

# Modern Slavery Statement Financial Year 2024



Simba Global



# Our purpose

## Better, Together

We work to contribute to a better world – for every person, every relationship, and every community. In all that we do, in every country that we touch, we will be better tomorrow than we are today.

### **Acknowledgement**

Simba acknowledges the Traditional Custodians of all lands on which we operate. We recognise their continuing connection to land, sea and community; and we pay our respects to their Elders - past, present and emerging.

#### **Registered Office**

289-311 Baywater Road  
Baywater North, VIC 3153

# Contents

<b>Message from the Executive Chair</b>	<b>4</b>
<b>Progressing our modern slavery statement commitments from 2023</b>	<b>5</b>
<b>About us</b>	<b>6</b>
Our business	6
Our team	7
Our governance	8
Our supply chain	10
<b>Risks of modern slavery in our operations and supply chain</b>	<b>12</b>
Our approach	12
Assessment of modern slavery risk	13
Risk in our operations	14
Risks within our product supply chain	15
Risks within our non-product supply chain	17
<b>Actions taken to mitigate modern slavery risks</b>	<b>18</b>
Living wage review	18
Supplier engagement	18
Site visits	18
Third party supplier audits	19
Systems and reviews	19
Communicating actions	19
Complaints handling	19
<b>How we assess the effectiveness of actions taken</b>	<b>20</b>
<b>Consultation process</b>	<b>21</b>
<b>Focus areas for 2024</b>	<b>22</b>
<b>Approval of statement</b>	<b>23</b>
<b>Appendix: Index</b>	<b>24</b>

# Message from the Executive Chair

Modern slavery remains a significant global challenge, impacting millions worldwide. In today's interconnected world with heightened awareness of human rights, the textile sector holds a crucial role in setting ethical standards and promoting sustainable practices. As active participants in this dynamic industry, we recognise our duty to uphold the highest levels of social and environmental responsibility. Our Modern Slavery Statement underscores our pledge to transparency, accountability, and ongoing improvement in combating modern slavery and human trafficking across our operations and supply chains.

As a leading entity in textiles, we acknowledge the complexities within our supply chains spanning multiple countries and involving numerous stakeholders. This year, we have intensified efforts to map and audit our Tier 2 product suppliers (fabric mills), enhancing visibility and mitigating risks. Our goal is to extend this mapping to all Tier 1, 2, and 3 suppliers by 2026, underscoring our commitment to transparency and inspiring industry-wide action.

Central to our mission is empowering workers throughout our supply chains, ensuring dignity, fair wages, and safe working conditions. We have conducted assessments on the wage practices among our Tier 1 product suppliers (manufacturers). We are pleased that all of our manufacturers pay equal to or above minimum wage. Furthermore, the Living Wage Indicator Typical family shows that 40% of our manufacturers in China are paying above a Living wage.

Our engagement with suppliers continues to deepen through enhanced training and direct on-site presence at Tier 1 suppliers in China, Pakistan and India. This proactive approach enables us to understand operations firsthand and swiftly address emerging issues, reinforcing our dedication to ethical practices, quality assurance, and sustainable supplier relationships. This year we have conducted a third-party audit, undertaken weekly site visits and held bi-annual supplier performance reviews for each of our 37 Tier 1 Manufacturers, with the aim to improve processes, ensure a high standard of conditions for works, and meet our customer's expectations.

Whilst progress is always continuous, we acknowledge there is much work ahead and remain steadfast in our commitment to achieving our goals. We invite collaboration with suppliers, partners, customers, and stakeholders to amplify our collective impact. Together, we can achieve meaningful change, fostering a brighter future for all.

