

APG & CO
THE BRAND ASSEMBLY

Modern Slavery Statement

FY2024

From the CEO

“APG & Co remains committed to driving meaningful change in our industry.”

References to *‘our’* and *‘we’* in this Statement are references to APG & Co.

I am pleased to present APG & Co’s fifth modern slavery statement, outlining our commitment to reducing modern slavery risks within our operations and supply chains.

In FY24, we made significant progress, developing a comprehensive sustainability strategy aligned with global frameworks like the United Nations Sustainable Development Goals (UN SDGs) and B Corp Impact Areas. This strategy forms a core part of our business, embedding sustainability across all facets of our operations. To ensure transparent and measurable progress, we have developed key focus areas for each strategic pillar, allowing us to assess and report on our impact. We continue to develop roadmaps with key performance indicators, a project we plan to complete next financial year. Our Sustainability Manager, reporting to the Chief Financial Officer (CFO), leads this approach, ensuring sustainability is integrated into our risk management processes and updates are regularly provided to the Audit Committee.

APG & Co’s executive leadership also took the strategic decision to expand the duties of our CFO to include the title and responsibilities of the role of Chief Operating Officer (COO); and the new title of CFO & COO was announced on 1 July 2024. This decision reflects the work the business is doing to garner synergy between key departments like finance, supply chain, sustainability and operations, all reporting into our CFO & COO.

Looking ahead, we’re excited to reinstate our annual supplier conference in FY25 which provides an essential opportunity to strengthen our partnerships and align our goals for ethical and sustainable practices across our supply chains. This event, combined with our modern slavery training and expansion of Retraced platform, will deepen our staff and our suppliers’ understanding of APG & Co’s values, compliance needs, and responsible sourcing practices.

A key milestone for FY24 was launching our worker voice platform, enabling garment workers to report workplace issues anonymously, in local languages. In FY25, we will expand this with a dedicated platform for suppliers to report concerns directly to our Sustainability Manager, fostering a culture of transparency and openness.

APG & Co remains committed to driving meaningful change in our industry. This statement reflects our ongoing journey towards a more sustainable, transparent, and accountable future, grounded in collaboration and shared responsibility.



A handwritten signature in black ink, appearing to read 'E. Hopkinson', written in a cursive style.

Elisha Hopkinson
CEO APG & Co

(This Modern Slavery Statement has been approved by the Board of APG & Co – 5th December 2024)

Things that make us proud at APG & Co

- Transparent and ethical procurement practices, reinforcing our dedication to responsible sourcing
- Strong supplier partnerships, and rigorous approval and compliance tracking led by our Sustainability and Audit teams
- Effective remediation and corrective action protocols, ensuring accountability across our supply chain
- Specialised modern slavery training for both our internal teams and our international suppliers, available in English, Mandarin and Vietnamese
- A comprehensive risk management approach, particularly focused on ethical cotton sourcing
- Policies promoting living wages and gender equality, which are integral to our ethos
- Our legacy of designing and supplying official uniforms for the Australian Olympic Team since 1984, including for the 2024 Games

Identification of the Reporting Entity and Consultation Process

This modern slavery statement, published in accordance with the Modern Slavery Act 2018 (Cth), outlines our actions over the period 1 August 2023 – 31 July 2024 (FY24).

This statement was produced for APG & Co and its four brands, Sportscraft, Saba, Jag, and Willow, on behalf of the Beaujolais Unit Trust who privately owns and controls the retail group.



Consultation Process

Our team compiled this statement through extensive consultations with key internal stakeholders (management, procurement, buying, offshore teams) and our suppliers. We gathered information from various sources, including social audit reports and Retraced assessments from suppliers, direct communications, purchasing records, Bill of Material data from product teams, and production reports from our systems. Insights from expense reports and external research by academic and civil society groups were also incorporated.

After drafting, the statement was reviewed by an external compliance team, our Audit Committee, and the Board of Directors to ensure it reflects all relevant information collected and analysed.

Governance

Audit Committee

At APG & Co, our commitment to human rights is supported at the highest level, with our Board dedicated to upholding our Supplier Code of Conduct and Global Sourcing Principles. The Audit Committee - consisting of our CEO, CFO, Group Financial Controller, and two independent Board members- oversees risk management, internal controls, compliance, and corporate governance. Meeting quarterly, the committee drives improvements across our policies and practices, ensuring a culture of integrity and accountability throughout the organisation.

Finance and Operations

On 1 July 2024, APG & Co announced the change of title and responsibilities of our CFO to include the role of COO to provide strategic oversight for building and implementing the company operational strategy. The following departments report into the CFO & COO role – Finance, Sustainability, Supply Chain and Logistics, Strategy and Commercial, and Technology and Digital Infrastructure. This change reflects the organisation’s commitment to streamline how the business operates and align the key stakeholders with the business objectives and goals including responsible operations and sustainable decision making.

Sustainability Department

In January 2024, APG & Co launched a renewed focus on sustainable practices, and initiated a re-alignment, the new sustainability strategy was one of the projects under that umbrella. In July 2024, after concluding the fundamental projects, the CEO announced the renaming of the ‘Social and Environmental’ department to the ‘Sustainability Department’. Led by a Sustainability Manager reporting directly to the CFO, this shift places sustainability at the core of our strategic decision-making. Effective from 1 August 2024, this change aligns our department name and purpose with global sustainability movements.

Modern Slavery and Audit Team

Our Senior Global Compliance Officer, with over eight years of experience, and the Production and Ethical Manager lead our modern slavery and audit initiatives based out of our China office, and this work is overseen by our Sustainability Manager based in our head office in Sydney. The team conducts unannounced on-site audits and desktop analysis, they work closely with suppliers to ensure compliance, foster relationships, and support use of the Retraced platform.

Our Sustainability Manager oversees compliance, sustainability strategy, and the Retraced platform, collaborating with the Compliance Officer and the General Manager of Supply Chain and Logistics. Together, they advance initiatives in modern slavery due diligence, traceability, living wage, and capacity building, strengthened by partnerships with external agencies and consultants.

Our structure, operations and supply chains



APG & CO's Structure

In FY24, APG & Co continued to grow its footprint and workforce, reflecting our commitment to supporting our team and expanding our reach across Australia and New Zealand. By the end of FY24, our dedicated staff included:

STAFF

Head Office	132	Support Office – Mascot, Sydney
APG& Co employs 893 staff across our head office and stores in Australia and New Zealand.	716	Australian Retail Team
	45	New Zealand Retail Team
Offshore offices in Shanghai, China and Ho Chi Minh City, Vietnam	10	Ho Chi Minh City
	5	Shanghai

Our brand portfolio remains robust, with:

STORES AND CONCESSIONS

Brands, stores and concessions	56	Sportscraft Freestanding Stores
	19	SABA Freestanding Stores
	1	JAG Freestanding Store
	82	Sportscraft David Jones Concessions
	82	SABA David Jones Concessions
	80	JAG David Jones Concessions

Additionally, we are proud to operate across New Zealand through two Sportscraft and SABA stores at Ballantynes, and multiple stores across Smith + Caughey locations for Sportscraft, SABA, and JAG.

Our Product Suppliers

APG & Co is committed to transparency in its supply chain, which is why we publish our supplier list and policies on our website. We continuously review our entire supply chain and operations, including raw material sourcing, to uphold ethical standards.

[Supplier List for 2024](#)

Our production is concentrated in tier 1 factories located in China, Vietnam, Indonesia, India, and Bangladesh. In FY24, we made the strategic decision to cease manufacturing in Sri Lanka, focusing our efforts on our key production hubs. Any small transactions with Sri Lankan suppliers, such as fabric samples or swatches, represent minimal activity outside of production.

APG & Co partners with Apparel Group for manufacturing Costco ranges and the Willow brand. Originally one entity, APG & Co and Apparel Group separated in 2013. Apparel Group produces products for APG & Co, with shared responsibility for factory sourcing and audits. In FY22, APG & Co launched Sportscraft Kidswear, licensing production to Vision Brand Group, and in FY23, launched JAG accessories, with Duraflex Australia handling manufacturing. Factory compliance for Apparel Group, Vision Brand Group, and Duraflex is jointly managed by APG & Co and the licensors.



