

ZIMMERMANN

MODERN SLAVERY STATEMENT 2025

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INTRODUCTION

Zimmermann is a luxury Australian fashion brand designing and retailing women's ready-to-wear clothing, swimwear, resortwear, accessories, and childrenswear.

Founded in 1991 by sisters Nicky and Simone Zimmermann, the Creative Director and the Chief Operating Officer respectively, the brand has grown from its Australian roots to operate globally.

This Modern Slavery Statement is prepared in accordance with the Modern Slavery Act 2018 (Cth) (the Act) and covers the reporting period from 1 July 2024 to 30 June 2025 unless otherwise stated.

OUR COMPANY AND PRODUCT

This Statement is made on behalf of AI Grace Aus HoldCo Pty Ltd, AI Grace Aus MidCo Pty Ltd, AI Grace Aus BidCo Pty Ltd, Oceania (TopCo) Pty Ltd, Zimmermann International Pty Ltd, Zimmermann Holdings Pty Ltd and their subsidiaries:

- + Zimmermann Wear Pty Ltd (062 643 609), responsible for design, sourcing, procurement, manufacture, production, Australian retail and wholesale operations, international wholesale operations, and the Australian head office;
- + Zimmermann (USA), Inc. (83-0501744), responsible for retail operations in the United States, online sales, and the American office located in New York City;
- + Zimmermann U.K. Limited (10189074), responsible for retail operations in the United Kingdom and online sales;
- + Zimmermann France (834780892), responsible for retail operations in France, European online sales, and the European office located in Paris;
- + Zimmermann Italy S.R.L. (10521850965), responsible for retail operations in Italy;
- + Zimmermann SP, S.L. (B16965246), responsible for retail operations in Spain;
- + Zimmermann (Shanghai) Clothing Accessories Co. (913100000MA), responsible for retail operations in China and digital sales;
- + Zimmermann St Barths (881 429 864), responsible for retail operations in Saint Barthélemy;
- + Zimmermann Germany GmbH (290354), responsible for retail operations in Germany;
- + Zimmermann Monaco S.R.L. (24S09725), responsible for retail operations in Monaco;
- + Zimmermann Greece (172076001000), responsible for retail operations in Greece;
- + Vivaia AG (105.841.823), responsible for retail operations in Switzerland; (together, the ‘Subsidiaries’).

In this document, unless otherwise apparent from context, references to ‘Zimmermann’, ‘we’ or ‘us’ are to the corporate group collectively.

Zimmermann engages in the design, manufacture, marketing, wholesale, and retail of luxury womenswear, as well as childrenswear and accessories. Womenswear constitutes the majority of our business, with the remainder comprising childrenswear and accessories such as bags, shoes, hats, jewellery, and sunglasses.

OPERATIONS AND SUPPLY CHAIN

Zimmermann operates retail stores in Australia, the United States, Saint Barthélemy, the United Kingdom, France, Germany, Monaco, Italy, Spain, Greece, Switzerland, Belgium, the United Arab Emirates, Saudi Arabia, Kuwait, Bahrain and China, and has a global digital business and international wholesale partners. Our head office is in Sydney, with additional operations in Paris and New York. In FY25, Zimmermann employed approximately 2,314 people worldwide.

Our supply chain includes Tier 1–5 suppliers:

Tier 1	Finished product manufacturing and assembly
Tier 2	Material manufacturing, such as suppliers of our fabrics and trims
Tier 3	Raw material processing, such as mills that create the yarn for fabrics
Tier 4	Raw material production (e.g. cotton farms)
Tier 5	Manufacturing of ancillary materials such as packaging

We do not own or operate factories. Our partners range from medium-sized facilities to small artisan workshops.

Garments represent the largest product category, accounting for 89% of our FY 2025 spend, whereas accessories and footwear account for the remaining 11%.

We also partner with logistics service providers and other organisations providing professional services.

