

The Oodie – FY2022-2023 Modern Slavery Statement

1. Introduction

Mandatory Criteria 1: Identify the reporting entity.

This Modern Slavery Statement (**Statement**) is made by Davie Clothing Pty Ltd T/A *the oodie* (ACN 629 766 703) (**Oodie, we, us or our**) in accordance with its obligations under the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**). This Statement is made for the period of 1 July 2022 until 30 June 2023.

This Statement sets out Oodie's ongoing efforts to mitigate and manage its human rights responsibilities within its internal operations, structure and when engaging with third party suppliers.

We wish to advise a delay in reporting due to an oversight. Statements were due 31 December 2023 and this statement was submitted 10 April 2024.

We also acknowledge that this Statement is our first and that, in previous reporting periods, we failed to publish a modern slavery statement in line with our obligations. Oodie has seen rapid expansion over the past few years and did not anticipate the level of success that we have been afforded.

This Statement signifies the commencement of our ongoing journey to identify and mitigate any risks of modern slavery within our operations and supply chains. We view this as an unwavering commitment to constant improvement in this regard.

Oodie launched in 2018 and has become a leading Australian online clothing retailer. Our rapid success in Australia has seen it expand to international markets.

2. Structure, Operations & Supply Chains

Mandatory Criteria 2: Describe the reporting entity's structure, operations and supply chains.

Structure

Oodie is an Australian private company with the following structure:

Davie Group Trading (Australia) Pty Ltd (ACN 646 762 745), which is an Australian private company and holding company of:

1. Davie Holdings No 2 Pty Ltd (ACN 632 202 263), which is an Australian private company and holding company of:

- a. Davie Clothing Pty Ltd T/A *the oodie* (ACN 629 766 703), which is an Australian private company responsible for the Australian retail of clothing garments and holding company of the following entities;
 - i. Davie Clothing Canada Inc (Registry number 3334602), which is responsible for the retail of Oodie products in North America; and
 - ii. Davie Group Payments NZ Ltd (NZBN 9429050689422), which is New Zealand Limited Company responsible for the retail of Oodie products in New Zealand.

Davie Group Trading (Australia) Pty Ltd is also a holding company to 5 Australian private companies and a Dutch company that is not trading. Oodie itself does not own or control other entities.

Operations

Oodie is a global clothing ecommerce brand based out of South Australia, with its registered office at 39 Orsmond Street, Hindmarsh SA 5007 Australia. The product range includes wearable blankets, sleepwear, beachwear, loungewear, footwear, accessories, pet accessories and toys (**Products**). Oodie offers its Products online and in store from retailers and resellers both domestically and overseas.

Oodie employs 61 employees in Australia and 1 employee in the United States of America.

Our main operations are the design, marketing, sales, and distribution of our Products.

Supply Chains

Oodie suppliers assist with manufacturing, packaging and delivering our Products. Oodie does not itself own or operate any factories.

All of our direct suppliers are based in China and Cambodia. Each supplier manufactures and packages the relevant Products. The following tables represent the Products and the locations where they are manufactured (**Table 1**) and the breakdown of our 5 major suppliers and the percentage of products each supplier manufactured over the last 12 months (**Table 2**).

TABLE 1:

Product	Country of Manufacture
Outdoor oodie	China
Outdoor zip thru oodie	China
Sleep Tees	China, Cambodia

Oodie wearable blanket	China, Cambodia
Travel oodie	China
Robes	China
Hair Turbans	China
Sleep sets	China
Blankets	China
Socks	China
Beach oodie	China
SLIPPERS	China

TABLE 2:

Supplier	Percentage of products
DH Textiles	56%
Qianshun Technology	13%
Li Yang Group	7%
Ecico Group	3%
Jack's International	19%

The production process for the Products includes knitting, weaving, printing, sewing, and cutting. Majority of the Products use textiles such as polyester, cotton, bamboo fibres, and elastane. After production, the packaging stage involves the attachment of labels and swing tags, vacuum packaging, placing products into mailers, packing into cartons, and loading into containers.

Oodie also partners with various logistics service providers and other organisations providing professional services.

3. Risks of Modern Slavery Practices

Mandatory Criteria 3: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.

Operations

As a company specialising in e-commerce services, Oodie has conducted its operations assessment and determined a low risk of modern slavery within its enterprise.

Our operations predominantly involve our employees executing various business and operational functions, supporting the delivery of our ecommerce services. Oodie has in place thorough human resources policies and procedures and diligently complies with the framework of Australian legislation, including the *Fair Work Act 2009* (Cth).

Given the online nature of the operations, Oodie does not operate physical retail outlets, and our Adelaide headquarters functions primarily in a business and administration capacity.

We take periodic measures to undertake compliance reviews ensuring adherence to this legislative framework, which affords protection to working conditions and employee health and safety. This active compliance also aids in preventing instances of modern slavery within Oodie's Australian workplace.

