



MODERN SLAVERY STATEMENT

City Beach rejects modern slavery in all its forms. Modern slavery is unlawful under various laws within Australia, Program and we are committed to ensuring the health, safety, and wellbeing of our workforce, and to implementing and enforcing effective systems and controls to reduce the risk of modern slavery in our business and in our supply chains.

Modern slavery is a global issue that affects an estimated 40 million people worldwide. At City Beach, we understand that eliminating modern slavery is not simply the responsibility of countries that engage in such abuses of human rights. Modern slavery, which includes slavery, servitude, forced labour, child labour, debt bondage, forced marriage, deceptive recruiting for labour and human trafficking, is often a hidden problem and we recognise we have a responsibility to ensure that we do our part to address these systemic issues.

City Beach is committed to working with suppliers to reduce the risk of human rights abuses in our business and the businesses we partner with. We are committed to ensuring that all parts of our business and supply chains fully understand our expectations. As addressing the risk of modern slavery is complex, City Beach is taking a continuous improvement approach to reducing the risks of modern slavery within its supply chain, aiming to reduce the risks over time.

CITY BEACH OVERVIEW: STRUCTURE, OPERATIONS & SUPPLY CHAIN

Established in 1985, Fewstone Pty Ltd ACN 010 496 465 ATF City Beach Trust Trading as City Beach is a privately owned Australian retail company with around 4,000 Australian employees who work in retail, warehousing, and as support office staff. City Beach is incorporated in Australia, and the Head Office and Registered Office is located in Brisbane CBD, with a centralised Distribution Centre located in Murarrie, Brisbane. We have an online store and a bricks and mortar retail network of over 60 stores located across Australia, selling clothing, swimwear, footwear, and accessories.

Our stores are stocked with product sourced both domestically and internationally by our third-party brand partners and our own in-house designed vertical brands, with supply chains located in various countries around the world. Our City Beach in-house designs are manufactured by supply chains located primarily in China, with a small percentage of our suppliers located in other countries including but not limited to Bangladesh, Bali, Mexico, and Pakistan. We also have a vast number of non-commercial goods suppliers and service providers.

The 2023 reporting period continued our focus on risks with our direct international suppliers since we have the strongest relationships and greatest influence in this group, whilst also working to ensure our domestic branded suppliers are also working to address Modern Slavery in their own supply chains.



According to the Global Slavery Index, fashion is in the top five products imported by Australia from countries which are at risk of using modern slavery in the production of the goods. Second only to technology, the apparel and footwear industry funnels more money toward Modern Slavery than any other industry. The 2018 Global Slavery Index states that US\$127.7 billion worth of garments are at risk of having Modern Slavery somewhere in their supply chain. The fashion supply chain is one of the largest and most complex supply networks. Slavery can exist in any stage of a clothing retail supply chain, from the picking of the cotton in use, to the manufacturing of the clothes and even during the later stages of fulfillment when product is shipped from its country of origin to Australia.

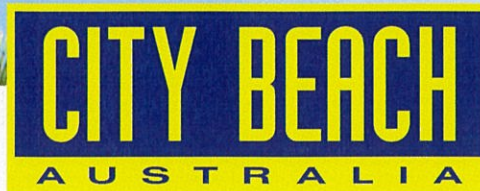
Our main operations in Brisbane Australia are deemed to be of low risk given the robust legislation for human rights in Australia, our robust recruitment and onboarding procedures, and our internal company policies. Our vertical brand production provides the biggest opportunity to reduce the risk of modern slavery, however this is also the most complex to manage.

In terms of our vertical brand production, we have many established suppliers across Asia and the Pacific who source raw materials and manufacture product in countries considered a high risk for human trafficking, slavery, indentured servitude, forced marriage, deceptive recruitment, and gender inequality. With most of our direct international supply coming from China, we understand that this region poses the greatest risk of Modern Slavery to our business.

China's overall risk of Modern Slavery is high. China is the second largest economy in the world with much of its economic development resulting from an economy specialising in the production of labour-intensive, cheap goods for export. Forced labour occurs in the production of some of these goods, including the manufacturing sector. According to the 2018 Global Slavery Index, there were more than 3.8 million people living in conditions of Modern Slavery in China. The actual figure may be greater as there is no legal requirement for businesses to disclose cases of modern slavery identified in their supply chain.

In this reporting period, we focused on continued assessment of the risks of our direct international supply chain, in particular those in China, by continuing to renew supplier agreements and by doing a review of supplier audit reports provided to assess risks. These findings allow us to collaborate with those suppliers in remediating identified risk within their places of work. This work will be ongoing and is outlined below.

This reporting period we also worked with both existing and newly onboarded domestic supplier brand partners. We understand that our level of influence in this area is lower due to the limited visibility into the supply chains of these third-party suppliers, however these risks cannot be ignored.



ACTIONS TAKEN TO ADDRESS RISKS

POLICY IMPLEMENTATION

City Beach has a suite of policies which apply to all directors, officers, employees, contractors, consultants, labour hire staff or other workers, subcontractors, and suppliers of City Beach. The policies outline our commitment and expectations in relation to modern slavery, and how issues or concerns should be raised. These policies also apply to any other representatives of our business and to any businesses in our supply chain.

The City Beach Code of Conduct, Modern Slavery, Whistleblowers, and Grievance Policies form an essential part of our internal governance in relation to Modern Slavery. These reflect our commitment to acting ethically within our business and enable us to enforce more stringent guidelines and behavioral conduct of the suppliers and manufacturers that we do business with.

