

# **Modern Slavery Statement**

**Polly Holdco Pty Ltd**

**1 January 2024 - 31 December 2024**

## 1. INTRODUCTION

a.k.a. Brands Holding Corp. (**a.k.a. Brands**), a company registered in the United States of America and listed on the New York Stock Exchange, is the ultimate holding company of Polly Holdco Pty Ltd (ACN 627 160 794) (**Polly Holdco**).

a.k.a. Brands is an owner of direct-to-consumer fashion brands. Polly Holdco is the ultimate holding company of each of a.k.a. Brands' Australian subsidiaries, with those subsidiaries being part of the Princess Polly, Culture Kings and Petal & Pup groups.

Polly Holdco and its subsidiaries understand the importance of building an inclusive, sustainable and resilient future that puts people, the planet and our community first. Polly Holdco is committed to understanding and reducing the risk of modern slavery in its operations and supply chains.

In addition to this statement, Culture Kings and Princess Polly have each published individual Modern Slavery Statements on the Modern Slavery Register for the reporting period of 1 January 2024 to 31 December 2024. Petal & Pup itself does not meet the revenue threshold for mandatory reporting under the *Modern Slavery Act 2018* (Cth).

## 2. POLLY HOLDCO

Polly Holdco is an Australian private company and has the following Australian subsidiaries in its group (for which Polly Holdco is the ultimate holding company unless noted otherwise):

- CK Holdco Pty. Ltd. ACN 647 405 169;
- CK Bidco Pty. Ltd. ACN 647 406 219;
- Culture Kings Group Pty Ltd ACN 627 007 970;
- TF Apparel Pty Ltd ACN 140 259 918;
- TF Intellectual Property Pty Ltd ACN 140 258 742;
- Culture Kings Pty Ltd ACN 140 242 968;
- Culture Kings Melbourne Pty Ltd ACN 164 107 608;
- Culture Kings Perth Pty Ltd ACN 603 930 669;
- Culture Kings Sydney Pty Ltd ACN 600 222 133;
- Culture Kings Brisbane Pty Ltd ACN 600 222 517;
- Culture Kings Gold Coast Pty Ltd ACN 600 222 955;
- TF IP Investments Pty Ltd ACN 647 448 502; and
- DXXM Life IP Pty Ltd ACN 641 298 320, in which CK Holdco holds 50% of the shares,

(together, **Culture Kings**);

- Polly Bidco Pty Ltd ACN 627 161 602;
- Princess Polly Group Pty Ltd ACN 169 188 658;
- Princess Polly IP Pty Ltd ACN 169 200 186; and

- Princess Polly Online Pty Ltd ACN 169 210 520,  
(together, **Princess Polly**);
- P&P Intermediate Pty Ltd ACN 634 285 788;
- P&P Bidco Pty Ltd ACN 634 285 822; and
- Petal & Pup Pty Ltd ACN 613 271 220,  
(together, **Petal & Pup**).

Together, Culture Kings, Princess Polly and Petal & Pup are referred to in this statement as the **Business Groups** (and each a **Business Group**).

This statement is made on behalf of Polly Holdco and its Business Groups. In this document, unless otherwise apparent from context, references to 'Polly Holdco', 'Business Groups', 'we' or 'us' are to Polly Holdco's corporate group collectively (**Polly Holdco Group**).

### 3. BUSINESS AND OPERATIONS

Our products are sold through online, wholesale and retail channels, including via:

- brick and motor retail stores in Australia, New Zealand and the United States; and
- digital channels via our websites.

Each of the Business Groups' head offices are situated in Queensland, Australia, with Culture Kings and Petal & Pup based in Brisbane, and Princess Polly on the Gold Coast. Together, the Polly Holdco Group employs 762 employees worldwide.

a.k.a. Brands sets strategies regarding modern slavery for the Polly Holdco Group as a whole and the board of each Business Group is responsible for setting the specific strategy, policies and procedure for that Business Group as well as overseeing governance issues.

The management team of each Business Group is responsible for delivering the strategic objectives set by the Business Group. This includes day to day compliance and ensuring policies and procedures are adhered to by members and staff.

### 4. SUPPLY CHAINS

Polly Holdco stocks and sells products from both its own in-house brands and third-party products on the Business Groups' respective websites and stores.

#### In-House Brands

During the reporting period, Polly Holdco engaged textile and manufacturing suppliers of in-house brands across a number of countries and regions including China, Mexico, Australia, India, Pakistan, and Bangladesh.

#### Third-Party Products

During the reporting period, Polly Holdco also engaged various third-party product suppliers to provide third party products as inventory. In each instance, our direct relationship lies with the third-party product suppliers themselves, rather than the third-party's factories or suppliers.

## 5. RISKS OF MODERN SLAVERY

No specific instances of modern slavery were identified in our operations or supply chains over the reporting period. However, Polly Holdco acknowledges that the global clothing and textile industry is considered a high area of risk for modern slavery, and that Polly Holdco's operational footprint means that its manufacturers may be located in countries where modern slavery is more prevalent.