**Hiten Somaia**  
Executive Chair



# Progressing our modern slavery statement commitments from 2023

Improvement area	Action Item	Actions Taken
Governance	Undertake contract review to ensure compliance with the Ethical Sourcing Policy and supplier manual.	The supplier manual and Ethical Sourcing policy is currently being strengthened with best-practice environmental and social sustainability compliance. This has meant that the PO contract review has stalled, with plans to complete this project in FY25.
Capacity building	Continue to enhance the buying, sourcing and quality team's capabilities to identify and manage modern slavery risks.	This year, Simba team members based in China undertook additional training on detecting Modern Slavery, with a focus on practical site observations.
Mapping Supply Chain	Undertake to map Tier 2 product suppliers to provide the necessary visibility to assess risk appropriately.	Tier 2 mapping of our Bangladesh suppliers has been completed. The introduction of a new Sustainability management system will streamline the mapping for Tier 2 in China, India and Pakistan. We believe this will allow us to complete Tier 2 supplier mapping by FY25.
Audits	Review current 3 <sup>rd</sup> party audit program and ensure it is in line with the current supplier manual and ethical sourcing policy.	The program to review all 3 <sup>rd</sup> party audits has been completed and found no changes were required. CAPs were followed up and implemented.
	Commence 3 <sup>rd</sup> party Tier 2 supplier audits	43% of our Bangladesh Tier 2 suppliers have existing SEDEX accreditation. Work will continue with the remaining Bangladesh Tier 2 and other jurisdictions as Tier 2 suppliers are mapped.
	Certify our local officers to undertake first-party sustainability and labour audits.	The initial training provider engaged to provide this certification could not supply these services in the jurisdictions in which Simba operates. We are currently investigating another training provider.
Supplier Engagement	Develop supplier engagement and training program on relevant components of our Simba Conscious strategy.	Commenced program to engage suppliers which included participation by suppliers in supply chain quarterly strategic planning held in Melbourne; a visit to suppliers in China by the Head of Procurement and engagement at the globally renowned Heimtex conference in Germany. Our in-country teams also conduct weekly site visits and have regularly and ongoing supplier engagement meetings.
Living Wages	Undertake a review of wages against the Anker Living wage methodology for our manufacturers in China, India and Pakistan.	Several of our customers use the Wage Indicator Typical Family and therefore this methodology was selected to review Tier 1 Manufacturers. We also audited against minimum wages. The review found that all our manufacturers are paying equal to or above minimum wages and at least 40% of manufacturers in China were paying above a living wage.
Remediation	Commence work to establish grievance and remediation process for suppliers.	This work has commenced and is due to be completed and implemented in FY25.



# About us

## Our business



Simba Global (Simba Textile Mills Pty Ltd) have been leading the Australian textile industry for more than 40 years with our unwavering commitment to quality and service delivery. We are headquartered in Melbourne and are the Australian subsidiary of Magnum Asia Pte Ltd.

Magnum Asia and its subsidiaries are a global textiles sourcing, warehousing and distribution group that services commercial, institutional, hospitality, retail, corporate, resort and promotional markets across Australia, New Zealand, much of Asia and the United States. We supply textiles including linen, towels, medical textiles, and corporate apparel to a diverse range of customers.

Simba Global has three business divisions which it owns and controls in Australia (the controlled entities):

- Commercial Division
- Retail Division
- Promotional Business Division

Each division sources, and in some instances, undertakes minor manufacturing of textiles and associated products for the Australian market. Magnum Asia operates in eight countries with offices in the United States, Australia, New Zealand, Singapore, India, China, Pakistan and Bangladesh.



# Our team

Internationally, our operations employ approximately 120 individuals.

Our staff work across sales, procurement, management, logistics and warehousing, retail and customer service, finance, quality and development.

Headcount as of 30 June 2024:

Country	Australia	New Zealand	Singapore	India	China	Philippines	Pakistan
Full time	53	5	4	8	9	5	6
Part time	6						
Casual	23						



# Our governance



There have been no changes to the governance structure since the last reporting period.





## Our governance

The Simba Global Board has accountability for the [Simba Conscious Strategy](#) which outlines our commitment to sustainability, ethical sourcing and mitigating risks of modern slavery. The CEO and the Board's Executive Chair are accountable for delivering the strategy, with the Simba Conscious committee responsible for delivering against each of the pillars. The Head of Procurement is the lead on implementing the 'Building sustainable supply chain' pillar which includes identifying and managing risks of modern slavery in the supply chain. The Head of People and Culture is responsible for ensuring compliance with labour laws for those we employ as well as across our supply chain.