This reporting period we continued our focus on the implementation of these policies as outlined below.

ONGOING SUPPLIER ENGAGEMENT

In this reporting period, to communicate our commitment and expectations around eradicating modern slavery within our supply chain, we continued to work to renew the supplier agreements of our existing international suppliers and manufacturers, whilst also using these policies to onboard new vertical brand suppliers. With hundreds of small individual suppliers, we concentrate on our top one hundred vertical suppliers, which make up over 95% of our international supply. All top one hundred suppliers have been issued the updated supplier agreement documentation, of which seventy-one have now been finalized. We continue to find some suppliers are very cooperative with renewing terms and signing our policies, however we also find some suppliers to be more resistant. We continue to collaborate with the remaining suppliers with an ongoing aim to ensure all suppliers complete this process.

We onboarded new international vertical brand suppliers and domestic suppliers with this updated documentation, and as we re-negotiate trade terms with existing domestic suppliers, we also issue them the updated agreements.

The City Beach Modern Slavery Policy states that suppliers must use best endeavors to ensure that there is no modern slavery in their supply chains and operations, and comply with any City Beach Supplier Code of Conduct that may be implemented from time to time. Any sub-contracting arrangements must impose obligations on sub-contractors to comply with this policy and must include appropriate due diligence procedures for sub-contractors.

In the event suppliers identify any occurrence, or material risk, of modern slavery in their supply chains or operations they are to take practical and effective steps to address that occurrence or risk. Suppliers must notify City Beach as soon as practicable of any occurrence, or material risk, of modern slavery they have identified and notify relevant authorities where appropriate. Suppliers must, at their own cost, undertake all remediation activities required by City Beach to address modern slavery or material risks of modern slavery in their operations.



CERTIFICATION AND COMPLIANCE MONITORING

At the time of onboarding (or when new agreements are provided to existing suppliers), international suppliers are requested to provide City Beach with an industry recognized compliance certificate and report such as:

- Amfori - Business Social Compliance Initiative (BSCI)
- Qualspec - Social Compliance Audit Report
- SMETA - Sedex Members Ethical Trade Audit Report
- Worldwide Responsible Accredited Production Certificate

As each of the above industry recognised audit reports includes a unique compliance rating system, City Beach production team reviews each report and tracks unsatisfactory compliance issues raised. For compliance issues identified that do not meet satisfactory standards, we liaise and work directly with those supply partners to understand the actions taken or intended to be taken.

During this reporting period, we continued the compliance audit of all international suppliers by requesting copies of certification, and/or updated certification from that previously supplied. We continue to find this process more difficult than the renewal of our supplier agreements but have made some good progress. Fifty-nine of our top one hundred international suppliers have now provided at least one form of recognized compliance certificate.

Many of our suppliers' reasoning in not being able to provide this is that obtaining and maintaining certification is expensive. However, we continue to request certification where none has yet been provided, whilst re-approaching those who have provided certification in the past to provide updated/renewed certification.

For those that have provided certification, findings have been tracked and logged, with review updates incorporated into our document management system providing us with visibility of any compliance issues raised and progress to remedy.

Where persistent or significant non-compliance issues remain, under our supplier contracts, City Beach can terminate our supplier partnerships and agreements if necessary.

TRAINING & AWARENESS

To ensure that our employees are informed of the risks of modern slavery, we have implemented an awareness campaign that forms part of our corporate training suite. Content is available on our internal operational platform for employees to access.

The training and awareness program occurs during the employee onboarding cycle, with this statement and company policy. We ensure all members of our merchandise production teams view this training material.



ASSESSING THE EFFECTIVENESS OF ACTIONS

We assessed the effectiveness of our actions during this reporting period in our bi-annual meeting with the relevant City Beach modern slavery stakeholders, namely the Production team responsible for consulting with International Suppliers, Buying representatives responsible for Domestic suppliers, and the Operations team. During this meeting progress status reports were discussed for each of the following areas of action identified:

- Identified the number of international suppliers who have successfully executed policy and documentation packs along with a list of suppliers that are yet to comply, as outlined above. Also discussed any specific suppliers of concern, including those suppliers yet to be actioned.
- Identified the number of international suppliers who have provided compliance certification as outlined above, and those who have not. Discussed difficulties in obtaining certification from the outstanding suppliers. Also discussed compliance issues and tracking outcomes of any actions that have or haven't been taken by suppliers that have been identified through reviews of the supplier audit reports provided.

This year, our Production team was also able to return to China and conduct visits to multiple factories and supplier offices for the first time post-pandemic. For one supplier, a SMETA equivalent audit was commissioned on a factory (and their offices). Only minor improvements were required, and time limits were set for the improvements.

Assessing modern slavery risk within our supply chain is an ongoing process for the business which will require refinement as we continue to work with and educate ourselves and our supply partners on the global issues at hand. The assessment findings that we identify during this reporting period will help to inform us of our next steps which we can improve upon in the following period.

CONSULTATION PROCESS

As there is only one entity reporting in this statement, no process of consultation was undertaken.

MODERN SLAVERY STATEMENT APPROVAL

This statement was approved by all Directors of Fewstone Pty Ltd on December 8th, 2023.

Director signature:

A handwritten signature in black ink, appearing to read "C. Ierna", written over a white background.

Carmelo Ierna, Director
City Beach, December 2023