OPERATIONS AND SUPPLY CHAIN

Our supply chain distribution in FY 2025:

	<i>% of Spend by Country</i>		<i>% of Spend by Country</i>
Country of origin of finished goods (Garments, Accessories and Footwear)	77% China	Country of origin of fabrics and trims	92% China
	7% Italy		4% Italy
	5% Vietnam		1% Portugal
	4% Sri Lanka		1% India
	3% Portugal		0.45% Turkey
	1% India		0.45% Japan
	1% Turkey		0.27% Spain
	1% Madagascar		0.13% Thailand
	1% Spain		0.13% France
	0.11% Indonesia		0.08% Other Countries
	0.06% Ecuador		
	0.03% Australia		

Number of suppliers and production facilities:

	<i>Number of Suppliers</i>	<i>Number of Production Facilities</i>
Tier 1 Garments	32	46
Tier 1 Accessories and Footwear	21	26
Tier 2 Accessories, Fabrics and Trims	62	126

GOVERNANCE

The Board of Zimmermann Wear Pty Ltd and the Chief Operating Officer hold ultimate responsibility for ethical business conduct and modern slavery risk management. Zimmermann employs a Global Sourcing Compliance Manager and a Sustainability and Social Compliance Manager who have day-to-day responsibility for assessing and managing modern slavery risks, supported by a cross-functional Human Rights Working Group.

Human Rights Working Group

Co-chaired by the CEO and COO, the Human Rights Working Group is composed of representatives from the following departments:

- + Production
- + Sustainability
- + Sourcing
- + Human Resources
- + Retail
- + Legal
- + Marketing
- + Logistics

MEMBERSHIPS AND PARTNERSHIPS

Zimmermann is a member of the UN Global Compact and the Modern Slavery Community of Practice hosted by the Global Compact Network Australia. These memberships support engagement with industry peers, multi-stakeholder dialogue, and the sharing of best practices on addressing human rights and modern slavery risks. In addition to our formal memberships and partnerships, we regularly connect with peers and external experts to explore opportunities for collaboration.



RISKS OF MODERN SLAVERY IN OPERATIONS AND SUPPLY CHAIN

We follow the UN Guiding Principles on Business and Human Rights to assess and address modern slavery risks. Our Human Rights Working Group meets bi-annually to evaluate potential and actual human rights impacts across our operations and value chain. Key risk areas include segments of our supply chain in Asia, particularly where decentralised, home-based work is used in accessories and hand-crocheted garments, and lower-tier textile production such as cotton farming and yarn processing, where transparency is more difficult to achieve.

Zimmermann's salient human rights impacts are assessed across a range of stakeholder groups, including employees, value chain workers, customers, suppliers, business partners, and the broader communities in which we operate. Further details on these impacts, including risks of forced and child labour, are outlined in our [Human Rights Policy](#).

Our current methodology for assessing modern slavery risks considers both country-level factors, such as political, socio-economic, and environmental conditions, and sector-specific risks, including supply chain complexity, the employment of vulnerable workers, recruitment practices, and purchasing practices.

To identify risk indicators and monitor mitigation efforts at the site level, we use a combination of audits and Worker Sentiment Surveys. In addition, we regularly conduct site visits to directly assess alignment with our values and expectations.

ACTIONS TAKEN TO ADDRESS THOSE RISKS

CAPACITY BUILDING

Zimmermann provides mandatory modern slavery training for employees globally and specialised training for procurement teams and key suppliers.

We collaborate with local ethical trade specialists to deliver training in suppliers' local languages. During the reporting period, we delivered specialised training on Responsible Recruitment and Employment Contracts to address recurring issues identified through our grievance mechanism and audit findings.

Six key suppliers representing 60% of our spend were invited to participate in this capacity-building initiative, with five suppliers attending the comprehensive session.

The training was designed in two parts: the first focused on educating suppliers about the principles of responsible contracting, compliance risks, and best practices for robust employment contracts; the second equipped suppliers with materials and methodologies to effectively train their own workers on employment rights, entitlements, and contract obligations. All participating suppliers received training materials in Mandarin, along with additional resources on local employment and labour law legislation, enabling them to cascade this critical knowledge throughout their workforce and strengthen compliance with fair recruitment and employment practices.

Additionally, we provide expert support to audited facilities, assisting them in developing Corrective Action Plans (CAPs) to address nonconformities identified during assessments. This guidance equips each site with a solid understanding of root cause analysis, ensuring they address underlying issues rather than just surface-level symptoms.

RESPONSIBLE PURCHASING PRACTICES

We have established strong commercial relationships with many of our suppliers, some of whom have partnered with us for over ten years and collectively account for approximately 70% of our Tier 1 spend (Primary Suppliers).

