reporting threshold under the Australian Modern Slavery Act. Our early adoption and deliberate commitment to transparency have strengthened our risk-management processes, improved supply chain visibility, and embedded a culture of accountability across our organization. Robust due diligence and a best-practice mindset are essential for responsible business conduct and support our transition from voluntary disclosure to mandatory compliance across Australia, the UK, and Canada.

FY25 was not without challenges. Geopolitical instability and tense global trade conditions created significant supply chain uncertainty. A portion of the year was spent mitigating disruptions, re-prioritizing resources, and managing progress accordingly. These challenges underscored the importance of our investment in Vietnam. Our Ho Chi Minh City Representative Office relocated to a larger space to support a growing operational team, and supply chain consolidation increased Vietnam's contribution across both Tier 1 and Tier 2 suppliers. Our presence in Vietnam enables deeper supplier engagement, stronger visibility, and a more informed response to potential risks.

FY25 focused on strengthening the foundations of our ethical framework and supply chain partnerships. We intentionally focused on areas where we identified a higher risk of human rights violations. This included funding social-compliance training across our Tier 1 suppliers; increasing investment in responsibly sourced fibers through farm-to-floor traceability programs, which significantly improved visibility into our Tier 3 and Tier 4 supply chain; and expanding our monitoring scope to include approved subcontractors through third-party assessments and on-site visits by our Vietnam team. New ventures into Denmark and Hong Kong created exciting opportunities to expand our brand footprint. The UK remains a key market, where we saw a 47% increase in Lodge and department store concession openings. Our department store partners play a critical role in market access, and alignment with their human rights due-diligence frameworks is a mandatory part of the onboarding process.

This statement reflects the collective efforts of our internal teams, suppliers, and external partners, as well as the ongoing investments we make in responsible sourcing. As we move into a mandatory reporting environment, our commitment to ethical conduct, continuous improvement, and accountability remains steadfast. We welcome the appointment of the Australian Anti-Slavery Commissioner, whose work will support compliance, assist victims, and strengthen national efforts to address modern slavery. We encourage other jurisdictions to advance in similar developments.

In accordance with the requirements of the legislation listed above, I attest that I have reviewed the information contained in this report for all reporting entities. Based on my knowledge, and having exercised reasonable diligence, I attest that the information contained in this report is true, accurate, and complete in all material respects for the purposes of the applicable Acts for the financial year ending 30 June 2025.

We welcome any feedback on this statement, please email: [sustainability@roddandgunn.com](mailto:sustainability@roddandgunn.com).

Regards,



Michael Beagley  
Chief Executive Officer and Director of the Board





# RODD & GUNN GLOBAL FOOTPRINT

## OPERATIONS

The Rodd & Gunn brand was established in 1987 when the first stand-alone store opened in Auckland, New Zealand. From that moment forward, the Rodd & Gunn brand became synonymous with premium high-quality menswear apparel, footwear, luggage, and accessories. We're a proud Kiwi brand, with an ever-growing global presence.

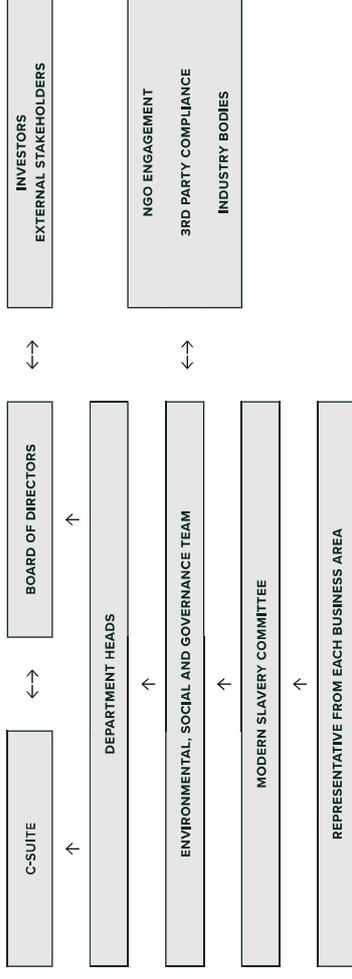
Rodd & Gunn has continued to expand its retail, wholesale, and hospitality network across both the Southern and Northern Hemispheres. We now operate 281 stand-alone stores and department store concessions, a 13% growth on FY24. In 2016, we entered the hospitality sector with the opening of The Lodge Bar in Queenstown. This venture has since grown to four dining and bar destinations across New Zealand and Australia, each showcasing the best that both regions have to offer. In FY25, the brand extended into two new markets: Denmark and Hong Kong further strengthening our global presence.

Rodd & Gunn's principal head office located in Auckland, New Zealand, supported by offices in Melbourne, Milan, New York, London, and, more recently, a representative office in Ho Chi Minh City, Vietnam. The Vietnam office is approaching its two-year anniversary and has provided essential centralized support to our global team, while enhancing the direct nature of our supplier relationships. Ensuring that every market has access to on-the-ground operational support, through training, recruitment, guidance, and connectivity has been crucial to our growth and to the cohesion of our expanding network of staff, stores, wholesale partners, and suppliers.



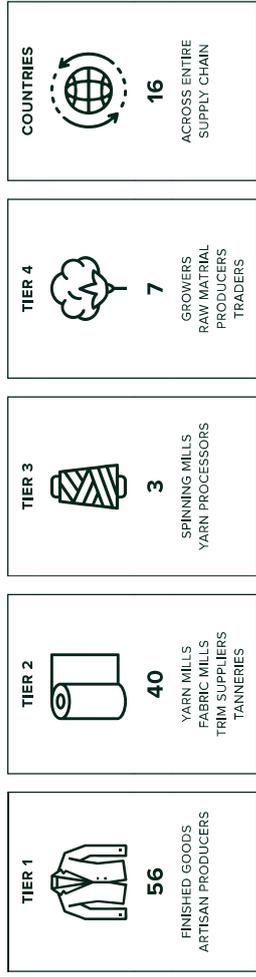
## HUMAN RIGHTS GOVERNANCE STRUCTURE

Rodd & Gunn New Zealand Limited is a corporation. We operate in the Retail, Wholesale, E-commerce, and Hospitality sectors. We are governed by a **Board of Directors** and with our CEO also an active Director on the Board. Accountability for our action and progress on matters relating to Modern Slavery sits with our Board, and they are responsible for ensuring that fundamental human rights are upheld throughout all levels of the company. Our ESG Team in collaboration with the **Modern Slavery Committee**, work diligently and cross functionally to help business understand, identify, limit, and remediate the risks of Modern Slavery. They work directly with our operational and supply chain partners to ensure due diligence processes are followed through. Our Human Rights Governance Structure is responsible for reporting on matters relating to ethical sourcing and human rights risks.



**SUPPLY CHAIN**

The design of our apparel, footwear, and accessories is carried out entirely in-house, with our product design team based in Melbourne and our textile design team located in Milan. Manufacturing is undertaken through a global network of trusted suppliers with whom we maintain direct, long-term relationships. We classify all stages of our supply chain using an industry-recognized tier system that divides the production process into four levels. Each supplier is selected for their high-quality craftsmanship, strong ethical standards, and commitment to social and environmental responsibility. Our most recent supplier list is available on our website (<https://www.rodandgunn.com/brand-story/sustainability>). In FY25, Rodd & Gunn worked directly with 99 suppliers across 16 countries, representing a 13% reduction from FY24 as we continue to consolidate the geographical spread of our Tier 1 and Tier 2 supply base.



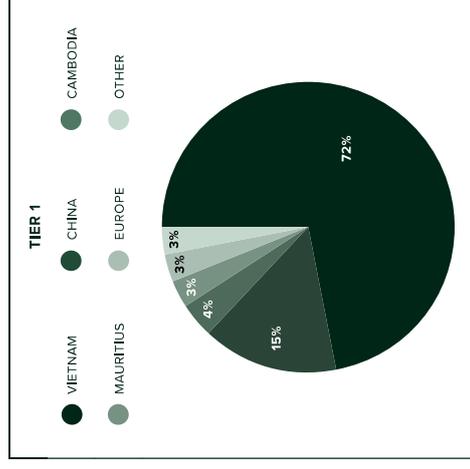
**GARMENT WORKFORCE**

Our dedication to protecting human rights extends to every individual involved in the making of our products. Most workers within our supply chain are employed in small to medium-sized manufacturing facilities. Any form of exploitation is incompatible with our brand values. We believe all garment workers deserve dignity, respect, fair recognition for their skills, and safe, healthy working conditions. The following snapshot of our supply chain workforce reflects data from our FY25 factory assessment portfolio. While overall figures have remained relatively stable compared with the previous year, the proportion of internal migrant workers in China has risen to 38%, up from 14% in FY24. This increase largely reflects strengthened due diligence and oversight in the region, and it underscores the importance of ensuring our response and focus appropriately addresses the heightened level of risk. Understanding the gender split across our supply chain is essential for effective due diligence. Gender influences vulnerability, with women often facing greater risks of discrimination, unequal pay, and unsafe working conditions. Monitoring this distribution helps identify where additional safeguards or targeted interventions may be needed.



**PRODUCTION BY REGION**

Maintaining transparency across all levels of our supply chain enhances visibility and helps us identify potential human rights or modern slavery risks. It also provides insight into how our financial resources are distributed throughout the supply chain, an essential factor in evaluating impact, assessing risk, allocating resources, and making responsible decisions. The following breakdown illustrates how our geographical investment is allocated across our Tier 1 and Tier 2 suppliers which we have mapped and verified 100%. Our commitment to Vietnam has resulted in a 22% increase in Tier 1 finished-goods manufacturing, while Tier 2 sourcing in Vietnam is slowly growing from 0% in FY24 to 6% in FY25, reflecting our ongoing consolidation into this region. Having a dedicated production team based in our Ho Chi Minh office strengthens our ability to build supplier relationships and maintain close oversight of operations. Europe also remains a key region for textile and yarn procurement, representing 33% of our Tier 2 supply chain as we continue to invest in premium materials from some of the world's leading fabric mills.



SUPPLY CHAIN MAP

**TIER 1 (56)**  
GARMENT MANUFACTURERS  
& ARTISAN PRODUCERS



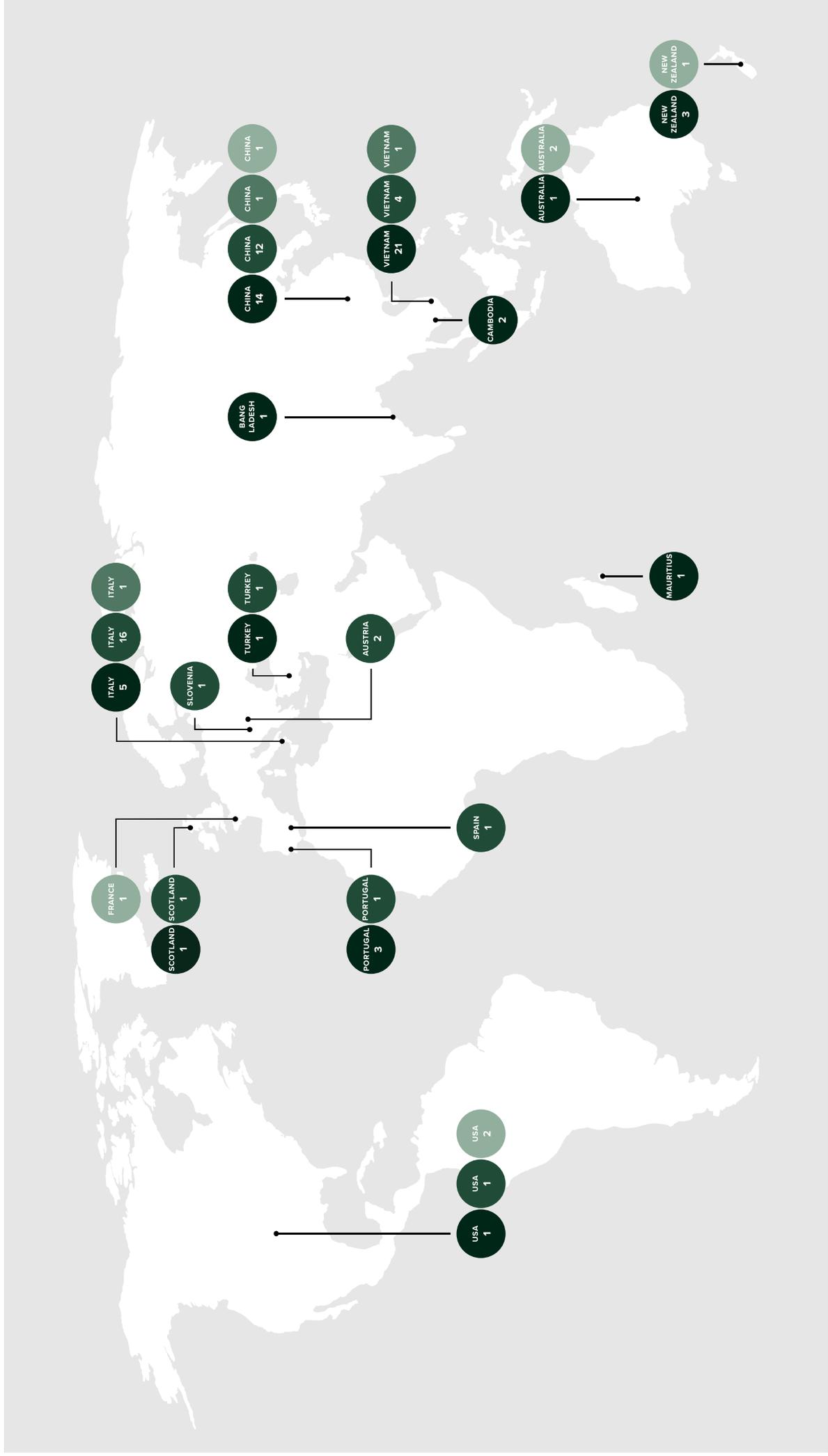
**TIER 2 (40)**  
YARN MILLS, FABRIC MILLS  
& TRIM SUPPLIERS



