



MODERN SLAVERY STATEMENT

# 2023

EVOLUTION AND IMPACT



**PREMIER  
INVESTMENTS  
LIMITED**

A.C.N. 006 727 966

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# Joint Letter from Premier's Chairman & the Interim CEO (Retail) & Just Group CFO



We are proud to share this modern slavery statement with you to update you on our FY23 work program. This document is for all our stakeholders, including customers shopping in our seven brands; our team members in our stores, support offices or distribution centres; our supply chain partners producing our product ranges; our investor group; and our industry peers. This modern slavery statement demonstrates our focus and ongoing commitment.

Everything starts with our people, because we know and deeply believe that creating engaging experiences for Premier's customers starts with our team: respecting them and building their trust and loyalty. As our operations have now largely normalised after a number of years of supply chain interruption, we have been encouraged by our team's ability to re-commence travel into all regions to meet and engage with our supply chain stakeholders in person. This has laid the foundation for our teams to see first hand the impact of our Ethical Sourcing Program, and to further embed and accelerate change.

Our expanded Ethical Sourcing Program is now in its fourth year, and while we understand that our program needs to continuously improve to respond to new and emerging issues along with the broader challenges of the global economy, the next phase of our program will provide us deeper insights and deliver measurable outcomes. We are committed to lasting change.

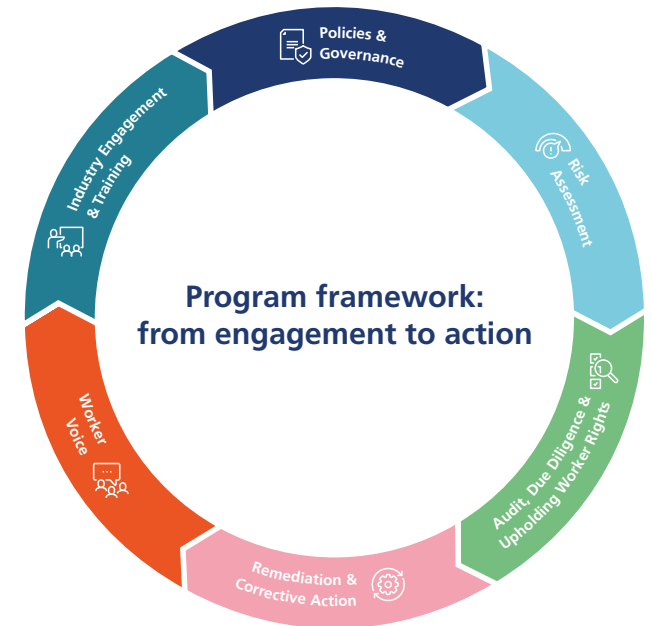
This is a journey of evolution, where the 'sum of the parts' of our Ethical Sourcing Program will have meaningful impact.

**Solomon Lew**  
Chairman &  
Non Executive Director

**John Bryce**  
Interim CEO (Retail)  
& Just Group CFO

25 January 2024

\*FY23 for Premier is the 52 week period ending 29 July 2023, being the reporting period for the purposes of this modern slavery statement.





# 1

## Overview



## About Premier Investments Limited

<b>Company type</b>	Public company limited by shares, incorporated in Australia
<b>Public trading of company shares</b>	Premier's shares are traded publicly on the Australian Securities Exchange (ASX:PMV)
<b>Registered office</b>	Level 7, 417 St Kilda Road, Melbourne VIC 3004 Australia
<b>Company website</b>	premierinvestments.com.au
<b>Principal activities</b>	Premier operates a number of specialty brands through its 100% ownership of Just Group Limited ( <b>Just Group</b> ).
<b>Just Group brands</b>	Smiggle, Peter Alexander, Just Jeans, Portmans, Dotti, Jacqui E, Jay Jays
<b>Location of retail operations</b>	Smiggle: Australia, New Zealand, Singapore, Malaysia, the United Kingdom, the Republic of Ireland and online  Peter Alexander, Just Jeans, Portmans, Dotti, Jacqui E, Jay Jays: Australia, New Zealand and online

<b>Premier's Reporting Entities</b>	<p>Entities report under the Modern Slavery Act if they are an Australian entity with a minimum annual consolidated revenue of \$100 million. For FY23, Premier has chosen to report in relation to its entire operations on behalf of each of the following Australian entities in its group:</p> <ul style="list-style-type: none"> <li>• Premier Investments Limited</li> <li>• Just Group Limited</li> <li>• Peter Alexander Sleepwear Pty Ltd</li> <li>• Smiggle Pty Ltd</li> <li>• Just Jeans Pty Ltd</li> <li>• Jay Jays Trademark Pty Ltd</li> <li>• Portmans Pty Ltd</li> <li>• Dotti Pty Ltd</li> <li>• Jacqui E Pty Ltd</li> </ul>
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## Acknowledgment of Country



This Modern Slavery Statement was written on the lands of the Bunurong and Wurundjeri Woi-wurrung peoples. We recognise the continuing connection to the land, waters and communities of the Traditional Custodians of Country throughout Australia.

## Mandatory reporting criteria: checklist

Criteria under the Modern Slavery Act	Where to read more
Identify the reporting entity	5
Describe the reporting entity's structure, operations and supply chains	5, 8-9, 17-18
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities owned or controlled by the reporting entity	12-13
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls to assess and address those risks, including due diligence and remediation processes	15-31
Describe how the effectiveness of such actions are assessed by the reporting entity	33-34
Describe the process of consultation with any entities that the reporting entity owns or controls	5
Provide any other information that the reporting entity considers relevant	3, 6, 10, 36, 38

## Premier Investments Limited Board Approval

The contents of this statement was approved by the board of Premier on 25 January 2024. The Premier board is in a position to influence or control each of its subsidiaries and the reporting entities within the Premier group covered by this statement. The boards of Just Group's operating entities listed on this page 5 have been consulted in relation to the preparation of this statement.

This statement is issued by Premier jointly on behalf of all reporting entities in the Premier Group. Solomon Lew, a Director of Premier Investments Limited, has signed this statement.

**Solomon Lew**  
Chairman & Non Executive Director

25 January 2024






Beyond our well established audit program which includes corrective action and remediation, Worker Sentiment Surveys, Production Verification Audits and risk assessment tools, the following key work program achievements were completed in the reporting period.




## Risk assessment

- On-site factory visits across all key regions with a product and compliance focus
-  • On-the-ground visits to Bangladesh by the CEO, the Managing Director - Apparel, General Manager - Sourcing, Ethical Sourcing & Compliance Manager and Product teams to meet with the in-country team and suppliers
-  • Expansion of Ethical Sourcing Program to include importers




## Audit, due diligence & worker rights

-  • Completed or commenced all [living wage commitments](#) made in previous MSS
-  • Our Ethical Sourcing and Compliance Manager visited Bangladesh to scope our wage gap analysis framework with key suppliers
-  • Rolled out Better Cotton membership across Peter Alexander, Just Jeans, Jay Jays, Portmans, Dotti and Jacqui E






## Remediation & corrective actions

-  • Successfully remediated two zero-tolerance non-compliances in our supply chain
-  • Remediation of grievances raised through the Amader Kotha worker grievance mechanism being piloted in Bangladesh, together with the Bangladesh RMG Sustainability Committee (RSC) grievance channel
-  • Continued deployment of Corrective Action plan service across all primary factories with updated reporting from LRQA (formerly ELEVATE)



## Worker Voice

-  • Evolution of worker voice beyond worker sentiment surveys to include the rollout of Amader Kotha helpline
-  • Ethical Sourcing and Compliance Team conducted worker interviews in Bangladesh during on-the-ground visit
-  • Investment in psychosocial risk assessment project to better assess emerging workplace risk

## Industry engagement & training

-  • Supplier conference held in January & February 2023 in person in South East Asia with all key partners across our sourcing regions
-  • Became Sedex member to supplement existing LRQA investment, and to support licensor partnerships
-  • Commenced roll-out of anti-bribery and corruption training to support offices
-  • Better Cotton training rolled out in all brands that are sourcing Better Cotton
-  • Updated Modern Slavery training delivered to all suppliers

## Policies & contractual governance

-  • Roll-out of updated supply terms, including Supplier Ethical Code of Conduct translated into local language
-  • Roll-out of Key Principles of Ethical Business Conduct translated into local language

 **New initiatives in FY23 are marked with this symbol throughout this statement.**



# 2 Our operations





Our business includes our seven retail brands supported by our leading sourcing and operational capabilities and our 12,000+ valued team members.

## Portfolio of 7 Iconic Brands



peteralexander



portmans

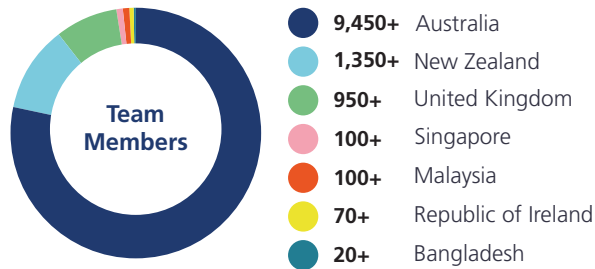
dotti

JACQUIE



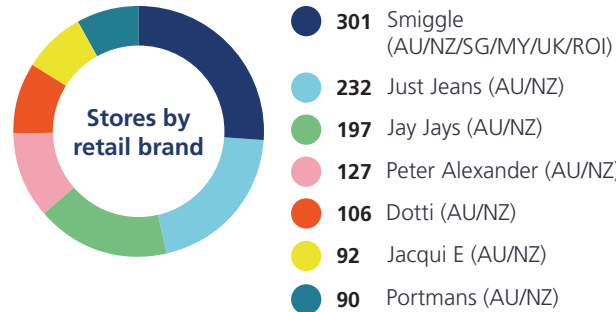
### Team members

We employ over 12,000 team members globally.



### Store & online network

1,100+ total stores globally, and online



### Support offices

#### Leveraging Centralised Support Functions

Five offices located in Australia, New Zealand, Singapore, the United Kingdom & Bangladesh

Australian office houses key operational support functions - Sourcing, Finance, Property Leasing & Store Development, eCommerce, Marketing, Information Technology, People & Culture.