The policies and processes that support Simba's operations require that universally recognised human rights are respected and safeguarded. Policies that support our modern slavery program include:

- Employee Code of Conduct - Sets out the standards of behaviour expected of our employees
- Employee Grievance Policy - Outlines the process for employees to lodge a grievance and how the company will investigate and address that grievance
- Ethical Sourcing Policy - Outlines our ethical procurement commitment and states our minimum expectations on business ethics, labour rights, child labour, anti-discrimination, harassment, working conditions and working hours
- Supplier Manual - Provides the guidance document for suppliers to do business with Simba including compliance to the ethical sourcing policy and principles





Simba is committed to complying with the laws and regulations of the countries in which our business operates. Our policies prohibit any activities involving modern slavery and are committed to safe and healthy working conditions, including the right to freedom of association and collective bargaining.

# Our supply chain

Our supply chain is global, working with more than 331 direct suppliers across both product and non-product goods and services.

## Product suppliers

Our product range includes a wide array of items, such as linens, towels, medical textiles, and corporate apparel. We collaborate with 39 Tier 1 manufacturing suppliers situated in India, China, Pakistan, and Bangladesh. Key to our philosophy is the robust and long-lasting nature of these partnerships; several of our Tier 1 suppliers have been essential to our business for more than ten years.

	Tier 1	Tier 2	Tier 3	Tier 4																												
 Product	Finished Product	Fabric	Yarn	Fibre																												
 Who	Manufacturers Total suppliers: 39	Fabric Mills Total known suppliers: 11	Spinning Mills Total known suppliers: 7	Ginners																												
 Processes completed	Cutting, sewing, finishing, packing, shipping	Milling, dying, printing and embroidery	Spinning and knitting	Cotton processing																												
 Geography	<table border="1"> <tr> <td>China Total Suppliers</td> <td>17</td> <td>Currently mapping</td> <td>To be mapped by 2026</td> </tr> <tr> <td>India Total Suppliers</td> <td>6</td> <td colspan="2">vertically integrated Tier 1 - 3</td> </tr> <tr> <td>India Total Suppliers</td> <td>7</td> <td>Currently mapping</td> <td>To be mapped by 2026</td> </tr> <tr> <td>Pakistan Total Suppliers</td> <td>4</td> <td colspan="2">vertically integrated Tier 1- 3</td> </tr> <tr> <td>Pakistan Total Suppliers</td> <td>4</td> <td>Currently mapping</td> <td>To be mapped by 2026</td> </tr> <tr> <td>1</td> <td></td> <td>vertically integrated Tier 1 - 2</td> <td>To be mapped by 2026</td> </tr> <tr> <td>Bangladesh Total Suppliers</td> <td></td> <td></td> <td></td> </tr> </table>	China Total Suppliers	17	Currently mapping	To be mapped by 2026	India Total Suppliers	6	vertically integrated Tier 1 - 3		India Total Suppliers	7	Currently mapping	To be mapped by 2026	Pakistan Total Suppliers	4	vertically integrated Tier 1- 3		Pakistan Total Suppliers	4	Currently mapping	To be mapped by 2026	1		vertically integrated Tier 1 - 2	To be mapped by 2026	Bangladesh Total Suppliers						
China Total Suppliers	17	Currently mapping	To be mapped by 2026																													
India Total Suppliers	6	vertically integrated Tier 1 - 3																														
India Total Suppliers	7	Currently mapping	To be mapped by 2026																													
Pakistan Total Suppliers	4	vertically integrated Tier 1- 3																														
Pakistan Total Suppliers	4	Currently mapping	To be mapped by 2026																													
1		vertically integrated Tier 1 - 2	To be mapped by 2026																													
Bangladesh Total Suppliers																																

## Our supply chain

Our Tier 1 manufacturing suppliers fall into two categories. Class 1 suppliers consist of mainly publicly listed companies that specialise in high-volume, high-quality products, constituting 70% of our procurement. Class 2 suppliers, comprising smaller, family-owned operations, provide lower volume products, making up the remaining 30%.

