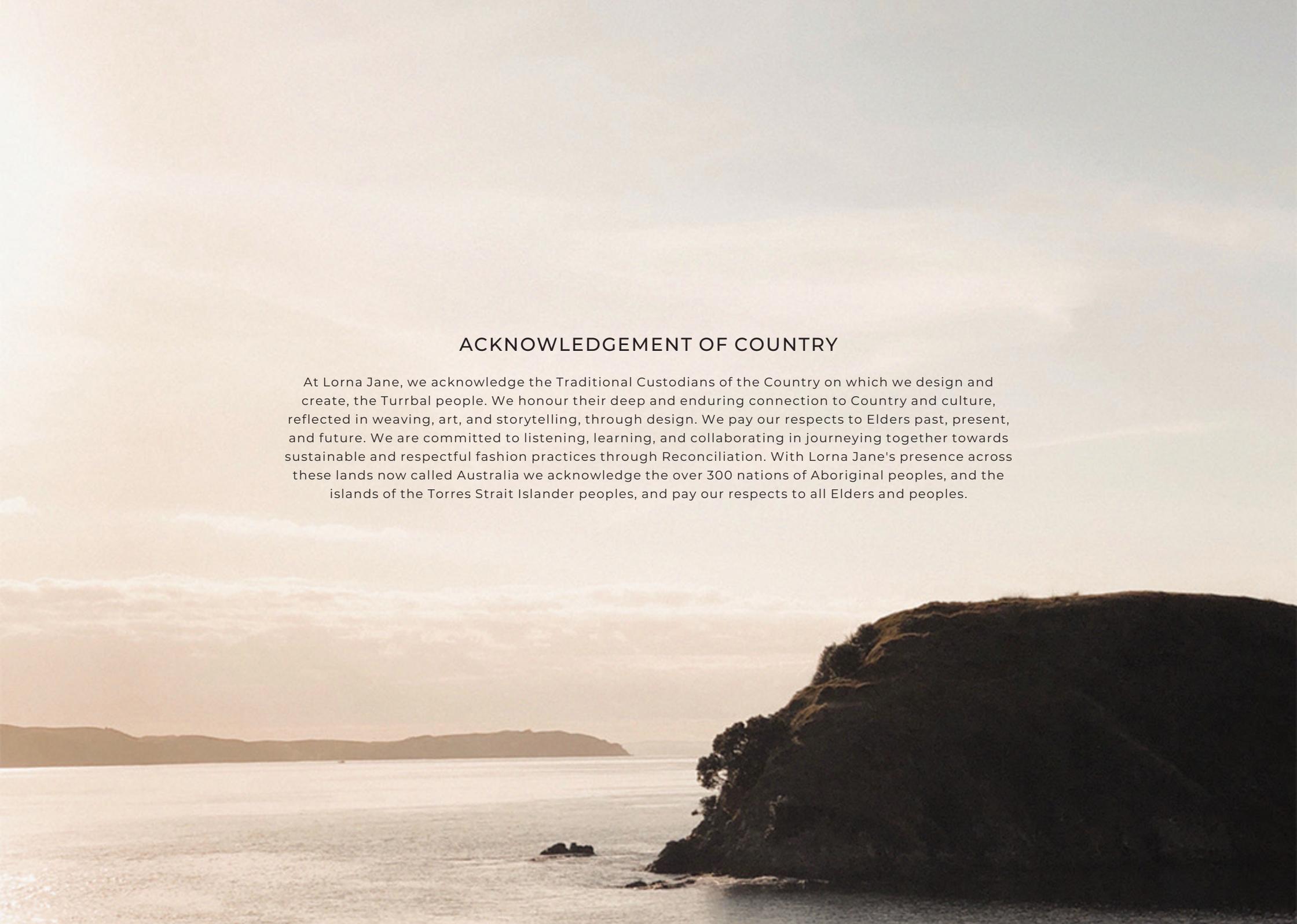




# Modern Slavery Statement FY25

LORNA JANE PTY LTD | ABN 91 065 384 616  
Reporting period: 1 July 2024 – 30 June 2025



## ACKNOWLEDGEMENT OF COUNTRY

At Lorna Jane, we acknowledge the Traditional Custodians of the Country on which we design and create, the Turrbal people. We honour their deep and enduring connection to Country and culture, reflected in weaving, art, and storytelling, through design. We pay our respects to Elders past, present, and future. We are committed to listening, learning, and collaborating in journeying together towards sustainable and respectful fashion practices through Reconciliation. With Lorna Jane's presence across these lands now called Australia we acknowledge the over 300 nations of Aboriginal peoples, and the islands of the Torres Strait Islander peoples, and pay our respects to all Elders and peoples.



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A photograph of a tropical scene. In the foreground, a thick, dark tree trunk and several palm fronds are visible, creating a natural frame. The background shows a clear, turquoise body of water under bright, sunny conditions. The text "Introduction & Executive Note" is centered in the middle of the image in a white, serif font.

Introduction & Executive Note

This Modern Slavery Statement was approved by the Executive Management Team and the owners of Lorna Jane Pty Ltd. in compliance with the Modern Slavery Act 2018 (Cth), the contents of this statement have been reviewed and verified by an authorised representative to ensure accuracy.

This statement is signed by Bill Clarkson, 11th Dec, 2025

Lorna Jane is committed to eliminating modern slavery in all its forms and embedding ethical, responsible practices across every level of our operations and supply chains. In FY25, we advanced this commitment through targeted action—achieving 100% traceability of our Tier 1 suppliers and fabric mills, expanding oversight to non-trade procurement, and taking a leadership role in industry collaboration on living wages.

By prioritising the rights, well-being, and voices of workers, we are fostering a culture of transparency, accountability, and shared responsibility. Through strengthened supplier engagement, risk-based due diligence, and measurable governance, we continue to build a supply chain that reflects our values and respects the dignity of every person contributing to our products.

### The Reporting Entity

Lorna Jane Pty Ltd (ABN 91 065 384 616), referred to as “Lorna Jane,” “we,” or “our,” is a designated reporting entity under the Modern Slavery Act 2018 (Cth) (the ‘Act’). Lorna Jane owns and controls fourteen related entities, detailed on page 12, with the owners of Lorna Jane Pty Ltd serving as the higher entity for the purposes of the Act. This is our fifth statement under the Act, detailing Lorna Jane’s approach to identifying, assessing, and addressing modern slavery risks during the 2024-2025 Australian financial year.