### Distribution centres

Operated by Premier in Australia and New Zealand, and partnering with third party logistics partners in Singapore and the United Kingdom servicing all owned retail operations & wholesale customers.

We ship tens of millions of units of product annually from our valued suppliers to our six retail markets and online channels.

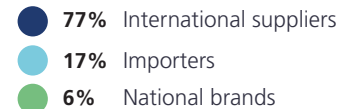
## Sourcing

### Our merchandise offering

Our seven brands work with international suppliers with factories located in China, Bangladesh, Pakistan, Vietnam, India, Indonesia and Taiwan to manufacture apparel, accessories and general merchandise for resale.



We also work with a number of importers and buy products from a range of national brands.



### Non-merchandise goods and services

We partner with key non-merchandise goods and service providers to support our core operations, including:

- Freight and logistics
- Labour hire
- Financial services, such as banking and insurance services
- Information technology
- Property services
- Creative services, such as advertising and marketing
- Store support goods and services, such as shopping bags, team member apparel and cleaning services



## About our own operations

Modern slavery risks in our own operations are low.

Premier's own team members are directly employed by entities within the Just Group. These team members have their employment terms set out in contracts governed by employment laws and industrial instruments of the relevant country. This includes our teams located outside of Australia.

Strong policies, team member training, accessible grievance mechanisms and ongoing monitoring are key program controls we use to assess and mitigate the risk of modern slavery in our operations.

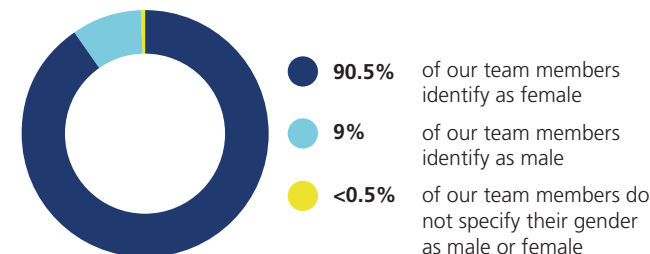


However, we recognise emerging risks in our own workplace. By way of example, in the reporting period, we initiated a new project to assess psychosocial risk in our workplace.

Psychosocial risks are any factors in the design or management of work that may cause an employee to experience a negative psychological response, eg. occupational violence, bullying & harassment (including sexual harassment). Recent legislative changes in several jurisdictions have clarified and increased our obligation to assess, monitor and control such psychosocial risks. Our external advisers are assisting us to assess our psychosocial risk profiles across all operations, and to provide a detailed analysis to assist in building an actionable improvement plan.

## About our 12,000+ team members

The majority of Premier's own team members are employed on a permanent basis, with the balance comprising limited tenure/ fixed term or casual team members (the latter in particular with a focus on scaling up our store network to support peak retail trade between October and January each year).



Premier's robust framework clearly defines the expectations and rights of our team members and available grievance mechanisms, as set out below in Table 1.

TABLE 1

<b>Employment terms</b>	Written and signed agreements that clearly articulate individual team member obligations and rights in the scope of their role including pay and conditions, reviews, grievance mechanisms and requiring supporting verification of information (i.e. age, proof that they are eligible to operate machinery).  In addition, we recognise the importance of freedom of association and acknowledge team members have the right to collectively negotiate.
<b>Code of Conduct</b>	Clearly articulated expectations for team members and contractors behaviour. References all parts of our framework including compliance and grievance mechanisms.
<b>Working rights</b>	Compliance with all local laws ensuring team members' legal working rights.
<b>Policies and training</b>	Just Group has a number of policies and resources that are shared and also delivered through regular training and education programs to assist teams and promote compliance. Subject areas covered in our training include workplace behaviour, health and well-being, team safety, ethical sourcing and anti-bribery and corruption.
<b>Listening &amp; grievance mechanisms</b>	Just Group has an internal People Support helpline set up for team members to access if they require a grievance channel. All grievances are treated seriously, sympathetically and confidentially and, where we consider it necessary, will be investigated thoroughly and impartially.
<b>Audit &amp; verification</b>	Monthly audit of applicable team members to ensure team members are paid in full compliance with and verified against the Just Group Retail Agreement.

# Governance & accountability framework



## Our approach

Premier's governance and accountability framework is set out on Table 2.

Critical governance and oversight is provided top-down by the Premier Board. Our framework ensures the execution of the Board's governance and due diligence strategy along with a clear path of accountability.

A critical lever in our framework ensures decisions around factory selection and compliance are completely independent of everyday commercial decisions made by our product teams. This means product teams, in their day-to-day dealings with suppliers, cannot work outside of the framework and principles of our Ethical Sourcing Program. Product teams are in turn supported by both in depth training and the dedicated resources of our Ethical Sourcing Team.

Our program also reflects, and is based on, the following list of internationally recognised human rights charters and principles:

- The United Nations' Universal Declaration of Human Rights;
- The International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work, and Core Conventions;
- United Nations Guiding Principles on Business and Human Rights (UNGPs).

Our program is not static. We are committed to addressing new and emerging risks within our supply chain and operations.

## Due diligence

Modern Slavery risks in operations we do not own or control are inherently higher risk. Our program encompasses our direct and indirect operations. We are aware that risks in our supply chain extend beyond the merchandise we sell to our valued customers. Our approach is segmented and based on inherent risk, with a primary focus on those areas where we can make the most impact. This does mean that we de-prioritise risk in other areas (as further set out in this statement). A detailed analysis of the scope of our program in relation to direct suppliers, where our impact is most significant, is set out in Table 7 on page 16.

TABLE 2

<b>Governance</b> Oversight & risk of our program	<b>Premier Board</b>	Responsible for providing guidance and approval of the Ethical Sourcing strategy, including our Modern Slavery Statement
	<b>Premier Audit &amp; Risk Committee</b>	Responsible for oversight of the work program due diligence and risk management practices. This includes the Ethical Sourcing Program, including our Modern Slavery Statement
	<b>Just Group Board</b>	Responsible for monitoring agreed work program, reporting and progress of commitments made in Ethical Sourcing work plans
<b>Accountability</b> Delivering our program	<b>CEO and Executive Team</b>	Accountable for progress of the agreed work program, reporting and risk management
	<b>Ethical Sourcing Working Group</b>	Accountable for overseeing the collaborative development and implementation of the Ethical Sourcing strategy
	<b>Brands and Operational Support Functions</b>	Consulted on approach and accountable for operationalising agreed frameworks





# 3

## Risks

# Risks of modern slavery in Premier's operations and supply chains

## Approach

Premier actively monitors the risk of modern slavery occurring in its operations and supply chains through a holistic program which seeks full transparency in relation to human rights and working conditions. We do this through a combination of actions including our audit program, corrective action plan monitoring, worker voice tools, that are embedded in our ethical sourcing program framework. Further detail on these initiatives are outlined in Section 4 (Actions). These activities include both qualitative and quantitative measures to help identify the most material inherent human rights risks within the regions from which we operate and source, and to provide confidence that our program has meaningful impact.

We support and endorse the UNGPs on Business and Human Rights, which are also supported widely by our industry peers and Government. The framework outlines key considerations businesses should observe in their operations to assess, address and mitigate the risks of modern slavery in their supply chains. Business' impact can be explained through the 'cause', 'contribute', 'directly linked' continuum, outlined in Table 3. As our program evolves we are actively analysing how we can strategically and practically target our efforts using this continuum.

Premier's approach to the mitigation of labour rights risks is centred on the ILO's continuum of exploitation in Table 4 which highlights how minor labour issues, if neglected, can over time become far more serious issues. Premier's Ethical Sourcing Program therefore has a dedicated focus on working with supply partners on the timely identification and resolution of labour non-compliances, no matter how minor, before they amplify or exacerbate.

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## Risk Assessment Tools

We continue to use two key tools, being LRQA's EiQ platform and Sentinel technology in order to manage and monitor risk. Significant investment has been made in team, best practice technology and tools to ensure alignment between real human rights risks and its overall strategy. The EiQ draws on LRQA proprietary audit data together with publicly available risk indices to segment risk in our supply chain. LRQA undertakes 18,000 audits per year across 170+ geographies and 350+ products and services. Using this information, risk ratings are given to regions and products based on inherent risk and further civil society indices. Using the EiQ metrics we have identified risks associated with our operations and supply chains, which are assessed through the country, activity and category (outlined in Tables 5 and 6).

Sentinel is a web-based analytics tool that provides real-time alerts on labour, health and safety, environment, business ethics, sanctions, customs and management system breaches. The tool scrapes the web via social media, news articles and government websites to pick up any incident which involves Premier suppliers and factories. Any alert in relation to our supply chain is followed up immediately for either remediation or confirmation of remediation. In the reporting period, Sentinel added a number of additional sources to its scope including X (formerly Twitter) and the RMG Sustainability Council (RSC) website, which includes grievances raised through the RSC helpline.

TABLE 3

	<b>Risks which may cause modern slavery practices</b>	<b>Risks which may contribute to modern slavery practices</b>	<b>Risks which may be directly linked to modern slavery practices</b>
<b>Description</b>	Operational risks that may directly result in modern slavery	Operational risks and/or actions in supply chains that may contribute to modern slavery. This includes acts or omissions that may facilitate or incentivise modern slavery	Operational risks, products or services that may be connected to modern slavery through third parties with whom one transacts
<b>Remediation</b>	An adverse impact is caused in relation to human rights, with an expectation that impact should cease, be prevented, and remediated	Through contributing to a human rights breach, it is expected to cease, prevent and remedy the impact(s) to the extent of the contribution. It is also expected to exercise leverage over the supplier to mitigate any remaining impact	There is a direct link to the human rights breach and therefore leverage should be used or sought to mitigate the adverse impact

## The continuum of exploitation

TABLE 4





## Exposure to inherent modern slavery risk

In our FY23 risk assessments for our direct operations and supply chain as detailed in Tables 5 and 6, we have included the overall country risk which includes both civil society and supply chain risk data. The 'human rights risks exposure' column highlights the key labour rights issues linked to each country in which Premier conducts business. In some cases, the human rights risk may be less or more severe based on the product source or operational activities.