The nature of our relationships with Tier 1 suppliers varies across different regions. For instance, in India 46% of our suppliers are vertically integrated, overseeing the process from yarn production, fabric production to finished product. This integration enhances visibility and transparency throughout the textile supply chain. Conversely, in China, our Tier 1 suppliers focus solely on manufacturing, while Tier 2 and Tier 3 suppliers handle other stages of production.

Transparency is paramount in our supplier relationships. We conduct quarterly internal Supplier Performance Reviews to monitor performance against various metrics, including environmental, social, and governance (ESG) standards. Our quality team conducts weekly site visits to Class 1 suppliers, inspecting finished goods and reporting any concerns regarding modern slavery or labour practices to our procurement leadership. This year, we have continued to implement our annual third-party social audit program, completing 37 audits of our Tier 1 suppliers and 3 audits for our Tier 2 Bangladesh suppliers. We have also conducted weekly site visits and held biannual supplier performance reviews with each Tier 1 Manufacturer.

We are committed to ethical sourcing practices and do not knowingly engage with factories that do not align with our [Ethical Sourcing Policy](#). However, one significant industry challenge we face is accurately tracing the origin of cotton fibre. While we require spinners and knitters to avoid sourcing from known modern slavery hotspots, current technology limitations mean we cannot yet guarantee complete traceability. As both fibre identification technology and our sustainability initiatives evolve under Simba, we remain dedicated to addressing and improving these standards

### Non-product suppliers

Our operations depend on a network of suppliers offering various goods and services. In FY24, we engaged with 294 non-product suppliers, representing 20% of our total annual expenditure. The primary categories where our spending was concentrated include:

- Warehousing and logistics 45%
- Financial services 10%
- IT and telecommunications 3.5%

Most of our product is transported through shipping. We recognise the shipping industry faces modern slavery risks due to global supply chains and vulnerable seafarers. Issues include deceptive recruitment, poor conditions, and exploitation in remote ports.





# Risks of modern slavery in our operations and supply chain

## Our approach

At the core of our modern slavery risk management strategy is a commitment to ethical conduct, prioritising integrity and respect. We rigorously enforce policies through comprehensive, ongoing due diligence integrated into our daily operations. This dynamic process identifies and addresses risks, focusing on prevention, mitigation, and remediation. We continuously evaluate and disclose our efforts to customers, employees, and partners, ensuring accountability and transparency.

### Identify and assess risks

- Supplier risk assessments
- Due diligence of potential suppliers
- New supplier onboarding program

### Take action

- Policies and procedures
- Contractual obligations
- Weekly site visits
- Annual third-party audits

### Monitor and respond

- Corrective action plans
- Annual assessment of risks and the effectiveness of actions taken
- Respond to questions raised by stakeholders

### Communicate and educate

- Report against Australia's Modern Slavery Act
- Ethical Sourcing Policy and Supplier Manual
- Internal training and capacity building
- Supplier training

## Assessment of modern slavery risk

Our 2024 analysis considers various factors, including:

- **Country risk indicators:** We rely on sources like the Global Slavery Index and SMETA risk profiling to assess the risk of modern slavery in different countries.
- **Type of risk:** including Forced labour, migrant labour exploitation, bonded labour, harsh or inhumane treatment, excessive overtime, poor working conditions.
- **Vulnerable groups:** We pay attention to the presence of vulnerable groups within specific countries or regions to better understand the potential risks they face including women and migrant workers.
- **Visibility:** We consider the level of supply chain visibility that we have as part of our assessment of the potential risk of modern slavery.





# Risk in our operations

Business area	Risk profile
Operations	Low: Predominantly Australian workers directly engaged

The risk of modern slavery in our operation remains low. This is because:

- **Direct Employment Contracts:** All team members are employed directly under full-time, permanent, or casual contracts. These agreements detail minimum pay, hours of work, breaks, deductions, leave entitlements, health and safety protocols, termination procedures, and grievance mechanisms. We verify the right to work in Australia through VIVO checks and conduct thorough reference checks for all employees.
- **Employee Code of Conduct:** Our Employee Code of Conduct mandates zero tolerance for workplace harassment, bullying, bribery, corruption, discrimination, and serious misconduct. All team members undergo induction training that covers these expectations and receive specific Modern Slavery awareness training.
- **Regular Internal Audits:** We conduct routine internal audits of our systems and processes to ensure compliance with policies and legal requirements. Any identified issues are promptly addressed as part of our ongoing due diligence efforts.