Our Services (GNFR) Providers

We also rely on essential services that enable APG & Co to operate effectively, ensuring seamless functionality across our head office and multiple retail locations. These include:



Human Resources (HR):

Recruitment, onboarding, payroll, superannuation, and compliance with workplace safety and Fair Work legislation.



Facilities Management:

System maintenance, electrical, plumbing, general repairs, and car park maintenance.



Customer Service:

Call centres or support teams for inquiries, complaints, orders, returns, and refunds.



Health and Safety Services:

Workplace health and safety assessments, fire safety systems, first aid training, and emergency response.



Security Services:

On-site security personnel, CCTV surveillance, alarm systems, and access control.



Legal and Compliance Services:

Legal advice on contracts, business operations, intellectual property, and compliance with consumer laws and privacy regulations.



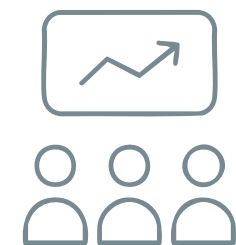
Freight and Logistics:

Transportation of goods from suppliers, warehousing, stock management, and last-mile delivery for online orders.



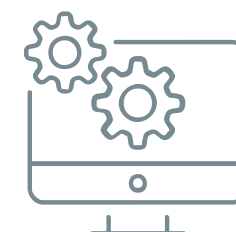
Finance and Accounting:

Bookkeeping, financial reporting, tax compliance, payroll processing, and budgeting.



Training and Development:

Ongoing staff training (sales, customer service, compliance), leadership, and performance management.



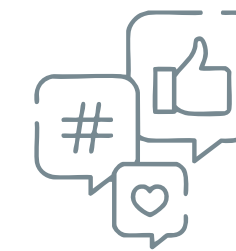
IT and Technical Support:

Installation and maintenance of Point of Sale (POS) systems, network security, and hardware/software support.



Cleaning Services:

Daily cleaning, maintenance, waste disposal, recycling, and sanitisation of our stores and offices.



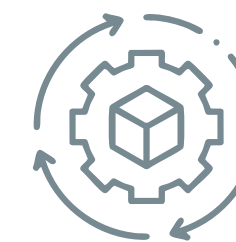
Marketing and Advertising:

Digital marketing, in-store promotions, signage, and branding.



Utilities Management:

Electricity, water, gas supply management, energy efficiency, sustainability initiatives, waste management, and recycling programs.



Supply Chain Management:

Vendor relations, stock replenishment, distribution planning, and demand forecasting.

Our Modern Slavery Risks

Product - Related Risks

APG & Co relies on respected resources to stay informed about modern slavery risks in the inherent risks in the garment industry. The Walk Free Foundation offers critical insights on forced labour, child labour, and slavery risks, particularly in cotton supply chains, while the US Department of Labor provides country-specific data on goods produced by forced or child labour. Additionally, APG & Co consults resources from the International Labour Organization (ILO), Ethical Trading Initiative, and Anti-Slavery International to help identify and address these risks across our supply chains. We recognise that the inherent modern slavery risks in our industry and the main countries where we produce include the following:

Forced Labour

- **China:** The garment industry in China is known for forced labour risks, especially in the Xinjiang region, where the Uyghur population and other minority groups are reportedly subjected to forced labour, particularly in cotton production. The Walk Free Foundation highlights forced labour concerns in this region, and recent reports from the US Department of Labor also highlight forced labour risks in Chinese cotton and garment production.
- **Vietnam:** While Vietnam has made progress in improving labour conditions, reports of forced labour in garment factories persist, especially involving migrant workers from neighbouring countries. Modern slavery resources indicate these workers can be vulnerable to exploitative recruitment practices.

- **India, Bangladesh, and Indonesia:** Forced labour cases are also reported in these countries, particularly in lower-tier suppliers and informal production units. The US Department of Labor identifies risks in sectors producing textiles and garments, where forced labour is sometimes embedded within subcontracting chains.

Child Labour

- **India and Bangladesh:** Child labour remains a serious issue in India and Bangladesh, particularly in rural areas where children are involved in cotton harvesting and textile production. The US Department of Labor has flagged these countries as high-risk for child labour in garment manufacturing.
- **Indonesia:** In Indonesia, the informal garment and accessory sectors present risks for child labour. Reports from the Walk Free Foundation indicate that children, especially in impoverished areas, are sometimes used in informal production environments.

Wage Exploitation and Excessive Overtime

- **China, Vietnam, and Indonesia:** Wage exploitation and excessive overtime are prevalent across these manufacturing hubs. Due to weak enforcement of labour laws, garment workers often endure long hours, unpaid overtime, and low wages, as highlighted by the Walk Free Foundation and other labour rights groups.

Product - Related Risks Cont.

- **India and Bangladesh:** Documented cases of wage exploitation are common in these countries, where factory workers receive less than the minimum wage and are forced to work overtime without fair compensation. This is especially concerning in subcontracted and informal production.

Health and Safety Hazards

- **Bangladesh:** Since the Rana Plaza collapse in 2013, health and safety risks in Bangladesh's garment industry have drawn global attention. While some improvements have been made, many factories still pose high risks due to poor fire safety and building standards. The Accord on Fire and Building Safety highlights ongoing challenges in the sector.
- **India, China, Vietnam, and Indonesia:** Health and safety risks persist in garment factories across these countries, especially in unregistered or subcontracted production units. Workers often lack proper protective gear, and poor ventilation and cramped conditions contribute to occupational health hazards.

Exploitation of Migrant Workers

- **China, Vietnam, and Indonesia:** Migrant workers are particularly vulnerable to exploitation, including withheld passports, excessive recruitment fees, and poor working conditions. The Walk Free Foundation and US Department of Labor reports highlight increased risks for migrant workers, especially in large manufacturing hubs where labour shortages lead to a reliance on migrant workers.

- **Bangladesh and India:** Both countries experience significant internal migration, with workers moving from rural to urban areas. These workers often face exploitation risks, including poor living conditions, wage withholding, and limited legal protections.

Environmental Degradation and Resource Exploitation

- **Cotton Production:** Cotton is a high-risk raw material due to its water-intensive nature and the prevalence of forced labour in its production, especially in China. The Walk Free Foundation highlights the forced labour risks in cotton supply chains linked to Xinjiang region.
- **Leather Production:** Leather tanning and production pose significant environmental risks, including pollution from chemicals used in processing. India and Bangladesh, both major leather producers, have been flagged for unsafe working conditions and environmental degradation in tanneries, where workers are exposed to hazardous substances.

Gender Discrimination and Harassment

- **All Countries:** Gender discrimination and harassment are widespread in garment factories across China, Vietnam, Bangladesh, India, and Indonesia. Female workers, who make up a large portion of the garment workforce, are often vulnerable to discrimination, harassment, and exploitation. Modern slavery resources and the Walk Free Foundation report that many female workers lack access to grievance mechanisms, face unequal pay, and are frequently coerced into working under poor conditions.

Lack of Transparency and Traceability in Supply Chains

- **All Countries:** Many factories rely on complex subcontracting chains that lack transparency, making it difficult to trace labour practices effectively. This is particularly problematic in lower-tier suppliers that handle raw materials and processes such as dyeing and finishing. Both the Walk Free Foundation and US Department of Labor identify transparency and traceability as major challenges, especially in regions with high levels of informal employment.

Risks Associated with Informal and Home-Based Work

- **India and Bangladesh:** Informal and home-based work is common in garment and accessory production in India and Bangladesh. Workers in these settings often fall outside the protection of labour laws, making them vulnerable to low wages, long hours, and poor working conditions. These risks are heightened for women and children, who are frequently involved in home-based work for the garment industry.

Services (GNFR) Related Risks

The following service industries, both in Australia and internationally, have inherent modern slavery concerns, often due to outsourcing, subcontracting, and reliance on vulnerable workers, particularly in countries with weaker labour protections:



Human Resources (HR):

Recruitment agencies, especially those sourcing migrant workers, may engage in unethical practices such as charging recruitment fees, withholding documents, and misrepresenting job conditions, leading to debt bondage and exploitation.