Bill Clarkson, Director

## Key Achievements in FY25

In FY25, Lorna Jane continued to build on our responsible business practices, embedding ethical labour standards, transparency, and a focus on environmental sustainability across all key aspects of our operations and supply chains. Through targeted initiatives and strengthened collaboration with our partners, we further advanced our commitment to human rights and responsible sourcing. Key achievements during this period include:

### **Non-Trade Procurement (NTP) ESG Program**

Launched a robust NTP ESG Program incorporating mandatory ESG screening, detailed risk assessments, and compliance checks for all new and existing suppliers. This significantly enhanced our Modern Slavery Act compliance and deepened our oversight of indirect procurement risks.

### **Tier 2 Fabric Mill Traceability**

Achieved 100% traceability of our Tier 2 fabric mills. All sites have been integrated into our social compliance program, enabling proactive monitoring and management of modern slavery risks at the fabric production level.

### **Preferred Fibre Program – Improved Traceability and Transparency**

Introduced our Preferred Fibre Program to strengthen traceability and ethical assurance of raw materials. The program prioritises fibres certified to credible third-party standards and incorporates digital traceability tools to better manage modern slavery risks from fibre sourcing to finished products.

### **Leadership in Industry-wide Living Wage Working Group**

Initiated and led an industry-wide Living Wage Working Group, supported by Oxfam's What She Makes campaign. The group now includes over 30 brands working collaboratively to progress living wage outcomes in global supply chains—reflecting our commitment to fair remuneration and systemic improvement in worker rights.

### **Policy Review and Enhancement**

Undertook a comprehensive review of our core governance documents. This included major updates to our Supplier Code of Conduct, strengthening requirements around child labour, forced labour, and remediation. These updates align with international best practice and clearly communicate our expectations for ethical conduct and labour rights across all tiers of our supply chain.

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We are proud of these milestones, which reflect our continued effort to uphold high ethical standards across our operations and supply chains. As we move forward, we remain committed to driving positive social and environmental impact through transparent, accountable, and values-led business practices.

# Our Operations, Structure & Supply Chains





## OUR OPERATIONS, STRUCTURE & SUPPLY CHAINS

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### Our Operations

Lorna Jane's core business and operational activities continued to evolve in FY25 as we strategically expanded and refined our retail footprint to better serve our customers and respond to market demand. As a leading retailer of women's activewear and lifestyle products, we offer a diverse range of garments and accessories, including tights, leggings, shorts, tops, jackets, sports bras, swimwear, shoes, lifestyle books, and digital gift cards.

In FY25, we opened six new stores, relocated seven, and strategically closed three locations, bringing our total footprint to 99 stores across Australia and 11 in New Zealand.

Internationally, our business remains focused on digital markets, with an online presence in China. Our UK entity remains registered but inactive, and no further changes have been made to our North American operations since the closure of our US warehouse in FY24.

Our corporate functions continue to operate from our headquarters in Eagle Farm, Queensland, encompassing core business areas including finance, procurement, people and culture, distribution, marketing, partnerships, sales, IT, design, and product development.

Lorna Jane's supply chain operations are now fully integrated with our ESG and modern slavery risk management frameworks. In FY25, we embedded a formal ESG onboarding process for non-trade procurement suppliers, expanded our social compliance program to cover Tier 2 fabric mills, and achieved 100% traceability of Tier 1 suppliers. These developments ensure that modern slavery risks are actively monitored and addressed across both merchandise and non-trade procurement (NTP) activities, supporting a more transparent and accountable supply chain.

## Our Team

As of FY25, Lorna Jane employs a total of 1,217 team members across Australia, New Zealand, China, and Manila, reflecting growth from the previous reporting period's 891 employees and underscoring our ongoing expansion.

Below is a detailed breakdown of our workforce:



### Australia-Based Team

88% (1072 team members) are based in Australia, working across our retail network, corporate office, and warehouse facilities.



### New Zealand-Based Team

10% (124 team members) work across New Zealand, including retail roles in our stores and our in-house managed warehouse (3 full-time and 9 casual team members). All New Zealand warehouse employees are hired directly by Lorna Jane, with no agencies involved.



### China-Based Team

1% (12 full-time team members) support our online sales operations.



### Manila-Based Contractors

1% (9 contractors) based in Manila, employed through a reputable recruitment agency, support key functions across our business.

CHINA

PHILIPPINES

AUSTRALIA

NEW ZEALAND

## Our Team

Our workforce composition by role includes:



### Retail Roles

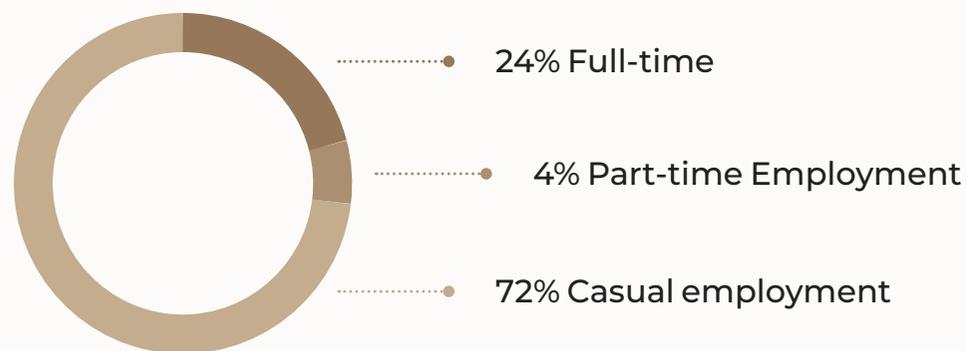
84% of our team members (919 in Australia and 103 in New Zealand) work in retail positions.



### Corporate & Warehouse Roles

8% of our workforce (93 team members) are employed in executive, professional, and administrative roles at our Queensland headquarters, 57 team members within our Australian warehouse and an additional 9 team members working directly in our New Zealand warehouse.