These measures underscore our commitment to maintaining ethical standards and safeguarding against modern slavery risks throughout our organisation.





# Risks within our product supply chain

**Risk profile**

Vertically integrated suppliers



**11**  
Total number Tier 1



**40%**  
Percentage of total volume of product produced



India, Pakistan, Bangladesh

**Medium**

We partner with large suppliers that are vertically integrated, offering enhanced visibility across our production supply chain. Regular audits are conducted to minimise and manage risks, despite these suppliers being located in higher-risk countries


↑  
Vertically integrated  
↓

**Risk profile**

Horizontally integrated suppliers



**28**  
Total number Tier 1



**60%**  
Percentage of total volume of product produced



China, India, Pakistan

Tier 1 Manufacturers	Tier 2 Fabric Mills	Tier 3 Spinning Mills	Tier 4 Ginners
<p><b>Medium</b></p> <p>We work with a small number of suppliers which allows for close management and oversight.</p> <p>Regular audits are conducted to effectively minimise and manage risks, despite their locations in higher-risk countries.</p>	<p><b>High</b></p> <p>These suppliers are based in high-risk countries with Simba having less visibility and control over each supplier. The further into the supply chain, the higher the risk.</p>		



## Risks within our product supply chain

Based on our risk assessment, ongoing supplier interactions, and this year's supplier social audit reports, Simba has not identified any instances of modern slavery in our supply chain. While we maintain a zero-tolerance policy towards modern slavery, including child labour, forced labour, or bonded labour, we acknowledge the potential risks and have implemented strategies to prevent, mitigate, and manage them.

We intentionally maintain a small Tier 1 supplier base to foster direct relationships and actively oversee any associated risks. These longstanding partnerships, some spanning over a decade, enable fair pricing, realistic production volumes, and dependable delivery expectations managed by our procurement team.

Subcontracting is strictly prohibited unless authorised by the Head of Procurement. While unauthorised subcontracting remains a concern, any such instances prompt engagement with factory management to understand the reasons. If deemed unreasonable or posing a significant risk, immediate cessation is required. Non-compliance initiates mediation, and persistent risk leads to

divestment from the factory. This year we did find an excessive use of an authorised subcontractor. Whilst the subcontractor was authorised to undertake work, the volume was deemed excessive, and this was discussed and remedied with the supplier. This is an example of how effective due diligence can identify any potential issues early.

The highest risk of modern slavery typically resides deeper within the supply chain. In jurisdictions, where our products are vertically integrated by Tier 1 manufacturers overseeing all production stages from yarn spinning to shipping, this risk is minimised.

In other regions, visibility into working conditions at Tier 2, 3, and 4 factories is limited due to indirect relationships. To address this risk, work to map our supply chain beyond Tier 1 suppliers has begun. This year we have completed mapping Tier 2 product suppliers in Bangladesh and have commenced a SEDEX audit regime for these suppliers, along with all of our Tier 1 product suppliers. Work to map all Tier 2 and beyond is well underway and is due for completion by the end of 2026.





# Risks within our non-product supply chain

Business area	Risk profile
Warehousing and logistics	Low
Labour Hire	
IT and Telecommunications	
Computer hardware	

Regarding our non-product supply chain, we have focused our modern slavery risk assessment solely on Tier 1 suppliers. This decision reflects our prioritisation of the product supply chain, where our influence and impact are most significant. As a result, our exposure to modern slavery risks in these categories is generally perceived to be low.

Our Tier 1 non-product suppliers are primarily located in Australia and benefit from lower risk levels due to their adherence to local laws and ongoing engagement with Simba. However, we acknowledge that certain vulnerable groups, such as migrant workers, and certain industries including shipping, face heightened risks related to labour rights issues, including excessive working hours.