**TIER 3 (3)**  
SPINNING MILLS  
YARN PROCESSORS



**TIER 4 (7)**  
GROWERS, RAW MATERIAL  
PRODUCERS & TRADERS



## MODERN SLAVERY RISKS

This section outlines where risks may arise and how they are assessed, using a consistent framework each year to track changes and improve mitigation. The fashion retail industry faces elevated risk due to low-skilled, labour intensive production and sourcing from higher risk countries. Risks are often hidden in lower tiers, so we consider geography, sector, supply chain tier, and business relationships holistically.

### MODERN SLAVERY RISKS DEFINED

In this assessment, Modern Slavery is the umbrella term used to describe the use of exploitive labour practices, which include:

- Slavery and servitude
- Forced or compulsory labour
- The worst forms of child labour
- Debt bondage
- Human trafficking, including deceptive recruitment

Forced labour risks are highest in manufacturing countries with weak protections, excessive overtime, reliance on migrant labour and poor worker voice. Child labour risks are greatest in lower tiers (e.g. cotton and textiles, informal or subcontracted work). Debt bondage may occur where workers take on recruitment related debts. Deceptive recruitment and other abuses can occur where labour brokers or unlicensed sub agents are used, or actual conditions differ from what was promised. According to Walk Free, the International Labour Organisation (ILO) and the International Organisation for Migration (IOM), **50 million** people are currently trapped in modern slavery, when last assessed in 2021. Freedom from slavery is a fundamental human right and we believe that all people associated with our business should be treated with respect and dignity.

### RISK METHODOLOGY

We map our operations and supply chain from Tier 1 suppliers through to Tier 4 (sub suppliers and raw material sources), as well as service providers (e.g. logistics, cleaning, labour hire, hospitality). For each, we assess inherent risks linked to location, industry and workforce, guided by the OECD Due Diligence Guidance for Garment and Footwear and Australian Government indicators.

### RISK CRITERIA

We use both qualitative and quantitative factors:

- Qualitative: nature of work and workforce (e.g. unskilled, temporary, or migrant labour, vulnerable worker groups, level of oversight or audits, known labour violations or media reports).
- Quantitative: supplier numbers and spend in higher risk countries or sectors, supplier self-assessment results, and wage levels compared with living wage benchmarks. We also rely on tools such as the Global Slavery Index, Transparency International Corruption Index and the U.S. Department of Labor's list of goods produced by forced or child labour.

### RISK RATING AND ANNUAL REVIEW

We combine these factors to assign Low/Medium/High risk ratings for different supply chain segments, prioritising deeper due diligence where risk is higher. Recognising apparel and footwear as globally high-risk sectors, we start from a conservative position and refine ratings based on supplier specific factors (e.g. labour practices, adherence to our Code of Conduct, certifications, industry/government response). The template is updated annually using the same criteria to track changes such as shifts in sourcing regions or strengthened vetting. This statement reflects the financial year ending 30 June 2025.

### GEOGRAPHICAL RISK ASSESSMENT

Geography is a key driver of risk. Rodd & Gunn operates and sources across multiple countries. When assessing a country, we consider labour law strength, prevalence of exploitation and known sector specific issues. Domestic operations in Australia are generally low risk due to stronger regulation and oversight, while many sourcing regions carry higher inherent risks, particularly where governance and enforcement are weaker. We use indices and human rights reports and note any countries subject to trade or import restrictions linked to forced labour. Our detailed risk assessment for key manufacturing locations include:

#### VIETNAM – MEDIUM RISK

Major Tier 1 garment and Tier 2 textile production. Vietnam remains a cornerstone of Rodd & Gunn's Tier 1 sourcing and Tier 2 textile production, consisting of a large pool of garment factories and a substantial internal-migrant workforce. While legal protections exist, structural restrictions on independent unionisation and collective bargaining limit worker voice and weaken grievance mechanisms. In some cases, high pressure on overtime and production quotas, combined with migrant status and limited worker mobility, raise the risk of coercive labour practices. For these reasons, Vietnam is assessed as a medium-risk sourcing country, requiring ongoing oversight of working hours, subcontracting disclosure, and worker-voice channels. Vietnam represents 72% of Rodd & Gunn's Tier 1 supply chain.

#### CHINA – HIGH RISK

Tier 1 garment, Tier 2 trims and textiles, Tier 3 spinning. China supplies a sizeable portion of Rodd & Gunn's Tier 2 (trims, textiles) and some Tier 3 inputs, remaining central to upstream sourcing even as Tier 1 involvement has declined over the years (currently representing 15% of Rodd & Gunn's supply chain). The state-controlled union model and widespread reports of forced labour linked to certain high-risk cotton regions undermine freedom of association and raise forced-labour risk, especially when subcontracting and potential labour-transfer schemes are involved. Given documented issues with ongoing excessive overtime and forced labour, the country remains at high risk. Continuous traceability (especially for cotton and raw materials), plus strict subcontracting controls, are critical.

#### CAMBODIA – HIGH RISK

Cambodia continues to pose serious risk in the garments sector: many factories are subcontracted, and low wages, high overtime, and weak worker voice/union presence contribute to poor worker conditions. Recent reporting indicates that forced-labour exposure has intensified, especially in informal or unmonitored parts of the supply chain, including coercive practices and withholding of rights. Given these systemic vulnerabilities, Cambodia warrants a high-risk classification when engaging in garment production, and demands rigorous audit frequency, strong "no-unauthorised-subcontracting" enforcement and robust grievance-mechanism effectiveness verification., low wages, limited union coverage, weak enforcement, ongoing reports of child labour, excessive overtime and precarious work. Cambodia represents only 4% of Rodd & Gunn's Tier 1 supply chain.



TOP 3 MANUFACTURING RISK ASSESSMENT BY COUNTRY

RISK	RISK LIKELIHOOD		
	VIETNAM	CHINA	CAMBODIA
CHILD / FORCED LABOUR	MODERATE	LIKELY	LIKELY
WORKPLACE DISCRIMINATION	UNLIKELY	MODERATE	MODERATE
LACK OF FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING	RARE	LIKELY	LIKELY
UNSAFE WORKING / LIVING CONDITIONS	UNLIKELY	MODERATE	MODERATE
PAID BELOW MINIMUM WAGE	RARE	MODERATE	MODERATE
EXCESSIVE OVERTIME	RARE	LIKELY	UNLIKELY
TEMPORARY AND / OR MIGRANT WORKFORCE	MODERATE	LIKELY	LIKELY
UNAUTHORISED SUB-CONTRACTING	MODERATE	MODERATE	MODERATE
GRIEVANCE MECHANISMS & REMEDY	MODERATE	MODERATE	MODERATE
SCORE	19	31	29
OVERALL COUNTRY RISK	MEDIUM	HIGH	HIGH

METHODOLOGY

	RARE	UNLIKELY	MODERATE	LIKELY	ALMOST CERTAIN
RISK LIKELIHOOD	THE EVENT MAY OCCUR IN EXCEPTIONAL CIRCUMSTANCES	THE EVENT SHOULD OCCUR SOMETIMES	THE EVENT COULD OCCUR SOMETIMES	THE EVENT WILL PROBABLY OCCUR IN MOST CIRCUMSTANCES	THE EVENT IS EXPECTED TO OCCUR IN MOST CIRCUMSTANCES
POINTS PER RISK	1	2	3	4	5

	LOW	MEDIUM	HIGH	VERY HIGH	CRITICAL
OVERALL RISK RATING	ACCEPTABLE WITH PERIODIC REVIEW	TOLERABLE WITH PERIODIC REVIEW	TOLERABLE WITH CONTINUOUS REVIEW	INTOLERABLE - IMMEDIATE ACTION REQUIRED	INTOLERABLE - URGENT ACTION REQUIRED
POINTS RANGE	0 - 12	13 - 23	24 - 32	33 - 39	40 - 45

BROADER SUPPLY CHAIN RISK ASSESSMENT BY COUNTRY

COUNTRY / REGION	OVERALL RISK	KEY SECTORS / TIERS	RISK DRIVERS	KEY FOCUS AREAS
AUSTRALIA	LOW	<b>TIER 4</b> Cotton, wool, agriculture and operations/logistics	Outsourced cleaning, security, and labour-hire; migrant labour vulnerabilities; underpayment risks in seasonal sectors	Screen all third-party service providers; verify recruitment fee policies; maintain worker grievance access and training
BANGLADESH	VERY HIGH	<b>TIER 1 - 3</b> Accessory production and input materials (textiles, yarn)	Repression of union rights (ITUC "10 worst"); low wages; excessive overtime; subcontracting; gender inequality	High audit frequency; no unauthorised subcontracting; independent grievance channels; supplier training on FOA
EUROPE	MEDIUM	<b>TIER 2 &amp; 3</b> Textiles and woollen yarns, including spinning mills	Undeclared work and migrant labour exploitation in southern Europe; weakening labour protections across EU (ITUC 2025)	Annual certification reviews (LWG, OEKO-TEX); subcontractor mapping; worker voice mechanisms
INDIA	HIGH	<b>TIER 2</b> Leather Tanning	Bonded and child labour in informal sectors; chemical exposure; weak enforcement; migrant/young female workforce	Strong third-party audits; local agent oversight; supplier remediation tracking; health & safety compliance reviews
NEW ZEALAND	LOW	<b>TIER 4</b> Wool and food/beverage for hospitality	Seasonal migrant labour in agriculture and food supply; low-risk domestic operations	Screen service providers; check recruitment intermediaries; maintain HR oversight and contract transparency
PAKISTAN	HIGH	<b>TIER 2 &amp; 3</b> Textiles & yarn spinning and Leather tanning	Debt bondage; child labour in spinning mills; weak FOA; wage exploitation; informal subcontracting	Enhanced traceability; living-wage benchmarking; zero-fees recruitment verification; social-audit follow-up
TURKIYE	HIGH	<b>TIER 2 &amp; 3</b> Textiles and spinning <b>TIER 1</b> Limited production	Large refugee and migrant workforce; pervasive subcontracting; FOA suppression; high prevalence of modern slavery (GSI 2023)	Require full subcontractor disclosure; independent grievance validation; refugee-worker protection; high audit frequency
UNITED STATES	MEDIUM	<b>TIER 4</b> Cotton and raw hides	Supply-chain exposure to forced-labour imports (e.g., UFLPA); erosion of union protections in some states	Traceability for raw materials; supplier compliance with CBP/DOL forced-labour lists; contract clauses on worker rights

## INDUSTRY RISK ASSESSMENT

Modern slavery risks can emerge at every stage of the garment supply chain, from the cultivation of raw materials to their processing into textiles, and finally through to garment manufacturing. Workers throughout these layers, often hidden in the more remote parts of the supply chain, may be exposed to harsh or exploitative conditions. In severe cases, such conditions can escalate into forced labour or debt bondage.

### FINISHED GOODS MANUFACTURING

Tier 1 includes garment factories in Vietnam, China and Cambodia and footwear/accessories factories in China and Europe. We have direct contracts and stronger oversight through quality inspections, compliance audits, and visits. Nonetheless, risks persist, including unauthorised subcontracting, recruitment of migrant workers, underpayment or withholding of wages, and weak grievance mechanisms. Relationship length, business volume and leverage affect risk and our ability to influence practices.

