



# DECJUBA 2021 MODERN SLAVERY STATEMENT

This statement outlines the actions DECJUBA (ABN 22 611 918 873), is taking to address the risks of Modern Slavery in our business operations and supply chain for the 2021 end of financial year.

At DECJUBA, we define Modern Slavery as any practices such as human trafficking, slavery, forced labour, child labour and slavery-like practices where one person has taken away another person's freedom by threats, violence, coercion, abuse of power and deception.



## A WORD FROM OUR CEO

At DECJUBA, our brand promise is to 'deliver amazing' – as part of this promise, we are committed to eliminating Modern Slavery. We understand that Modern Slavery is part of a complex set of issues and challenges, and we are committed to a long term and considered approach which will allow us to be part of this change.

We are proud to submit our second formal Modern Slavery Statement, taking responsibility for transparent and ethical business dealings across all platforms.

We know that Modern Slavery disproportionately affects women. As a female-led organisation with more than 1500 employees, and partner suppliers across the globe, we take seriously the responsibility to lead from the front, 'be the change' and take our place amongst those taking measures to eradicate Modern Slavery and human trafficking.

Tania Austin, DECJUBA, Owner & CEO

# INTRODUCTION

DECJUBA is a privately owned, Australian retailer, offering effortless, edgy fashion. Since being relaunched by Tania Austin in 2008 DECJUBA has grown the head office (Melbourne, Victoria) and store footprint to over 140 stores across Australia and New Zealand. DECJUBA employs over 1,500 team members, represented by a mixture of full-time (26%), part-time (9%) and casual (65%) team members.

Aiming to 'deliver amazing' at every touchpoint, DECJUBA launched its first sub-brand, D-LUXE Basics, in 2016 and expanded the brand in 2017 with DECJUBA Kids. In addition to our physical stores, we operate online, catering to our Australian, New Zealand and international customers. The online offering is managed through our Australian Head Office.



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*We are committed to real, sustainable long-term change that will impact lives.*

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# OUR SUPPLY CHAIN

We are proud to have long-standing partnerships with our suppliers, some of whom we have known for many years. These relationships are fundamental to the success of our journey. During non-COVID effected times, our leadership team regularly visits our suppliers and their manufacturing sites, continually building and developing transparent and authentic relationships.

With products ranging from apparel, footwear and accessories, the future sourcing model will see our products manufactured in multiple countries including Australia, China, Vietnam, Pakistan, Indonesia, and Sri Lanka.

DECJUBA has no financial interest or ownership in any of the factories used to manufacture our products. Further information on our ethical partnerships and factory locations can be found on the ethical partnerships page on our website.

DECJUBA's production occurs via a supplier/agent and sub-contractor model where suppliers either own their factories or sub-contract the production to other factories. Our products (finished goods) are sent from our suppliers to Australia and New Zealand via sea transport, then distributed to our stores through our third-party warehouses in Melbourne, Australia and Auckland, New Zealand.

Our business operations also extend to other business areas, including transport and logistics providers, property, cleaners, procurement (office suppliers), visual merchandising, and promotional materials.



# MODERN SLAVERY

## UNDERSTANDING THE RISKS

At DECJUBA, we frequently assess the potential risks of Modern Slavery within our business operations and supply chain. Our local operations are identified as low risk, while our offshore manufacturing program presents a higher risk. By examining each supplier model and geographical location, we have determined the higher risks areas across supplier, product and supply chain as follows:

### SUPPLIER RISKS

We recognise our sourcing model, by its nature of suppliers and agents who act on our behalf, may present an increased risk of modern slavery and forced labour. We utilise our suppliers to manage the sub-contractor relationship to manufacture our products.

### PRODUCT RISKS

Textiles and apparel present a greater risk of modern slavery due to the many and varied stages of production required, some with little to no industry oversight to protect workers across the supply chain.

### SUPPLY CHAIN RISKS

Our work through robust factory auditing, supplier and factory visits, researching product categories, sourcing markets and engaging industry experts has helped us to better understand the potential risks within our sourcing model such as forced labour, child labour, poor recruitment practices and migrant/cross border labour, all of which create an increased risk of modern slavery.

We also know our risks can depend on the way we interact with different production stages within our supply chain, including:

- Where we work with Tier 1 suppliers who act on our behalf to manage subcontractors to manufacture our products;
- Where our sourcing model uses Tier 2 – 3 factories in foreign markets; and
- Where we have detail around the traceability of Tier 4 operations.

We govern these risks by requiring our suppliers to implement our social compliance expectations throughout their supply chain activities.