Security Services:

Security roles, often filled by migrant or low-paid workers, are vulnerable to exploitation, including excessive hours, underpayment, and harsh working conditions. Workers are sometimes forced to work in unsafe environments without adequate protections.



Legal and Compliance Services:

Outsourcing legal work to countries with limited labour protections can lead to exploitation through low wages, high-pressure environments, and limited access to legal rights.



Facilities Management:

Facilities maintenance often relies on subcontractors, where low-skilled, vulnerable workers may face poor wages, inadequate safety measures, and little job security. In countries with weak labour protections, forced or bonded labour is a concern.



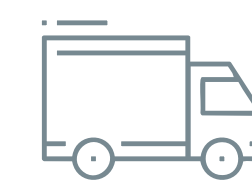
Customer Service:

Call centres are frequently outsourced to low-cost labour markets where workers may experience low wages, high turnover, long hours, and limited labour rights. Lack of job security and forced overtime are also concerns.



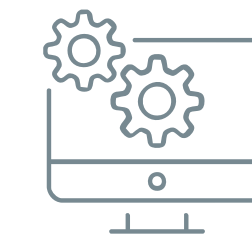
Health and Safety Services:

Health and safety roles, especially in outsourced or subcontracted arrangements, may involve low-paid workers facing inadequate safety protections, excessive working hours, and lack of proper training.



Freight and Logistics:

Exploitation of low-paid or migrant workers, forced overtime, wage theft, and poor working conditions in warehousing and transportation. In some cases, workers face excessive hours and limited access to labour rights, especially in overseas hubs and ports.



IT and Technical Support:

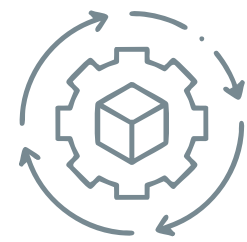
Outsourcing to countries with weaker labour regulations can expose workers to low wages, poor working conditions, and lack of job security. In addition, forced labour can exist in electronic hardware production for POS and IT equipment.



Finance and Accounting:

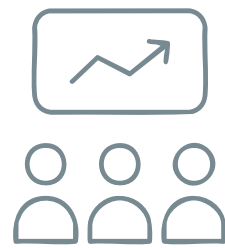
Outsourced bookkeeping and payroll services, especially in regions with weaker labour regulations, can expose workers to low wages, extended working hours, and limited labour rights.

Services (GNFR) Related Risks Cont.



Supply Chain Management:

The need for complex global vendor relationships increases instances of forced labour and exploitation, particularly in regions with poor labour oversight. Suppliers and subcontractors may operate in environments where wage theft, forced labour, and exploitative conditions are common.



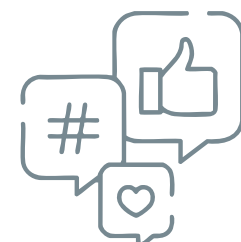
Training and Development:

Outsourced training services, especially those provided online or in low-wage countries, may involve workers who experience low wages, job insecurity, and limited labour rights.



Cleaning Services:

Cleaning services are high-risk for modern slavery due to low pay, exploitative working conditions, subcontracting, and high levels of migrant labour. Workers may face wage theft, limited legal protections, and long hours.



Marketing and Advertising:

Content creation and data processing can be outsourced to countries with less stringent labour regulations, where workers may face low wages, long hours, and lack of job security. Exploitation can also arise in promotional goods production.



Utilities Management:

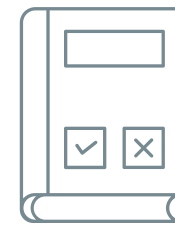
Utilities and waste management, particularly in countries with less oversight, can expose workers to dangerous conditions, long hours, and low wages. Waste disposal and recycling are especially high-risk for forced labour and poor working conditions.



Actions taken in FY24 to address our Modern Slavery risks

Actions to address our product - related risks

We implement our Modern Slavery and related policies



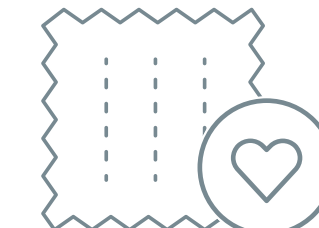
Code of Conduct

Which establishes clear ethical guidelines and expectations around responsible business conduct. It provides a roadmap for suppliers, workers, and employees to understand and adhere to the principles of fair labour, humane treatment, and ethical practices.



Global Sourcing Principles

These are a detailed extension of the clauses in APG & Co's Code of Conduct, this policy expands on the requirements for responsible sourcing of materials and labour.



Responsible Material Sourcing Policy

An internal policy providing guidance for our brands in sourcing responsibly from fibre and textile producers in order to reduce human rights and environmental risk.



Hazardous Substances Policy

A critical policy for protecting the safety of workers, ensuring proper handling and disposal of dangerous substances to minimize health risks and potential human rights violations.



Gender Equality Policy

A policy prioritising the protection of women's rights, which reduces vulnerability to exploitation and workplace safety risks and in doing so, ensures fair treatment and opportunities for all workers.



Living Wage Policy

As part of our wider strategy on human rights, this policy helps us understand how we can improve wage systems for the workers who are engaged within our business and supply chains.

We have a robust supplier approval process

In 2015, APG & Co introduced a supplier approval process for all Tier 1 and Tier 2 suppliers, including co-brand, wholesale, and goods-for-sale suppliers, with mandatory compliance checks to maintain due diligence and supply chain visibility. In 2023, we formalised this into a Supplier Onboarding Process Manual, standardising the selection of ethical suppliers and embedding human rights due diligence (HRDD) early in the engagement. This process involves identifying new suppliers, building relationships, assessing factory quality, signing APG & Co's Code of Conduct and Global Sourcing Principles, and reviewing third-party audit reports. Suppliers based in China and Vietnam undergo additional quality control visits and initial audits. Regular audits ensure ongoing compliance, and we updated our Code of Conduct and Global Sourcing Principles to strengthen our commitment to ethical sourcing and human rights standards.

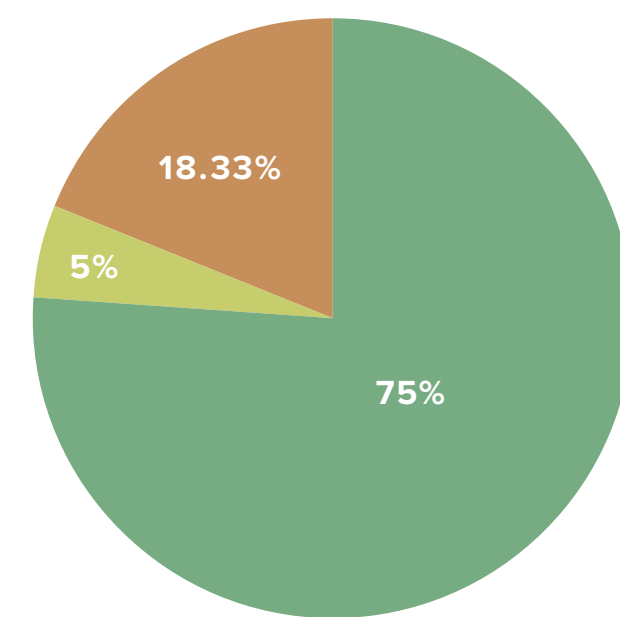
We conduct rigorous supplier audits

APG & Co is committed to ethical sourcing and preventing modern slavery. In FY24, we conducted comprehensive audits across our Tier 1 and Tier 2 supplier factories, including unannounced checks and in-depth reviews of subcontracted and informal units. This ongoing monitoring, coupled with corrective actions, strengthens suppliers' capacity to meet our social and environmental standards, supporting our goal of a modern slavery-free supply chain.