### TEXTILE MILLS, YARN MILLS, TANNERIES, TRIM SUPPLIERS, SPINNING MILLS

These suppliers provide fabrics, yarns, dyes, tanned leather, and components (zippers, buttons, trims) to Tier 1 factories. We have direct relationships with many Tier 2 suppliers across Europe and Asia but not all. Due to this, oversight is typically weaker here than at Tier 1, and mills may employ workers under poor conditions. We map and vet these suppliers and flag those in high-risk categories or locations for further investigation.

### RAW MATERIAL PRODUCTION

These upstream tiers are hardest to trace yet often have the highest risk of severe exploitation, including forced labour and debt bondage, due to poverty, seasonal or migrant work and, in some contexts, state-imposed labour. Cotton supply chains especially, are known for modern slavery risks and we use external indicators, certifications, and industry collaboration to assist us in understanding & mitigating our exposure. Reports of child and forced labour in cotton production have been documented in countries such as Benin, Burkina Faso, China, Kazakhstan, Pakistan, Tajikistan, Turkmenistan, and Uzbekistan, leading several governments to tighten regulations to address these abuses.

### HIDDEN SUB-CONTRACTORS

Unauthorised subcontracting to smaller, unregistered workshops is a known issue in fashion supply chains and can significantly increase our risk. Factors such as rising production costs, shortages of skilled labour, and pressure for faster turnaround times have contributed to an increase in unauthorised subcontracting within the garment industry. When production is shifted to an unapproved facility, brands lose visibility over both working conditions and product quality creating a heightened risk of worker exploitation as well as potential damage to the brand's reputation. Limited insight into the deeper tiers of the supply chain where unauthorised subcontracting is most likely to occur makes monitoring for issues such as unsafe working environments, child labour, or forced labour far more challenging.

### LABOUR BROKERS AND MIGRANT LABOUR RISKS

Labour brokers in the manufacturing sector are often subcontracted to recruit and hire migrant workers, but their involvement can create significant risks to workers' rights and well-being. Although these intermediaries may operate legally in some settings, they are frequently linked to exploitative practices, including charging excessive recruitment fees, misrepresenting job conditions, and contributing to situations that can result in forced labour or human trafficking. Because labour brokers often work within a legal grey area, there is an added risk that they may use unlicensed or unauthorised subagents to mobilise workers making accountability for abuse or exploitation even more challenging. Many workers recruited through these brokers have limited access to legal support and are highly vulnerable due to their reliance on the broker for job placement, visa status, and documentation.

### AGENTS OR INTERMEDIARIES

Occasionally we source through agents or trading companies. This can obscure factory conditions and dilute accountability if agents prioritise price or delivery over labour standards. We request detailed information on production sites and include them in our risk mapping. Sourcing via agents is treated as requiring heightened oversight under the same due diligence framework used for our direct suppliers.

## OPERATIONAL RISK ASSESSMENT

Direct corporate operations occur primarily in countries with strong regulatory environments including Australia, New Zealand, USA, UK, Canada, and Europe. As such, the inherent operational risk of modern slavery within owned entities is assessed as low. However, risks are recognised in operational areas that rely on third-party casual labour or recruitment intermediaries, such as temporary staffing in fulfilment centres or the procurement of third-party services. Focused internal controls through employee contracts, Codes of Conduct, and HR oversight mitigate these risks and our efforts to internalise recruitment functions, particularly in Vietnam, reduce dependency on external labour brokers and improve candidate verification protocols.

### LOGISTICS AND SHIPPING

Third party logistics providers manage transport, warehousing and distribution, providing an essential component to the operations of global supply chains. While typically lower risk than manufacturing, this sector can involve low paid, temporary, or migrant workforces, long hours, and poor conditions, particularly in some regions and shipping contexts. Given the high volume of workers required for loading, unloading, navigating and other logistical tasks, the vast and complex supply chain is exposed to modern slavery risks. We assess whether partners have policies against forced labour and modern slavery. We include logistics in our assessment to avoid blind spots, though it is generally not our highest risk area.

### THIRD PARTY SERVICE PROVIDERS

In retail operations, we use cleaning, security, and labour hire services, which are recognised as higher risk sectors in Australia and overseas due to low wages, outsourcing and heavy use of migrant workers. Multi-layer subcontracting can further weaken accountability. We assess providers' recruitment and employment practices, including pay at or above legal minimums, working hours and freedom to leave employment, and take extra care where labour hire involves cross border movement and potential debt bondage risks.

### HOSPITALITY

Our hospitality operations rely on a diverse set of food and beverage suppliers; many connected to agricultural and seasonal workforces. The use of labour brokers or subcontractors in is treated as a critical relationship level risk and is included in our broader risk assessment and supplier engagement processes. Agricultural industries such as wine, seafood, meat, dairy, and fresh produce are vulnerable to human rights violations such as temporary recruitment, migrant labour, poor conditions, and unstable wages due to poor pay structures like pick rates. A substantial portion of our fresh produce and wine suppliers come from New Zealand and Australia. According to Walk Free, migrant workforces face risks of exploitation in the horticulture and viticulture industries under seasonal employment and experience underpayment, withholding of wages, excessive work hours, passport retention, contract substitution, and health and safety violations. Despite New Zealand and Australia having some of the strongest government responses to combating modern slavery.



## POLICIES

### OPERATIONS

#### PEOPLE AND CULTURE

Our entire workforce (and all the subsidiaries it controls), whether permanent or casual, are given an employment contract and are required to uphold our **Employee Code of Conduct**. This document highlights our position and expectations for all our staff on matters of Health and Safety, Anti-Bullying, Anti-Sexual Harassment, Grievance and Resolution, Equal Opportunities and Modern Slavery. In addition to the Code of Conduct, employees are presented with a suite of policies, some of those policies include:

- Workplace Health and Safety Policy
- Anti-Bullying, Anti-Discrimination, Anti-Harassment and Equal Opportunity Policy
- Modern Slavery Policy

Our human resource framework helps to identify any human rights breaches early on, and each team manager is required to monitor and manage any reported incidences through our Human Rights Governance Structure and Grievance channels.

#### RESPONSIBLE PURCHASING POLICY

Rodd & Gunn has developed strong and trusted partnerships with our suppliers; however, we recognise that our purchasing practices can influence human rights outcomes within our supply chain. To guide ethical decision-making, we introduced our Responsible Purchasing Policy in 2018, setting clear expectations for all team members to support fair treatment of workers and minimise unintended pressure on suppliers. The policy provides practical guidance across key business practises such as forecasting, design, price negotiation, delivery lead times, payment practices and responsible exit strategies. Ensuring our commercial activities do not create negative social or environmental impacts. Throughout FY25, we continue to review and evaluate the policy's effectiveness. Each year, our Buying and ESG teams meet to assess how our purchasing behaviours align with the policy and to identify opportunities for improvement. Our Responsible Purchasing Policy is publicly available on our website (<https://www.rodandgunn.com/au/brand-story/sustainability>).



### SUPPLY CHAIN

#### SUPPLIER CODE OF CONDUCT

Our Supplier Code of Conduct (the Code) sets out the minimum standards, expectations, and values that we require of all supplier partners. To support accessibility and understanding across our global supply chain, the Code is available in 11 languages spoken by our suppliers and workers. We work closely with our auditing partners and ground staff in Vietnam to ensure the Code is clearly displayed at supplier facilities. The Code is aligned with the Ethical Trade Initiative (ETI) Base Code and the International Labour Organization (ILO) Core Conventions and is reviewed and updated regularly to reflect evolving industry best practice. Our Supplier Code is publicly available on our website (<https://www.rodandgunn.com/au/brand-story/sustainability>).

#### MAPPED FACILITIES THAT HAVE SIGNED THE SUPPLIER CODE OF CONDUCT



During the reporting period, we increased the proportion of Tier 3 suppliers that have signed and displayed our Code of Conduct at their facilities from 0% to 14%. This progress extends the reach of our standards and ensures a greater number of workers have visibility of our expectations and access to grievance mechanisms. For the first time, we also achieved Code of Conduct compliance with 14% of our major Tier 4 raw-material providers, who have formally signed the Code. Our ongoing focus is to expand the reach of the Code beyond Tier 1 suppliers and further into the lower tiers of our supply chain, where risks of modern slavery can be more difficult to identify and address.

#### SUPPLIER POLICIES

Rodd & Gunn require suppliers to adopt a range of social, environmental, animal, chemical and material sourcing policies which are also important to the health, protection, and wellbeing of all workers and animals in the supply chain. This suite of policies is not only drive best practice within our supply chain, but to continue to hold ourselves accountable to these high standards. To access these policies in more depth please visit our website (<https://www.rodandgunn.com/au/brand-story/sustainability>). Here is a list of policies that we developed to strengthen and reinforce our Code and supplier practises:

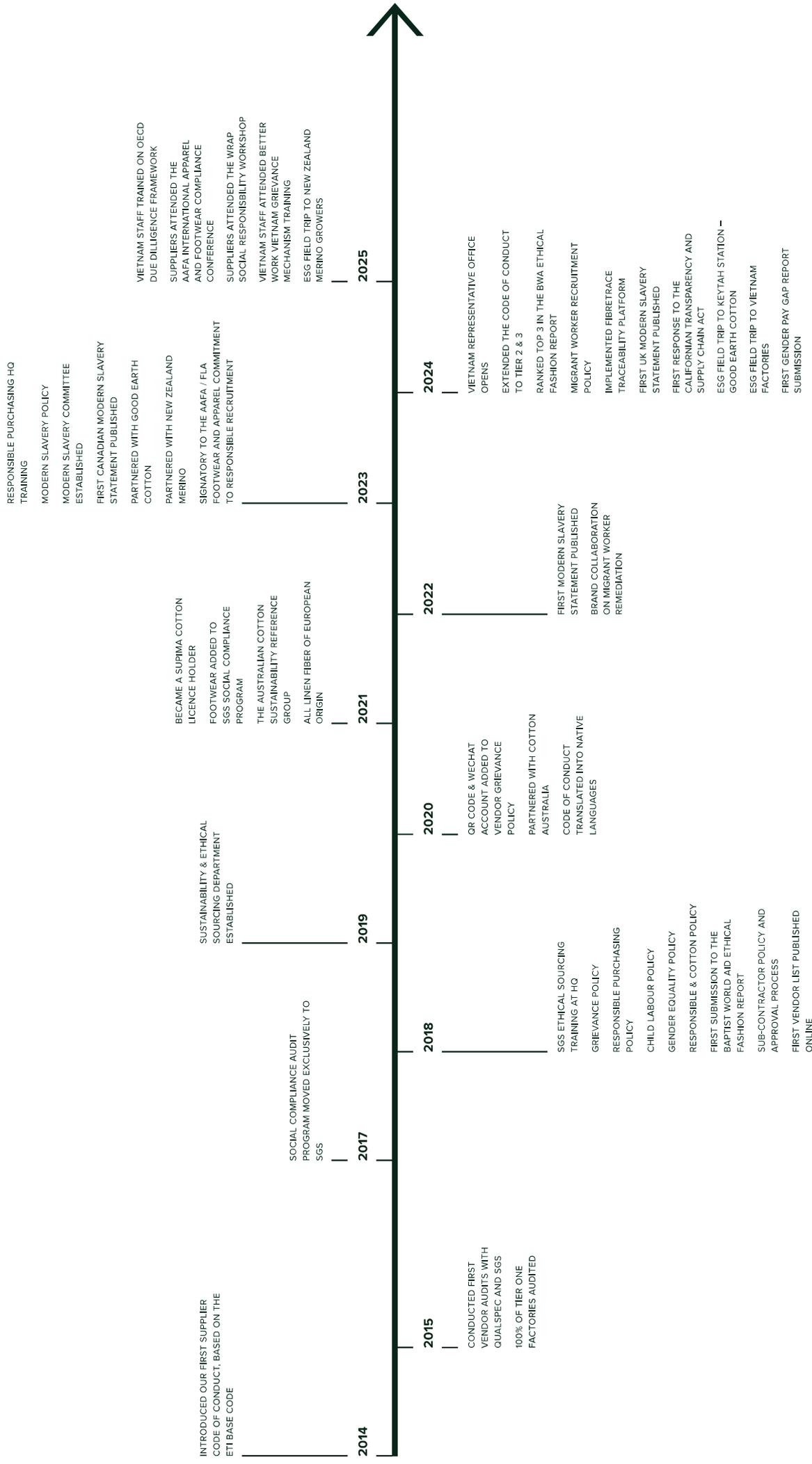
- No Child and Forced Labour Policy
- Gender Equality Policy
- Migrant Worker Recruitment Policy
- Responsible Cotton Sourcing Policy
- Worker Grievance Policy
- Sub-Contractor Policy
- Animal Welfare Policy
- Chemical Management Policy

## DUE DILIGENCE FRAMEWORK

Rodd & Gunn aligns its approach with the three pillars of the UN Guiding Principles on Business and Human Rights, protect, respect, and remedy, across all operations and supply chains. Our Board is committed to working closely with the ESG team, the Modern Slavery Committee, and our business and supply chain partners to identify, prevent, mitigate, and remedy any potential human rights violations.