A significant portion of our Primary Suppliers' business is dedicated to Zimmermann. We maintain regular dialogue with them around forward planning and workflow, which helps ensure adequate staffing during peak periods.

Our approach to supplier engagement focuses on building strong, long-term partnerships that are mutually beneficial. We encourage suppliers to provide feedback, which informs our evaluation of purchasing practices.

When onboarding new suppliers or production facilities, we require them to complete a self-assessment questionnaire that covers labour standards and specific indicators of modern slavery risk.

Suppliers must sign our [Supplier Code of Conduct](#), which incorporates human rights principles. Our Supplier Code of Conduct is integrated into supplier contracts.

ACTIONS TAKEN TO ADDRESS THOSE RISKS

% of suppliers that have signed our Supplier Code of Conduct:

	FY2025	FY2024	FY2023	FY2022	FY2021	FY2020
Tier 1 Garments	100%	98%	100%	100%	98%	96%
Tier 1 Accessories and Footwear	96%	100%	100%	100%	92%	86%
Tier 2 Fabrics and Trims	97%	98%	94%	98%	98%	82%

We conduct independent third-party audits of production sites, prioritising those with higher risk profiles and new facilities.

Corrective actions are monitored and supported through targeted programs. While termination may occur if suppliers fail to meet our standards, it is considered a last resort, typically applied when suppliers are uncooperative or unwilling to implement improvement plans.

SUPPLY CHAIN MAPPING AND TRACEABILITY

Zimmermann requires suppliers to disclose material origins and processing locations to ensure accountability and prevent modern slavery risks. Our Traceability Policy mandates mapping materials to their sources, with a particular focus on priority natural fibres such as cotton, linen, silk, and wool, and on all other materials upon request.

% of key natural fibres' weight traceable at each stage in FY 2025:

Tier 4 (Country)	Tier 3 (Yarn supplier or mill)	Tier 2 (Fabric weaving or knitting mill)	Tier 3 (Yarn colouration) and Tier 2 (Fabric colouration)	Tier 1 (Garment factory)
54%	68%	90%	93%	100%

Traceability across all Tiers continues to improve. In FY 2024, the traceability percentages for Tiers 4, 3, 2 (fabric weaving or knitting) and 3/2 (yarn or fabric colouration) were 51%, 59%, 87% and 79%, respectively.

In accordance with our Traceability Policy, suppliers are required to provide appropriate documentation, such as invoices and transport documents, to demonstrate the chain of custody of materials. To verify the claimed origin of raw materials, we also conduct spot checks using traceability technologies, including fabric isotope testing.

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

We monitor progress through audit outcomes and worker engagement.

Within our supply chain, anonymous worker surveys help uncover issues that may not be apparent through audits alone. Worker engagement is an integral part of our audit process. We use technology-enabled anonymous surveys to capture workers' perspectives across key indicators: Labour, Health and Safety, Environment, and Management Systems. Survey results are reviewed alongside audit reports and inform decisions on corrective actions and capacity-building initiatives. Since the programme launched in 2020, 3024 surveys have been completed. 832 supply chain workers responded to the survey in the reporting period.

FY 2025 Survey Results:

<i>Indicators</i>	<i>Strong Performance</i>	<i>Satisfactory Performance</i>	<i>Needs Improvement</i>	<i>Needs Significant Improvement</i>	<i>Average Score FY 2025</i>
Labour	18%	26%	38%	18%	Needs Improvement
Health and Safety	28%	28%	41%	3%	Satisfactory Performance
Environment	21%	44%	33%	3%	Satisfactory Performance
Management System	13%	49%	33%	5%	Satisfactory Performance

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

Sites Audited in FY 2025

		<i>Tier 1 Garments</i>	<i>Tier 1 Accessories & Footwear</i>	<i>Tier 2 Accessories, Fabrics & Trims</i>
Audits	Total number of sites	46	26	126
	Sites audited in FY25	44	16	31
	New sites in the reporting year	4	9	15
	% of new sites audited in the reporting year	100%	44%	27%
	% of suppliers terminated as a result of the audit	0%	0%	0%

Audit-based Risk Assessment

Audit performance: Needs significant improvement ¹	12%
Audit performance: Needs improvement	12%
Audit performance: Satisfactory	62%
Audit performance: Good	14%
Percentage of female workers	65%
Percentage of foreign migrant workers	0.24%
Transparency rate ²	54.32%
Incidents relating to forced and child labour or abuse	None identified
Freedom of association and collective bargaining violations	None identified

¹ These are sites identified as having non-transparent recordkeeping, either being unable or unwilling to provide the necessary documents to evaluate wages, benefits, and compliance with overtime limits.