Our employment structure reflects our operational needs:



### Lorna Jane's Corporate Structure

The reporting entity is a privately owned Australian company that sits at the head of a wider corporate group. It owns and controls a number of subsidiaries and related entities across Australia and several international jurisdictions.

None of these controlled entities individually meet the statutory criteria to qualify as reporting entities under the Modern Slavery Act 2018 (Cth). However, they form part of the consolidated group for the purposes of this statement, and the risks and actions described throughout this report apply to the group as a whole.

The broader group includes entities operating retail stores, e-commerce platforms, intellectual property, brand and marketing functions, and regional operations in North America, Asia, Europe, and New Zealand. These entities are wholly or majority owned and are governed under the same policies, standards, and due diligence processes as the reporting entity.

### Our Supply Chains

#### Our Merchandise Supply Chain

In FY25, Lorna Jane continued to advance our supply chain to support growth and resilience, maintaining a rigorous focus on ethical practices, transparency, and oversight. While our partnership with Active Apparel Group (AAG) remains foundational—anchored by more than 30 years of collaboration and a strong alignment on ethical production and social responsibility—we also took meaningful steps to diversify our sourcing base this year.

To better support demand and operational flexibility, we onboarded two new garment factories during FY25. Although these new facilities represent less than 2% of our total finished garment volume, each underwent a thorough assessment and due diligence process. All meet Lorna Jane's high standards for social, labour, and environmental performance, matching the expectations we set for AAG.

Our overall consolidated approach ensures robust transparency and control in our Tier 1 supply chain. The overwhelming majority of finished garments continue to be supplied through AAG's own factory, allowing us to exercise direct oversight, while the introduction of selected new partners has further strengthened our business continuity and risk management, without compromising our commitment to responsible sourcing.

Lorna Jane's supplier relationships are underpinned by rigorous onboarding protocols, ongoing monitoring, and our unwavering commitment to ethical and quality standards. The table below outlines the composition of our Tier 1 suppliers by product type and their share of overall value for FY25:

Product Type	2025 % of Overall Value
Finished Garments	97.12%
Accessories - Bags	1.00%
Accessories - Socks	0.99%
Accessories - Gloves	0.50%
Accessories - Towels	0.26%
Accessories - Bottles	0.13%

### Focus on Finished Garments

The vast majority of our supply chain value continues to be derived from finished garments, enabling targeted oversight and risk management where it has the highest impact. While AAG's own factory remains our primary garment supplier—facilitating deep collaboration and rigorous due diligence—we have thoughtfully diversified our sourcing through a small number of new partners. This expansion, covering less than 2% of finished garment production, has been managed to ensure all partners meet Lorna Jane's standards for ethical, social, and environmental performance.

This approach sustains robust risk mitigation and responsible sourcing, building resilience and flexibility into our supply chain. By leveraging our long-term relationship with AAG and thoroughly vetting new suppliers, we continue to reinforce strong ethical supply chain practices and our commitment to the highest standards of responsible production.

## Key Supply Chain Insights

### High Consolidation

The vast majority of Lorna Jane's finished garment production continues to be centralised through our longstanding partner, AAG. This structure allows us to maintain stringent oversight and efficient, direct communication to ensure the highest standards of ethical production. During FY25, we also onboarded a small number of carefully vetted garment factories, which together account for less than 2% of our finished garment volume, further supporting resilience and due diligence without compromising our ethical ambitions.

### Specialised Approach for Accessories

Accessories still represent a minor portion of our total product line—approximately 3%. These items, such as gloves, bottles, and diaries, are sourced from a select group of specialist suppliers, each subject to a thorough risk assessment and high standards of transparency.

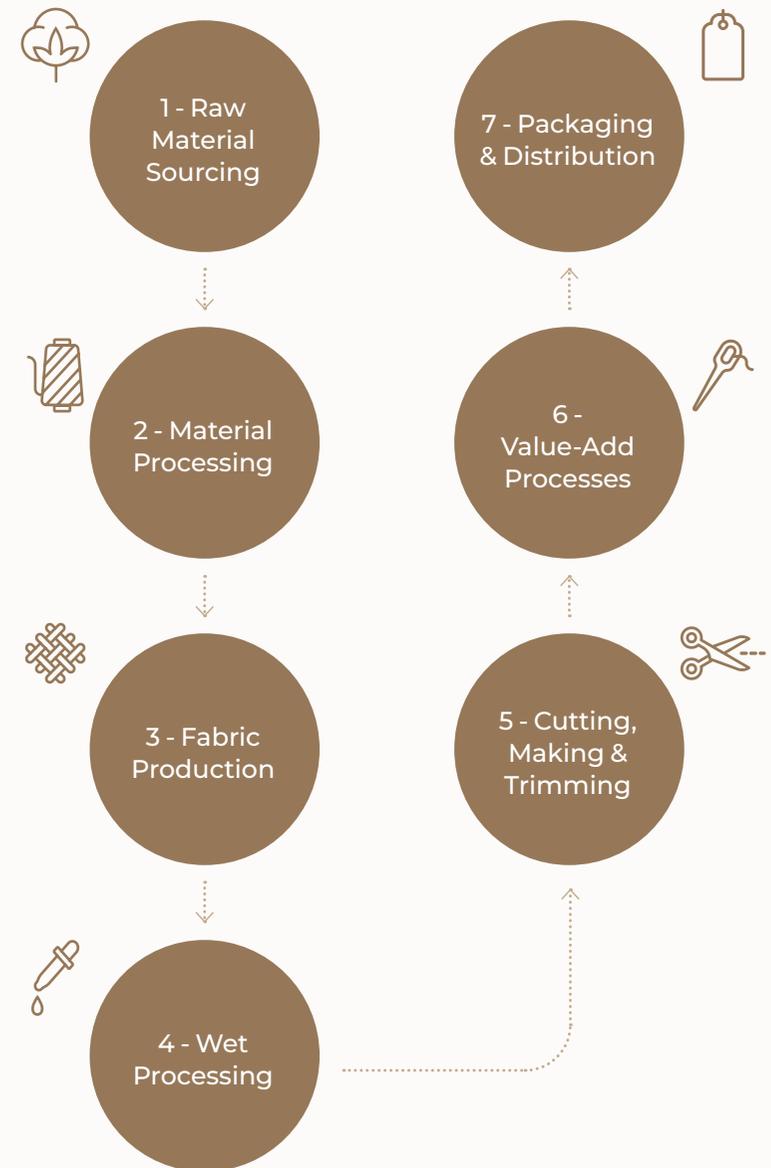
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This consolidated and focused sourcing strategy supports our commitment to rigorous quality and ethical standards. The limited scope and careful management of both our finished garment and accessory supplier base enable Lorna Jane to continually monitor, assess, and effectively mitigate risks across our supply chain. This approach positions us to promptly identify emerging challenges and implement best-practice solutions, ensuring ethical integrity as our business evolves.