The Board also accepts full responsibility for addressing modern slavery risks, including Forced Labour and Child Labour. The following section outlines key due diligence processes and actions we undertake to manage these risks within our operations and supply chain. Our Responsible Business Journey demonstrates the sustained progress we have made in this area since 2014.

### RODD & GUNN RESPONSIBLE BUSINESS JOURNEY



## OPERATIONS

We are guided by the OECD Framework for Responsible Business Conduct which helps to raise awareness of any negative impacts of business operations whilst contributing to the sustainable development of the countries we source from.

### PEOPLE AND CULTURE

We strive to build a passionate, motivated, and productive environment where our people are supported and respected. We recognise that the use of third-party recruitment providers for temporary staff at our fulfilment centres presented an increased risk, largely due to limited visibility over how and where these workers were sourced. Over the past 12 months, we have transitioned away from this model and invested in expanding our internal capabilities so that all recruitment is now managed in-house across Australia and New Zealand. This shift allows us to apply our own rigorous verification protocols, ensuring full transparency and greater protection for all candidates throughout the hiring process.

### VETTING AND ONBOARDING

At Rodd & Gunn, we are committed to ensuring that every team member is engaged through ethical, transparent, and legally compliant employment practices. All employees receive a formal employment contract and are required to comply with our operational standards, including our Code of Conduct. The Code outlines the ethical behaviours, policies and expectations that guide decision-making and conduct across the organisation. This framework reinforces our commitment to a respectful, inclusive, and safe workplace, and supports compliance with our Equal Employment Opportunity and Anti-Discrimination policies. In line with our obligations under Australian employment legislation and modern slavery expectations, all team members' right-to-work entitlements are verified through VEVO checks and other approved verification platforms prior to commencing employment. Rodd & Gunn does not engage individuals without lawful working rights.

### HO CHI MINH CITY REPRESENTATIVE OFFICE

The establishment of our Ho Chi Minh City office has further strengthened this approach, providing essential support to our growing global operations and reinforcing our commitment to responsible and accountable recruitment practices. Lengthy consultation processes in Vietnam were conducted to ensure we are creating a culture that reflects the rest of our business. Some of the employee benefits include above market pay rates, 5-day week (instead of the common 6-day week in Vietnam), a non-compulsory 13th month lunar bonus, private health insurance, and higher annual leave entitlements. Having a team who not only understand the local language but the cultural context and nuances of working and operating a business in Vietnam has been crucial to the successful implementation of this strategy.

### EMPLOYEE GRIEVANCE CHANNELS

Rodd & Gunn is committed to a fair, respectful, and professional workplace where all team members are treated with dignity and have access to clear avenues for raising concerns. We expect a workplace free from bullying, harassment, unlawful discrimination, or any behaviour that breaches our Code of Conduct. Team members are encouraged to raise concerns early, either directly with their manager or Human Resources. Where appropriate, matters may be resolved informally. If the issue involves serious misconduct, inappropriate behaviour, or potential breaches of legal or ethical standards, team members should submit the concern in writing to HR for formal review in accordance with our Corrective Resolution process. Rodd & Gunn provides confidential access to our Employee Assistance Program (EAP) to support employees and their families with personal, family, or work-related matters. Support is available at any stage during employment, or specifically a workplace concern or grievance process.

If a concern relates to a potential breach of human rights or modern slavery risk within our operations or supply chain, this must be reported immediately to HR, who will escalate it through our internal governance structure (see page 11). These matters will be taken seriously and managed in line with our ethical obligations and legislative requirements. All grievances will be managed in a confidential, fair, and timely manner. Support will be made available to all parties involved, and impartiality will be preserved throughout any investigation.

## GENDER PAY GAP REPORTING

For the second consecutive year, Rodd & Gunn has submitted its Gender Equality reporting to the Workplace Gender Equality Agency (WGEA), which requires annual disclosure of detailed workforce, remuneration and policy data. This reporting framework aims to identify, monitor and improve gender equity outcomes in Australian workplaces, strengthening transparency and accountability. In FY25, Rodd & Gunn reported an improved average total remuneration gender pay gap of 7.9%, reduced from 10% in FY24. While not linked to modern slavery compliance, WGEA reporting enhances organisational transparency and strengthens governance of employment practices. By identifying inequities and reducing vulnerabilities that may contribute to exploitation, this process indirectly supports our broader efforts to mitigate modern slavery risks.

## MAPPING OUR BUSINESS OPERATIONS

We engage with a wide range of non-trade and third-party service providers across our business. To enhance visibility of modern slavery risks within this area, our Modern Slavery Committee works closely with each business unit to retrospectively map and identify all relevant providers. Once identified, we undertake an analysis to better understand their due diligence practices and, where applicable, obtain copies of their Modern Slavery Statements, Codes of Conduct, or equivalent policies. This process strengthens our oversight and supports a more comprehensive assessment of risk across our broader operational footprint. Our review considers factors such as geographic location, workforce characteristics, service type, and the provider's existing human rights governance to determine risk exposure. Where gaps or risks are identified, we work directly with providers to understand their systems, encourage stronger governance, and support alignment with Rodd & Gunn's expectations.

## MODERN SLAVERY CONTRACT CLAUSE

Since opening its first venue in Queenstown in 2016, The Lodge Group has operated across New Zealand and Australia. All hospitality staff are recruited internally and complete the same inductions, training, and onboarding as other Rodd & Gunn employees. By investing in a skilled workforce and partnering with local premium suppliers, we maintain high operational standards while fostering transparency. Mapping this segment of our business has established a supply chain register, allowing us to monitor suppliers' ethical and sustainable practices.

## THE LODGE GROUP

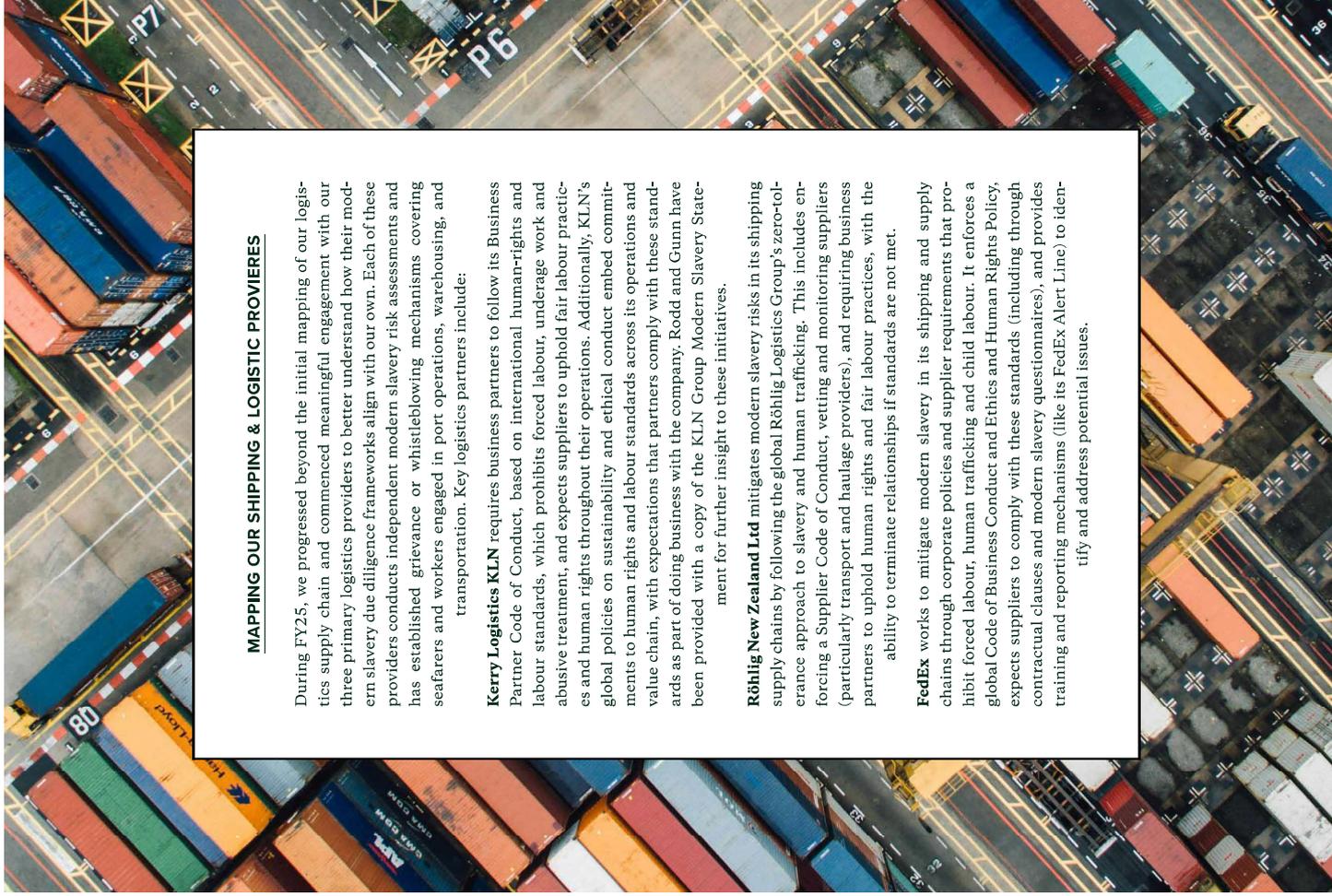
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## SHIPPING AND LOGISTICS

Rodd & Gunn partners with a range of global shipping and logistics providers to support product transportation at multiple stages of the supply chain. In FY25, we strengthened our oversight by implementing a new system to more closely capture and monitor shipping and logistics operations. This enhanced visibility allows us to better identify areas of the logistics process that are less transparent and therefore may present heightened modern slavery risks. While Rodd & Gunn does not own or operate any shipping or logistics assets and therefore has limited direct influence over recruitment and workplace practices within these operations. Maintaining direct commercial relationships with logistics providers as far back as Tier 2 provides valuable insight into where and how these services are delivered.

Our logistics team oversees the following three key phases of product transportation:

- Point A: Fabric and yarn mills (Tier 2) to finished goods manufacturers (Tier 1)
- Point B: Finished goods manufacturers to Rodd & Gunn fulfilment centres globally
- Point C: Rodd & Gunn warehouse and store network



### MAPPING OUR SHIPPING & LOGISTIC PROVIDERS

During FY25, we progressed beyond the initial mapping of our logistics supply chain and commenced meaningful engagement with our three primary logistics providers to better understand how their modern slavery due diligence frameworks align with our own. Each of these providers conducts independent modern slavery risk assessments and has established grievance or whistleblowing mechanisms covering seafarers and workers engaged in port operations, warehousing, and transportation. Key logistics partners include:

**Kerry Logistics KLN** requires business partners to follow its Business Partner Code of Conduct, based on international human-rights and labour standards, which prohibits forced labour, underage work and abusive treatment, and expects suppliers to uphold fair labour practices and human rights throughout their operations. Additionally, KLN's global policies on sustainability and ethical conduct embed commitments to human rights and labour standards across its operations and value chain, with expectations that partners comply with these standards as part of doing business with the company. Rodd and Gunn have been provided with a copy of the KLN Group Modern Slavery Statement for further insight to these initiatives.

**Röhlig New Zealand Ltd** mitigates modern slavery risks in its shipping supply chains by following the global Röhlig Logistics Group's zero-tolerance approach to slavery and human trafficking. This includes enforcing a Supplier Code of Conduct, vetting and monitoring suppliers (particularly transport and haulage providers), and requiring business partners to uphold human rights and fair labour practices, with the ability to terminate relationships if standards are not met.

**FedEx** works to mitigate modern slavery in its shipping and supply chains through corporate policies and supplier requirements that prohibit forced labour, human trafficking and child labour. It enforces a global Code of Business Conduct and Ethics and Human Rights Policy, expects suppliers to comply with these standards (including through contractual clauses and modern slavery questionnaires), and provides training and reporting mechanisms (like its FedEx Alert Line) to identify and address potential issues.