# Actions taken to mitigate modern slavery risks

In continuation of our Sustainable Supply Chain efforts and as outlined in our [previous statements](#), this fiscal year has witnessed progress on our existing commitments aimed at bolstering our efforts to prevent and mitigate the risks associated with modern slavery. Some areas for special mention include:

## Living wage review

This year, we conducted a comprehensive Living Wage review using the Wage Indicator Typical Family Methodology, which several of our customers use. This approach was specifically chosen to assess our Tier 1 Manufacturers. Concurrently, we audited compliance with minimum wage standards. The findings revealed that all of our manufacturers are paying wages equal to or exceeding the mandated minimums, with 40% of manufacturers in China notably surpassing living wage benchmarks.

## Supplier engagement

This year, our supplier engagement strategy included several key initiatives aimed at strengthening our partnerships and improving supply chain transparency. In Melbourne, suppliers were invited to attend our quarterly supply chain meetings, providing them with a platform to discuss performance metrics, address concerns, and align on future objectives. This face-to-face interaction not only enhanced our mutual understanding but also fostered a collaborative environment where suppliers felt more integrated into our strategic planning processes.

Additionally, a significant highlight was our trip to China in April, where we prepared suppliers for an upcoming request to provide comprehensive environmental and social sustainability data. This visit underscored our commitment to sustainability and allowed suppliers to directly showcase their practices and innovations in these critical areas.

Furthermore, the Heimtextil conference in Germany provided another valuable opportunity for engagement, where we held detailed discussions with all suppliers regarding the introduction of our new Environmental Management Systems (EMS). These interactions reinforced our dedication to environmental responsibility and ensured that our suppliers are aligned with our sustainability goals.

## Site visits

Our quality team conducts weekly site visits to our Class 1 Tier 1 suppliers to inspect finished goods, equipped with training to detect and report any signs of modern slavery or poor labour practices to our head of procurement. There were zero reports of potential modern slavery or poor labour practices made by our quality teams.



# Actions taken to mitigate modern slavery risks

## Third-party supplier audits

This year we continued our efforts with the rollout of our third-party social audit program, completing a total of 39 audits. These initiatives include audits not only at Tier 1 but also extend to Tier 2 suppliers in Bangladesh, ensuring comprehensive oversight and accountability across our supply chain. Our third-party audits issued 78 non-conformance which included issues with facilities maintenance, working hours, labour rights and worker safety. Corrective action plans were put in place and delivered within 60 days with currently only 1 open CAP. Site were re-audited to ensure compliance.

## Systems and reviews

Each quarter undertake an internal Supplier Performance Review to track the progress of all Tier 1 suppliers against a range of metrics including our ESG

standards. The auto-check within our CRM system, which was implemented last financial year, has been effective in ensuring our audit regime remains rigorously on schedule. It has also allowed timely engagement with suppliers who may have any outstanding Corrective Action Plans.

## Communicating actions

Our commitment to ethical sourcing outlined on our website and our actions taken to mitigate risks in these areas is outlined within this statement.

## Complaints handling

We handle any complaints made about Simba or its suppliers seriously. Our whistleblower policy outlines the framework for receiving, investigating and addressing allegations including remedy.





# How we assess the effectiveness of actions taken

We continue to implement and utilise measures to ensure the effectiveness of the actions we take to address modern slavery. These measures include:

	Activity	Measure
Governance	Board oversight	Quarterly presentation to the Board
	Policy reviews	Twice Yearly Operational Strategy Sessions
	Team Member training	Ongoing policy review Number of training sessions held and number of participants
Risk Management	Regular risk assessments	Annually
	Supplier onboarding	All new stock suppliers
	Regular review of risk matrix	Quarterly
Monitoring	Third-party audits	Audits conducted per tier; quantum of non-compliance
	Supplier Corrective Action plans	Number of CAPs in place and time to implement
	Worker engagement	Number of worker engagements
	Site visits	Number of site visits





# Consultation Process

We prioritise continuous consultation throughout our organisation to effectively address modern slavery risks. Staff engagement occurs through the Simba Conscious Committee, chaired by the Executive Chair and comprising representatives from various departments.

Additionally, we maintain regular dialogue with our procurement team to achieve fair negotiated pricing, emphasising optimal outcomes aligned with our Ethical Sourcing policy. The Board receives routine updates on the progress and implementation of the Simba Conscious strategy.