### Industry and Sector Risk

Factors associated with the manufacture of clothing, footwear, headwear and accessories can lead to increased risk of modern slavery. These factors include the nature of the work required, short-term contracts, pressure from purchasing practices such as short product delivery timelines, sub-contracting, reliance on unskilled or migrant workers and costs of production.

### Country Risk

A number of the countries and regions in which Polly Holdco's in-house and third-party products were manufactured have vulnerable populations, and/or are jurisdictions where worker rights and protections may sometimes be less formalised or less readily enforced than in Australia.

### Secondary Levels

Polly Holdco recognises that it has limited visibility over secondary levels of our chain of suppliers, third-party product suppliers and the source materials used in our products. The risk of manufacturers engaging second level suppliers increases the risk of low skill and migrant workers being engaged in the production of Polly Holdco's in-house and third-party products.

To help address these risks, we have developed frameworks for engaging with our manufacturers using a robust procurement process with auditing procedures and regular compliance programs.

## 6. MITIGATION OF MODERN SLAVERY RISKS

Polly Holdco understands that a commitment to mitigating modern slavery risks involves dedicating time and resources on an ongoing basis. Polly Holdco conducts a multi-faceted risk assessment to understand the risks of human rights abuses in our supply chain.

As outlined above, Polly Holdco has limited visibility over secondary levels of its chain of suppliers, third-party product suppliers and the source materials used in our products. Unless stated otherwise, the mitigation strategies outlined in this section 6 of are utilised for final stage production of in-house products only.

### Onboarding

Prior to engaging with any potential supplier, Culture Kings and Princess Polly each conduct an initial screening of that potential supplier to identify any risks of exposure to modern slavery. We further continue to conduct ongoing risk assessments to maintain the currency of those assessments with our suppliers throughout the term of their engagement with Polly Holdco.

Our due diligence approach draws on desktop research from globally recognized indices and resources, supply chain mapping, supplier and worker surveys, audit reporting, and site visit observations. We use this to evaluate our existing supply chain and to source new suppliers. We are committed to reviewing our risk assessment approaches, remaining well-informed on updated research, and continuously assessing our supply chain.

In the reporting period, Petal & Pup did not undertake any specific onboarding sprocedures relating to modern slavery.

### Monitoring

As part of our anti modern slavery initiatives, we continually monitor and audit our supplier relationships and sourcing arrangements for modern slavery risks in our supply chain. We do this by:

- engaging with our suppliers on a regular basis to monitor performance and potential for modern slavery issues; and
- where practicable, including a contractual obligation to comply with a Code of Conduct, including an anti-slavery provision.

### Training

Polly Holdco recognises the importance of staff training and awareness. During the reporting period, we conducted training via interactive e-learning modules that included topics on ethics, conflicts of interest, human rights, integrity, working with third parties/monitoring and evaluating, anti-bribery and corruption.

### Standards and Policy

Each Business Group may develop and maintain standards and policies relevant to modern slavery that best suit that individual Business Group, their supply chain and their operating procedures. Each Business Group (with the exception of Petal & Pup) has terms of trade that each supplier must adhere to which includes modern slavery requirements. Compliance with each Business Groups' relevant policies and procedures is continually monitored.

Culture Kings and Princess Polly each maintain a database containing all supplier factory certifications. Petal & Pup does not maintain such a database. Culture Kings and Princess Polly review all supplier documentation and have escalation procedures in place in the event of non-compliance with the relevant terms of trade, policy or the relevant factory certification. Where non-compliance has occurred, the Business Group will take remedial and/or corrective action and terminate the relevant supply arrangements if necessary.

## **7. EFFECTIVENESS**

The management team of each Business Group is accountable for the daily compliance of that Business Group (including all operating entities and subsidiary boards) with identifying and mitigating modern slavery risks in its operations and supply chains and assessing the effectiveness of the Business Group's risk mitigation initiatives. a.k.a. Brands provides group level directions where necessary and reviews the policies and procedures of each Business Group.

The management team of each Business Group undertakes regular reviews of that Business Group's modern slavery processes, procedures and policies (if any) and Polly Holdco is committed to improving its practices and mitigating modern slavery risks in its supply chains.

## **8. CONSULTATION**

In preparing this statement, Polly Holdco actively engaged and consulted with all of the Business Groups, including liaising with the board of directors, senior leadership members and frontline team members.

Each director of the Polly Holdco and its subsidiaries has been consulted and provided feedback on this statement. All feedback received was considered in the preparation of this statement.

## 9. APPROVAL

This statement is made by Polly Holdco for the year ending 31 December 2024. This statement has been reviewed and approved by the board of directors of Polly Holdco on behalf of itself and its subsidiaries for the purposes of Section 16(2)(a) of the *Modern Slavery Act 2018* (Cth).

Signed by

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

**Ciaran Joseph Long**  
Director  
Polly Holdco Pty Ltd  
Date: 9 July 2025