### NGO ENGAGEMENT AND DISCLOSURE REPORTING

Rodd & Gunn actively collaborates with advocacy groups, non-governmental organisations, and industry initiatives to drive positive change and continually strengthen our social and environmental performance. Disclosure reporting, both mandatory and voluntary, supports accountability by informing internal decision-making and meeting external stakeholder expectations. Key engagement and reporting activities include:

- **Baptist World Aid, Ethical Fashion Report** – Participating since 2018, this bi-annual report assesses global apparel and footwear companies on efforts to address modern slavery, worker exploitation, and environmental impact.
- **Modern Slavery Reporting** – Voluntarily initiated in 2022 under the Australian Modern Slavery Act, outlining actions to identify, manage, and remediate modern slavery risks. In FY25, Rodd & Gunn reports under a mandatory framework across Australia, the UK, and Canada.
- **California Transparency in Supply Chains Act** – First reported in FY24, this legislation requires large retailers in California to disclose efforts to prevent slavery and human trafficking in supply chains, focusing on verification, auditing, certification, internal accountability, and training.
- **Australian Cotton Sustainability Reference Group** – Established in 2021, this advisory body unites apparel brands, environmental groups, First Nations communities, governments, researchers, and growers to discuss risks, improve industry performance, and advance the Planet / People / Paddock sustainability framework.
- **Australian Gender Pay Gap Reporting** – A mandatory WGEA process requiring annual reporting of workforce, remuneration, and policy data to monitor and reduce gender pay disparities, promoting workplace equity and accountability.

### MODERN SLAVERY COMMITTEE

In 2023, we established a Modern Slavery Committee which has been an important initiative in driving a holistic business approach to modern slavery awareness and action. The committee meets annually to discuss goals & progress for each department, proposed initiatives and any cross-functional support that is required to carry out those initiatives. Throughout the year, the ESG team works directly with various business units on matters that impact on that department specifically. These conversations have elevated the awareness on modern slavery across the business and initiated a collaborative culture of engagement.



## SUPPLY CHAIN

Rodd & Gunn do not own any of our factories or mills, but we have spent many years building long-lasting relationships, and we continue to seek out partnerships that support and uphold our values. We collaborate closely with our suppliers to identify and mitigate any potential risks of forced / child labour. We conduct and regularly review our labour rights risk assessment and apply the following due diligence framework in response to those risks.

### ONBOARDING NEW SUPPLIERS

We conduct comprehensive due diligence checks on all prospective suppliers. This includes reviewing existing social-compliance audits and certifications, assessing relevant social and environmental policies, examining company profiles, and understanding how suppliers engage with their workers and wider stakeholders. These reviews are guided by the Rodd & Gunn Minimum Sourcing Requirement Checklist, which covers five key focus areas that suppliers must demonstrate their commitment to:

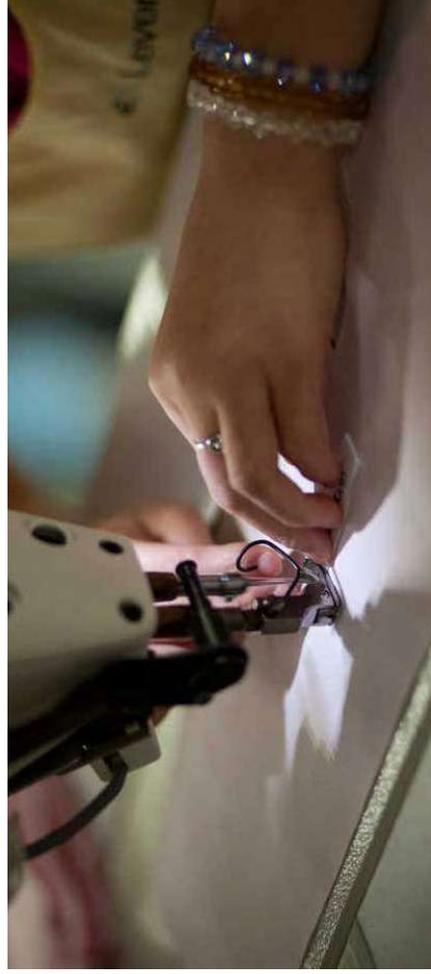
- Governance & Transparency
- Supplier Certifications & Standards
- Traceability & Raw Material Sustainability
- Packaging & Materials
- Environmental & Chemical Management

Once a supplier has been assessed and approved, they are required to review and sign our Supplier Code of Conduct and associated responsible-sourcing policies (see page 23) before any production commences. Following onboarding, our ESG team maintains regular engagement with suppliers to ensure ongoing compliance, continuous improvement, and timely updates of due-diligence information.

In addition to desktop-based assessments, Rodd & Gunn representatives from various departments will visit the new facility to build direct relationships and establish a foundation for strong, long-term partnerships. Our locally based team in our Ho Chi Minh City office play a critical role by supporting on-the-ground relationship building and providing valuable insight into the practical implementation of our Code, including the identification of any potential breaches.

### SUPPLIER MONITORING & PERFORMANCE ASSESSMENTS

In FY25, Rodd & Gunn continued its supplier monitoring program through a combination of independent third-party social compliance audits and recognised certification schemes, including WRAP, SMETA, SLCP, Better Work, BSCI, and SA8000. These assessments, along with on-site supplier visits and regular engagement, remain a key mechanism in evaluating working conditions, identifying non-compliances, and tracking the effectiveness of corrective actions across our supplier base. In FY25 the Rodd & Gunn team across various departments conducted on-site factory visits across 38% of our Tier 1 supply chain, representing 76% of our manufacturing footprint. Providing valuable oversight and supplier trust, which only enhances our overall monitoring program.



## SUPPLIER MONITORING METHODOLOGY

<b>AUDIT PRE-REQUISITE</b>	Rodd & Gunn only work with factories who demonstrate full cooperation with our audit requirements and due diligence screening process
<b>ASSESSMENT CONTENTS</b>	Checklists scan factories on local, national & international laws, in conjunction with industry Code of Conduct & some brand-specific requirements
<b>AUDIT TYPE</b>	On-site only for all new & initial audits.
<b>AUDIT FREQUENCY</b>	Varies depending on audit standard used. At a minimum, suppliers shall have a valid audit report / certification for all facilities at any point in time.
<b>AUDIT DATE</b>	Semi-unannounced with a four-week window, during which auditors arrive on any given day.
<b>AUDITORS</b>	Our preferred auditing body is SGS. All SGS auditors are fully trained & APSCA accredited, speak the local language of the regions we audit in and collectively share many years of experience.
<b>WORKER INVOLVEMENT</b>	We request that union or worker representatives are present for the opening/closing meetings and during the audit, ensuring workers' views are represented.
<b>WORKER INTERVIEWS</b>	Standard audit practice includes the interviewing of a representative sample of workers.

## SCOPE OF ASSESSMENTS

During the reporting period, 27 apparel, footwear & accessories suppliers were assessed (compared to 24 in FY24), representing facilities that were actively producing or delivering product for Rodd & Gunn. Assessments were distributed as follows:

	TYPE OF FACILITY					
	TIER 1			TIER 2		TIER 3
	APPAREL FACTORY	WASHING SUB-CONTRACTORS	FOOTWEAR FACTORY	ACCESSORIES FACTORY	FABRIC MILL	TRIM FACTORY
<b>NO. OF FACILITIES ASSESSED (FY25)</b>	17	2	-	3	4	1
<b>NO. OF FACILITIES ASSESSED (FY24)</b>	18	-	2	4	-	-

Due to the nature of supplier relationships, the proportion of Tier 1 assessments remains highest however, this year marked the first inclusion of Tier 2 and Tier 3 suppliers in our active monitoring cycle. This change demonstrates our commitment to extending oversight deeper into the supply chain where modern slavery risks are more difficult to identify and address. Whilst we will continue to aim for further increasing the number of facilities monitored, the tier 2 & 3 mills currently assessed already represent over 55% of Rodd & Gunn's fabric/yarn volume procured in this reporting period. In addition, self-assessments and third-party reports from **sub-contracted** facilities engaged in washing, embroidery or printing services for Rodd & Gunn orders were included in our monitoring scope. We recognise these harder-to-reach tiers represent opportunities to further increase our due diligence, deepen our engagement with suppliers and by doing so, raise supplier awareness to help prevent and mitigate potential modern slavery risks.

## AUDIT FINDINGS AND NON-COMPLIANCE OVERVIEW

We collaborate with each supplier on the expectations around managing and maintaining their Corrective-Action-Plan (CAP) to ensure any findings are communicated, discussed, and closed off within an agreed period. Any non-compliant findings are given a weighted rating of either MINOR, MAJOR or CRITICAL, depending on the severity and impact they have on the workers or on the environment. In FY25 across all assessed suppliers, a total of 181 non-compliances were identified, distributed across the following categories and severities:

### Top 10 Non-Compliances FY25

CATEGORY	CRITICAL	MAJOR	MINOR	TOTAL
HEALTH & SAFETY	1	3	73	77
FIRE SAFETY	-	7	3	10
WAGES & BENEFITS	-	11	10	21
SECURITY (CTPAT)	-	-	15	15
MONITORING OF COMPLIANCE	-	2	16	18
ENVIRONMENT	-	2	8	10
WORKING HOURS	-	7	7	14
WORKER INVOLVEMENT & PROTECTION	-	-	5	5
GRIEVANCE MECHANISMS	-	1	3	4
EMPLOYMENT CONTRACTS	-	1	3	4

### Tier Level Breakdown

CATEGORY	CRITICAL	MAJOR	MINOR	TOTAL
TIER 1	1	25	127	153*
TIER 2	-	7	13	20
TIER 3	-	2	6	8

\* The higher concentration of Tier 1 findings is proportionate to the distribution of assessments across the supply chain.

Although almost always minor in severity, Health & Safety remained the dominant area of non-compliance and is consistent with industry trends, while issues related to Wages and Benefits, Fire Safety, and Working Hours returned the most major findings. The Security (CTPAT) findings, while comparatively high in count, are limited in scope as this criterion is only audited under WRAP standards and therefore applies to approximately 31% of the total assessed supplier base. Critical findings are not common but treated with highest priority. All related corrections are followed up immediately with factory management and verified via on-site 3rd party assessment. The table below provides an overview with examples of how we classify non-compliances from a factory audit/assessment.

RATING	DESCRIPTION	EXAMPLES
CRITICAL	Issues which pose an immediate threat to the health & safety of factory workers and/or the environment and therefore require urgent attention <ul style="list-style-type: none"> <li>Serious human rights abuse</li> <li>Lack of business ethics</li> </ul>	<ul style="list-style-type: none"> <li>Full/Partial access deny</li> <li>Child/Forced Labour</li> <li>Inhumane treatment of workers (e.g. extreme threats or intimidation, fear of retaliation)</li> <li>Incomplete / false worker attendance records</li> </ul>
MAJOR	Any findings that are likely to have a negative impact on the medium-long term health & safety of workers, their rights or the environment <ul style="list-style-type: none"> <li>General breach of workers' welfare and/or rights</li> <li>Lack of legally required records</li> </ul>	<ul style="list-style-type: none"> <li>Lack of permits, certificates, reports</li> <li>Lack of safety equipment</li> <li>Excessive overtime hours</li> <li>Inadequate benefits and/or compensation</li> </ul>
MINOR	Issues which pose no immediate threat or risk to the health & safety of workers or the environment <p>Breach of legal requirement and/or Rodd &amp; Gunn Code of Conduct that generate relatively little impact on workers' welfare and/or basic rights</p>	<ul style="list-style-type: none"> <li>Lack of adequate and effective policy ans procedure</li> <li>Lack of communication and / or awareness training</li> </ul>

### PRE-PRODUCTION DUE DILIGENCE ASSESSMENTS

In addition to the 27 suppliers monitored in FY25, a further 15 facilities underwent pre-production due diligence checks in the reporting period as part of Rodd & Gunn's proactive risk management framework. These assessments identified 137 findings, with 72% closed within 12 months. All 15 facilities (14 apparel facilities and 1 fabric mill) are located in Vietnam, underscoring the strategic importance of this region in our sourcing network.

### MIGRANT WORKER PROTECTION

In the past year, Rodd & Gunn has strengthened its due diligence on migrant labor recruitment across our supply chain, focusing on both foreign and internal migrants who may face heightened risks during recruitment. In line with our Migrant Worker Recruitment Policy, we continue to embed the principles of the AAFA/FLA Apparel & Footwear Commitment to Responsible Recruitment, namely that no worker should pay recruitment fees, workers retain control of their personal documents, and all terms of employment are clearly communicated in a language they understand before deployment.