# Focus areas for 2025

At Simba, continual review and improvement is the foundation to our approach to combatting modern slavery. We strive to uphold high standards and create a responsible and ethical supply chain. In 2025 we aim to:

- **Map Tier 2 and Tier 3 product suppliers:** Complete a comprehensive mapping of Tier 2 product suppliers and initiate efforts to map Tier 3 suppliers. This will provide enhanced visibility and control over our entire product supply chain, improving transparency and risk management.
- **Revise and implement Supplier Manual and Ethical Sourcing Policy:** Review and update our Supplier Manual and Ethical Sourcing Policy to reflect best governance practices. This will ensure that suppliers fully understand Simba's expectations for environmental stewardship and social compliance, fostering stronger adherence to our ethical standards.
- **Review of Whistleblower Program:** To include developing a more comprehensive policy that encompasses the entire supply chain, effective reporting mechanisms, refresher training and updated remediation processes. This initiative will promote accountability and transparency within our supply chain.
- **Embed compliance into purchase orders:** Integrate environmental and social compliance requirements into all purchase order contracts. This ensures that our procurement processes reinforce our commitment to sustainability and ethical practices.
- **Deploy supplier questionnaire:** Distribute a detailed supplier questionnaire to benchmark environmental and social performance across the supply chain. This will facilitate data collection and analysis, driving continuous improvement in our sustainability efforts.
- **Maintain supplier audit regime:** Continue to execute our rigorous audit regime for Tier 1 and Tier 2 product suppliers, ensuring ongoing compliance with our standards and identifying areas for improvement.
- **Implement Sustain IQ platform:** Launch our new sustainability data platform, Sustain IQ, to enhance data visibility, track performance metrics, and identify opportunities for improvement across our supply chain.
- **Develop and roll out supplier training program:** Create and implement a training program focused on the relevant components of our Simba Conscious strategy. This will engage suppliers and equip them with the knowledge to align with our sustainability goals and ethical expectations.

# Approval of statement

Simba is committed to the spirit and intent of the Modern Slavery Act.

On 16 December 2024, based on the recommendations of the CEO of Simba and its controlled entities, in consultation with the senior leadership and management teams, including the general managers of Commercial, Retail and Business divisions, the Board of Directors of Simba – the principle governing body of the Australian reporting entity, unanimously resolved and approved the Simba 2024 Modern Slavery Statement pursuant to the Modern Slavery Act 2019 (Cth).

The Board authorised Ahmed Ebeid, a Director, and the Chief Executive Officer, as the responsible member of Simba and its controlled entities, to sign this Statement in accordance with the Act.



**Ahmed Ebeid**

Director and CEO, Simba Global Pty Ltd  
ACN 613 005 039

Date: 16 December 2024



# Appendix: Index

Modern Slavery Act (2018) Requirement			Page		
1.0	Identify reporting entity	Name of reporting entity	6		
2.0	Describe structure, operations and supply chain	Describe Structure - legal and organisational form	Legal Classification and ACN/ ABN	6	
			Provide the details of the reporting entity's registered office.	2	
			Indicate the approximate number of workers employed by the entity and any entities it owns or controls	7	
			Explain the general structure of the entity.	6	
			If the entity is part of a larger group, explain the general structure of the overall group (both upstream and downstream from the entity).	6	
			Whether it owns or controls other entities.	NA	
			If the entity does own or control other entities, explain what these entities do and where they are located	NA	
			Identify any trading names or brand names associated with the reporting entity and entities it owns or controls.	6	
			Describe Operations	Explain the nature and types of activities undertaken by the entity and any entities it owns or controls.	6
				If the entity's activities involve investments or financial lending, explain the type and nature of the entity's investments or lending.	NA
	Identify the countries or regions where the entity's operations are located or take place.	6			
	Provide facts and figures about the entity's operations, such as the total number of employees, factories, and/or stores.	6,7			
	Explain in general terms the type of arrangements the entity has with its suppliers and the way these are structured (are they often short-term and changeable or stable longer-term relationships).	10,11			
	Explain the types of business relationships the entity has in addition to suppliers, such as joint venture partners.	NA			
	Describe supply chain	Identify the countries or regions where the entity's suppliers are located.		10	
		Explain the main types of goods and services the entity procures.	10		
		To the extent possible, identify the source countries for these goods and services.	10		
		Link to any disclosures by the entity about the identity of their suppliers (such as a public supplier list).	NA		