Any activity that is not owned by Premier (for example, factories manufacturing our products, or shipping and freight forwarding operations) naturally presents a higher modern slavery risk.

Our program therefore recognises that contractual mechanisms, robust training, communications and monitoring verified through a third party are together an important part of risk identification and mitigation.

Premier does not own, operate or control any of the factories from which it sources finished goods. There is therefore a risk of modern slavery practices in those factories, as outlined in Table 6. We recognise our responsibility to engage and embed our comprehensive Ethical Sourcing strategy and framework to mitigate human rights risks throughout the supply chain.

## Risk indices for all sourcing countries worsened over the last year

Since our last Modern Slavery Statement, existing human rights risks coupled with emerging risks as a result of global macroeconomic factors have heightened our focus on issues such as overtime hours, exploitation of vulnerable workers and labour recruitment processes. This is particularly so due to economic downturn in the EU and USA coupled with the normalisation of inventory levels, which have impacted demand and therefore factory employment in the industries we source from.

TABLE 5

2023 Risk Assessment – Premier's direct operations			
Country	Inherent risk rating	Human rights risk exposure	Category
Australia	LOW	Migrant workers, freedom of association, excessive working hours	Support office, stores & distribution centres
New Zealand	LOW	Migrant workers, harassment and abuse	Support office, stores & distribution centres
United Kingdom	LOW	Domestic migrant workers, freedom of association, harassment and abuse	Support office, stores & 3PL partner
The Republic of Ireland	LOW	Migrant workers, freedom of association, excessive working hours	Stores
Singapore	LOW	Migrant workers, freedom of association, harassment and abuse	Support office, stores & 3PL partner
Bangladesh	HIGH*	Excessive working hours, freedom of association	Support office
Malaysia	HIGH*	Migrant workers, freedom of association	Stores

\* Whilst Bangladesh and Malaysia are considered high risk at an overall supply chain and civil society level, Premier directly employs its team members in those jurisdictions, and therefore we do not consider our risk exposure the same as that of other industries.

TABLE 6

2023 Risk Assessment – Premier's supply chain			
Country	Inherent risk rating	Human rights risk exposure	Category
China	HIGH	Excessive working hours, forced labour, freedom of association, raw materials	Apparel, accessories, footwear and general merchandise
Bangladesh	HIGH	Excessive working hours, freedom of association, harassment and abuse	Apparel
Pakistan	HIGH	Forced labour, child labour, migrant workers, freedom of association	Apparel
Vietnam	HIGH	Excessive working hours, child labour, freedom of association, harassment and abuse	Apparel
India	HIGH	Forced labour, freedom of association, harassment and abuse	Apparel and accessories
Indonesia	HIGH	Forced labour, child labour, freedom of association	Apparel
Taiwan	MEDIUM	Forced labour, migrant workers, freedom of association	General merchandise

**Risk key**    ● Low    ● Medium    ● High    ● Extreme

Data source: EIQ

A photograph of two women standing on a rooftop or balcony. The woman on the left is wearing a white long-sleeved blouse and a dark skirt. The woman on the right is wearing a dark blue polka-dot short-sleeved blouse and a dark skirt. They are both looking towards the camera with slight smiles. The background is a clear blue sky with some light clouds.

# 4 Actions



# Program framework: from engagement to action

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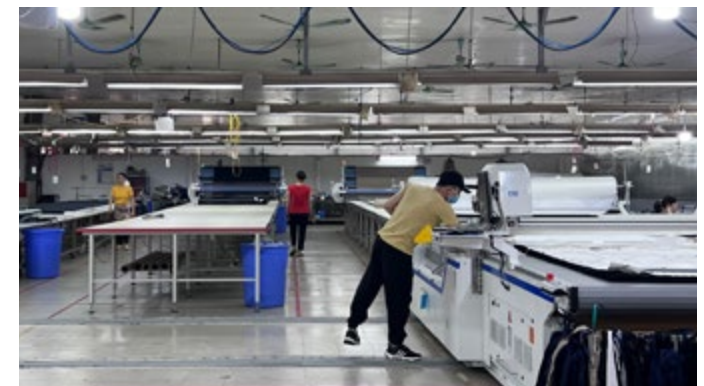
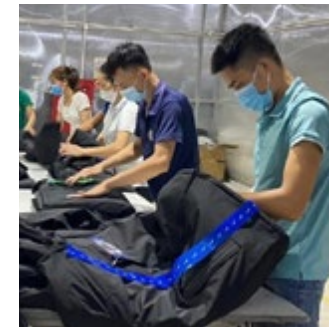
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Our Ethical Sourcing Program framework has six core pillars, with work programs in each pillar informing actions and change across all pillars. This drives insight and ensures our program evolves, so the 'sum of the parts' delivers ongoing and measurable impact.



# Program framework in detail

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A detailed analysis of our program framework in relation to our direct supplier partners is set out in Table 7 below. This includes the segmentation of suppliers based on risk, ongoing monitoring and due diligence as well as a number of remediation programs. In the pages that follow we set out more detail on the actions we have taken to assess & address modern slavery risks.

Engagement point	Supported by	Overview/Nature of engagement	TABLE 7
 <b>Risk assessment</b>	EiQ risk platform	EiQ draws on proprietary audit data and publicly available risk indices to segment risk in our supply chain.	
	Sentinel technology	Sentinel is a web-based analytics tool that provides real-time alerts on labour, health and safety, environment, business ethics, sanctions, customs and management system breaches of suppliers and factories.	
 <b>Audit, due diligence &amp; worker rights</b>	Social Compliance Audits	All primary factories are audited by LRQA (formerly ELEVATE) to the Responsible Sourcing Assessment Standard (ERSA). ERSA is a globally recognised audit type that has a heightened focus on human rights and transparency. The ERSA audit covers the following areas: transparency & business integrity, labour, health & safety, environment and management systems.  Secondary factories which account for less than 3% of purchases are assessed according to a mutual recognition audit (see page 19).	
	Production Verification Audits (PVA)	Our PVA program identifies unauthorised subcontracting in locations where we do not have team members in-country. Additionally to PVAs, our team members in-country also conduct product inspections.	
	Living Wage Commitments	Our Living Wage commitments aim to close the gap between minimum and living wages.	
 <b>Remediation &amp; corrective action</b>	Corrective Action Plan (CAP) monitoring and service	The CAP service ensures any audit non-compliances are monitored and remedied in a timely manner.  For primary factories the LRQA CAP service applies. For secondary factories mutual recognition CAPS are monitored for any zero tolerance or critical issues.	
	 <b>Worker Voice</b>	Worker Sentiment Surveys (WSS)	WSS are anonymous and are designed to allow workers to speak freely on grievance matters, wages and working hours, workplace wellbeing, environment, health and safety, productivity and stability.
Grievance Mechanisms		The Worker Help Line is a further grievance channel for workers to report issues which has been rolled out to Bangladesh suppliers as further detailed on page 27.	
 <b>Industry engagement &amp; training</b>	Industry engagement	Collaborating with industry peers to gain insights and improve worker conditions.	
	Supplier training and targeted remediation training	Supplier e-learning modules support upskilling of suppliers in relation to human rights issues in the supply chain. Targeted training is aimed at ensuring suppliers have sufficient remediation plans in place to capture any issues that arise from our audit activities.  Modern Slavery awareness training.	
 <b>Policies &amp; contractual governance</b>	Merchandise supply terms and conditions, Ethical Sourcing Code of Conduct, Key Principles of Ethical Business Conduct	Our package of contractual terms and conditions, supported by our policies, are one part of our external governance framework.	
		Policies & contractual governance <ul style="list-style-type: none"> <li>• Sign Just Group Supplier Ethical Code of Conduct</li> <li>• Acknowledge Key Principles of Ethical Business Conduct</li> <li>• Sign Terms &amp; Conditions</li> </ul> However we recognise that policies must be supplemented and supported by other mechanisms as set out above.	



## Traceability of our supply chain

Traceability and transparency are critical to Premier being able to effectively assess and mitigate modern slavery risks. Tier 1 (final stage production manufacturers) and Tier 3 (raw material producers) continue to be Premier’s priority in terms of the focus of its Ethical Sourcing Program. This is mainly due to the relatively higher volume of people employed in these sectors and hence the potential for greater risk in these tiers. Premier, however, also recognise the importance of its program continuing to evolve to deliver the necessary due diligence at sites used at all stages of the supply chain.

### Tier 1 – Final stage production

Our Tier 1 supply chain is fully mapped. We have also made progress to identify 68% of our importers’ factory partners.

The map on page 18 illustrates the location and size of our Tier 1 supply chain. In this statement, we have included for the first time the percentage of female workers by sourcing country. We partner with many different sized factories and have no exclusive arrangement with any, meaning the factory teams also manufacture for other businesses. We have also identified the EiQ risk rating for each of the countries our products are manufactured in.

During the reporting period we entered a new sourcing country, Indonesia. Like all new sourcing markets, the inherent risk profile was reviewed and key human rights issues were analysed. As part of this process, members of our product team also visited the supplier and factory in person.

### Tier 2 – Fabric, components and trims

Our brands source fabrics and trims from Tier 2 factories. Some of these sites, such as fabric mills, are nominated and therefore direct relationships with our company exist. For the majority of Tier 2 factories however, these are not nominated and there is no direct relationship with Premier and instead the Tier 1 supplier owns the relationship. We also monitor a number of

TABLE 8

Production tier	Inherent risk rating	Mapping & traceability – international suppliers	Mapping & traceability – importers
Tier 1 – Final stage production	HIGH	Complete – 100%	Work in progress – 68%
Tier 2 – Fabric, trims and componentry	EXTREME ▲	Mapping program commenced	Mapping program in development
Tier 3 – Raw materials	EXTREME	Mapping program in development	Mapping program in development

Tier 2 sites as part of our work with third party licensors.