We have expanded our monitoring and data-collection processes which now include tracking the number of migrant workers by gender, origin country (or region) and understanding recruitment channels used. To support consistent implementation, we have developed a Migrant Worker Self-Assessment Questionnaire (SAQ) which is completed by suppliers with a foreign migrant worker force. The SAQ gathers evidence on recruitment policies, fee-verification processes, adoption of the Employer Pays Principle, pre-departure briefings, worker training, and living conditions, enabling us to assess alignment with international recruitment standards and our own policies. Through this strengthened framework, combining supplier engagement, structured data collection and recruiter oversight, we continue to advance responsible recruitment and proactively address modern slavery risks within our supply chain.

**GRIEVANCE MECHANISMS**

Ensuring that workers in our supply chain have a meaningful voice is essential to identifying potential human rights risks or breaches. In 2018, we introduced our Worker Grievance Policy, which outlines clear steps for workers to confidentially communicate concerns directly to Rodd & Gunn. Workers can lodge grievances via QR code, dedicated email address, or country-specific social media channels. All suppliers are required to display the Grievance Notice in a prominent staff area that is free from management oversight and video surveillance, such as break rooms, dormitories, or rest rooms. Compliance with this requirement is monitored through our third-party audit partners and during Rodd & Gunn factory visits. To date, we have not received any grievances. This does not indicate the absence of issues but highlights the need to continue strengthening worker awareness and trust in grievance mechanisms. An effective grievance mechanism must be more than a compliance requirement; it must actively enable and empower worker voice. As such, exploring additional tools and approaches to strengthen worker engagement and encourage utilisation of the mechanism will remain a key focus for us moving forward.

**TRANSPARENCY AND TRACEABILITY**

Traceability is essential to understanding both the strengths and vulnerabilities within our supply chain. Without clear visibility, it becomes difficult to make informed business decisions and to proactively address risks. Limited supply chain insight can expose both Rodd & Gunn and the workers within our supply chain to serious issues such as unsafe working conditions, excessive working hours, forced or child labour, inadequate environmental practices, and unnecessary waste. Through increased transparency, audit insights, and supplier risk analysis, we can direct our resources toward the factories, regions, and fibres that present a higher risk of forced or child labour. These processes enable us to identify potential issues early and put mitigation measures in place before harm occurs. We also acknowledge that the greatest exposure to modern slavery often lies within the lower tiers of the supply chain, such as farms, gins, and mills where direct oversight is more limited.

To address this, we remain committed to expanding supply chain mapping and progressing towards full traceability across all product categories. As part of this commitment, we publish our full supplier list on our website each year, providing stakeholders with key information such as factory and mill locations, services performed, workforce data, audit outcomes, and supplier certifications (<https://www.roddandgunn.com/au/brand-story/sustainability>). Our team collaborates closely with suppliers to enhance visibility into the deeper tiers of our supply network, including raw-material origins. We maintain a seasonal traceability register for every style, capturing chain-of-custody information and other relevant details. Verification of supplier disclosures is supported through the review of formal documentation and ongoing communication, including Certificates of Origin, Transaction Certificates, supplier or spinner declarations, invoices, Bills of Lading, packing lists, and bale or spinner code records.

**VERIFIED TRACEABILITY BACK TO COUNTRY OF ORIGIN BY VOLUME**

TIER 1	TIER 2	TIER 3	TIER 4
<b>100%</b> APPAREL	<b>100%</b> APPAREL	<b>97%</b> APPAREL	<b>89%</b> APPAREL
<b>100%</b> FOOTWEAR	<b>100%</b> FOOTWEAR	<b>91%</b> FOOTWEAR	<b>57%</b> FOOTWEAR
<b>100%</b> ACCESSORIES	<b>100%</b> ACCESSORIES	<b>83%</b> ACCESSORIES	<b>73%</b> ACCESSORIES
<b>TRACED &amp; VERIFIED</b>	<b>TRACED &amp; VERIFIED</b>	<b>TRACED</b>	<b>TRACED &amp; VERIFIED</b>

**SUB-CONTRACTORS**

We work proactively to identify hidden tiers within our supply chain through regular engagement with suppliers, on-site visits, audits, and by requiring all Tier 1 suppliers to disclose any outsourced production for each season's orders. While sub-contracting any part of bulk production is prohibited, we recognise that certain stages of fabric or garment manufacturing may require specialised skills or machinery that a primary facility does not possess. In these limited circumstances, suppliers must obtain prior approval before engaging any sub-contracted process. For our Tier 1 production, the only sub-contracted services we permit are specialist laundering, embroidery, and printing. Any supplier seeking approval must go through the Rodd & Gunn Sub-Contractor Approval process, which requires full disclosure of the sub-contractor's location, operational details, and all traceability information. Sub-contractors are also required to read and comply with our Supplier Code of Conduct and Supporting Policies before any work begins. Compliance is verified through third-party audits, and we further strengthen oversight by arranging a site visit from a Rodd & Gunn Vietnam team member, providing an additional layer of due diligence and assurance.

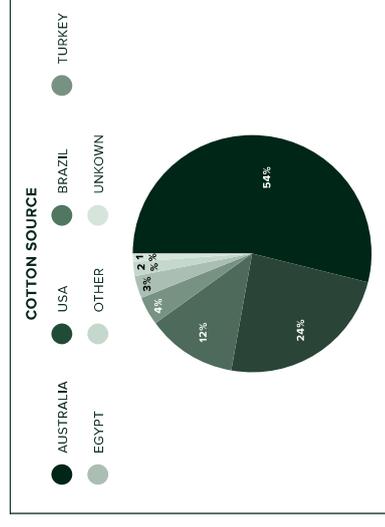
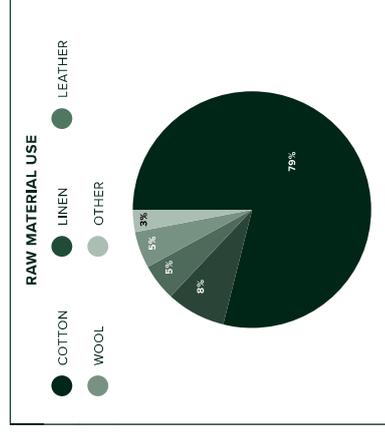
**EUROPEAN FABRIC & YARN SOURCING**

We are privileged to continue our long-standing relationships with some of the most premium textile mills in Italy and Europe. Our European Mills are our preferred fabric source, making up 33% of our apparel fabrics and yarns for FY25. Our Tier 2 suppliers are required to sign and adhere to our Supplier Code of Conduct and supporting policies. They provide us with third-party social compliance auditing reports with full disclosure. Due to the close relationship that has been established with our design office in Milan we can visit these facilities at any stage, further enhancing our visibility. Our mills fuse traditional methods with the latest technology to produce high-quality fabrics, in part exclusively for us. Many of our mills celebrate a long history in the textile industry, supporting local townships, stringent environmental regulations and continuing to provide opportunities & development for local communities and future generations.

**RAW MATERIALS SOURCING**

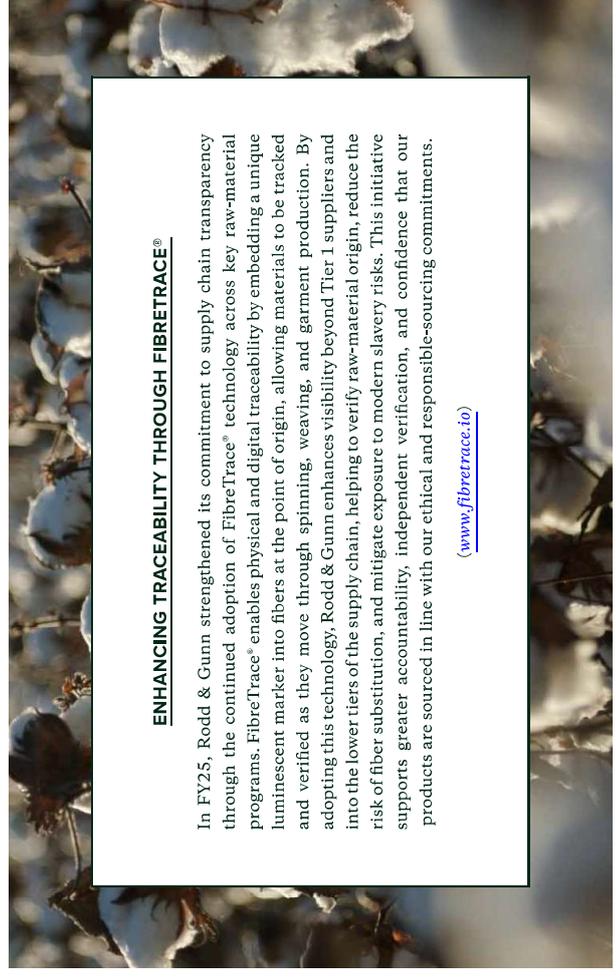
Natural fibres have long been central to our sourcing strategy, not only for their premium performance, comfort, and design qualities, but also for their environmental benefits. Today, natural fibres account for 97% by product volume of the raw materials we use, with cotton representing 79% of our product range. While cotton remains a core component of our collections, we recognise the human rights risks associated with its production.

In 2018, we introduced our Responsible Cotton Sourcing Policy, which targets regions identified as high-risk for human rights violations and outlines our expectations for verifying the chain of custody of cotton products. This commitment became even more relevant following the introduction of the Uyghur Forced Labor Prevention Act (UFLPA) in 2021, which prohibits the importation of goods linked to forced labour in the Xinjiang Uyghur Autonomous Region (XUAR) of China. Such legislative frameworks reinforce the importance of robust raw-material verification and underscore why origin transparency is essential to reducing forced-labour risk.



We collaborate with a range of premium raw-material providers and industry organisations to implement farm-to-floor traceability programs that confirm the origin of the fibres we use. Achieving full traceability to the farm level can be challenging, particularly for commodity-traded fibres, where seasonal shifts in climate, yield, quality, and market dynamics influence where and how raw materials are sourced. Despite these complexities, our mills and direct partners have enabled us to trace 89% of our raw materials back to their Country of Origin, and in some programs directly to individual farms. We have established strong relationships with raw-material providers and organisations working at the farm level to improve environmental and social practices, enhance transparency, and provide verified traceability. These partnerships are essential in reducing our exposure to modern slavery risks and ensuring greater accountability across the supply chain. We have established partnerships with the following premium raw-material providers:

- **Good Earth Cotton** - A modern regenerative farming program producing climate-positive, fully traceable Australian cotton. All garments made with Good Earth Cotton are verified through FibreTrace® technology, ensuring both physical and digital traceability. Good Earth Cotton represents 33% of the cotton used across our range.
- **Cotton Australia** - The peak body for Australia's cotton-growing industry. Through Cotton Australia's "Cotton to Market" engagement program, the origin of Australian cotton is verified from merchant through to garment manufacture. Since the partnership began in 2019, traceable Australian cotton has grown from 0% to 54% of our total cotton buy for FY25, making it our largest cotton-sourcing region.
- **Cotton USA** - Since 2022, we have partnered with Cotton USA to verify the origin of U.S.-grown cotton throughout our supply chain. In FY25, U.S. cotton represents 24% of our total cotton buy (down from 33% the previous year due to the expansion of the Australian Good Earth Cotton program). The U.S. remains our second-largest cotton-sourcing region.
- **The New Zealand Merino Company** - Through our partnership with NZM, established in 2023, we have forward-sourced New Zealand merino wool via the ZQRX regenerative agriculture program. Recognised globally for setting leading standards in fibre quality, animal welfare, environmental stewardship, and social responsibility, ZQRX accounts for 25% of our wool buy for FY25.
- **European Flax** - 97% of our linen is sourced from premium European Flax growers in France, Belgium, and the Netherlands. European Flax supports the local European agricultural community, promotes a highly skilled and qualified workforce, compliant with the International Labour Organisation and traceable to small European strip of land that stretches from Caen to Amsterdam and France.



**ENHANCING TRACEABILITY THROUGH FIBRETRACE®**

In FY25, Rodd & Gunn strengthened its commitment to supply chain transparency through the continued adoption of FibreTrace® technology across key raw-material programs. FibreTrace® enables physical and digital traceability by embedding a unique luminescent marker into fibers at the point of origin, allowing materials to be tracked and verified as they move through spinning, weaving, and garment production. By adopting this technology, Rodd & Gunn enhances visibility beyond Tier 1 suppliers and into the lower tiers of the supply chain, helping to verify raw-material origin, reduce the risk of fiber substitution, and mitigate exposure to modern slavery risks. This initiative supports greater accountability, independent verification, and confidence that our products are sourced in line with our ethical and responsible-sourcing commitments.