Key findings from our FY24 supplier audits

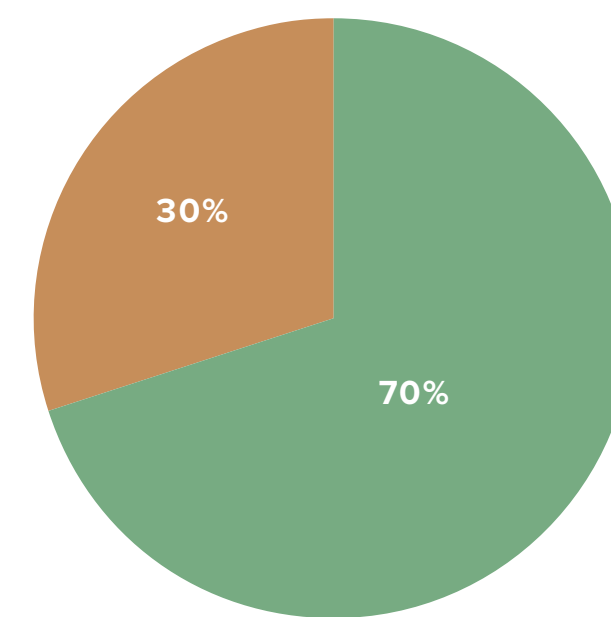
TIER 1 SUPPLIER LOCATIONS		TIER 2 SUPPLIER LOCATIONS	
COUNTRY	FACTORIES	COUNTRY	FACTORIES
China	37	China	19
Vietnam	14	Turkey	5
India	7	South Korea	1
Indonesia	1	India	1
Bangladesh	1	Vietnam	1

TIER 1 FACTORY AUDITS - 60 FACTORIES



● Green rating (strong compliance)
● Yellow rating

TIER 2 FACTORY AUDITS - 27 FACTORIES



● Orange rating
● Red rating (significant non-compliance)

As of 31 July 2024, no factories had a 'Red' rating or had any unaddressed significant compliance issues. Corrective action plans are underway for all Orange and Yellow-rated factories. These results reinforce APG & Co's commitment to high standards in ethical sourcing and modern slavery prevention.

Supplier Visits Update

China's fashion industry has come under intense scrutiny in recent years, particularly regarding cotton from the high-risk Xinjiang region. The Uyghur Forced Labor Prevention Act (June 2022) heightened industry caution, prompting many brands to shift supply chains to other Asian countries. This shift, alongside COVID-19 impacts, has placed additional pressure on suppliers to maintain compliance, which can have unintended consequences for regular garment workers.

At APG & Co, we prioritise compliance and transparency, investing in traceability to mitigate cotton supply chain risks. Recent supplier visits highlighted the significant pressures faced by our partners, from extensive documentation requirements to ongoing pandemic impacts. Positively, many of our Chinese suppliers view these challenges as growth opportunities, proactively improving practices, providing country-of-origin certificates, and enhancing documentation for greater transparency.

CASE STUDY

Issue remediation-supplier

During one of our standard unannounced audits in March 2024, our Senior Global Compliance Officer (Officer) identified gaps in the recruitment and human resource management process at one of suppliers in China. Upon investigation our officer confirmed that some workers did not have work identification on them and there were some gaps in the attendance records for workers on the production floors. A Corrective Action Plan (CAP) was issued to our supplier clearly highlighting the areas of concern. Additionally, our Officer explained the findings to the management present at the time of conclusion of the audit.

Our Officer ranked the issue as major and gave an orange rating to the supplier, which means the supplier is expected to address the issue within three months. As per our compliance team protocol, our Officer shared her findings and CAP with our Sustainability Manager at the head office in Sydney.

An unannounced follow-up audit was conducted by our Officer, the following was confirmed:

The factory has addressed all the concerns and issues raised in the CAP. They streamlined their hiring process to ensure all documentation is checked and saved on file and all employees are issued id cards including temporary staff. All staff identification records are maintained, and daily attendance sheets are checked against their virtual records. The factory management has invested in facial recognition technology and electronic entrance systems to ensure only registered id-ed employees enter the premises and there are multiple levels of attendance recordkeeping and validation. Further, they have also invested in hiring an additional guard on the factory floor to ensure all staff are following new processes.

APG & Co is satisfied with the actions taken by the supplier in improving processes and oversight. It was the first time in the last eight years of working with the factory that such an issue occurred. The factory has been audited ten times in the last eight years.



We invest in transparency and traceability

APG & Co partnered with Retraced to map and trace our entire supply chain, enhancing transparency in sourcing practices and labour conditions. This collaboration allows us to monitor supplier compliance, identify risks like modern slavery, and uphold ethical standards. Our goal is to connect with suppliers at every tier, track manufacturing, manage chain-of-custody, and conduct annual assessments. To support this transition, we implemented it in stages, offering training in Mandarin and English to our suppliers, and addressing challenges like infrastructure limitations and the need for trust.

In FY24, we onboarded all active suppliers and began a tracing pilot for core cotton programs, aiming to mitigate high risks in cotton supply chains. Our phased approach will conclude with a final report in our next modern slavery statement, covering key insights and improvements.

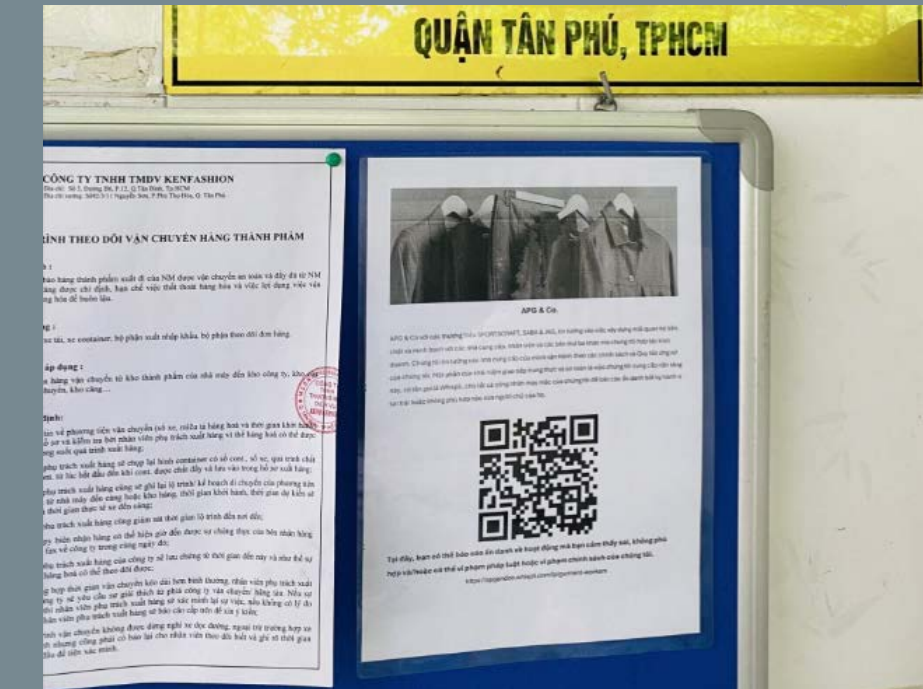
We also building a transition plan to include more traceable and certified cotton in our fabric mix including cotton varieties like GOTS, BCI, Australian cotton and Regen. Our commitment to quality and ethical sourcing remains strong as we drive toward a transparent, responsible cotton supply chain.

We have expanded our grievance mechanism system

In FY24 we partnered with Whispli to offer garment workers an anonymous, reliable communication platform. This platform is available in English, Mandarin, and Vietnamese, reflecting our production locations in China and Vietnam. It encourages workers to "speak up" in their preferred language. Our teams in Sydney, Shanghai, and Ho Chi Minh collaborated to launch this initiative and conducted an awareness campaign, ensuring that QR codes linking to Whispli are displayed prominently on factory notice boards.

Our Compliance Officer ensures this communication remains visible during site audits, educates workers about the platform, and emphasizes the anonymity of their identities. All submissions go directly to our Sustainability Manager, with access extended only if additional support is needed.

While we haven't yet received any reports through Whispli, we recognise that this may be due to a lack of awareness or trust in the platform. To address this, we are planning further awareness campaigns in FY25 to build trust and encourage workers to utilise this confidential channel for reporting concerns. We are committed to providing a safe and accessible platform for workers to voice their concerns and will continue to explore ways to improve its effectiveness.