### Supply Chain Structure and Complexity

Our supply chain spans several regions, with apparel production involving specialised stages and participants at each phase. While certain suppliers are vertically integrated—managing multiple stages under one facility—others focus on specific production areas like fabric dyeing or garment assembly. Key stages in Lorna Jane's apparel supply chain include:

- 1 Raw Material Sourcing**  
Procurement of base materials, such as cotton and high-performance synthetics.
- 2 Material Processing**  
Conversion of raw materials into fibres and yarns, suitable for activewear.
- 3 Fabric Production**  
Weaving or knitting fibres to create durable, high-quality fabrics.
- 4 Wet Processing**  
Dyeing, washing, and finishing treatments to meet fabric and performance standards.
- 5 Cutting, Making, and Trimming (CMT)**  
Precision assembly of garment pieces, ensuring consistency and quality.
- 6 Value-Add Processes**  
Custom touches, such as logo printing and trims, to enhance product identity and functionality.
- 7 Packaging and Distribution**  
Preparing finished products for retail with appropriate labelling and packing.



## OUR NON-TRADE PROCUREMENT (NTP) GOODS & SERVICES

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Lorna Jane's non-trade procurement supports essential operations across retail, corporate, and logistical functions. In FY25, our non-trade goods and services were sourced from a range of suppliers, predominantly based in Australia, with select international partners meeting specific business needs.

### Key Non-Trade Procurement Categories by Spend

The primary categories in Lorna Jane's non-trade procurement include:

#### **Property and Facilities Management (38%)**

Real Estate Services: Rental and lease agreements for retail and office spaces.

#### **Marketing and Communications (21%)**

Printed Matter and Recorded Media: Marketing materials and in-store visuals.

#### **Construction and Maintenance (13%)**

Construction Work: Retail store refurbishments and office maintenance.

#### **Logistics and Transportation (10%)**

Other Land Transportation Services: Logistics for goods and staff travel.

Supporting and Auxiliary Transport Services; Travel Agency Services: Additional transport support services.

#### **IT and Telecommunications (10%)**

Computer and Related Services (Australia, Ireland, United States):

IT infrastructure, hardware, software, cybersecurity. Post and Telecommunication Services: Connectivity for retail and corporate locations

#### **Professional and Financial Services (2%)**

Other Business Services: Consulting, auditing, and administrative support.

Services Auxiliary to Financial Intermediation: Financial support and management services.

Insurance and Pension Funding Services: Insurance and auxiliary financial services.

Financial Intermediation Services: Financial management and additional financial services.

#### **Government and Public Services (1%)**

Public Administration and Defence Services: Social security services and public administration.

#### **All Other Sectors Combined (5%).**



Modern Slavery Risks in  
Our Supply Chains and Operations

## Understanding Modern Slavery Risks in the Fashion Sector

Lorna Jane recognises that modern slavery risks persist within complex, multi-tiered supply chains—including those of apparel brands. These risks can originate from our direct operations, result from the actions of our immediate suppliers, or occur further down the supply chain and be indirectly linked to our business.

To identify and address these risks, we continue to apply the internationally accepted “cause, contribute to, and directly linked to” framework, consistent with the UN Guiding Principles on Business and Human Rights. This model enables us to analyse our level of involvement and responsibility for human rights impacts and informs targeted risk mitigation strategies.

This approach allows Lorna Jane to tailor oversight, interventions, and engagement with suppliers based on the nature of our connection to potential human rights risks.

We use this distinction to continuously improve our supplier due diligence procedures, audit and monitoring practices, and overall risk management throughout our global supply chain. This model remains at the heart of our commitment to ethical and responsible sourcing as our business evolves.

### Key Terms and Relevant Examples in the Fashion Sector:

Term	Explanation	Example relevant to the fashion sector
Cause	A business may cause an adverse human rights impact, such as modern slavery, if it directly creates or is responsible for the impact through its activities or omissions.	For instance, a logistics company may cause modern slavery by exploiting workers who crew its shipping vessels.
Contribute to	A business may contribute to an adverse human rights impact where its actions or omissions facilitate or encourage the impact, to the extent that harm would be unlikely without them.	For example, a fabric wholesaler might contribute to modern slavery by imposing price reductions on suppliers, achievable only through exploitative labour practices.
Directly linked to	A business may be directly linked to an adverse human rights impact if its operations, products, or services are connected to the impact through another entity's actions (e.g., a supplier), even if it has not caused or contributed to the harm.	For example, a fashion company could be directly linked to modern slavery if its supplier manufactures garments using raw materials from an exploitative third-party supplier.

### Risk Assessment Overview

Lorna Jane acknowledges that modern slavery risks remain present across the global apparel industry, particularly in complex, multi-tiered supply chains that span diverse jurisdictions and regulatory environments. In FY25, our sourcing model remained highly consolidated as mentioned above. This structure supports strong supplier relationships, on-the-ground visibility, and greater control over key production processes. However, risks related to raw material sourcing, working conditions, and subcontracted labour remain, and require continuous monitoring and responsive management.

#### Operational Risks

Production for Lorna Jane is primarily undertaken at the Ningbo Longson Garment Factory in Zhejiang, China. This facility is owned and operated by our long-term manufacturing partner AAG and provides full-service manufacturing, including cutting, sewing, finishing, and packing. The vertical integration of this site reduces exposure to unauthorised subcontracting and unregulated labour; however, risks relating to working hours, occupational health and safety, and fair wage calculations remain areas of active oversight.