In the reporting period have worked in collaboration with our Tier 1 suppliers to gain greater understanding and visibility of fabric and trim suppliers. This scoping exercise has enabled us to gather important data on approximately 80% of our apparel factories Tier 2 suppliers.

The data and insights drawn from independent insight tools such as EiQ indicates that the Tier 2 inherent risk rating has increased since our last Modern Slavery Statement (consistent with the increase in risk as described on page 13).

### Tier 3 – Raw materials

The raw materials used in our supply chain comprise any unprocessed material or commodity used to produce finished goods. For Premier’s products this include natural fibres such as cotton (eg. used in apparel), and man-made and synthetic material such as polyethylene terephthalate (PET) (eg. used in water bottles) and polyester (eg. used in apparel, and in backpacks and other school supplies). As this tier is further down in the supply chain, the inherent risk is considered to be extreme. Mapping this tier is a priority but it is not without complexity and challenge. Therefore, we are actively partnering with certification bodies that have established relationships, high levels of expertise and sufficient scale to deliver programs that improve labour rights in this sector.

Our Better Cotton membership began in early 2021 for Just Jeans and in 2023 our membership extended to all of the remaining Just Group Apparel Brands (Dotti, Jay Jays, Jacqui E, Peter Alexander and Portmans), and all of those brands now include Better Cotton as part of their assortment.

Our commitment to expand the program will ensure that a growing percentage of Premier’s cotton procurement will be driving demand for and use of responsibly sourced cotton. All apparel brands have improved their Better Cotton program in the reporting period. In FY24 an external auditor will be engaged to assist us to enhance the accuracy of our KPIs and measurement tools.

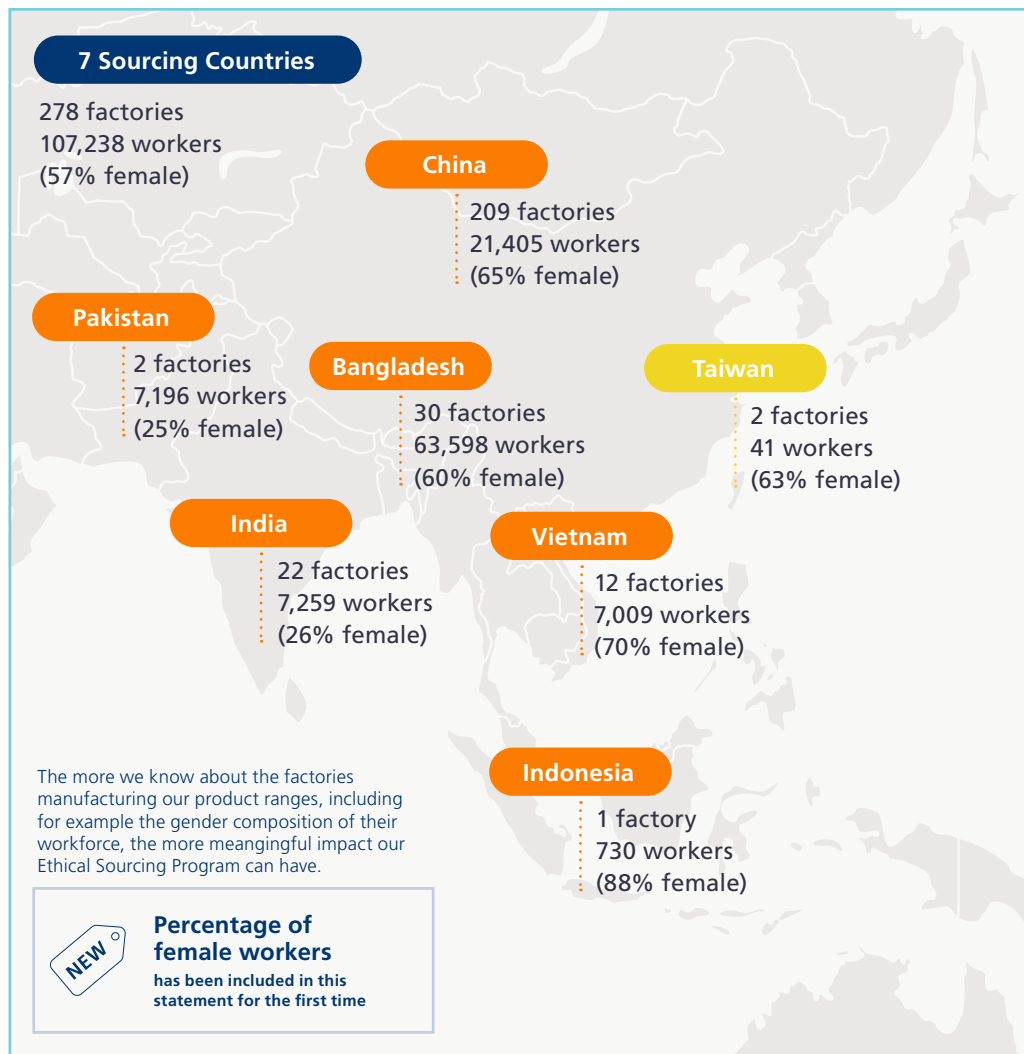
In addition, Peter Alexander continues to range a number of products using organic cotton and dyes certified as 100% organic according to the Global Organic Textile Standard (GOTS). The aim of GOTS is to ensure organic status – from harvesting of the raw materials, through to environmentally and socially responsible manufacturing.

Finally, as a group we do not condone the sourcing of cotton harvested from any region where state sanctioned forced labour regimes or practices exist, and we are signatory to the Cotton Pledge. We are committed to strengthening our ties with Better Cotton and GOTS, as well as exploring other new programs as they emerge.





### Our Supply Chain



Data collected from factories through 3rd party audits as of 29th July 2023.

### Sentinel findings

Sentinel is a web-based analytics tool that provides real-time alerts on labour, health and safety, environment, business ethics, sanctions, customs and management system breaches of suppliers and factories. In the reporting period we continued to utilise the Sentinel technology to ensure we are notified in a timely manner, any key supply chain risks or customs sanctions related to the suppliers and factories we work with.

By having our Tier 1 factory list uploaded to the EiQ platform, Sentinel generates alerts if they arise specifically for our supply chain.

In the reporting period Sentinel expanded its scope to include a number of internationally recognised human rights websites, sanctions lists and grievance mechanisms, including the RSC grievance mechanism which workers can use for health and safety matters. As a result of the scope expansion a number of incidents were added which were from previous years. All items were reviewed and were either followed up or we were satisfied with their remediation. The incidents we were alerted to for our Tier 1 factories is outlined in Table 9.

TABLE 9 – Sentinel incidents FY23

Incidents by topic	Incidents by risk rating				Comment
	Low	Medium	High	Extreme	
Labour	0	0	0	0	
Health and safety	0	2	1	0	One high risk incident was detected through the Better Work platform which had already been remediated. Two medium risk incidents were investigated and both were remediated.
Environment	0	0	0	0	
<b>Total incidents added in FY23</b>	<b>0</b>	<b>2</b>	<b>1</b>	<b>0</b>	



# Audit, due diligence & worker rights

## Approach to audit requirements

We have seen the benefits to dedicated and fully owned audit program partnering with LRQA for 97% of our group purchases with the aim to verify compliance to our Supplier Ethical Code of Conduct, which covers key issues including employment practices, forced labour, the environment and health and safety matters. Our audit results have provided far greater depth of insight and transparency which we are now able to plan into our future program of work. The scope of our audit program includes all international Tier 1 (final stage production) factories that manufacture for the Just Group brands. Our Tier 1 factories are segmented into two categories outlined below as we can leverage greater improvements in working conditions with those that we hold a longstanding and or stronger relationship with.

- Primary factories ≈ 97% of our annual purchases with international suppliers (includes suppliers that we spend >US\$100K)
- Secondary factories ≈ 3% of our annual purchases with international suppliers (includes suppliers that we spend <US\$100K)

## Mutual recognition audit activities for secondary factories

During the reporting period we continued to assess the compliance status of our secondary factory partners, through mutual recognition audits. These audits are when another customer of a supplier or the supplier themselves has commissioned the assessment to take place, rather than Premier. During FY23 we accepted a range of mutual recognition audits included SMETA 4 pillar, SMETA 2 pillar, BSCI, Better Work, WRAP and ICTI, which were conducted by APSCA approved member firms. These audits were reviewed by the Ethical Sourcing Team in line with the Code of Conduct. No critical or zero tolerance non-compliances were identified from these assessments.

## Social compliance audit findings for primary factories

During the reporting period our primary factories continued to undergo social compliance audits conducted by LRQA. The majority of our primary factory partners were audited to the ERSA standard. Whilst this remains our key audit type, there were cases where licensor partners asked for a factory to undergo a SMETA 4 pillar audit per their requirements. In these cases the audit was still conducted by LRQA.

The ERSA audit has a heightened focus on humans rights and transparency, and covers five key pillars including:



We commissioned LRQA audits at 122 factories throughout the reporting period. Non-compliances are categorised into five severity ratings and examples of these non-compliances are detailed below:

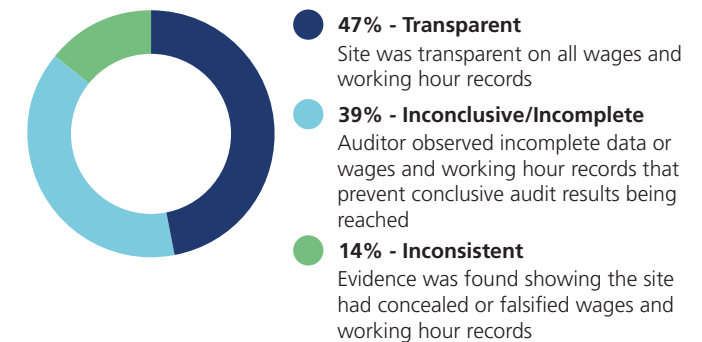
Severity Rating	Example of non-compliance
Minor	Soap not available in bathroom facilities
Moderate	Fire safety equipment is not clearly labelled
Major	Electrical wiring was found uncovered
Critical	No system in place to track working hours
Zero Tolerance	Attempted bribery

As transparency is a key pillar of the Ethical Sourcing Program, factories were assessed on their level of transparency in sharing all records with the auditor. Of the audits that took place, 14% of factories were found to conceal working hour and wage records, which was an improvement from 17% in FY22.