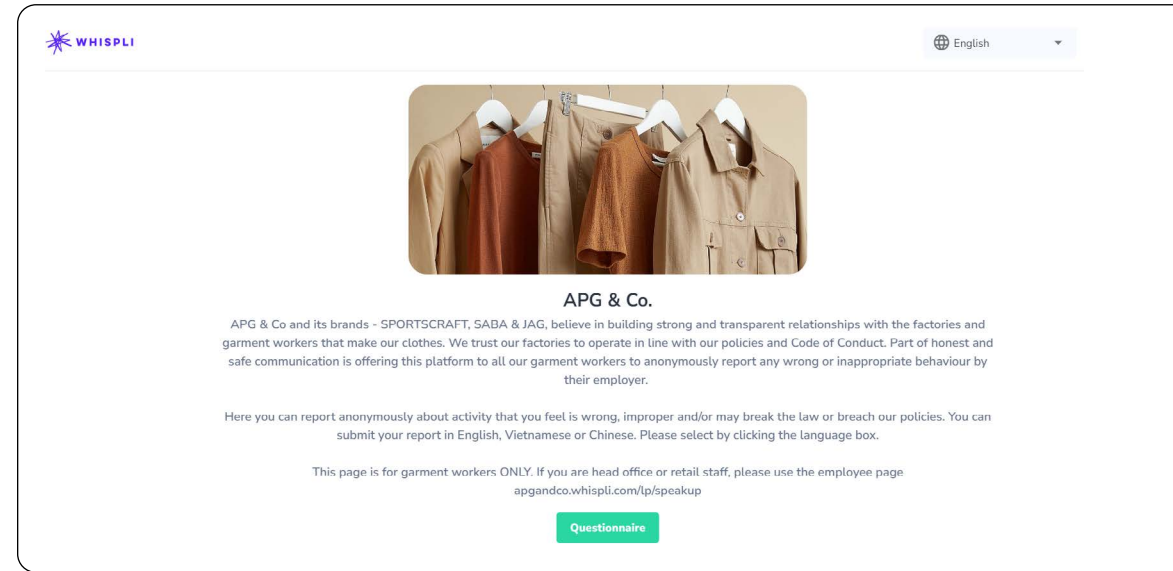
CASE STUDY

Addressing barriers - Garment workers

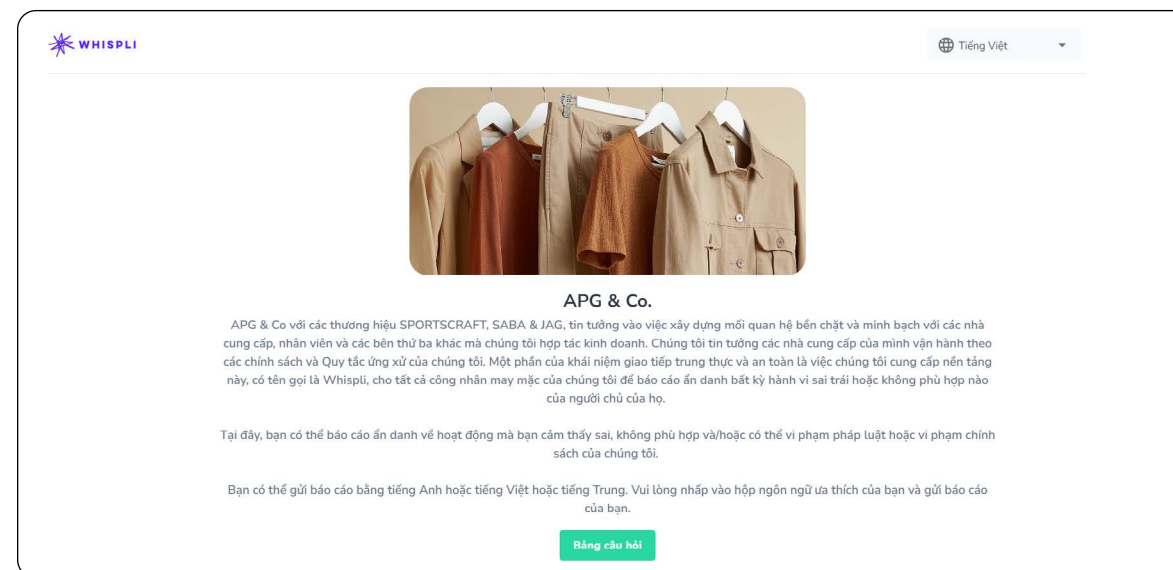
APG & Co’s Senior Global Compliance Officer conducts interviews with garment workers during all audits to maintain oversight and build a relationship of trust and openness. Even after years of conducting interviews and relation building, noting APG & Co conducts annual supplier audits and our Officer has been with us for eight years, we believed there were still gaps in our system and we could offer additional channel of communication to our garment workers. Based on our interview findings, we knew that language and anonymity are two primary barriers for garment workers. Both barriers were within our control to address.

Last year APG & Co implemented a grievance mechanism system to overcome both these barriers. We decided to partner with Whispli to offer a completely anonymous platform that allows our garment workers to have trusted conversations with us. APG & Co is confident in this solution and believes this platform will help us to further strengthen our compliance practices. We are proud to report that this platform is available in three languages – English, Mandarin and Vietnamese. Considering majority of our production and sourcing occurs in China and Vietnam, it is important to offer a platform that encourages our craftsmen and women to “speak up” in a language that is most comfortable for them.

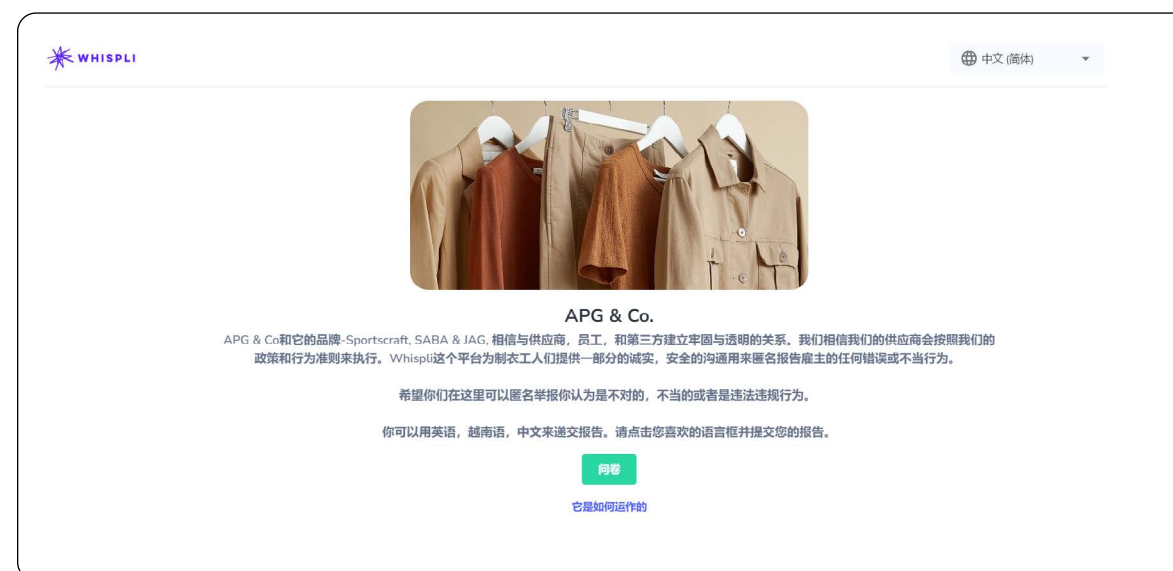
Below are images of our garment worker page on Whispli -



Vietnamese:

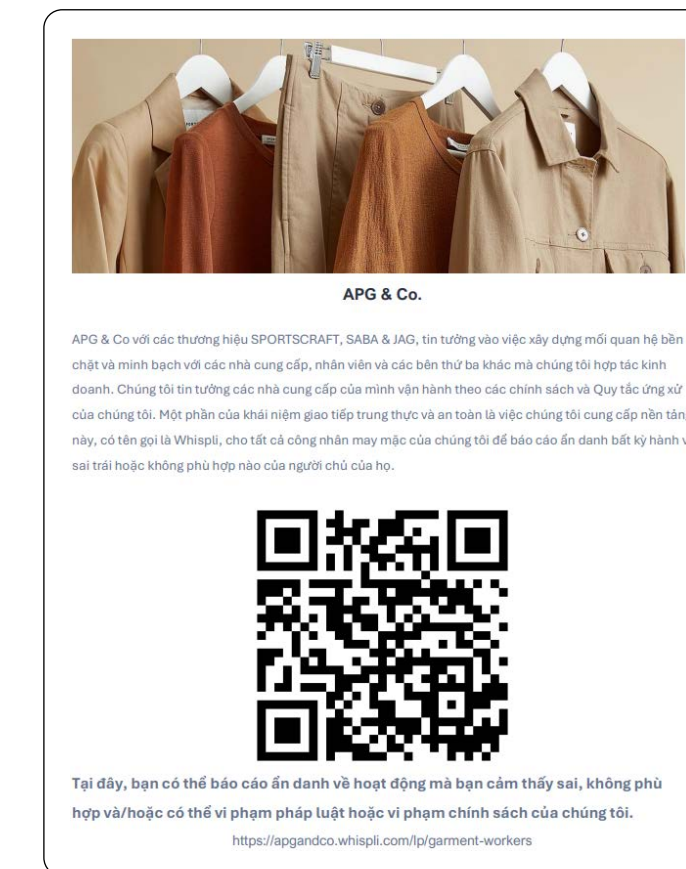


Mandarin:



Our Sydney, Shanghai and Ho Chi Minh teams collaborated to rollout this page to our production facilities. After the page went live, we pushed out our awareness campaign designed in three languages as well. We mandated all our factories to display the QR codes for this dedicated page always posted on the main notice board or an area easily accessible to our garment makers.

Below is an image of the communication sent to suppliers -



APG & Co is proud to report that our suppliers have printed this communication and put it up on the factory floors for workers to access. See images on page 18.

Furthermore, our Officer ensures this communication is displayed when she visits our production sites for audits. Additionally, she also educates the staff and garment workers about the platform. It is stressed that our garment markers identities are protected, and they can reach us about any issues they might be facing. All forms go to our Sustainability Manager directly, and no one else in the business has access. However, access can be extended if the Sustainability Manager decides a particular issue requires additional support.

We have a strong commitment to modern slavery training

Internal Training:

APG & Co's internal modern slavery training in FY24 educated staff on recognising and managing modern slavery risks across our operations and supply chain. The course covered Australian reporting requirements and practical guidance for identifying risks, particularly in high-risk areas like cotton production.

The training reinforced human rights as a core company value, offering steps for due diligence, supplier transparency, and aligning with the UN's Guiding Principles. Specific guidance was provided for procurement teams on high-risk services, such as freight and cleaning, where exploitation risks are common.

Staff also learned how fast-fashion demands can lead to exploitative practices, raising awareness of how roles within the company may impact modern slavery risks.

Supplier Training:

We provided comprehensive training to our suppliers to ensure they fully understand APG & Co's modern slavery action plan. This training, available in English, Mandarin, and Vietnamese, covers our transparency and traceability initiatives, as well as the importance of strong supplier relationships and worker engagement across the supply chain.

By offering the training in multiple languages, we demonstrated our commitment to accessibility, helping suppliers engage with the material and fostering better collaboration across language barriers. The training addressed modern slavery fundamentals, relevant laws, industry-specific

risks, our mitigation efforts, and joint strategies to combat these issues. This approach empowers suppliers to support our shared goal of ethical, transparent practices and uphold workers' rights across all levels of production.

We are focused on staff awareness and responsibility

At APG & Co, we encourage our teams to take an active role in identifying and addressing modern slavery risks across our supply chain. This begins with a detailed review of all purchasing, helping us understand our sourcing practices, how they impact our supply chain, and any associated risks. Knowing where our goods and services come from, along with understanding the pressures of fluctuating budgets and timelines, is essential.

Teams are asked to map all purchasing, gathering details like product type, supplier contacts, and geographic origins, then assess risks as low, medium, or high based on sector, location, and other relevant factors. We stress the importance of escalating any concerns. If anyone encounters unethical practices or suspects modern slavery, they're urged to report it to APG & Co's Sustainability Manager for guidance and action.

The insights gathered enhance our modern slavery compliance program, reinforcing APG & Co's transparency, accountability, and commitment to an ethical, equitable supply chain. This process empowers every team member to contribute to safeguarding human rights.

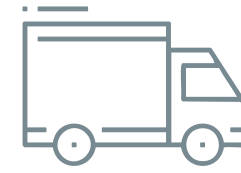
We are focused on collaboration

APG & Co actively partners with industry groups and initiatives to combat modern slavery and support labour rights. Since 2020, we've supported the ILO's Call to Action, aiding manufacturers and protecting workers impacted by COVID-19 through regular audits and supplier engagement. We submit our supplier list to the Open Supply Hub annually, promoting transparency and collaboration with other brands and civil society. In FY21, we committed to a living wage policy based on the Anker Methodology, continuing in FY23 with benchmarking against global wage standards and integrating fair wage practices into our procurement.

In FY23 we joined the Transparency Pledge, committing to deeper supply chain transparency. We also encourage suppliers to work with independent unions and NGOs, reinforcing our commitment to ethical sourcing and contributing to industry-wide progress on modern slavery.

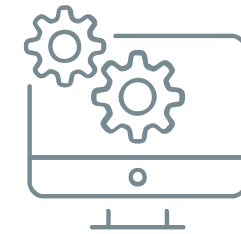
Actions we have taken to address our service (GNFR)-related risks

In FY24, the following actions were taken by APG & Co to mitigate modern slavery risks across the following service (GNFR) industries:



Freight and Logistics:

APG & Co partnered with logistics providers who demonstrated strong labour practices, particularly in overseas hubs. We conducted regular audits on warehousing and transport providers to check compliance with fair labour standards and included contractual clauses to prohibit forced overtime, wage theft, and other exploitative practices.



IT and Technical Support:

APG & Co selected IT service providers in countries with robust labour protections. We ensured suppliers adhered to ethical sourcing for electronic hardware by requiring certifications for labour standards and conducted due diligence on subcontractors providing support services to verify fair wages and working conditions.



Human Resources (HR):

We worked only with recruitment agencies that adhered to ethical recruitment practices, prohibiting fees and document withholding. APG & Co required transparency on recruitment practices and used contracts holding agencies accountable for fair treatment of workers. We also conducted regular checks to ensure compliance.



Facilities Management:

APG & Co vetted subcontractors for compliance with fair wages, safe working conditions, and job security measures. We required suppliers to provide detailed information on subcontracting arrangements and ensured that workers in vulnerable roles received adequate protections and training.



Finance and Accounting:

We partnered with finance and accounting firms operating in countries with strong labour protections. APG & Co ensured that outsourced services met fair wage standards and were conducted under ethical working conditions, with strict contractual terms to prevent exploitation.



Cleaning Services:

APG & Co engaged cleaning companies committed to fair pay, safe conditions, and legal protections for workers. We conducted audits and insisted on contractual clauses preventing subcontracting without prior consent, minimising risks associated with migrant labour exploitation.

Actions We Have Taken Cont.



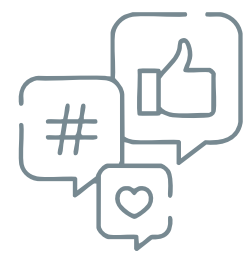
Security Services:

APG & Co hired security firms with transparent labour practices and a commitment to fair treatment of employees. We required regular reports on working hours, wages, and safety conditions, and conducted periodic checks to confirm compliance with safety and wage standards.



Customer Service:

We partnered with call centre providers in countries with strong labour rights or ensured that overseas providers met APG & Co's standards for fair wages and working conditions. APG & Co included contractual terms to prevent forced overtime and ensured stable, ethical employment conditions.



Marketing and Advertising:

APG & Co engaged marketing and content providers in regions with strong labour protections, or ensured outsourced providers met our labour standards. We set clear expectations around fair pay, hours, and working conditions, especially in the production of promotional goods.



