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Reporting Entity

Adventure Holding Australia Pty Ltd (ACN 622 679 216) is the reporting entity for the purposes of the *Modern Slavery Act 2018*.

Structure, Operations and Supply Chains

The Adventure Holdings Group (“**AHA Group**”) consists of the following entities, Adventure Operations Australia Pty Ltd, Adventure Employees Australia Pty Ltd, Adventure Trading Australia Pty Ltd, Adventure Trading NZ Limited, Adventure Trading UK Ltd, Primus Australia Pty Ltd, Solidify Pty Ltd, Sourcehub Pty Ltd, KDNA Pty Ltd and Grit & Max Pty Ltd. All AHA Group entities report into a single Board of Directors and a shared services team is responsible for the implementation and day-to-day management of policies and communication with the Board.

This Statement sets out how the AHA Group has identified, addressed and remediated against modern slavery pursuant to the Modern Slavery Act 2018 (Cth) (“*The Act*”) during the first reporting period and our plans to address modern slavery going forward.

The Company was established in November 2017 to invest in the outdoor camping and leisure industries, with the aim to becoming a leading independent importer and seller of outdoor camping and leisure products. The Company’s initial focus was the acquisition of the OZtrail Leisure Product group which was completed during January 2018. In August 2018, the AHA Group acquired Primus Australia Pty Ltd, trading as “Companion Brands”. Companion Brands is a complementary business importing and wholesaling outdoor camping and leisure products as well as supplying light industrial and hardware products.

The principal activities of AHA Group during the reporting period consisted of the importing and sale of outdoor leisure, camping and industrial products.

The AHA Group’s products are produced by 3rd party vendors mainly in China, with a small number of products produced in other ASIA pacific countries. Whilst the AHA Group does not own or operate factories; we have developed considerable long-term relationships with our valued suppliers and are proud of the working relationships we share.

We collaborate with these suppliers to ensure the working environments in which our products are made are compliant with and align to the AHA Group’s Responsible Sourcing Principles which specifically address modern slavery. The AHA Group is in the final stages of implementing a representative office in China, with a direct sourcing team employed by the AHA Group to manage our sourcing process and continue to develop the AHA Group’s relationship with our valued suppliers.

We acknowledge that our supply chains are complex and include various stages, geographies and skill sets to bring our products from raw materials through to finished products. At present, AHA Group’s strongest relationships are with the suppliers who are at the final stage of the manufacturing process. As a result, our current procedures focus on addressing modern slavery risks in this process. We recognise there is a need to continue expanding these procedures further down our supply chain.



Risks of Modern Slavery Practices in Our Operations and Supply Chains

The AHA Group acknowledges that Modern Slavery is a risk in our operations and supply chain and are committed to analysing the risk, addressing the risk, and educating our business. This is an ongoing analysis and education process which we will continue to question and investigate as our experience, environment and industry evolves.

Actions Taken to Assess and Address Those Risks

AHA Group commits to respecting employees, service providers, customers, distributors, and suppliers as well as their legal entitlement and human rights. We ensure each employee is familiar with and acknowledges our code of practice which stipulates respect of basic rights and opposes child and forced labour.

AHA Group continues to engage with suppliers with a strong focus on ethical and sustainable practices. AHA Group asks that suppliers acknowledge and put into practice the AHA Group supplier agreement which contains clear prohibition on adopting any practice that could contravene the modern slavery act. In addition to this, AHA Group undertakes the following practices to help ensure ongoing and active surveillance including, and not limited to:

1. Recent introduction of formal Supplier Agreements acknowledging and agreeing to terms set out under the Modern Slavery clause. Agreements to be reviewed and renewed an annual basis
2. Ensures Tier 1 and Tier 2 suppliers have active and ongoing memberships and registrations to independent ethical bodies such as BSCI, SEDEX and ISO. Membership renewal is dependent on ongoing third party audits
3. Conduct own random annual ethical and sustainable factory audits
4. Clear policy against using sub-contractors to assist with transparent tracking across the full supply chain
5. Supplier identification, development, and training practices to ensure ongoing best practice and compliance

How we Assesses the Effectiveness of Such Actions

AHA Group recognises the need for ongoing assessment of effectiveness and actions taken and commits to act upon any information suggesting improper action within the supply chain. We constantly monitor and meet with our Tier 1 and Tier 2 suppliers through face to face quarterly business reviews and actively discuss ethical standards and behaviour.

Process of Consultation

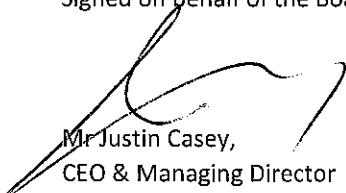
AHA Group is committed to developing and maintaining a robust, group-wide response to modern slavery. We developed this joint statement in consultation with the board, sourcing, supply chain, human resources and finance teams. The consultation process is ongoing and will be reviewed at key points throughout the year. This report has been developed by key stakeholders and the senior executive team and has the board's support and approval.

Governance

The CEO and Executive team are responsible for ensuring the AHA Group meets its responsibilities under the Act. They are supported by the AHA Group team members responsible for sourcing, production and sustainability.

This Modern Slavery Statement by the AHA Group was approved by the Board of Directors on the 23rd March 2021.

Signed on behalf of the Board of Directors by



Mr Justin Casey,
CEO & Managing Director