In instances where this critical non-compliance was identified, the Ethical Sourcing team engaged the relevant supplier to investigate the findings further and agree on corrective actions, such as a re-audit so wages and worker hours could be verified. In one case, a factory was not supportive of the transparency principle, and the site was responsibly exited.

Chart 1 below illustrates the different transparency ratings of the sites that were audited by LRQA.

Transparency ratings - Audits conducted by LRQA CHART 1



Although the sum of both inconsistent/incomplete and inconclusive transparency audits did pleasingly fall from 54% to 53% in the reporting period, there has been a slight increase on inconclusive/incomplete transparency audits in that period. We continue to focus on engaging with suppliers to improve transparency and collaboration in our audits, including being a key focus in the Ethical Sourcing and Modern Slavery training delivered to suppliers in the reporting period.

## Case study: remediation of zero-tolerance non compliance

During the reporting period, one zero tolerance non-compliance was identified through audits conducted by LRQA. This incident involved an allegation of a factory manager attempting to bribe an LRQA auditor. Due to the severity of this finding, the matter was escalated to Premier within 24 hours of it occurring. The Ethical Sourcing team engaged with the supplier to explain the breach of Premier’s Code and the unethical nature of attempted bribery. The supplier agreed to resolve and remediate the matter by the management team of the supplier and factory undertaking Anti-Bribery and Business Ethics training delivered by LRQA.

This training program included:

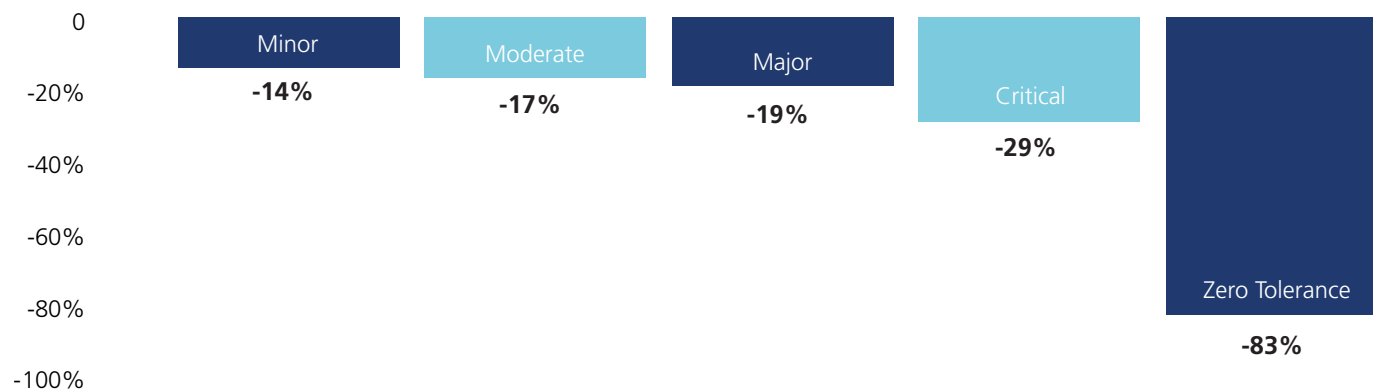
- Baseline assessment of current policies and procedures;
- Business Ethics training;
- Risk evaluation and identification of current practices to identify and prioritise opportunities;
- Update current policies on Business Ethics and ensure management’s understanding;
- Develop Business Ethics training program for wider worker force;
- Implement new policies and training programs and create structure to ensure an annual review is complete.

The factory successfully completed this training program over a period of three months, in which they were able to gain valuable learnings and insight from on the importance of business ethics. The supplier understood the severity of this matter and clearly understands that any further incident could lead to the termination of our business relationship.

The results of audits conducted by LRQA are provided in Chart 2 and 3. This is the first year we are able to measure like-for-like reporting which found an overall decrease of total non-compliances identified in FY22 vs FY23. Furthermore, as illustrated in the mentioned charts, we saw a decrease in all severity categories and pillars year on year. We identified that health & safety non-compliances remain the most common pillar of findings throughout the reporting period. However, we are pleased that zero tolerance and critical issues have seen the largest percentage decrease year on year. Further information on the status of non-compliances are detailed on page 24.

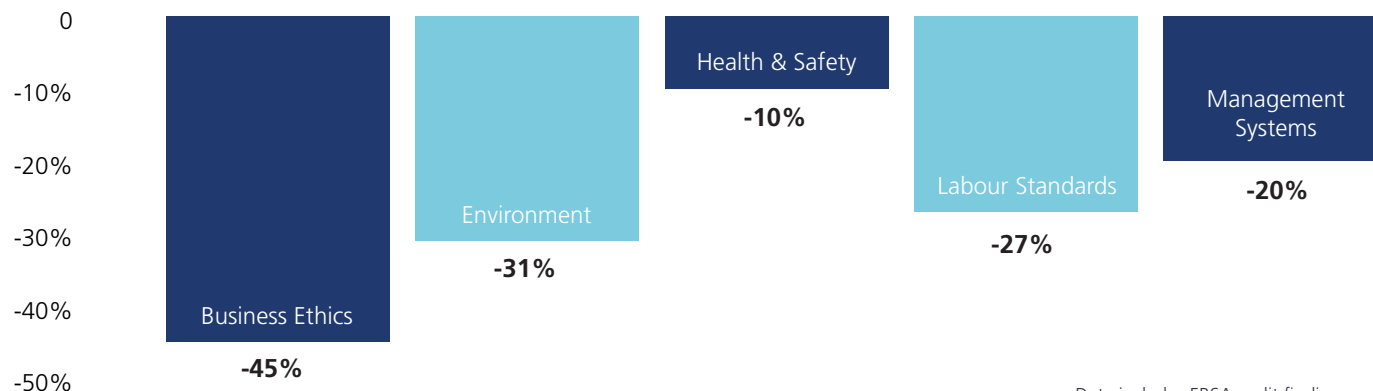
**Percentage decrease of non-compliances by severity year on year FY22 and FY23**

CHART 2



**Percentage decrease of non-compliances by pillar year on year FY22 and FY23**

CHART 3



Data includes ERSA audit findings only



**Monitoring for unauthorised subcontracting**

Premier continues to recognise the risk of unauthorised subcontracting of the final stage production processes of our products. Whilst we hold meaningful relationships with our suppliers that are built on full transparency, we have measures in place to monitor the risk of unauthorised subcontracting within our Tier 1 supply chain.

**Production Verification Audits (PVA's)**

Throughout the reporting period, we continued to conduct PVA's through LRQA to verify that our product was produced in factories that are approved and comply to our Ethical Sourcing Program. In a PVA, a sample of Premier purchase order and style data is reviewed at a factory where our supplier has confirmed the orders have been produced. Through the audit, LRQA review factory records to determine that the below processes were conducted in the approved factory on record.



To ensure the success of the PVA program, the tracking of approved factories at a purchase order and style level is embedded in our product team's day to day process. An approved factory is confirmed from the supplier at the time of order placing, which allows the product team members to confirm that the factory that has been nominated for an order is an approved site within the Ethical Sourcing Program.

All suppliers remain in scope for a PVA, meaning any supplier can be audited to identify potential cases of unauthorised subcontracting. During the reporting period we prioritised suppliers and factories where we have a higher spend. During FY23 we conducted PVA's at 34 Tier 1 factories located in China, Vietnam, India and Pakistan. No cases of unauthorised subcontracting were identified, as all Tier 1 processes of the sample data were verified to be produced in approved factories.

**Production inspections by our teams in-country**

In addition to our work with LRQA, we also continued to conduct further production inspections. Our compliance, quality and merchandise team members located in Bangladesh and China visit factories on a regular basis to ensure planned production is being conducted in the relevant approved Tier 1 factories. Our team in Bangladesh were able to verify over 80% of orders through in-line inspections. Through these production inspections, no unauthorised subcontracting was identified.

**Case study: Identifying unauthorised subcontracting through internal processes**

During the reporting period a case of unauthorised subcontracting was identified by a support office brand merchandise team member. Through a cross check of a factory address, this team member picked up a difference in address that was listed on our approved factory list, compared to the address the supplier had provided for orders that were in production.

After further investigation by the Ethical Sourcing team, it was found that the factory had moved locations without disclosing this information. This is considered a case of unauthorised subcontracting, due to Premier having no oversight of the conditions of the new site where product was manufactured. In this instance we believe this was an oversight on the supplier's behalf, but we are pleased the product team member was able to identify this as it proves the effectiveness of training and processes that are in place to support the Ethical Sourcing Program. In this case we were able to work with the supplier on appropriate remediation.

Subsequently, the factory was audited to be compliant to the standards of our Ethical Sourcing Program. However, this was still considered a serious breach and the supplier has committed to better communicate any changes to production facilities.

### Living Wage

During the last reporting period, we published our [Living Wage Position Statement](#) which also included a roadmap of commitments and activities which work towards closing the gap between minimum and living wage.

One key activity which was completed as part of our commitments was finalising the scope of a wage gap analysis – further information is available in the Case Study on page 23.

An update on our progress in relation to this important initiative is set out in the table below.