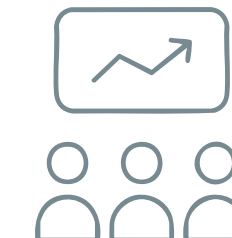
Legal and Compliance Services:

We selected legal service providers in regions with established labour rights or ensured that outsourced legal work was conducted under fair conditions. APG & Co set clear contractual expectations for wages and working hours and verified compliance with regular oversight.



Utilities Management:

We worked with utility providers who could demonstrate fair labour practices and safe working conditions. For waste management, APG & Co specifically chose providers with established safety standards and policies against forced labour, ensuring regular checks on working conditions and wages.



Training and Development:

APG & Co chose training providers with a commitment to fair labour practices. APG has also taken proactive steps which include training its procurement team to identify potential red flags and issues related to the procurement of those services. Specific risks identified in service procurement included industries like cleaning, security, and logistics, which are known to be vulnerable to exploitation. In these sectors, red flags included contractors paying below minimum wage, lack of adequate health and safety measures, and restrictions on workers' freedom to resign or leave employment freely. Additionally, the procurement team was trained to recognise risks associated with the use of subcontractors, especially if visibility into their working conditions and compliance with labour laws is limited.

How we assess the effectiveness of our actions to address our modern slavery risks

By implementing these assessment methods, APG & Co can ensure that its modern slavery actions are effective, transparent, and continuously evolving to meet the highest ethical standards.

Sustainability Manager Oversight

Our Sustainability Manager, who reports directly to the CFO, played a crucial role in embedding modern slavery considerations into our risk management processes. Through regular updates to senior leadership and the Audit Committee, the Sustainability Manager ensured that our anti-slavery initiatives received strategic attention and were integrated into broader risk oversight. This oversight created a structured, accountable approach to tackling modern slavery risks and allowed for prompt action at the executive level when necessary.

Developing Key Performance Indicators (KPIs)

In FY24, we initiated the development of KPIs aligned with each strategic pillar of our enhanced sustainability strategy. These KPIs will provide clear, quantifiable metrics to assess the impact of our modern slavery initiatives. This process includes:

- **Revamping our supplier audit process:** Increased visibility and closer collaboration with suppliers will enable more effective monitoring and improvement of ethical performance.

- **Reinstating our living wage project:** We are investigating potential living wage gaps within our supply chain starting with Tier 1 suppliers, with the goal of implementing a training module for suppliers focused on fair wage practices and gender equality. Module completion rates will be tracked to assess effectiveness.
- **Transition targets for responsible materials:** We aim to establish brand-specific transition targets for utilising certified and responsibly sourced materials, such as cotton and wool, directly mitigating risks associated with conventional production methods.

By regularly reviewing KPI outcomes, we will ensure that progress towards reducing modern slavery risks is measurable, allowing for timely adjustments to maintain alignment with our goals. This approach aims to promote accountability across all levels of the organisation, reinforcing our commitment to transparency and continuous improvement. We plan to complete this project in FY25.

Regular Supplier Audits and Evaluations

APG & Co conducted comprehensive supplier audits and evaluations to assess compliance with our modern slavery policies and responsible sourcing practices. By documenting compliance levels, identifying areas for corrective action, and tracking improvements over time, we gained a thorough understanding of each supplier's commitment to ethical practices. These audits allowed us to address potential risks proactively and strengthen relationships with suppliers who shared our values, making our supply chain more resilient against exploitation.

Managing the Worker Voice Platform

Our Sustainability Manager manages the worker voice platform. Both, Sustainability and Compliance teams work closely to ensure the platform is accessible to garment workers. The platform is promoted by our Compliance Officer, specifically the safety messaging around anonymity. Our Sustainability Manager has worked closely with the platform solution provider, Whispli to build a platform which is user friendly and simple. We have also taken training on managing the platform effectively and attended events hosted by Whispli to stay updated on the latest features to further improve the platform and improve the team's knowledge and awareness on best practice in making garment worker grievances. APG & Co plans to introduce a dedicated grievance channel for its suppliers in FY25.

Benchmarking Against Global Frameworks

APG & Co benchmarked its modern slavery actions against established global frameworks, such as the UN SDGs and B Corp Impact Areas. By aligning with these frameworks, we set a standard for our actions and regularly reviewed how these guidelines influenced our progress. This benchmarking not only enhanced our credibility but also ensured that our initiatives reflected best practices, allowing us to measure our progress against internationally recognised standards.

Impact Assessments of Modern Slavery Training

We evaluated the impact of our tailored modern slavery training by assessing supplier and staff engagement, understanding, and application of the content. Post-training assessments and quizzes provided valuable feedback on knowledge retention and application, helping us determine whether the training met its objectives. This approach allowed us to refine future training sessions, ensuring that all participants were well-equipped to recognise and address modern slavery risks in their roles.

Reviewing Supplier Compliance Documentation

APG & Co regularly reviewed supplier-provided compliance documentation, including audit results and certificates of origin, to verify adherence to our modern slavery standards. By cross-referencing these documents with our ethical standards, we ensured that our suppliers continued to uphold the commitments we had established. This review process strengthened accountability and provided an ongoing measure of compliance across our supply chain.

Stakeholder Engagement and Feedback

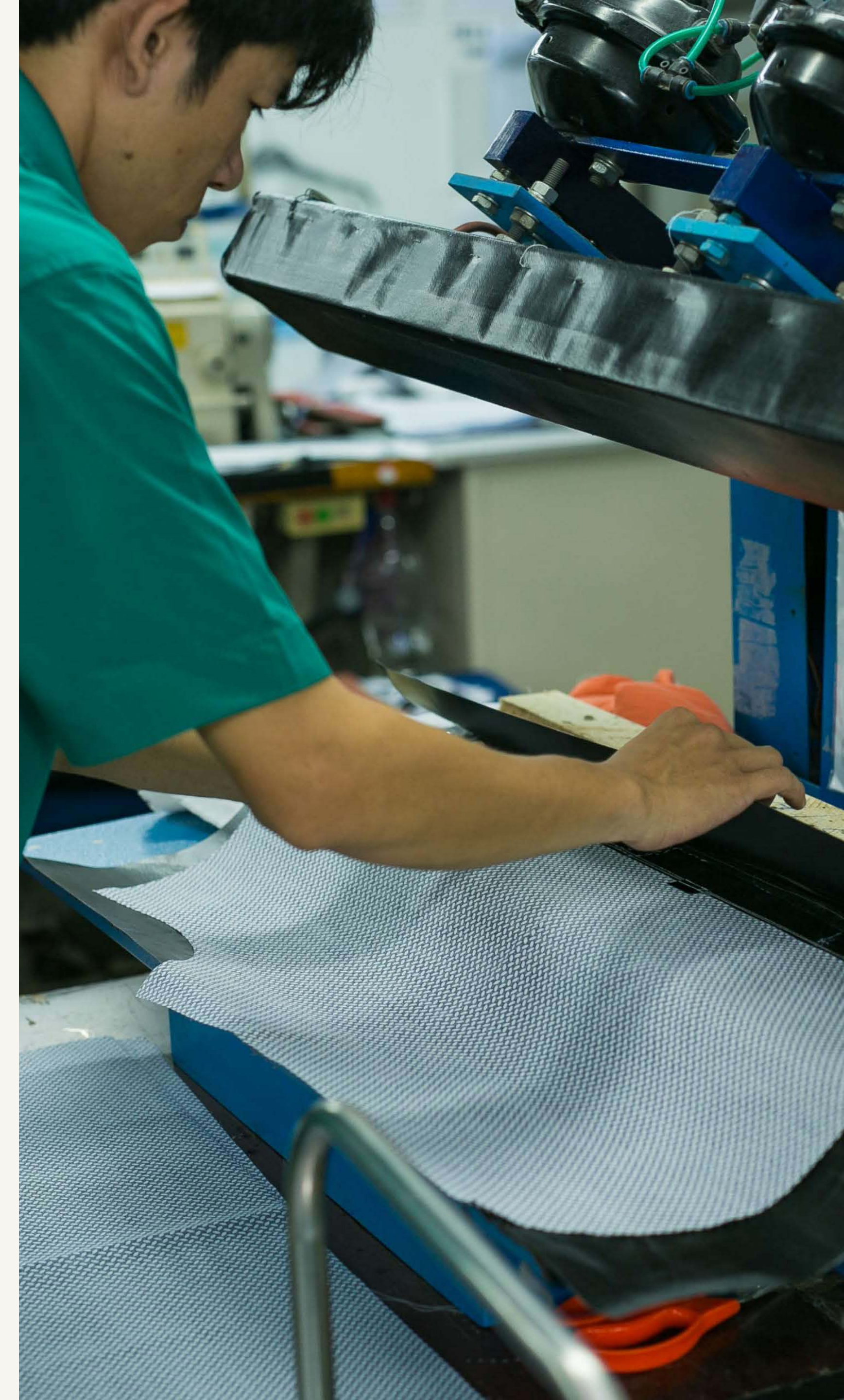
We actively engaged with internal stakeholders, including procurement and supply chain teams, to gather feedback on the effectiveness of our modern slavery initiatives. Their insights provided practical perspectives on operational challenges and successes, allowing us to identify areas for improvement and refine our approach. This feedback loop was essential for continuous learning and adapting our initiatives to better address modern slavery risks.