Supply Chains

Oodie maintains a moderate level of visibility over our supply chain. We have successfully mapped the supply chains of our key suppliers (as set out above in Table 2) and their subcontractors, to trace the path of production to ensure standards and principles of modern slavery prevention are upheld. Areas of the supply chain that involve packaging materials, as well as the procurement of source materials require further exploration and are yet to be fully mapped out. This incomplete visibility poses a potential risk to the quality and ethical principles that we strive to maintain in our supply chain.

We have identified a risk of being directly linked to modern slavery practices further down our supply chains, especially pertaining to the labour practices used by raw material providers. The sourcing of certain products and services from China and Cambodia has also been determined to carry potential risks due to the possibility that such materials could be sourced using modern slavery techniques. These risks mean that we will remain vigilant and proactive in our supply chain management.

Oodie's subsidiaries have the same supply chain as Oodie.

4. Actions Taken to Address Risks

Mandatory Criteria 4: Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.

During our reporting period we have put in place the following measures, introducing our groups first Anti Modern Slavery Policy; revising and updating our internal policies; reviewing supplier engagement processes and principles; and establishing an internal team responsible for managing and overseeing our reporting entity obligations.

Oodie acknowledges the risks associated with modern slavery in our manufacturing operations based in countries like China and Cambodia. As part of our efforts to assess and manage these risks, our strategy involves working exclusively with factories subjected to amfori Business Social Compliance Initiative (**BSCI**) or equivalent audits.

Additionally, these suppliers are required to meet the compliance prerequisites set by enterprise-level licensing entities. By adhering to these requirements, we aim to ensure the upholding of social responsibility standards within our supply chain.

Knowledge of our suppliers and sub-suppliers is paramount in this risk management strategy. We maintain a list of our key suppliers and most of their sub-suppliers. For our major Products like wearable blankets and sleep tees, we have full visibility over our supplier's sources and printing facilities. However, we acknowledge that we do not currently have insight on the origins of the raw materials used by these printing factories, and consider this as an area for further scrutiny.

To bolster our capabilities in the identification and mitigating measures of risk, regular audits and inspections are conducted. All our suppliers are required to have BSCI or equivalent audits, and must meet the approval standards set by our enterprise partners' licensing requirements. Third-party quality control (**QC**) agents are tasked with routine inspection of factories. They closely monitor and review BSCI reports on a yearly basis and are trained to flag any issues. So far, no actions regarding modern slavery concerns have been necessary due to no reported cases or claims from our supply chain assessments.

We understand that our current whistleblower policies do not include modern slavery. Recognising the importance of employee engagement in identifying and addressing unethical practices, we are making steps to incorporate modern slavery issues within this framework.

During this current reporting period we have put in place the following measures: introducing our group's first anti-modern slavery policy; revising and updating our internal policies; and reviewing supplier engagement processes and principles.

5. Effectiveness of Our Actions

Mandatory Criteria 5: Describe how the reporting entity assesses the effectiveness of these actions.

Throughout this reporting period, our primary objective was to enhance our understanding of potential modern slavery risks within our operations and supply chains. At this early stage we have been unable to assess the efficacy of our initial measures. Nevertheless, we have

commenced the process of establishing processes and increasing visibility of our high risk business operations to enable us to identify and mitigate modern slavery risks across our operations and supply chains.

With the inclusion of the Supplier Code of Conduct in our supplier agreements, we have further emphasized the importance of this commitment to our suppliers.

6. Consultation with Associated Entities

Mandatory Criteria 6: Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement). Mandatory reporting criteria six requires statements given by single reporting entities to describe how they consulted in the preparation of their statement with any entities they own or control. In the case of joint statements, the reporting entity must describe how they consulted with each entity covered by the statement in the preparation of their statement and with any entities they own or control.

During the reporting period this Statement covers, we actively engaged and consulted with all companies we own or control in the development of this Statement. We discussed details of the Modern Slavery Act's reporting requirements; information regarding the actions we intend to take to address these requirements; and provided them with relevant materials and updates.

7. FY2024 Goals

Mandatory Criteria 7: Provide any other relevant information.

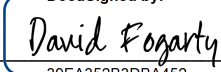
Our goals for the next reporting period are to roll out amendments to our engagements with existing suppliers to get them to agree to our Supplier Code of Conduct and complete our Supplier Questionnaire so that we can increase visibility of the risks within our supply chains and ensure ongoing compliance. We also intend to obtain contractual warranties from our suppliers as an additional risk mitigation strategy.

We also intend to improve our internal processes to ensure accountability for our reporting entity obligations moving forward. This will include developing a range of internal policies and training to strengthen our internal knowledge of modern slavery risks and processes for addressing potential grievances.

Each month, the executive team meetings will include modern slavery as an agenda item to ensure our goals are reviewed and maintained, and to discuss any additional breaches or risks that have been identified. The executive team will share all relevant information and findings with the Board.

8. Approval of Statement

In accordance with section 13 of the Modern Slavery Act, this statement was approved by the Board of Davie Clothing Pty Ltd (ACN 629 766 703) on 10 April 2024

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David Thomas Fogarty
Director