Areas of Focus	Commitment in 2022	Progress to date – 2023
Responsible purchasing practices training	<ul style="list-style-type: none"> <li>• Refresher training with additional tools scheduled for FY23</li> </ul>	<ul style="list-style-type: none"> <li>• Partial – full rollout scheduled for FY24</li> </ul>
Open costing and ring fencing of labour cost	<ul style="list-style-type: none"> <li>• Complete rollout and consistency of approach by end of FY23</li> </ul>	<ul style="list-style-type: none"> <li>• Complete – majority of core lines use open costing across all apparel brands</li> </ul>
Modern Slavery training	<ul style="list-style-type: none"> <li>• Updated comprehensive supplier training and workshop to be delivered in FY23</li> </ul>	<ul style="list-style-type: none"> <li>• Complete – training included the concept of Living Wage and introducing the Just Group’s position on Living Wage</li> </ul>
Wage gap analysis	<ul style="list-style-type: none"> <li>• Increased transparency and accuracy of worker wage information through new LRQA audit program and worker sentiment surveys</li> <li>• Finalise the scope of a wage gap analysis by end of FY23 for implementation in FY24</li> </ul>	<ul style="list-style-type: none"> <li>• Complete – now ongoing as a key pillar of our program</li> <li>• Partial – scope for wage gap analysis complete for pilot to begin early FY24</li> </ul>
Amplify worker voice	<ul style="list-style-type: none"> <li>• Roll out of grievance mechanism helpline to all factories by early FY23</li> </ul>	<ul style="list-style-type: none"> <li>• Partial – Rollout commenced starting with Amader Kotha in Bangladesh</li> </ul>





## Case study: Scoping our wage gap analysis framework: engaging in person with our factory partners

In the reporting period, key management personnel from our Australian support office visited Bangladesh with the primary focus to scope our wage gap analysis framework in person as part of our living wage commitments.

As part of our commitment to working alongside our suppliers and other industry participants to strive to close the gap between minimum legal wage and a living wage, on this trip to Bangladesh we engaged with two of our strategic factory partners' management teams on our strategic work plan. A focus of our discussion was to openly understand their current position on the topic and to discuss our proposed plan for a wage gap analysis.



Exploring the scope of a wage gap analysis

In those discussions:

- Management understood and were supportive of the Global Living Wage Coalition definition of a living wage
- We introduced our suggested plan for a living wage gap analysis which was appreciated and supported by both factories
- One site completed one wage gap analysis framework prior so we could complete some initial analysis in person which highlighted key challenges and improvements
- It was determined that the Fair Labor Association (FLA) Wage Compensation Tool was the best way to calculate the gap in worker wages

Upon return from our meetings in Bangladesh, we reviewed the wage gap analysis tools we have researched, what was publicly available information as well as what tools can be used from private sources. This review assisted in us finalising our framework for our wage gap analysis.

Our visits highlighted the importance and value of initiating a new project in person and building trust from the beginning.

Our next steps will be to visit each factory to complete and verify the wage gap analysis in person. As the FLA tool combines all team members wage information together, we have decided to split this by gender to ensure any gender pay differences are included in this work. We will continue to update on this work program as fair remuneration contributes to improving working conditions throughout our supply chain.

## Due diligence on suppliers of goods and services not for resale

Premier acknowledges that our risk related to modern slavery is not limited to the supply chains of our products manufactured for resale. We work with a range of non-merchandise suppliers that play key roles in the operations of our business.

In our last Modern Slavery Statement we reported on the launch of a Modern Slavery Self-Assessment Questionnaire in relation to this group of suppliers.

The data obtained has identified some opportunities in the monitoring and due diligence of modern slavery risks with non-merchandise suppliers which in the next reporting period we intend to prioritise.

We will continue to engage with our key non-merchandise suppliers to strengthen our understanding so we can assist in building a tailored Ethical Sourcing Program for this group of suppliers.

We will also conduct industry benchmarking research to further understand best practice programs that exist to identify and monitor modern slavery risks within non-trade supply chains.

We recognise the need to develop deeper and better insights into the suppliers of goods and services not for resale, and are committed to deeper engagement in the next reporting period.



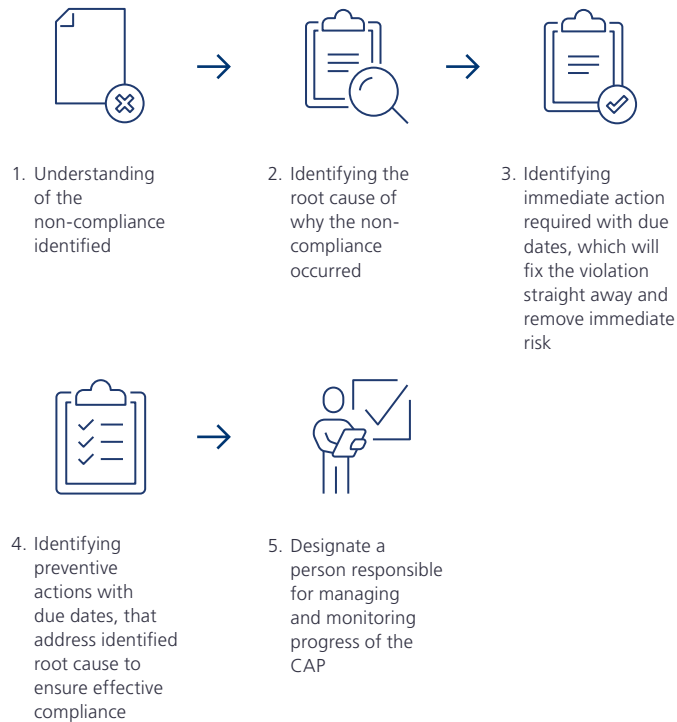


# Remediation & corrective action



## Corrective Action Plan (CAP) service for primary factories

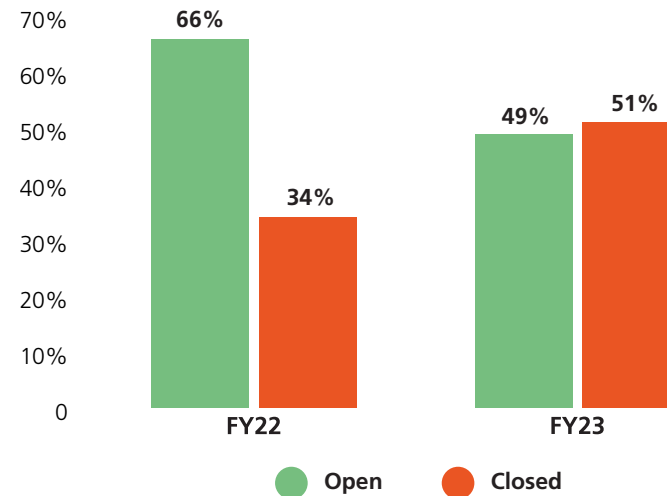
During the reporting period, we continued to deploy the Corrective Action Plan (CAP) service for primary factories to work with their team to close out non-compliances found in an LRQA audit. The aim of this service is for LRQA to provide direct support to the factories, to ensure they are correctly identifying the root cause of a non-compliance, so an effective CAP can be implemented to ensure the issue does not repeat in the future. There are five key elements to an effective CAP, including:



Our suppliers and factories worked with LRQA throughout the reporting period to implement CAP's for non-compliances so the incidents found in audits could be remediated. Chart 4 illustrates the percentage of open and closed non-compliances comparing FY22 and FY23. This shows there has been a substantial improvement year on year on the amount of non-compliances that have been remediated as part of the CAP service. The findings that remained open as of the end of FY23 comprise of issues with a severity rating of either major, moderate or minor. These findings will be addressed in the next reporting period when the factories go through their next audit cycle.

As detailed on page 19 and 20 of this report, the one zero tolerance non-compliance and critical issues related to lack of transparency, were remediated outside of the general CAP service. This is to ensure that the findings that are most severe are dealt with in the most appropriate manner, which in most cases require specific and closely monitored remediation.

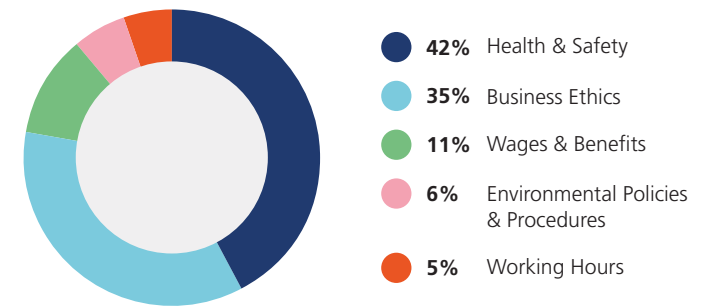
**CAP service progress - Open & closed non-compliances FY22 vs FY23** CHART 4



This CAP service also includes an e-learning element, where factories are assigned three modules directly related to the findings found in their audit. These modules have been designed to provide factories with practical tools they can use to address issues in their business. The factories have a total of 90 days to implement an effective CAP, to ensure non-compliances are addressed so they do not occur again in the future. In the reporting period 78% of factories audited by LRQA completed all three modules that were assigned, which was up 2% from FY22.

Chart 5 summarises the type of e-learning modules that the factories completed during the CAP service.

**Total e-learning modules completed by category** CHART 5



## Case study: Remediation of complaints received through the RSC helpline

The International Accord and the RMG Sustainability Council (RSC) is a tripartite, legally binding agreement between brands and trade unions which are committed to ensuring a safe and healthy ready-made garment industry in Bangladesh. Through the RSC programs, all factories that Premier work with in Bangladesh are regularly audited on occupational safety and health compliance (OSH).

The RSC also provide access to a complaints mechanism for workers to raise concerns about OSH risks. All complaints are investigated and remediated appropriately by the RSC team, with all progress being communicated to the relevant factory and workers named in the complaint. The mechanism also receives out of scope complaints, which are any non-OSH related issues. In these cases, the RSC notifies signatory brands of the complaint and provides suggested remediation. Premier has supported the investigation and remediation of non-OSH complaints that have been received by the RSC throughout FY23.

In the reporting period, eight grievances across five factories were reported to the RSC helpline that were out of scope. The complaints received were in relation to unpaid wages and benefits for workers that had either resigned or had been dismissed by the factory.

