

Statement date: 15 December 2022

## **Modern Slavery Statement – Seed Heritage and French Connection**

### **Reporting Entity**

This is the modern slavery statement of Steambrook Pty Ltd (ACN 114 765 703) (“Seed”/ “Seed Heritage”), F. C. Australia Pty Ltd (ACN 081 217 165) (“French Connection”), Seed Heritage New Zealand Pty Ltd, Seed Heritage Singapore Pte Ltd, Landmark Concept Ltd and Seed Heritage Canada Holdings Limited.

### **Our structure, operations and supply chains**

Seed Heritage and French Connection are Australian privately-held companies that operate retail apparel and accessories businesses. Our products consist mostly of lines we have developed and produced ourselves, but also smaller quantities of third party wholesalers’ products. They are sold in our stand-alone stores and department store concession sites around Australia, as well as online – chiefly through our own websites.

Our own product lines are developed by our in-house design and production teams, and manufactured by third party facilities that are chiefly located in mainland China.

In addition to its Australian operations, the Seed Heritage brand is also operated internationally through Steambrook Pty Ltd’s affiliated companies (named above). These companies have stores currently trading in New Zealand, Singapore and Hong Kong, and operate an online store in Canada.

### **The risks of modern slavery practices in our operations and supply chains**

The manufacture of apparel, footwear and related accessories typically involves multiple producers and suppliers of components, as well as other sub-contractors such as dye houses which are involved in production.

Modern slavery practices have been found to exist in multiple forms across all sectors operating within that production chain. These include:

- **Indentured labour or debt bondage** – people are forced to work for nothing to pay off a debt, losing control over both their employment conditions and the debt;
- **Child labour** – children younger than legal working age are engaged to work in factories and the like;
- **Wage theft** – workers are not paid according to law;
- **Forced labour** – threats are used to compel people to work against their wills; and

- **Deceptive recruitment** – people are misled about the conditions under which they will be working or living in facilities controlled by their employers.

These practices exist in various parts of the world and in numerous industries.

Those industries include two which our businesses utilise – the production of apparel and related accessories, and the production of timber products (which we import in order to build our stores).

### **The actions we take to assess and address those risks**

We have a deep and longstanding commitment to doing all we can to make sure our supply chain is free from worker exploitation in all of its many forms. We have a variety of measures in place to achieve that goal.

These measures include regular training of our staff who are involved in procurement and sourcing, both in-house and through professional training providers. This ensures our staff remain up to date on the evolving risks of modern slavery practices, and new ways in which suppliers might conceal and we might detect them.

We vet all new suppliers thoroughly before deciding to engage them, including ensuring we have numerous independent audit reports on file in relation to their practices and facilities.

We enforce rigorous trading terms across our entire supply chain. All of our primary suppliers commit to abide by those contractual terms, which include such things as:

- All suppliers must seek our consent to all sub-contractors and suppliers to be engaged in the production process;
- We have the right to audit not only our suppliers at any time without notice, but also their suppliers and sub-contractors who are involved in the production of our goods;
- All third parties who perform work or supply materials to our suppliers must commit to the same stringent terms as our contracted supplier does;
- We have absolute prohibitions on the sourcing of any labour or materials from certain regions and sectors in which modern slavery practices are known to be especially prevalent. These include cotton grown in Uzbekistan, and factories operating in the Xinjiang province in China;
- We require all workers to be properly paid, and to be of proper working age;

- We require adequate rest and where applicable safe, clean and comfortable living quarters to be provided to workers;
- We require that all workers be freely and honestly engaged, never be coerced in anyway to work against their wills, and be free to leave their employment as and when they choose;
- We require that our suppliers have copies of a fact sheet we give them prominently displayed in their factories. These fact sheets are translated into all commonly spoken local languages, and set out what rights and conditions the facility operator has committed to us to provide for workers. It gives workers the details of channels through which they can make a direct confidential complaint to us if they believe those conditions are not being provided.

We also have stringent protocols in place in relation to the production and importation of timber products. We have a close and longstanding relationship with our key supplier of timber products and work with it, and all of our other offshore suppliers of timber products, within the framework of a comprehensive compliance system that ensures suppliers give us reliable assurances that our timber has been responsibly sourced and produced.

### **How we assess the effectiveness of our actions**

Our ability to influence our suppliers is in part reflective of the quality of our business relationships and in part how we monitor their performance.

We seek feedback from suppliers on an ongoing basis.

We choose to engage with reputable independent advocacy groups such as Baptist World Aid Australia, which helps us to better understand what comparable businesses are doing to help combat these practices.

We also routinely invest in the services of expert third-party audit providers to audit our suppliers' records and factories. Our auditors are adept at detecting even carefully concealed modern slavery practices, and are briefed to comprehensively investigate factory operations including uncovering hidden accounting records (which might reveal underpayments or undisclosed sub-contractors), viewing personnel files, privately interviewing workers, inspecting living quarters and investigating recruitment practices.

We have mapped our supply chain to identify potential gaps, and have created a plan to fill those gaps over time. This allows us to have greater certainty about the identities and practices of our suppliers' suppliers, and to assess modern slavery risks accordingly.

Evaluating and addressing modern slavery risks are central parts of supplier management processes. We do this using objective key performance indicators and controls to monitor ongoing risks. These include taking in account:

- Suppliers' willingness to disclose and give access to all levels of their manufacturing processes;
- Whether suppliers completed any improvement actions in a timely matter; and
- Suppliers' preparedness to fully and openly engage in our assessment activities such as regular ethical sourcing surveys and third party audits.

**Our consultation with any entities we own or control**

Our practices and contractual arrangements apply group-wide, and include all of our overseas trading entities and domestic related companies.

The content of this statement was approved by the boards of each of the reporting entities covered by this statement. The boards of Steambrook Pty Ltd, F. C. Australia Pty Ltd, Seed Heritage New Zealand Pty Ltd, Seed Heritage Singapore Pte Ltd, Landmark Concept Ltd and Seed Heritage Canada Holdings Limited each approved this statement on 15 December 2022.

**Signed by the responsible member of each board:**

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**Daniel Hammerschlag**  
**Finance Director**

**Steambrook Pty Ltd, F. C. Australia Pty Ltd, Seed Heritage New Zealand Pty Ltd, Seed Heritage Singapore Pte Ltd,  
Landmark Concept Ltd and Seed Heritage Canada Holdings Limited**

**15 December 2022**