COVID-19 has presented many challenges when working with our suppliers and factories, including not allowing travel, which leads to the cancellation of events such as our annual supplier conference and in-country factory visits. These activities are equally as important to us as they are to our business partners. We are committed to in-person factory visits and face-to-face supplier conferences when travel is again accessible and safe.

# MODERN SLAVERY OUR ACTIONS

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*Ethical and sustainability practices are at the core of our values as a business.*

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Our first step in addressing the risk of modern slavery in our supply chain operations was to establish the DECJUBA Ethical Sourcing and Social Compliance Code. Additionally, we have developed supporting policies to the code, including a Modern Slavery Policy and a Forced Labour Policy, giving a more detailed approach to our expectations of suppliers and factories including our remediation process in the event of a confirmed case of modern slavery.

In addition to developing our DECJUBA Ethical Sourcing and Social Compliance Code and supporting policies, we have implemented the following to assist us to minimise the risk of modern slavery while improving our sourcing practices:

## 1. SUPPLIER AGREEMENT

DECJUBA suppliers must agree to all terms and sign our Supplier Agreement. This agreement covers our operational business relationship and all trading terms including governance of the supply chain. Suppliers cannot be used for any activity until a signed Supplier Agreement has been received and approved by DECJUBA.

## 2. TRACEABILITY

DECJUBA has established traceability as a key pillar of our Ethical Partnerships. We have completed tracing 100% of our Tier 1 factories. Our Supplier Agreement also stipulates that all Tier 1 sub-contractors are disclosed and approved by DECJUBA before being engaged. We are currently working through Tiers 2 (Inputs) and 3 (Fabrics), and have taken steps to traceability with our Tier 4 (Raw Materials) suppliers and will continue this process over the 2022 year.

## 3. ONBOARDING PROCESS

In 2021, we implemented further changes to strengthen our requirements to develop a more controlled supplier onboarding process. We now review every new Supplier business model, including ownership, size, scope, and capability, before proceeding to a final assessment of the Social Compliance Audit Report. The new onboarding process allows us to refine our supplier base and identify those partners with a shared ethical view.

Our standard practice involves visiting each of our factories to look at the premises and manufacturing processes. Our teams meet with the factory owners to understand their views and policies on environmental and social issues before approval. Due to COVID-19 travel restrictions, we are currently conducting this process electronically with the plan to revert to our standard practice with suppliers once travel restrictions cease.

#### 4. FACTORY AUDITS

To ensure our workers' are protected from the risk of modern slavery, we utilise an independent factory audit program. Within these audits are confidential individual and group worker interviews where they can raise concerns. From this, we conduct annual follow up audits to address these concerns and ensure corrective actions.

#### 5. INTERNAL SUPPLIER RATING SYSTEM

Our internal Supplier Rating system is carried out by our Compliance Manager. Suppliers receive a rating on several set criteria that include metrics around sustainability and ethical practices. We regularly review this information and speak with Suppliers to drive continuous improvement.

#### 6. TRAINING

DECJUBA conducts MSS-related training for its employees and suppliers so that they have a clear understanding of the risk of modern slavery and DECJUBA's remediation program. We are committed to delivering and improving our training programs over the coming years with internal and external specialists to ensure we keep up to date with new identification and mitigation strategies across modern slavery.

#### 7. REPORTING OUR PROGRESS

DECJUBA is committed to ensuring we are communicating ethical sourcing and sustainability messages on our external website. We acknowledge our reporting still requires further work to meet industry and consumer expectations, and in turn, to be more transparent with new identification and mitigation strategies across modern slavery.



## 9. ADDITIONAL MEASURES

2021 saw an increased focus on Supply Chain transparency with the appointment of an internal compliance manager. This has allowed DECJUBA to continually develop and measure supplier's adherence to our policies.

These included:

- Supply chain consolidation - introducing full-service suppliers who can undertake all required stages of production in the one factory (vertical operations).
- Improving supply chain relationships - despite restrictions due to COVID-19, we have built even stronger supplier relationships through the use of technology such as conference call facilities. Regular communication ensures we maintain visibility of our suppliers and that our CSR practices are still being embedded into our supply chain, as well as making sure our Suppliers know and are free to give feedback on our ordering process.
- Communicating with our suppliers more frequently to ensure we all stay informed and connected.
- Engaging with external resources to help us better understand global expectations and how we implement these into the DECJUBA operations.
- Recruiting resources to oversee our Ethical and Sustainability programs.

- Continuing our journey to a more sustainable future by partnering with organisations to protect workers in the supply chain. Examples of these partnerships include BCI (Better Cotton Initiative), Verité, Walk Free and The Textile Exchange a not-for-profit organisations that aim to improve the textile industry standards.