([www.fibretrace.io](http://www.fibretrace.io))

**CERTIFICATIONS**

Certifications have emerged as a powerful tool to help guide the brand and our supply chain toward environmentally and socially responsible practices. The role certifications have on our responsible sourcing is pivotal, serving as the catalysts for positive change and the bases for sustainability claims. They set benchmarks, foster transparency, ensure quality and safety indicators are met, help us meet regulation, protect workers, and empower our consumers to make informed choices aligned with their values. Rodd & Gunn strongly endorse and encourage our suppliers to adopt a preferred range of certifications. These standards cover various aspects, including material sourcing, production processes, labour practices, environmental management, and overall ethical conduct. For FY25, 91% of our apparel range was sourced to one or more of the below certifications and standards vs 73% in FY24:

SOCIAL	ENVIRONMENTAL	MATERIAL	ANIMAL WELFARE
SMETA	OEKO-TEX STANDARD 100	GOOD EARTH COTTON	RESPONSIBLE WOOL STANDARD (RWS)
SA8000	OEKO-TEX STEP / MADE IN GREEN	MYBMP AUSTRALIAN COTTON	RESPONSIBLE DOWN STANDARD (RDS)
WRAP (Gold / Premium)	BLUESIGN	EUROPEAN FLAX	RESPONSIBLE ALPACA STANDARD (RAS)
SLCP	ZDHC	MASTER OF LINEN	GOOD CASHMERE STANDARD (GCS)
BETTER WORK VIETNAM	ISO 14001 / 50001	ZQ MERINO / ZORX	
SGS	LEATHER WORKING GROUP (LWG)	GLOBAL ORGANIC TEXTILE STANDARD (GOTS)	
BSCI	FOREST STEWARDSHIP COUNCIL (FSC)	ORGANIC CONTENT STANDARD (OCS)	
		GLOBAL RECYCLE STANDARD (GRS)	
		RECYCLED CONTENT STANDARD (RCS)	



## REMEDATION

Remediation can take on many different forms, and we collaborate closely with our suppliers and third-party auditors to help remediate any non-compliances or breaches from our Code of Conduct when issues occur.

### CORRECTIVE ACTION PLAN (CAP)

Once audits have been completed, a CAP is developed for the factory based on any non-compliances found during an audit. These non-compliances are rated according to their severity (minor / major / critical) and root causes are defined. For each CAP non-compliance a responsible person/department is assigned and due dates for completion are agreed upon. Factories are required to conduct a root cause analysis for each non-compliance to ensure that corrective actions address the underlying issues and lead to effective, long-term improvements. We engage directly with all factories to monitor progress on implementing agreed corrections and system changes. All non-compliances are tracked year on year, enabling us to identify recurring themes or areas where progress is limited. This data-driven approach enhances our understanding of emerging risks, negative trends, and potential systemic or organisational issues. We use these insights to deepen our engagement with factory management, mitigate risks, and support the development of stronger and more sustainable practices over time. Additionally, we track factories' closure rates to assess their capacity to resolve issues promptly and to identify cases where residual risks may require further support or investigation.

Corrective action and closure performance experienced a moderate decline compared to FY24. This decline is partially attributed to the expansion of the assessment program to include an additional 15 suppliers under our pre-production due diligence framework, limiting resource capacity for follow-up verification. These closure rates will be updated once pending verifications reach the 12-month mark and reflected in our next statement.

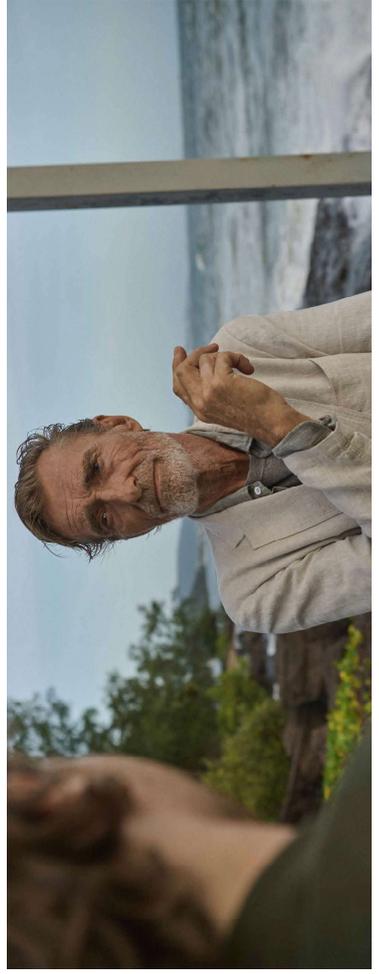
CAP CLOSED & VERIFIED (WITHIN 12 MONTHS)	MINOR		MAJOR		CRITICAL		OVERALL	
	FY25	FY24	FY25	FY24	FY25	FY24	FY25	FY24
	58%	76%	38%	78%	100%	100%	54%	75%

We believe this direct communication enhances our relationships with suppliers and builds our understanding of the root causes, as well as potential systemic challenges. For any non-compliances that cannot be accurately verified by our team internally, we request a follow-up audit to ensure these non-compliances have been officially assessed.

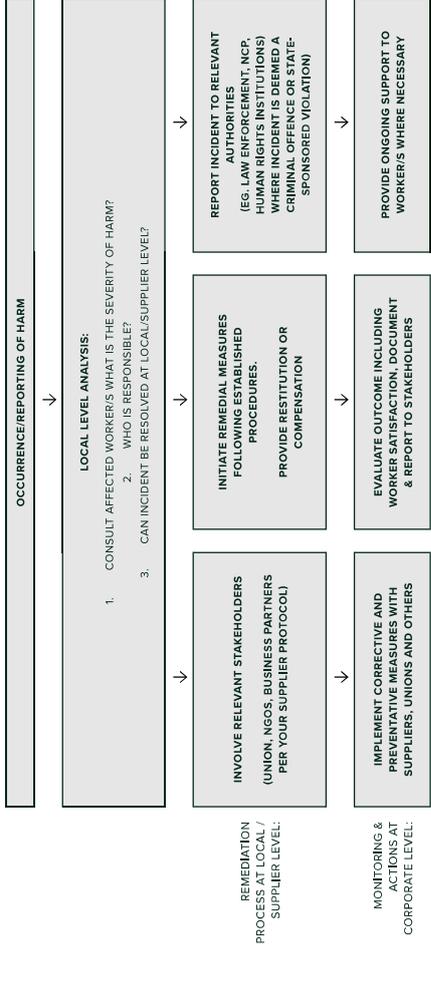
### REMEDATION PROCESS

In the past we have collaborated with other brands, industry specialists, NGOs, and civil society to remediate on a large scale. This type of engagement can provide further insight into a wider range of issues and causes and allow for more effective remediation and collaboration of experience and resources. If a case of modern slavery or forced labour is identified through our supply chain, either through our grievance mechanism, third party audit company or other external avenues, we adopt the Ethical Trading Initiative (ETI).

Access to Remedy: [https://www.ethicaltrade.org/sites/default/files/shared\\_resources/Access%20to%20remedy\\_0.pdf](https://www.ethicaltrade.org/sites/default/files/shared_resources/Access%20to%20remedy_0.pdf)



## REMEDATION PROCESS MAP



### REMEDATING LOSS OF INCOME

We have not been able to identify any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains. We do not cancel purchase orders and in no cases have force majeure clauses been enforced. We continue to be guided by industry-led organisations and their approach to prevention and remediation of human rights abuses such as:

- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- Ethical Trade Initiative (ETI) > Access to Remedy Guidance
- International Labour Organisation (ILO)

Rodd & Gunn believe it is a right for every person to earn a fair wage, which is most often higher than the government set minimum wage in many countries. We understand that low wages are often a key indicator of forced labour abuses, so we consistently monitor and record minimum, actual wage received and living wage data from our production countries, to compare with wage records supplied to us through our third-party auditors. We ensure that the suppliers we choose to work with uphold our values, to ensure all workers have enough income to live safely and freely, with some discretionary income, and are working towards paying a living wage for all workers.

### SUPPLIER EXIT STRATEGY

We aim to support, educate, and collaborate with our suppliers to help drive sustained business, continuous improvement, and positive change. In the rare circumstance where we decide to exit a supplier, we ensure the supplier is provided with sufficient notice and a long-term phase-out plan is determined with a clear period that is in line with their production and worker schedule. We take full responsibility and pay in full for all finished goods, this also includes any raw materials and trims purchased by the suppliers for future production. We ensure that suppliers, factories, and mills are not left out of pocket. We understand that terminating relationships with suppliers can impose further distress for workers and will only resort to this if the attempts to remediate have been unsuccessful. Exiting a supplier is considered when one or more of the following circumstances occur:

- A decline in workmanship resulting in elevated customer return rates.
- Inability to meet a design/spec requirement.
- Rodd & Gunn is unable to meet a supplier requirement or minimum quantity.
- No longer commercially viable such as changes in trade regulations and logistical challenges.
- An unwillingness to resolve critical non-compliances or provide the transparency expectations laid out at the beginning of the relationship.
- A change in supplier practice where the human rights impacts are too great.

## TRAINING AND AWARENESS

Building awareness and capability across our team is critical to ensuring we can identify, respond to, and prevent potential instances of modern slavery within our operations and supply chain. Throughout the reporting period, key business functions participated in a range of industry events, workshops, and training initiatives designed to strengthen understanding of human rights risks and responsible business conduct. These activities support informed decision-making and help embed responsible sourcing practices across the business.

Examples of training and knowledge-building activities undertaken during the reporting period include:

- Effective Supply Chain Grievance Mechanisms Seminar, facilitated by Baptist World Aid in partnership with the UN Global Compact Network and the NSW Anti-Slavery Commissioner's Office.
- Five Principles of Responsible Purchasing e-learning module delivered by Better Buying.
- OECD Due Diligence for Responsible Business Conduct online course for the garment and footwear sector.
- Participation in the Australian Cotton Sustainability Reference Group, contributing to industry-wide sustainability leadership across the pillars of Planet, People, and Paddock.
- Carbon Masterclass led by Good Earth Cotton and Keytah Station in partnership with Downforce Technologies.
- Grievance Mechanism Training delivered by Better Work Vietnam, supported by factory-level assessments and capacity-building programs that drive continuous improvement.
- Deployment of the Better Buying Purchasing Practices Index (BBPI), an anonymous supplier survey that gathers feedback on purchasing practices across all tiers of the supply chain and identifies areas for targeted improvement.
- Attendance at the Good for Business Fashion Sustainable Summit, facilitated by The Growth Activists, focused on driving tangible impact toward a more equitable and regenerative fashion industry and embedding sustainability into business strategy and implementation.

### SUPPLIER TRAINING

As Rodd & Gunn continues to expand across the Northern Hemisphere, regulatory expectations have increased accordingly. Better Work Vietnam is a widely adopted supplier monitoring program within our supply chain, with more than 30% of our suppliers participating in its compliance and training framework. Better Work Vietnam combines independent compliance assessments with ongoing advisory services and structured training to support factories in strengthening labour standards, workplace systems, and grievance mechanisms. This includes participation in the Factory Assessment and Capacity-Building Training (FACT) program, which provides targeted training to factory management and worker representatives on labour law compliance, worker-management dialogue, effective grievance mechanisms, and remediation of non-compliance. The FACT program has only been adopted in 1 of our factories, so encouraging this to be adopted more broadly will be a focus going forward. This integrated approach supports our modern slavery objectives by building supplier capability, increasing awareness of labour rights, and reducing the risk of exploitation within our supply chain.

To further support our supply chain partners and strengthen shared capability, Rodd & Gunn funded training for all Tier 1 suppliers in Vietnam and Cambodia to attend a series of social-compliance conferences hosted by the American Apparel and Footwear Association (AAFA) in partnership with Worldwide Responsible Accredited Production (WRAP). These events provided practical guidance on emerging regulatory requirements, human rights due diligence, responsible purchasing and sourcing practices, and effective remediation strategies.

The training sessions attended included:

- AAFA 2024 International Apparel & Footwear Compliance Conference
- AAFA & WRAP 2024 Hanoi Social Responsibility Workshop
- AAFA & WRAP 2024 Cambodia Social Responsibility Workshop

We received highly positive feedback from participating suppliers and are pleased to report that 90% of our Vietnam and Cambodia Tier 1 supply chain attended at least one of these sessions. AAFA has indicated that this conference series will be held in Vietnam every two years, and we intend to continue investing in this initiative to support ongoing capability building and improved social-compliance outcomes across our supply chain.