Enhanced Risk Management Processes

Modern slavery risk assessments were integrated into APG & Co's broader risk management framework. We regularly reviewed these processes to ensure they were effective in identifying, mitigating, and responding to potential risks throughout our supply chain. This integration enabled a proactive approach to risk management, embedding anti-slavery measures into every stage of our operational processes.

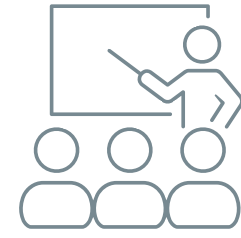
Regular Reporting and Transparency

APG & Co published regular updates on modern slavery initiatives and progress in our annual sustainability and modern slavery statements. This transparency not only allowed for external accountability but also demonstrated our commitment to continuous improvement and ethical sourcing practices. By openly sharing our progress, we strengthened trust with stakeholders and reinforced our dedication to eliminating modern slavery risks within our operations and supply chain.



Our FY25 focus

We intend to take the following steps in FY25 to address our modern slavery risks:



Reinstating the APG & Co Annual Supplier Conference

In FY25, APG & Co will bring back its Annual Supplier Conference, an essential event for direct engagement with our supplier network. This conference will reinforce open communication, providing a platform to gain insights into modern slavery and ethical challenges our suppliers face. By gathering feedback on their understanding of our values, compliance requirements, and responsible sourcing practices, we can fine-tune our support and foster stronger, collaborative relationships. This conference represents a significant step toward a more transparent, resilient supply chain, as we align our standards and build partnerships capable of addressing complex compliance issues together.



Strengthening Our Supplier Approval Process

One of our main goals for FY25 will be to continue and further develop our supplier approval process. Initially introduced in 2015 and formalised into a comprehensive Supplier Onboarding Process Manual in 2023, this process ensures thorough due diligence and supply chain oversight. Strengthening it will support our product teams in ethical supplier selection, align partners with APG & Co's human rights due diligence requirements, and uphold consistent compliance standards, further securing our commitment to ethical sourcing.



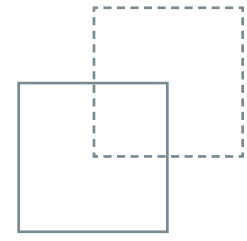
Implementation of Modern Slavery and Related Policies

APG & Co will continue to enforce critical policies, such as the Code of Conduct, Global Sourcing Principles, and Responsible Material Sourcing Policy. These policies provide clear guidelines on ethical conduct, responsible sourcing, and labour standards, forming the foundation of our commitment to combatting modern slavery.



Ongoing Supplier Audits

APG & Co will maintain rigorous supplier audits across Tier 1 and Tier 2 suppliers, including unannounced checks within subcontracted and informal units. These audits evaluate adherence to ethical standards, identify improvement areas, and enforce corrective actions, reinforcing compliance and transparency within our supply chain.



Expanding Transparency and Traceability

Our collaboration with Retraced will deepen in FY25, enabling us to monitor supplier compliance, manage documentation, and conduct annual assessments. We will enhance tracing efforts, particularly for high-risk materials like cotton, fostering trust and accountability through transparent sourcing. Retraced will further facilitate fabric sourcing by managing country-of-origin certificates and chain of custody documents, with a pilot tracing project for 20 key cotton programs set to conclude by December 2024. Insights from this project will inform future sourcing decisions, ensuring swift responses to any high-risk suppliers.



Regular Reporting and Transparency

In FY25, APG & Co will publish updates on our modern slavery initiatives and progress through annual sustainability report and modern slavery statements, reinforcing external accountability and showcasing our commitment to ethical sourcing.



Expansion of Grievance Mechanisms

In FY25, APG & Co will introduce a dedicated platform for suppliers to report issues and concerns while keeping their identity safe. Additionally, we will continue to promote the Whispli platform, an anonymous reporting tool for garment workers available in English, Mandarin, and Vietnamese. This platform supports a safe reporting environment for workplace conditions, with QR codes and audit engagement ensuring widespread awareness.



Sourcing Consolidation

To streamline oversight, we will continue consolidating our supplier pool, building deeper partnerships with a focused group of suppliers. This strategy enables us to manage compliance effectively and foster strong supplier relationships aligned with our modern slavery goals.



Continued Commitment to Modern Slavery Training

We will enhance modern slavery training for staff, focusing on identifying risks, particularly in high-risk regions. Procurement teams will receive targeted guidance on service-related risks in areas like freight and cleaning, while supplier training will be offered in English, Mandarin, and Vietnamese, fostering shared responsibility across our supply chain.



GNFR (Goods Not for Resale) Procurement

APG & Co will resume efforts to address modern slavery risks within GNFR procurement, particularly in high-risk services such as cleaning, security, and logistics, with this project slated for completion by FY26.



Living Wage Assessment Update

Our assessment of living wages across our supply chain will resume in FY25, as part of our commitment to fair wages for all workers.



Vietnam Audit Strategy Update

Our Senior Global Compliance Officer, and the Vietnam office team will continue leading supplier audits, ensuring legal and code of conduct compliance. As our traceability and sourcing consolidation efforts progress, we will review and potentially adjust our audit strategy to further strengthen due diligence in Vietnam.



Responsible Purchasing Practices Training

APG & Co will introduce responsible purchasing practices training for the procurement team and key roles in finance, brand management, and social and environmental leadership, empowering informed purchasing decisions aligned with ethical standards.



These goals for FY25 reinforce APG & Co's commitment to a more ethical and transparent supply chain. By enhancing our processes, partnerships, and training, we are setting stronger foundations not only for our own business but also for the broader garment industry to address and mitigate modern slavery risks. Our efforts contribute to an industry-wide movement towards sustainable, responsible sourcing and the protection of workers' rights into the future.

Compliance with Reporting Requirements

To comply with the Modern Slavery Act 2018 (Cth), APG & Co is required to address the following criteria in this modern slavery statement:

———— **Identify the reporting entity**

APG & Co must clearly identify the entities covered by this statement, including any subsidiaries or controlled entities. This has been done on page 6 of this statement.

———— **Describe the Process of Consultation**

Our consultation process is described on page 6 of this statement.

———— **Describe the Structure, Operations, and Supply Chains**

A description of APG & Co's structure, operations, and supply chains is provided on pages 8-10 of this statement.

———— **Describe the Modern Slavery Risks**

We must outline the specific risks of modern slavery practices within APG & Co's operations and supply chains. This has been done on pages 11-14 of this statement.

———— **Actions to Address Modern Slavery Risks**

APG & Co is required to describe the steps we have taken to assess and address modern slavery risks. This has been done on pages 15-22 of this statement.

———— **Assessing the Effectiveness of Actions**

We need to explain how we assess the effectiveness of the actions we have taken to address our modern slavery risks. This has been done on pages 23-24 of this statement.

———— **Other Relevant Information**

This has been included on pages 25-27 of this statement as we have set out our goals for FY25.