Although the use of temporary or seasonal workers at this site is limited, it is recognised as a potential vulnerability. To mitigate associated risks, all short-term workers are either directly employed or contracted via a single, pre-approved labour hire agency that is independently assessed against international labour standards. This approach ensures that employment terms for temporary workers are consistent with those of permanent staff.

#### Supply Chain Risks

Lorna Jane maintains long-standing relationships with all Tier 1 merchandise suppliers. However, in FY25 our supply chain became more complex due to the introduction of new suppliers across several product categories,

particularly accessories and packaging. While our core finished garment production remains consolidated through AAG, the newer suppliers operate independently and fall outside of AAG's vertically integrated structure. AAG does not own the factories used for Lorna Jane production, and oversight is maintained through formal supplier agreements and third-party audits.

We acknowledge that modern slavery risks increase in the lower tiers of our supply chain, where visibility and control are reduced. This is particularly relevant in raw material sourcing, multi-component products (such as accessories), and where nominated suppliers are introduced through brand partners or clients. Accessories in particular present unique challenges, as they often involve multiple factories, subcontracted processes, and complex sourcing models. These suppliers are not yet fully integrated into our social compliance program but are being prioritised for onboarding and assessment in FY26.

To address emerging risks in this more fragmented supplier landscape, Lorna Jane requires all merchandise suppliers to complete a formal onboarding process. This includes SEDEX registration, provision of third-party social audit evidence (e.g. SMETA, WRAP), and contractual compliance with Lorna Jane's Supplier Code of Conduct. While this provides a strong foundation for ethical oversight, we recognise that audit readiness, traceability systems, and supplier capacity vary significantly across regions and product types. Our approach is therefore tiered and responsive: suppliers assessed as higher risk receive targeted engagement and support, including corrective action planning where necessary.

We also acknowledge that tools like SEDEX offer important visibility but do not replace the need for ongoing engagement, follow-up, and escalation when risks are identified. This is particularly important in cases where audit findings indicate excessive overtime, inconsistent wage practices, or unsafe working conditions. Across all factories, our goal is to drive continuous improvement and uphold the rights and dignity of all workers—including those in temporary, seasonal, or subcontracted roles.

### Risk Assessment Overview CONTINUED

#### Cotton Sourcing Risks

Cotton remains a significant raw material across Lorna Jane's product categories and is globally recognised as a high-risk commodity for modern slavery. Known risks include limited transparency at the farm level, the use of migrant or informal labour, and documented exposure to state-imposed forced labour in high-risk sourcing regions.

To mitigate these risks, Lorna Jane works closely with our manufacturing partner, AAG, to strengthen traceability efforts across the cotton supply chain. In FY25, cotton suppliers were mapped from spinning mill to finished garment, and all active suppliers are required to hold at least one of the following certifications: Global Organic Textile Standard (GOTS), Global Recycled Standard (GRS), OEKO-TEX, or Better Cotton Initiative (BCI). While most spinning mills are now traceable, documentation gaps remain at the farm level due to limited disclosure from upstream suppliers. AAG has acknowledged these limitations and is currently exploring the use of FibreTrace to improve fibre-level transparency and compliance with legal frameworks such as the Uyghur Forced Labor Prevention Act (UFLPA).

Lorna Jane is also reviewing traceability platforms for direct use across future collections and will continue to assess fibre sourcing risk as part of our Preferred Fibre Program and raw material risk reviews.

#### Non-Trade Procurement Risks

In FY25, Lorna Jane reviewed modern slavery risks associated with our non-trade procurement (NTP) suppliers, who support key indirect functions such as logistics, facilities, technology, marketing, and property services. While the majority of our NTP suppliers are based in Australia and assessed as low risk, we recognise that certain service sectors—particularly logistics, cleaning, and construction—may involve subcontracted labour, casualised workforces, or other risk factors associated with vulnerable workers.

To address these risks, we established a formal Non-Trade Procurement (NTP) Social Compliance Program, which includes structured onboarding, ESG risk screening, and contract clauses aligned with our Supplier Code of Conduct. This program is outlined in detail on page 24.

#### Conclusion

This year's risk assessment confirms that a consolidated sourcing model with strong supplier relationships can provide meaningful control and oversight. However, it also highlights the need for sustained attention to upstream risks in raw material sourcing, oversight of labour hire practices, and the ethical management of third-party suppliers. Lorna Jane remains committed to evolving our risk assessment methodology in line with emerging risks, industry developments, and international human rights standards.



## SUPPLY CHAIN RISK ASSESSMENT & MITIGATION

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### Actions Taken to Address Manufacturing Risks

#### Strengthening Supplier Oversight and Ethical Commitments

Lorna Jane continued to strengthen our ethical sourcing program throughout FY25 by embedding enhanced due diligence, proactive supplier engagement, and clear supplier expectations across our manufacturing supply chain. Our focus areas included modern slavery prevention, worker protection, living wage verification, and raw material traceability.

All manufacturing suppliers are required to comply with Lorna Jane's Supplier Code of Conduct, which was comprehensively revised in FY25 to reflect international best practice. The updated Code strengthens expectations around forced labour, child labour, working hours, freedom of association, grievance mechanisms, and ethical business conduct. These requirements are embedded in supplier contracts and enforced through onboarding, monitoring, and audit processes.

#### Tier 1 Suppliers: 100% Traceability and CAP Monitoring

In FY25, Lorna Jane maintained 100% traceability of all Tier 1 garment suppliers. All Tier 1 facilities:

- Are registered on SEDEX
- Have completed the SEDEX Self-Assessment Questionnaire (SAQ)
- Were audited within the last 12 months (WRAP, SMETA, or equivalent)

While all sites are rated low to medium risk based on SEDEX and audit data, two critical non-compliance issues were identified during the year. These issues are being actively addressed through corrective action plans (CAPs), which are monitored monthly in collaboration with AAG to ensure timely and verifiable resolution.