## Appendix: Index

Modern Slavery Act (2018) Requirement			Page	
3.0	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Caused, contributed or directly linked to	Describe risks that the entity, and entities it owns or controls, causes, contributes to and/or is directly linked to modern slavery	13,14,15,16,17
			Should identify the general types of modern slavery risks that may be present in the operations and supply chains	13
			Include sector/ industry risks; product and services risks; geographic risks; entity risks	13,14,15,16,17
			Must include sufficient detail to clearly show the types of products and services in the entity's operations and supply chains that may involve risks of modern slavery	13,14,15,16,17
4.0	Describe what actions over the past 12 months, the reporting entity, and entities it owns or controls, is taking to assess and address the risks of modern slavery	Due diligence	How the entity has identified and assessed actual and potential human rights impacts : eg <ul style="list-style-type: none"> <li>Reviewed existing information such as Human Rights Impact Assessments; WH&amp;S inspections, Social Impact Assessments</li> <li>Mapped key parts of your operations and supply chains</li> <li>Assessed the risk through risk matrix</li> </ul>	12
			What tools, systems, policies and personnel does the entity have in place to monitor high risk suppliers and mitigate associated risks eg supplier and employee codes of conduct, Human Rights policy, complaints mechanism available.	12,18,19
			Are these tools, systems, policies available publicly, if so where	NA
			How is the entity taking appropriate action to address impacts eg staff and supplier training, incident reporting, working directly with high risk suppliers	18,19
			How is the entity is tracking performance eg credible audits, using existing traceability processes	19
			How the entity is publicly communicating what you are doing	19
			Remediation processes	What is in place for the entity to respond to complaints of modern slavery
		What is the process for remediation	19	

## Appendix: Index

Modern Slavery Act (2018) Requirement			Page		
5.0	Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks		Explain what the reporting entity is doing to check whether its actions to assess its modern slavery risks are working. How will it know whether it is appropriately identifying and evaluating its modern slavery risks?	20	
			<p>Explain what the reporting entity is doing to check whether its actions to address modern slavery risks are working. How will it know if its actions are making a difference?</p> <p>Could include</p> <ul style="list-style-type: none"> <li>• Establishing a regular review process</li> <li>• Regularly checking your risk assessment processes</li> <li>• Setting up a process to provide for regular engagement and feedback between key departments</li> <li>• Conducting internal and external audits</li> <li>• Tracking actions you have taken and measuring impact</li> <li>• Working with suppliers to check their progress</li> <li>• Looking at trends reported through the complaint's mechanism</li> <li>• Partnering with an industry group, or trusted NGO to undertake an independent review</li> </ul>	20	
6.0	Describe the process of consultation with any entities the reporting entity owns or controls	Not needed if no other entities owned or controlled	The level of consultation you undertake should reflect your relationship with the other entity and the risk profile of that entity. Your consultation should be sufficient to ensure that the modern slavery risks relating to the other entity have been appropriately identified, assessed and addressed and that other entity is aware of what actions they need to take.	21	
7.0	Any other relevant information	Only if relevant	<p>May include</p> <ul style="list-style-type: none"> <li>• How the reporting entity has supported the development of legislation on modern slavery in another country</li> <li>• Whether the reporting entity has participated in external forums on modern slavery to help improve awareness</li> <li>• How the reporting entity has partnered with a civil society organisation or industry body</li> <li>• How the reporting entity has contributed to addressing the root causes or structural factors that contribute to modern slavery, such as poverty, forced migration, and education</li> <li>• If you reported on a situation of modern slavery in a previous statement, any updates on how the situation has been addressed</li> </ul>	NA	
			Approved by principal governing body	The statement must say that it has been approved by the principal governing body for the reporting entity; name that governing body; and specify the date that governing body approved the statement	23
			Signed by a responsible member of the reporting body	Usually a Director or the Board	23