² Sites that have demonstrated transparent practices, including accurate recordkeeping. Due to varying transparency assessments by different audit frameworks, this indicator includes only audits arranged by ZIMMERMANN.

GRIEVANCE MECHANISMS AND ACCESS TO REMEDY

Impacted stakeholders can seek remedy through the process outlined in our [Whistleblower Policy](#).

Additionally, Zimmermann provides confidential grievance channels in key factories, enabling workers to report concerns safely. These channels are operated by an independent third party.

To align with the effectiveness criteria described in the UN Guiding Principles on Business and Human Rights, we have partnered with an organisation with over a decade of experience in designing and implementing grievance mechanisms and supporting remediation.

Our approach to remediation prioritizes worker wellbeing and involves collaboration with suppliers, trade unions, NGOs, and local experts where necessary. Corrective measures may include rectification, process improvements, or, in severe cases, termination of relationships with non-compliant suppliers.

During FY25, we strengthened our supply chain grievance mechanism to provide workers with greater voice and access to remedy. The confidential hotline currently operates in eleven factories across five key suppliers in China, representing approximately 56% of our finished goods spend.

In December 2024, we conducted comprehensive refresher training across all participating facilities, achieving exceptional participation rates of 97-100% and training approximately 615 workers in Mandarin Chinese. The training utilized multiple engagement methods including video presentations, role-play exercises, and interactive Q&A sessions to ensure workers understood how to safely raise concerns.

Since the mechanism's launch, 29 grievances have been successfully lodged and resolved, with 76% relating to compensation and employment contract issues. This channel has proven instrumental in identifying workplace concerns early and enabling prompt remediation, reinforcing our commitment to worker wellbeing and the UN Guiding Principles on Business and Human Rights.

All grievances received during the reporting period were investigated and resolved, including cases relating to incorrect wage payments, excessive overtime, and incomplete employment documentation. Each case was addressed through a structured remediation process, which involved close collaboration with the relevant suppliers to conduct a root cause analysis and develop corrective action plans.

These plans included measures such as revising payroll systems, implementing stricter overtime controls, and ensuring proper employment documentation. To verify the effectiveness of these actions, we deployed anonymous worker surveys and conducted follow-up checks to confirm that the issues were fully resolved and that workers were satisfied with the outcome.

PLANNED PROGRESS

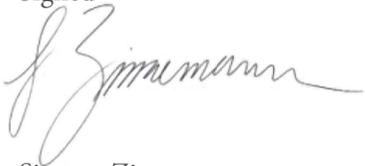
For the next reporting period, we aim to:

- + Maintain and expand supply chain traceability
- + Increase on-site visits by social compliance staff
- + Continue to strengthen the ability of our suppliers and internal procurement teams to identify and mitigate modern slavery risks
- + Ensure 100% Supplier Code of Conduct adherence in Tier 1 and improved execution in Tier 2
- + Continue engaging workers and suppliers through training and anonymous surveys

PROCESS OF CONSULTATION WITH OTHER ENTITIES

This statement was developed with input from multiple functions across our business and approved by the Boards of the reporting entities on 9 December 2025. It is signed on behalf of the Boards by Simone Zimmermann, Director of AI Grace Aus HoldCo Pty Ltd, AI Grace Aus MidCo Pty Ltd, AI Grace Aus BidCo Pty Ltd, Oceania (TopCo) Pty Ltd, Zimmermann International Pty Ltd, Zimmermann Holdings Pty Ltd, and Zimmermann Wear Pty Ltd.

Signed



Simone Zimmermann
Director

Zimmermann Wear Pty Ltd
Zimmermann Holdings Pty Ltd
Zimmermann International Pty Ltd
Oceania (TopCo) Pty Ltd
AI Grace Aus BidCo Pty Ltd
AI Grace Aus MidCo Pty Ltd
AI Grace Aus HoldCo Pty Ltd

Dated: 9 December 2025





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