### Actions Taken to Address Manufacturing Risks CONTINUED

#### Fabric Mills: 100% Mapped, Monitored, and Risk Assessed

In FY25, we also achieved full traceability of all four Tier 2 fabric mills used in our active supply chain. These facilities:

- Are registered on SEDEX
- Have completed the SEDEX SAQ

Risk assessments were completed using SEDEX Risk Radar, with three mills classified as low to medium risk and one mill identified as high risk. While we have not yet conducted third-party audits at the fabric mill level, we are engaging directly with the high-risk facility to support improvements and prepare for audit readiness in the coming year.

#### Expanded Use of Supplier SAQs and SEDEX Monitoring

Supplier risk assessment in FY25 was enhanced through systematic use of SEDEX tools and SAQs. These mechanisms support:

- Identification of risk trends across human rights indicators
- Cross-referencing of audit and SAQ data
- Prioritisation of supplier follow-up and remediation
- Monthly monitoring of SEDEX scores and open CAPs

Lorna Jane receives ongoing supplier summary reports and CAP tracking updates from AAG across Tier 1 and Tier 2 sites, which are reviewed as part of our broader governance cycle.

#### Temporary Labour Risk Controls

To manage risks associated with temporary or seasonal labour, AAG maintains an exclusive partnership with Ningbo Yijia Human Resources Co., Ltd, a vetted and approved labour hire agency. The agency is subject to:

- Annual compliance assessments
- Payroll audits to confirm legal wage and entitlement payments
- Requirements to provide equal benefits to temporary and permanent staff
- Ensured worker access to anonymous grievance channels

This approach reduces the likelihood of informal recruitment practices and ensures consistent worker protection across all roles.

### Actions Taken to Address Manufacturing Risks CONTINUED

#### Living Wage Verification and Industry Collaboration

Building on our long-term commitment to wage fairness, Lorna Jane continued to uphold verified living wage standards at our core manufacturing site, Ningbo Longson. A third-party audit by Bureau Veritas (FY23) confirmed wages exceeded the Anker benchmark by 29%, with retroactive back-pay issued where needed.

In FY25, we advanced this work by founding and leading a multi-brand Living Wage Working Group, supported by Oxfam's What She Makes campaign. Over 30 brands now participate in this group, working collaboratively to address structural barriers to living wages in global garment supply chains. Lorna Jane remains recognised as a Step 5 (fully compliant) brand by Oxfam.

#### Worker Voice and Grievance Mechanisms

To support safe and anonymous worker feedback, an independent grievance system is maintained at our core production site. QR-code enabled forms are available throughout the facility, with all grievances reviewed confidentially. In FY25:

- The system remained accessible to all workers, including temporary staff
- No grievances related to modern slavery were raised
- All issues were resolved transparently and documented in line with procedure

This mechanism supports a culture of open communication and accountability.

#### Traceability and Raw Material Risk Management

In FY25, Lorna Jane launched our Preferred Fibre Program to improve visibility and oversight of raw material sourcing. Key features include:

- Prioritisation of certified fibres (e.g. GOTS, GRS, OEKO-TEX, BCI)
- Fibre-level risk screening for high-risk origins (e.g. Xinjiang cotton)
- Supplier disclosure of upstream traceability beyond Tier 1

We are also exploring digital traceability platforms such as FibreTrace. AAG has begun piloting this technology across selected production lines, and outcomes from this pilot will inform future rollout and integration into our sourcing strategy.

### Actions Taken to Address Manufacturing Risks CONTINUED

#### Industry Collaboration and Capacity Building

In FY25, Lorna Jane strengthened our commitment to industry collaboration by launching and leading a new Living Wage Working Group, supported by Oxfam's What She Makes campaign. This group now includes over 30 brands working together to address barriers to living wages in global supply chains. Through regular peer learning and shared resources, the group is helping to raise industry standards and build alignment on wage transparency, brand accountability, and responsible purchasing.

We also continued to work closely with our manufacturing partner, AAG, to support factory-level improvement programs and engage suppliers in our ethical sourcing goals. Monthly reporting, corrective action reviews, and ongoing communication with production teams have helped improve issue tracking and supplier responsiveness.

Looking ahead, Lorna Jane plans to expand supplier training and onboarding materials, with a particular focus on risk areas such as labour hire, grievance processes, and raw material traceability. These resources will support our broader aim of building a supply chain where all partners understand and uphold their responsibilities to prevent modern slavery.

#### Governance and Accountability

Lorna Jane maintained its cross-functional Modern Slavery Steering Committee throughout FY25. This group met every six weeks and is responsible for providing oversight, ensuring alignment across departments, and driving accountability in how we manage modern slavery risks across both trade and non-trade supply chains.

#### Modern Slavery Steering Committee

The Steering Committee includes senior leaders from key departments, bringing a wide range of operational, ethical, and strategic perspectives.

**Fiona Hochmuth** Chief Financial Officer (CFO)

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**Paige McCabe** Chief Operating Officer (COO)

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**Ginny Xie** Group Financial Manager

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**Mike Lawrence** General Manager IT

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**John Peters** Global Logistics Manager

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**Nicole Bennett** ESG Manager

### Actions Taken to Address Manufacturing Risks CONTINUED

#### Standing Agenda

Each meeting follows a structured agenda to ensure focused and transparent governance. Key agenda items include:

1. Review of Risk Indicators – Supplier audit outcomes, grievance data, and risk tracking
2. Corrective Action Oversight – Updates on CAPs and supplier follow-up
3. Policy and Training – Progress on modern slavery policy implementation and training effectiveness
4. Stakeholder Engagement – Worker voice, collaboration initiatives, and public commitments
5. Forward Planning – Risk horizon scanning and alignment with broader ESG strategy
6. Climate Governance (as applicable) – Integration of climate-related risk discussions when relevant

#### Reporting Structure

The Committee reports directly to the CEO. Formal meeting minutes are documented and reviewed by the Executive Team, with key insights and actions integrated into Lorna Jane's broader risk management and governance framework.

#### Executive Oversight

The ESG Manager meets fortnightly with the CFO to provide regular progress updates across ESG and compliance initiatives, including modern slavery, supply chain traceability, and third-party risk management.



## SUPPLY CHAIN RISK ASSESSMENT & MITIGATION

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### Non-Trade Procurement (NTP) Risk Assessment and Mitigation

#### Risk Assessment Approach

In FY25, Lorna Jane developed and launched a formal social compliance program for our Non-Trade Procurement (NTP) suppliers, who provide key indirect operational services such as logistics, cleaning, real estate, marketing, and IT. An initial sector-based risk assessment was conducted to identify potential areas of vulnerability and prioritise due diligence accordingly.