The benefit of having an on the ground team member located in Bangladesh, is that we are able to closely follow up on these complaints directly with the factory and verify information in person. Our local team member, who is a qualified social compliance auditor, followed the subsequent process to further understand and remediate the complaints:

1. Review complaint and proposed remediation set by the RSC and discuss next steps internally
2. Contact the supplier and factory requesting an explanation on why the complainant was not paid correctly when their employment ceased at the factory
3. Organise a call with the supplier and factory to review the remediation plan required, in order to solve the complaint
4. Outline that the factory has seven business days for the settlement to occur, per the remediation plan
5. Request and review digital copies of documentation showing that the necessary payments have been made to the complainant
6. Visit the factory so documentation can be reviewed and verified in person
7. Contact the complainant via phone to verify that the records that the factory provided, match their records and confirm that they have received all outstanding wages

Once confirmation is received that the worker is satisfied and has received the outstanding payments, the complaint is closed. Out of the eight complaints that have been received in FY23, seven have been remediated and closed. We are currently working through the remediation process of the remaining complaint, which we will continue to do so into FY24 to ensure full remediation is reached.

Whilst the RSC mechanism is largely built for OSH issues, it is encouraging workers utilising the channel to report issues related to unpaid wages. However it has also highlighted that a larger scope of human rights grievances are not being captured and or raised through this mechanism, further confirming the need for a grievance mechanism that is externally run, known and trusted by workers.





## Worker voice

Genuine engagement in understanding the worker experience in the factories we operate in is critical to assessing whether we are contributing to safe working environments, and workplaces that are free from harassment and discrimination.

In the reporting period, we continued our work in the worker voice program to identify which factories we need to be engaged with more closely, to remediate issues identified through our worker voice tools and to proactively mitigate risks in the future and aligning to one of the UNGP's core pillars, access to remedy.

### Anonymous worker sentiment surveys

We have continued to deploy anonymous Worker Sentiment Surveys (WSS), both integrated with audits and standalone as required. In the reporting period, 40 factories which collectively represented over 27,000 workers had surveys conducted with a sample of workers at each site. Of the total sample group surveyed, 69% of participants were women.

Whilst results from the WSS's tracked improvement overall, as set out in Table 10, we are aware of potential actions by factory management and trends in supply chains which can lead to workers not feeling able to fully express themselves despite having anonymity. We will continue to analyse our approach in order for workers to know they can speak freely without retaliation, to ensure we are seeing true and transparent responses from workers.

Overview	Our operations	Risks	<b>Actions</b>	Measuring effectiveness	Looking ahead
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TABLE 10

	Dimensions of the Worker Sentiment Surveys											
	Overall Score (0-10)		Grievance Mechanism		Wages & Working Hours		Workplace Wellbeing		Environment, Health & Safety		Productivity & Stability	
	FY22	FY23	FY22	FY23	FY22	FY23	FY22	FY23	FY22	FY23	FY22	FY23
Bangladesh	8.70	8.65 ▼	8.74	8.56 ▼	9.08	9.00 ▼	8.88	8.81 ▼	8.77	8.85 ▲	8.04	8.00 ▼
China	8.86	8.96 ▲	8.99	9.23 ▲	8.87	8.87 ○	9.06	9.18 ▲	8.78	8.88 ▲	8.60	8.65 ▲
India	8.00	8.75 ▲	7.79	8.69 ▲	8.43	8.90 ▲	8.34	9.11 ▲	7.94	8.20 ▲	7.50	8.87 ▲
Vietnam	8.14	8.62 ▲	8.26	8.76 ▲	7.87	8.74 ▲	8.50	8.80 ▲	8.34	8.58 ▲	7.71	8.24 ▲

**Risk key** ▲ Score improved ▼ Score decreased ○ No change

Notes: The overall score is on a scale of 0 to 10, where a lower number represents negative sentiment, and a higher number positive sentiment.  
Taiwan sites were not surveyed in the FY22 or FY23 reporting period. Pakistan sites were surveyed in the FY22 reporting period.  
Indonesia became a new sourcing country in FY23, therefore the sample size was too small to report in this statement.

### Worker grievance mechanisms

A core pillar of our Ethical Sourcing Program is providing trusted, anonymous and external grievance mechanisms to workers in our supply chain in order for them to speak safely and freely, outside of traditional routes such as suggestion boxes.

### Research and scoping of grievance mechanisms

In the previous reporting period we tested an externally supplied grievance mechanism. On review, this mechanism did not meet the effectiveness criteria (principle 31) of the Guiding Principles on Business and Human Rights. This presented an opportunity for us to explore other grievance mechanisms adopted by industry peers. Through our research we engaged with several of our peers, connected with third party service providers and benchmarked known mechanisms by applying the cultural context of each sourcing region against principle 31.

Whilst there are improvements in the options available in the market, we also noted that there were several options currently in use that presented some concerns to us. Grievance mechanisms that were only available during production hours were not deemed accessible as workers would rarely have the time or feel comfortable making a call during work hours. Equally, options that required workers to complete online forms with a number of steps were deemed too onerous and it was clear from our analysis that would deter people from speaking up.

Our findings from our initial research and scoping determined that we would not find a 'one size fits all' product to roll out across all sourcing regions, and a more tailored, thoughtful and culturally sensitive approach was required.



### Amader Kotha pilot in Bangladesh

Amader Kotha is a locally run helpline based in Dhaka, by civil society organisation Phulki in partnership with LRQA and US based helpline specialists Clear Voice. It was established in 2014 in response to the Rana Plaza factory collapse a year prior. Amader Kotha translates in English to “Our Voice”, with its mission to provide a trusted grievance channel for workers in the ready-made garment sector in Bangladesh. Reaching 1.5 million workers, Amader Kotha fields over 9,600 calls a month and resolves over 90% of issues.

The helpline is a toll-free number which operates for 16 hours per day on working day by local operators fluent in Bengali. After hours, workers can leave a voice message and they are called back the next day. There is also a chat function available through Whatsapp, however most workers prefer to speak to someone over the phone.

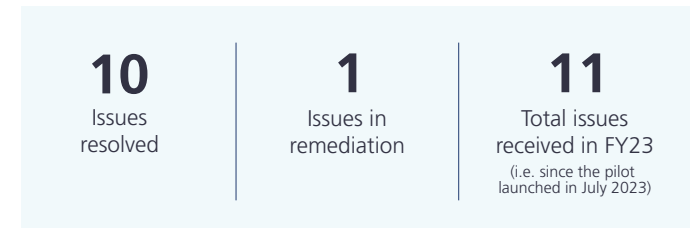
Amader Kotha was chosen as it is deeply trusted and well known in Bangladesh and transparently remediates grievances raised. This was not only verified by our local office in Dhaka but also by several of our strategic supply partners in Bangladesh.

The rollout process of Amader Kotha in Bangladesh is as follows:

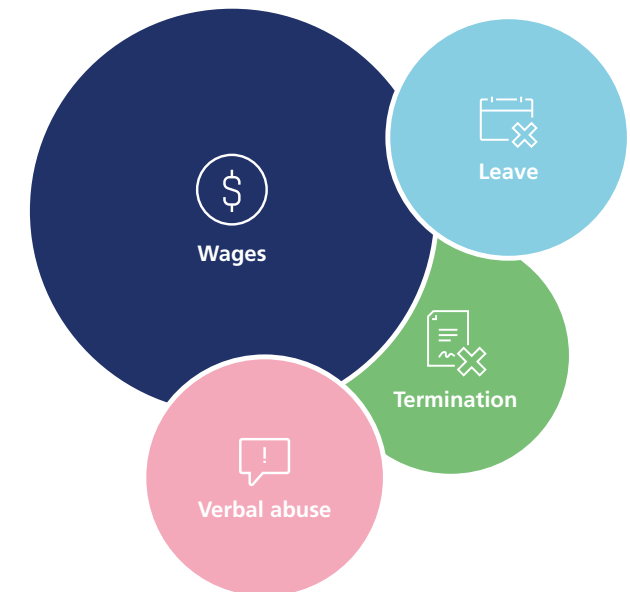


### Issues reported through Amader Kotha

The Amader Kotha pilot commenced in July 2023. Some factories in our supply chain were already part of the Amader Kotha program, therefore we were able to immediately turn on reporting for these sites. Our next reporting period will include data from a full reporting cycle. The number and type of issues are detailed as follows (one month of data):



The top four categories that workers raised grievances about were as follows:



Premier has a number of initiatives and partnerships that we are proud to support, learn from and be a part of. We value the following organisations' contribution and work to uphold human rights, ethics and provide greater transparency in supply chains.

## Due diligence initiatives

### About the initiative

### Our involvement



LRQA (formerly ELEVATE) is a leading global assurance partner providing (among other things) compliance, supply chain and ESG specialist services to companies globally, with a view to anticipating, mitigating and managing risk. Our work with LRQA has driven an increasing level of transparency along with effectiveness of our ethical sourcing audit and compliance programs – through data, analysis and review.

2021 – commenced our strategic partnership



Sedex's platform ensures data-driven insights and tools are available to our teams to ensure continuous improvement in environmental, social and governance outcomes.

2022 – Just Group became a Sedex member



APSCA is a professional standards body for social compliance audits. We will only accept third party social compliance audit reports from APSCA member firms.

2022 – Just Group became a supporter brand

## Worker voice initiatives

### About the initiative

### Our involvement



Amader Kotha is a locally run helpline based in Dhaka, by civil society organisation Phulki in partnership with LRQA and Clear Voice.

2023 – Just Group commenced pilot



## Industry initiatives

### About the initiative

### Our involvement



Better Cotton trains farmers to use water efficiently, care for soil health and natural habitats, reduce use of the most harmful chemicals and respect workers' rights and wellbeing. Better Cotton is sourced via a chain of custody model called mass balance. This means that Better Cotton is not physically traceable to end products, however, Better Cotton Farmers benefit from the demand for Better Cotton in equivalent volumes to those we 'source'.

2021 – Just Jeans joins as a member of Better Cotton

2022 – Our membership of Better Cotton expands to all apparel brands



The International Accord is an independent, legally binding agreement between brands and trade unions committed to a safe ready made garment industry in Bangladesh. We continue to work with the Accord and the RMG Sustainability Council (RSC). In 2024, the International Accord intends to expand to include Pakistan.

2013 to 2021 – Just Group member of Accord, and the Alliance before it

2022 – Just Group joins International Accord (successor body of original Accord)

## Advocacy

In addition to the above, we support policy and broader industry initiatives which look to improve human rights and working conditions in the supply chains we operate in. Additionally, we engage with other organisations and NGO's in a collaborative manner including Baptist World Aid and Action Aid.