We understand that there are challenges to eradicating modern slavery; and we are committed to ensuring we protect workers from all aspects of modern slavery across our business operations. We acknowledge that even though we have taken some action to minimise modern slavery across our business, we still have further steps to put in place and are committed to implementing these actions moving forward.



# ASSESSING OUR ACTIONS

To support our approach to combatting modern slavery, DECJUBA has developed a road map in 2021 to effectively deliver our goals. Several actions and tools have been created to understand and assess if our commitment to eradicating modern slavery from our supply chain is effective or requires adjustment. The ongoing assessment ensures we provide an adequate level of protection to workers.

Being able to measure our performance in reducing modern slavery across our business operations is key to understanding how we improve as a business. We utilise several indicators and tools to measure our approach, including: setting KPIs, education and training, feedback sessions, engagement in supplier conferences and using external benchmarking data to assess progress.

ACTION/TOOLS	WHY	OUR PROGRESS	TIMELINE
INTERNAL MS KPI'S	Measuring if the actual number of MS cases identified in DECJUBA is reducing	DECJUBA have not identified any case of MS in its business operations	Ongoing
TRAINING SESSIONS	Educating our team and Suppliers on our MS expectations	Internal – 1 training session held in late 2021 External – 1 training session held in Multi Regions in 2022	Ongoing
EXTERNAL METRICS	Using external metrics such as the Global Modern Slavery Index to identify factors that make people vulnerable and provide an analysis of the action's country governments are taking to respond to Modern Slavery.	Every sourcing market has been assessed against the Global Modern Slavery Index to understand where risk is highest, enabling us to focus our attention where it is needed most.	Ongoing use and focus for attention during 2022
PRODUCT CATEGORIES (RISK)	Different product categories involve different levels of MS risk such as the actual processes involved during manufacturing, or the materials and components required.	We are working towards implementing risk mitigation strategies such as sourcing components from a region with stronger MS controls and visibility in Multi Regions.	Focus during 2022
FACTORY AUDITS	Using an independent assessment of a factory's social compliance standards is a key tool for assessing MS risk.	Every Tier 1 Factory used by DECJUBA today (both Supplier owned or through a sub-contractor) has achieved this audit expectation.	Continued adherence during 2022 including Tier 2 factories
WORKER INTERVIEWS	Listening to the factory workers is critical to ensuring we are working towards protecting them.	Every audit completed includes this requirement and if/when required, is highlighted in reporting by the auditor for us to follow up. In 2022, we will look at ways to improve the worker's voice e.g., Confidential Grievance Mechanisms.	Focus on Grievance Mechanisms during 2022/23
SUPPLIER CONFERENCE	Supplier Conferences allow us to build supplier relationships and educate our Suppliers on expectations towards eradicating MS within Supply Chains and our business dealings.	Successfully managed a virtual conference with our suppliers in October 2021. We were able to share strategic goals and acknowledge the contribution made by our supplier group. The conferences will remain as virtual until international travel opportunities become clearer.	Focus on continual improvements during 2022
FACTORY VISITS	Being on the factory floor and speaking with factory owners, managers, supervisors and factory workers helps us gauge how workers treatment. Site visits also allow DECJUBA to assess factory managements attitude towards workers and provides visibility of workers performing their roles in the factory environment.	Virtual meetings remain. Global borders beginning to open and travel will be assessed in line with government guidelines and recommendations.	Virtual floor walks with factories in 2022

\* MS – Modern Slavery

\* KPI – Key Performance Indicators

## CONSULTATION

DECJUBA does not own or control any other business entity. The update of this 2021 report resulted from ongoing consultation across the DECJUBA business with senior management, and external body's and relevant team members where required. The sub-entities such as D-LUXE and DECJUBA Kids are part of the DECJUBA business and managed by the same internal management team.

## COVID-19 RESPONSE

COVID-19 continued to present challenges throughout 2021 for DECJUBA. Our supplier partners continued to work successfully with us as we navigated deliveries with no cancelled orders as a result of store closures.

Our actions during these times include:

- DECJUBA offices and stores continued to operate within state and federal government guidelines;
- Increased cleaning programs remained in place and providing required PPE where necessary;
- Ensuring Suppliers paid workers in line with their legal entitlements;

The DECJUBA team is committed to utilising our influence, driving change and improving people's lives.

We know our responsibility does not end here, and we will continue taking steps forward over the coming years to eradicate the risk of modern slavery from our end-to-end Supply Chain.

# DECJUBA APPROVAL

This Modern Slavery Statement has been approved by  
Tania Austin, Sole Director, Owner & CEO.

SIGNATURE:

A handwritten signature in white ink, appearing to read 'Tania Austin', is written over a horizontal white line.

DATE: 31 DECEMBER 2021

[www.decjuba.com.au](http://www.decjuba.com.au)