#### NTP Supplier Risk Findings

- 128 suppliers exceeded our annual spend threshold of \$50,000 and were included in the first round of ESG screening.
- Of these, 39 suppliers had published Modern Slavery Statements and were deemed lower risk due to existing obligations under the Modern Slavery Act.
- A further 56 suppliers were assessed as low risk based on their industry sector and business structure (e.g. Australian-based, regulated, or professional services).
- This left a remainder of 32 suppliers deemed medium risk due to service type, workforce model, or limited ESG disclosure. These suppliers were prioritised for enhanced review under our NTP ESG Program.

### Non-Trade Procurement (NTP) Risk Assessment and Mitigation CONTINUED

#### Enhanced Due Diligence: NTP ESG Program (Launched FY25)

In response to these findings, Lorna Jane launched the NTP ESG Program to improve how we assess and manage modern slavery risks among our indirect suppliers.

#### Key Components Include:

##### ESG Supplier Application & Screening

All new NTP suppliers must complete a detailed ESG Supplier Application Form and formally agree to Lorna Jane's revised Supplier Code of Conduct. The 32 existing medium-risk suppliers identified during the review were also required to complete this onboarding process.

##### Spend-Based Risk Segmentation

Suppliers are categorised based on annual spend, with those exceeding \$50,000 flagged for enhanced review. These high-spend suppliers are subject to desktop ESG research and may be required to complete additional self-assessment questionnaires (SAQs) where risk indicators or information gaps are identified.

##### Enhanced Risk Assessments & Audits

Our ESG team proactively reviews publicly available ESG and labour rights disclosures. Suppliers identified as moderate-to-high-risk undergo additional due diligence, including follow-up questionnaires and potential independent audits to confirm alignment with ethical labour standards.

##### Integrated Compliance and Payment Controls

ESG compliance is now directly embedded into our financial processes. Supplier payments are contingent on completion of onboarding and verification steps, helping ensure suppliers meet our minimum ethical and legal expectations.

##### Ongoing Monitoring & Enforcement

Supplier compliance is monitored through quarterly reporting and annual reviews. Where issues arise, corrective actions are initiated, with clear escalation pathways that may include temporary suspension or contract termination for unresolved breaches.

Training, Capacity Building  
& Collaboration



## TRAINING, CAPACITY BUILDING & COLLABORATION

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While Lorna Jane did not deliver formal training programs during FY25, we remain committed to strengthening ethical awareness and capability across our business and supplier network.

Our manufacturing partner, AAG, continued to deliver mandatory internal training for their management teams and production staff, covering modern slavery awareness, labour rights, grievance mechanisms, and ethical conduct. These sessions are complemented by onboarding and policy briefings for all new suppliers and temporary labour agencies.

Lorna Jane works closely with AAG to support these initiatives and ensure alignment with our expectations. This collaboration helps ensure that workers throughout our supply chain are aware of their rights and have access to safe channels for raising concerns.

Looking ahead, we plan to expand our direct training and capacity-building efforts, both within Lorna Jane and across our suppliers. This includes developing more formal onboarding resources, tailored training content, and refresher programs to build awareness of key risks such as labour hire, raw material sourcing, and grievance procedures.

We will also review the relevance and effectiveness of existing materials to ensure they remain fit for purpose as risks evolve and our program matures.



A woman is walking on a sandy beach at sunset. She is wearing a white tank top and maroon leggings. She is carrying a rolled-up yoga mat over her left shoulder. The background shows the ocean with waves and a hazy sky. The text "Monitoring & Measuring Our Effectiveness" is overlaid on the image in a white serif font.

Monitoring & Measuring  
Our Effectiveness

## MONITORING & MEASURING OUR EFFECTIVENESS

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Lorna Jane remains committed to continuously monitoring and evaluating our modern slavery risk management practices across all business operations and supply chains.

We utilise a combination of quantitative and qualitative measures—including supplier ESG screening outcomes, compliance audits, traceability data, and stakeholder feedback—to comprehensively assess the effectiveness of our policies, supplier engagement strategies, targeted training initiatives, and remediation processes.

With the introduction of our robust NTP ESG Program, Preferred Fibre Program, and enhanced supplier policy framework in FY25, we have strengthened our ability to identify and address modern slavery risks at multiple levels of our supply chain.

To ensure our approach remains effective and responsive, we regularly review these initiatives, adapting our methods as needed to align with industry best practices, emerging regulatory requirements, and evolving stakeholder expectations.



Effectiveness Measures and Indicators

Area	Objectives	Effectiveness Indicators
Policy Implementation	Ensure policies (including the Supplier Code of Conduct) are clearly communicated, implemented, and regularly updated in line with international best practice.	<ul style="list-style-type: none"> <li>Frequency of policy reviews and updates- Percentage of suppliers acknowledging receipt and acceptance of updated Code of Conduct</li> </ul>
Supply Chain Risk Assessment & Traceability	Identify, assess, and mitigate modern slavery risks through comprehensive risk mapping, supplier segmentation, and implementation of the NTP ESG Program.	<ul style="list-style-type: none"> <li>Percentage of supply chain mapped and risk-assessed</li> <li>Number of high-risk suppliers identified and engaged in enhanced due diligence</li> </ul>
Training and Capacity Building	Build internal and supplier understanding of modern slavery risks, ESG due diligence expectations, and remediation practices.	<ul style="list-style-type: none"> <li>Number of targeted training sessions conducted</li> <li>Percentage of internal staff and key suppliers completing training</li> </ul>
Audit Compliance & Corrective Action	Conduct regular audits, follow up on non-compliance, and drive continuous improvement — particularly among higher-risk suppliers.	<ul style="list-style-type: none"> <li>Percentage of high-risk suppliers audited annually</li> <li>Corrective Action Plan (CAP) closure rate within defined timeframes</li> </ul>
Grievance Mechanisms & Remediation	Ensure effective, anonymous grievance channels and timely resolution to strengthen worker protection and supplier accountability.	<ul style="list-style-type: none"> <li>Number of grievances filed and resolved</li> <li>Average time to resolution</li> <li>Visibility of grievance outcomes (e.g. shared with staff, included in reporting)</li> </ul>
Living Wage Monitoring & Industry Collaboration	Monitor wage benchmarks and support industry collaboration to close wage gaps—particularly through leadership in Oxfam’s What She Makes campaign.	<ul style="list-style-type: none"> <li>Annual wage assessments conducted using credible benchmarks</li> <li>Progress toward wage gap closure</li> <li>Participation and leadership in multi-brand initiatives</li> </ul>

# Process of Consultation



This statement has been prepared in consultation with all relevant reporting entities within Lorna Jane, including owned and controlled entities, to ensure alignment and oversight in addressing modern slavery risks across our operations and supply chains.