## EFFECTIVENESS INDEX

Our ESG Team together with The Board, Senior Management and the members of the Modern Slavery Committee continuously monitor our risks, implement action, and identify areas for further resources and interrogation. We use a number of tools, objectives and measurable actions to access our effectiveness, each measured against the previous year to ensure continuous progress and review. Here we have used a traffic light system to mark the stage of implementation each objective is at.

OBJECTIVES	EFFECTIVENESS INDEX	FY25 STATUS
MODERN SLAVERY COMMITTEE	<ul style="list-style-type: none"> <li>Cross-functional engagement, frequency of meetings</li> <li>Number of cross-functional departments represented on the Modern Slavery Committee</li> <li>Percentage of operational suppliers mapped and reviewed for Modern Slavery risk</li> </ul>	IN PROGRESS
INTERNAL GRIEVANCE MECHANISMS	<ul style="list-style-type: none"> <li>Implementation of confidential Whistle Blower Policy</li> <li>Number of internal grievances raised relating to human rights or labour practices</li> <li>Completion of grievance mechanism reviews or enhancements</li> </ul>	PLANNING PHASE
POLICIES & CONTRACTS	<ul style="list-style-type: none"> <li>Number of new or renewed contracts issued with modern slavery clauses</li> <li>Number of policies reviewed or updated during the reporting period</li> </ul>	IN PROGRESS
RISK ASSESSMENTS	<ul style="list-style-type: none"> <li>Completion of annual operational modern slavery risk assessments</li> <li>Number of third-party service providers assessed for modern slavery risk</li> <li>Integration of modern slavery risk considerations into procurement and onboarding processes</li> </ul>	IN PROGRESS
NGO ENGAGEMENT & REPORTING	<ul style="list-style-type: none"> <li>Participation in external benchmarking or disclosure initiatives</li> <li>Year-on-year improvement or maintained performance in external assessments</li> <li>Engagement with industry or civil society initiatives addressing modern slavery</li> </ul>	IMPLEMENTED
TRAINING & AWARENESS	<ul style="list-style-type: none"> <li>Number or percentage of relevant staff completing modern slavery training</li> <li>Completion of OECD Due Diligence gap analysis or equivalent internal review</li> <li>Induction training of modern slavery related policies</li> </ul>	IN PROGRESS
OBJECTIVES	EFFECTIVENESS INDEX	FY25 STATUS
TRANSPARENCY & TRACEABILITY	<ul style="list-style-type: none"> <li>Public vendor list</li> <li>Percentage of Tier 1-4 suppliers mapped and verified, including sub-contractors</li> <li>Percentage of raw materials traced to Country of Origin</li> <li>Number of on-site factory, mill or farm visits conducted by Rodd &amp; Gunn teams</li> </ul>	IN PROGRESS
RESPONSIBLE MATERIAL SOURCING	<ul style="list-style-type: none"> <li>Percentage of cotton traced through verified farm-to-floor programs</li> <li>Percentage of raw materials aligned with recognised sustainability or traceability standards</li> <li>Percentage of raw materials aligned with recognised sustainability or traceability standards</li> </ul>	IMPLEMENTED
CODE OF CONDUCT & SUPPLIER POLICIES	<ul style="list-style-type: none"> <li>Percentage of Tier 1 suppliers that have signed the Supplier Code of Conduct</li> <li>Increase in Tier 2, Tier 3 and Tier 4 suppliers formally adopting the Code</li> <li>Number of supplier policies communicated and implemented across the supply chain</li> </ul>	IMPLEMENTED
RISK ASSESSMENTS & SUPPLIER MONITORING	<ul style="list-style-type: none"> <li>Number of suppliers assessed through third-party audits or certifications</li> <li>Percentage of audit findings closed within agreed timeframes</li> <li>Identification of recurring risk themes and targeted mitigation actions</li> </ul>	IN PROGRESS
TRAINING & AWARENESS	<ul style="list-style-type: none"> <li>Percentage of Tier 1 suppliers participating in social-compliance training</li> <li>Supplier attendance rates at AAFA, WRAP or Better Work training programs</li> <li>Feedback or engagement outcomes from supplier training initiatives</li> <li>Supplier-facing training sessions supported or funded by Rodd &amp; Gunn</li> </ul>	PLANNING PHASE
GRIEVANCE MECHANISM	<ul style="list-style-type: none"> <li>Number of worker grievances raised through supply chain mechanisms</li> <li>Verification of grievance mechanism visibility during audits and site visits</li> <li>Ongoing evaluation of grievance mechanism accessibility and worker engagement</li> </ul>	PLANNING PHASE

## CLOSING SUMMARY

Rodd & Gunn recognizes that addressing modern slavery is an ongoing responsibility that requires vigilance, transparency, and collaboration. While we continued to strengthen our governance, due diligence, and supply chain oversight during FY25, we acknowledge that modern slavery risks remain, particularly within complex, global supply chains where visibility can be limited. This statement reflects our commitment to identifying and responding to those risks in a proportionate and responsible manner, and to continuously improving the effectiveness of our actions in line with international best practice and evolving regulatory expectations.

To support continuous improvement, Rodd & Gunn has identified the following priorities for the year ahead:

- Enhancing effectiveness measurement by refining our effectiveness index and improving year-on-year tracking of key modern slavery risk indicators across our operations and supply chains.
- Deepening supply chain oversight by expanding supplier monitoring and traceability initiatives into lower-tier suppliers, particularly in higher-risk regions and raw-material supply chains.
- Strengthening worker voice by reviewing and enhancing grievance mechanisms, increasing worker awareness, and exploring additional tools to support safe and meaningful engagement.
- Centralising procurement in Vietnam for all non-apparel goods to improve supply chain visibility and alignment with acceptable operating standards.
- Building internal and supplier capability through targeted modern slavery and responsible-purchasing training for relevant teams and key suppliers.
- Improving risk-based engagement by tailoring supplier monitoring and remediation approaches to country-specific and sector-specific risk profiles.
- Maintaining transparency and accountability through continued public reporting, engagement with non-government organisations, and alignment with emerging guidance from the Australian Anti-Slavery Commissioner.
- Conducting annual corporate self-assessments using the OECD Due Diligence Gap Analysis and the Walk Free Modern Slavery Benchmarking Tool.
- Supporting consistent recruitment and identity verification processes across global markets through a centralised onboarding solution provider, enhancing transparency and strengthening end-to-end employment practices.
- Expanding farm-to-floor programmes across our product range through partnerships with leaders in raw-material and textile innovation.
- Continuing to extend the implementation of our Supplier Code of Conduct across lower tiers of the supply chain.

Rodd & Gunn remains committed to staying informed of emerging risks, applying a metric-based approach to assess and benchmark effectiveness, and transparently communicating our progress in FY25 and beyond.

# GLOSSARY OF TERMS

## The American Apparel & Footwear Association (AAFA)

A national trade association representing apparel, footwear and other sewn products companies, and their suppliers, which compete in the global market.

## Anti-Slavery International

Founded in 1839 the oldest international human rights organisation in the world who work to eliminate all forms of slavery and slavery like practices throughout the world.

## Artisan Production

An establishment or business where an artist, artisan, or crafts person teaches, makes, or fabricates crafts or high-quality products by hand or using traditional methods, with minimal automation and in small batches.

## Baptist World Aid (BWA)

A Christian charity organisation based in Australia, helping to reduce poverty in communities around the world.

## BSCI

Business Social Compliance Initiative refers to a leading supply chain management system by Amfori that helps companies monitor and improve ethical practices, labour rights, and environmental standards in factories worldwide.

## Carbon Disclosure Project (CDP)

A not-for-profit charity that runs the global disclosure system for investors, companies, cities, states, and regions to manage their environmental impacts. The world's economy looks to CDP as the gold standard of environmental reporting with the richest and most comprehensive dataset on corporate and city action.

## Chain of Custody

In the legal context, is the chronological documentation or paper trail that records the sequence of custody, control, transfer, analysis, and disposition of materials, including physical or electronic evidence.

## Code of Conduct

A statement that describes a minimum set of behaviours, rules, responsibilities, and practices which an organisation expects of its suppliers and staff to uphold. It may extend to the supply chain and may include commitments on how the organisation will work with its suppliers to build trust and ensure compliance.

## Due Diligence

Refers to an ongoing management process to identify, prevent, mitigate, and account for how an entity addresses actual and potential adverse human rights impacts in their operations and supply chains, including modern slavery.

## Ethical Fashion

An umbrella term describing the efforts within the fashion industry or a brand to reduce its environmental impacts, provide protection for garment workers, and uphold animal welfare.

## Ethical Sourcing

Products and services from each point of a business's supply chain are obtained in an ethical way, which includes upholding rights, decent working conditions, health and safety, good business ethics and more.

## Labour Rights Index

A de jure index that measures major aspects of employment regulation affecting a worker during the employment life cycle in 135 countries.

## Migrant Worker

A person who moves away from his or her place of usual residence, within a country (internal) or across an international border (Foreign), temporarily or permanently, and for a variety of reasons.

## Modern Slavery

Situations of exploitation in which a person cannot refuse or leave because of threats, violence, coercion, deception, or abuse of power. Throughout this statement the term "Modern Slavery" has been used as an umbrella term that is referring to all forms of modern slavery such as forced labour, child labour, human trafficking, and bonded labour.

## Multistakeholder Initiatives (MSI)

MSI's are frameworks for engagement between businesses, civil society and other stakeholders such as governments. They seek to address issues of mutual concern, including human rights and sustainability.

## NGO

A non-profit organization that operates independently of any government, typically one whose purpose is to address a social, environmental, or political issue.

## The Organisation for Economic Co-operation and Development (OECD)

An intergovernmental organisation with 38 member countries with market-based economies collaborate to develop policy standards to stimulate sustainable economic growth and world trade.

## SAS8000

A certification in the fashion industry identifies factories and brands that meet global standards for ethical treatment of workers, covering child/forced labor, health/safety, fair pay, working hours, and non-discrimination, demonstrating a commitment to social responsibility through a rigorous, third-party verified system.

## SLCP

The Social and Labor Convergence Program (SLCP) is a non-profit, multi-stakeholder initiative in the apparel and footwear industry that provides a common framework for assessing social and labour conditions in global supply chains.

## SMETA

Sedex Members Ethical Trade Audit is a widely used ethical audit methodology in the fashion industry (and beyond) to check factories' labour, health & safety, environment, and business ethics.

## Subagent

An individual or entity appointed by a primary agent to perform specific tasks or duties on their behalf. The subagent works under the authority or instructions of the main agent but does not have a direct relationship with the principal (the person or party for whom the primary agent is acting).

## Supplier Tiers

Supply chains can be broken down into a system of "Tiers" based on closeness to your business or final product. Tier 1 suppliers are the direct garment manufacturers for the final product. Tier 2 suppliers provide all the input materials for production. Tier 3 suppliers are the subcontractors to you. Tier 2 and tend to be spinning mills. Tier 4 suppliers are the providers and traders of the raw materials.

## Trafficking in Persons Report (TIP)

An annual report issued by the U.S. State Department's Office to Monitor and Combat Trafficking in Persons. It ranks governments based on their perceived efforts to acknowledge and combat human trafficking.

## Traceability

Supply chain traceability is the process of tracking every commercial transaction in the end-to-end supply chain to account for the time and place where every step occurred in the supply chain of a unit, batch, or lot of finished good.

## Transparency

Supply chain transparency is the process of disclosing suppliers to private customers and other stakeholders.

## Transparency International (TI)

### Corruption Perceptions Index (CPI)

Focuses on public sector corruption in countries, but their CPI data is crucial for understanding the corrupt environments where fashion supply chains operate; instead, the Fashion Revolution organization creates the Fashion Transparency Index (FTI), ranking 250 major brands on their supply chain disclosure for human rights and environmental practices, revealing significant opacity and exploitation often linked to corruption risks.

## United Nations Guiding Principles on Business and Human Rights

An instrument consisting of 31 principles implementing the United Nations' "Protect, Respect and Remedy" framework on the issue of human rights and transnational corporations and other business enterprises.

## Voluntary Reporting

The reporting person or entity, without any legal or administrative requirement to do so, submits a voluntary report because they chose to do so and not because they were forced.

## ZORX

The ZORX certification is a regenerative agriculture platform and index for ethical wool, developed by the New Zealand Merino Company (NZM). It is not a traditional pass/fail certification, but rather a framework for continuous improvement that goes beyond mere sustainability to actively restore and improve the environment, animal welfare, and social impacts of wool production.

## WRAP

Manufacturing facilities (factories) in the apparel, footwear, and sewn products sectors that have been certified by Worldwise Responsible Accredited Production (WRAP), an independent, non-profit organization promoting ethical, safe, and lawful manufacturing





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