Each entity covered by this statement, including those owned and controlled entities:

- Shares common directors
- Operates from the same registered office, except where local requirements mandate a separate registered office (e.g., Singapore)
- Adheres to consistent policies, codes, and procedures
- Operates within the apparel and activewear sector
- Relies on shared suppliers
- Reports to a centralised executive team

Consultation with senior management, executives, and directors across these entities has been integral in developing this statement and guiding actions during the reporting period. Key elements of the consultation process included:

### **Regular Executive Meetings**

Members of the c-suite, along with company Executives convened every 6 weeks to discuss, review, and approve key issues, actions, and recommendations related to managing modern slavery risks.

### **Documented Communication**

Updates, actions, and findings on modern slavery initiatives were communicated and reviewed through structured email correspondence and document exchanges.

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This collaborative process ensures alignment across all reporting entities, reinforcing Lorna Jane's unified approach to identifying and addressing

A woman with voluminous curly hair is walking down a set of stone steps. She is wearing a black, sleeveless jumpsuit with a white trim along the neckline and a small white logo on the back pocket. She is also wearing white sneakers with black accents. A white, woven bag is slung over her shoulder. The background features a large, dark, paneled door and stone columns. The text "Looking Forward" is overlaid in the center of the image.

Looking Forward

Lorna Jane is committed to continuously strengthening our modern slavery risk management approach and embedding ethical integrity across all aspects of our operations and supply chains. Building on the momentum of FY25, the following strategic priorities will guide our work in FY26:

### **1. Living Wage Monitoring and Leadership in Industry Collaboration**

We will continue to uphold living wage commitments across our primary production facility and maintain Step 5 verification under Oxfam's What She Makes campaign. In parallel, we will expand our leadership of the Living Wage Working Group, supporting cross-brand collaboration, knowledge-sharing, and wage data transparency across participating brands.

### **2. RISE Worker Empowerment Rollout**

In partnership with AAG, we will implement the RISE (Responsible Industrial and Sustainable Engagement) worker empowerment program at the Ningbo Longson facility. This initiative focuses on strengthening worker voice, promoting gender equity, and embedding social dialogue into factory systems to reduce the risk of exploitation and build long-term social resilience.

### **3. Deepening Retail Awareness and Training Programs**

We will launch modern slavery training tailored for our retail teams, building ethical literacy and strengthening frontline awareness of supply chain risks. Retail staff will be equipped to champion responsible business practices in their daily decision-making and interactions.

### **4. Tier 2 Expansion: Social Compliance at Fabric Mill Level**

Following the successful traceability of our fabric mills in FY25, we will deepen our engagement through supplier performance reviews, audit support, and corrective action planning. All mills will remain active on SEDEX and subject to regular reassessment, with targeted improvement support for any high-risk sites.

### **5. Cotton Traceability and Raw Material Risk Controls**

We are exploring advanced fibre-level traceability platforms, including FibreTrace and Good Earth Cotton technologies, to enhance visibility and verification across our cotton supply chain. These tools will support compliance with evolving legal requirements (such as UFLPA), strengthen responsible sourcing, and mitigate forced labour risks in upstream tiers.

### **6. Ethical Performance KPIs and Executive Oversight**

Modern slavery and responsible sourcing KPIs will be formally embedded into relevant business functions, including ESG, procurement, people and product. These KPIs will be reviewed quarterly by senior leadership, with outcomes used to drive continuous improvement and inform public reporting.

Lorna Jane is committed to continuously strengthening our modern slavery risk management approach and embedding ethical integrity across all aspects of our operations and supply chains. Building on the momentum of FY25, the following strategic priorities will guide our work in FY26:

### **7. Support for Supplier Audit Readiness and Capacity Building**

We will continue working with AAG and other key suppliers to maintain certification under leading audit frameworks (e.g. WRAP, SMETA), while supporting readiness for more rigorous future expectations under international due diligence laws. This includes guidance, documentation support, and improved scheduling to manage overtime risk and enhance compliance outcomes.

### **8. Global Alignment with Emerging Human Rights Due Diligence (HRDD) Laws**

With support from AAG, we will review and benchmark our risk management systems against emerging global modern slavery and human rights due diligence legislation, including the EU CSDDD and Australian Modern Slavery reforms. This process will ensure our policies and processes meet or exceed new regulatory expectations across multiple jurisdictions.

### **9. Embed our Social Compliance to Non-Trade Procurement (NTP)**

We will roll out a structured social compliance program to cover all non-trade procurement (NTP) suppliers. This includes ESG onboarding, risk-based due diligence, and annual performance reviews to ensure our indirect suppliers meet Lorna Jane's ethical and human rights standards.

### **10. Team Leadership and Cross-Functional Engagement**

Each department within Lorna Jane plays a role in advancing our modern slavery risk management strategy. In FY26, function-specific objectives will be implemented and monitored—ranging from People & Culture (training and onboarding), to Design & Product (preferred fibre selection), to Logistics (supplier onboarding and audit review). This collaborative approach ensures that ethical performance is not siloed but embedded into core business operations.

# THANK YOU

Thank you for taking the time to review our Modern Slavery Statement.  
We remain committed to continuous improvement and to working collaboratively with our partners to uphold human rights across our supply chain. For further information about our ESG approach and policies, please visit our website - [www.lornajane.com.au/sustainability](http://www.lornajane.com.au/sustainability)