### Working with our license partners

A number of our brands collaborate with well known and iconic third party brands that manage and oversee their own global licensing programs.

It is always our preference that a factory used to manufacture licensed product undergoes an ERSA conducted by our partner LRQA. Where licensors have their own audit requirements in place, we will engage directly with licensor ethical sourcing teams to educate those teams on the scope of our program and ethical sourcing framework. This collaboration often provides new learnings and insights for both parties. In some cases, licensors will accept the requirements of our program in place of their own.

Where required, we will align to licensor preferred audit types. The requirement remains that the assessment must still be conducted by LRQA.

In the reporting period, the Just Group became a Sedex member to support our licensor requirements. Sedex is an Environmental, Social and Governance platform where suppliers can share their audit results with customers who can monitor the remediation of non-compliances.

### Training our own team members

#### Modern Slavery Training

We continued to deliver Modern Slavery training with 80% of Just Group product team members trained, in addition to the Bangladesh support office, Finance and Commercial, People & Culture and the Just Group Executive.

The training content included the following:

- Definitions and understanding the concepts of ethical sourcing and modern slavery
- The prevalence of modern slavery globally and high-risk commodities

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- Key events, government legislation and NGO pressure
- The human rights risk specific to the Just Group's operations and supply chains
- Highlighting key support required from team members with the Ethical Sourcing Program

We followed up our training program with an effectiveness survey to understand improvements for future training initiatives.

#### Better Cotton Training

As part of our rollout of Better Cotton across the six apparel brands we delivered Better Cotton training to all product teams in the reporting period. An important part of both the initiative and the training itself is the emphasis on Modern Slavery risk and worker rights in cotton farming.

#### Anti-bribery and Corruption Training

In the reporting period, we commenced the rollout of anti-bribery and corruption training to our support offices. This important training equips all levels of our organisation with tools and awareness of our policies and procedures to mitigate the risk of such unethical practices. A particular focus of this training includes practical case studies which detailed common red flags.


#### Store teams and Customer Engagement

Each of our brands hosts annual store conferences where store team members are trained and updated on company initiatives. The Ethical Sourcing team created an educational video with our People and Culture team which introduces the concept of Modern Slavery as well as an overview of our Ethical Sourcing Program. The purpose of this being to both educate our teams as well as help assist them with customer engagement on this topic.

### Training our suppliers

#### Ethical Sourcing and Modern Slavery Training

This annual training was conducted online with over 185 participants in attendance from all sourcing countries, the following key topics were covered:

- The ILO indicators of forced labour
- Case studies highlighting potential incidents of Modern Slavery
- An overview of the Just Group ethical sourcing program including Worker Voice (Grievance Mechanism)
- Introduction to the concept of a Living wage 
- Introduction to our Tier 2 traceability project

#### Supplier Conference January/February 2023

- We met in person in South East Asia with our strategic suppliers accounting for over 80% of group purchases
- Suppliers were given an update in relation to our Ethical Sourcing Program and a number of key initiatives

#### Managing Working Hours – Root Cause Remediation Training

A complex and systemic issue encountered across all supply chains is excessive overtime and is considered an indicator of forced labour. Overuse of overtime can also be linked to the need for fairer wages. As part of a multi-pronged approach to the Living Wage issue the Just Group, in partnership with LRQA, developed a worker hour management webinar in the reporting period (to be delivered in FY24). Suppliers from China and Bangladesh will attend with training importantly conducted in their local language.





## Commemorating the 10th anniversary of the Rana Plaza collapse

On the 10th anniversary of the tragic collapse of Rana Plaza in Bangladesh we held a commemorative 'lunch and learn' presentation hosted by our General Manager of Sourcing with a presentation by one of our valued suppliers. We also displayed profiles and interview pieces with team members in our Bangladesh office and factory partners. The event was attended by over 100 of our team.

### Worker profiles

#### Runa

**Age:** 35

**Role at factory:**  
Senior sewing  
machine operator

I have been working in the garment industry for 13 years. My mother died from cancer when I was young so I needed to start working to help support my other family members. I love cooking on the weekend and spending time with my loved ones.

I still remember the collapse of Rana Plaza, a few of my neighbour's friends worked nearby at the time. Luckily nothing happened to them during the collapse which was one of the most shocking tragedies. I felt very bad after hearing about the collapse on the news.

Nowadays we feel safe when at work. The RSC (Accord) has activity ensured that, we have enough emergency exits, hose reels, fire extinguishers and trained fire fighters so that we can also be prepared in the case of an emergency. We feel happy being part of an RSC approved factory.

10 years on from the Rana Plaza collapse, we experience much better safety standards in the workplace which was only a dream 10 years ago.

#### Monayem

**Age:** 52

**Role at factory:**  
Assistant cutter

I have been working in the garment industry for nine years. My only child is studying here in Dhaka (computer diploma) thus I chose to move from our village to here to be close to my son.

Previously I used to work as farmer and I grew different types of vegetables.

When I am not working, our family enjoy going out to share a meal.

When the Rana Plaza collapse occurred, I was in the village and saw the incident via the TV news and we felt very sorry for the victims.

Since the collapse, the industry has changed a lot. Particularly with workplace safety becoming a top priority. We have 4 emergency exits, fire extinguishers and other safety equipment in the factory thus we feel good having all these measures to ensure our safety.





# Policies & contractual governance

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## Policies

Our core policies include the following:

Policy	Purpose	FY23 developments
<a href="#">Supplier Ethical Code of Conduct</a>	To articulate in full our expectations of business conduct. Our Code is based on the United Nation's Universal Declaration of Human Rights, and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, and Core Conventions. The Just Group is committed to operating based on the United Nations Guiding Principles on Business and Human Rights (UNGPs).	 Updated & rolled out to international suppliers, including in local language
<a href="#">Key Principles of Ethical Business Conduct</a>	To set out on one page our key requirements for ethical business conduct. Also used as a resource for our own team members to have conversations with suppliers from the outset of our dealings with them.	
<a href="#">Cotton Pledge</a>	To inform suppliers that we prohibited the sourcing of cotton from certain high forced labour risk geographies.	International suppliers re-signed in the reporting period
<a href="#">Sharp Tool Control Policy</a>	To set out our requirements to ensure merchandise is delivered safely for handling by team members and customers.	International suppliers re-signed in the reporting period
<a href="#">Team Member Code of Conduct</a>	To set out to team members their expected behaviours, including our policies with respect to bribery & corruption and other unethical practices.	 Updated annually & rolled out
<a href="#">Whistleblower Policy</a>	To encourage the reporting of suspected wrongdoing, including illegal, fraudulent or other types of undesirable conduct.	–

## Contractual governance: supplier onboarding

Premier has a non-negotiable supplier and factory onboarding process, to ensure all Tier 1 factories are captured in the Ethical Sourcing Program.

The onboarding process includes:

1. Social compliance audit review: review by the Ethical Sourcing team of a valid factory social compliance audit conducted by a member firm of the Association of Professional Social Compliance Auditors (APSCA) that has been conducted within the past 12 months. An ERSA is required for all factories for any supplier that exceeds US\$100k in spend by the Just Group annually.
2. Sentinel: complete search of supplier and factory being onboarded via the LRQA Sentinel system.
3. Approval: approval by the Ethical Sourcing team is required in writing before the accounts registration team can create a supplier number in the system.
4. Policies:
  - Review and acknowledgement of the Just Group's Key Principles of Ethical Business Conduct
  - Signing of our Supplier Ethical Code of Conduct
  - Signing of our Terms and Conditions.

During the reporting period we onboarded 40 factories across our seven brands, located in China, Bangladesh, Indonesia, India and Vietnam.

All new suppliers were supported through the above process to ensure compliance to the Ethical Sourcing Program.





# 5

## Measuring effectiveness










# Assessing Premier's actions: our effectiveness framework

As Premier's supply chain evolves, our governance framework is agile to meet the demands and changes to improve or enhance supply chain outcomes. Our measure of 'effectiveness' is initially determined by putting measures in place to gain insights and transparency as to the incidence of modern slavery in the supply chain, and then remediating issues accordingly. This requires multiple activities being implemented to provide a range of methods of assessing supplier due diligence, and for worker voice to be communicated up the supply chain. A summary of that framework is set out in Table 11 below, against which we have set out the outcomes in the reporting period. In addition, we have introduced a scorecard to self assess our actions and projects as to where they are in their level of progress.

## Our framework for measuring effectiveness:

TABLE 11  
Progress against commitments

Engagement point	Action	Objective	Reporting period outcomes	
 <b>Risk assessment</b>	Supplier on-boarding	To determine if there are any modern slavery risks identified prior to commencing the registration process	Scope of LRQA's Sentinel tool expanded including a retrospective online sweep to identify any historical issues.	
 <b>Audit, due diligence &amp; worker rights</b>	ERSA audits conducted in Tier 1 primary factories	To identify key human rights risks and indicators of modern slavery in the supply chain	No evidence found of child or forced labour No instance of auditors being refused access to site No evidence found of workers being prevented from attending interview No evidence found of workers having their identification documents withheld Improvement in audit transparency compared to FY22 reported on at page 19 Reduction in non-compliances compared to FY22 reported on in Chart 2 on page 20 Improvement in closed non-compliances compared to FY22 reported on in Chart 4 on page 24	
 <b>Remediation &amp; corrective action</b>	Non-compliance remediation	To ensure issues raised in audits that may be indicators of modern slavery are remediated appropriately	78% of sites audited completed all three assigned e-learning modules All suppliers with critical and zero tolerance non-compliances found in their audits either had remediation plans in place or were exited	
	Monitoring for unauthorised subcontracting	To monitor and identify any instances of unauthorised subcontracting by factories. Sites not approved by Premier are at higher risk of modern slavery indicators	34 Production Verification Audits undertaken in primary factories One incident of unauthorised subcontracting was found through internal processes Our Bangladesh team verified production for over 80% of total orders	

Note: The self assessment is against our FY23 commitments, but we recognise at every engagement point and stage of our program there is room for further improvement.

**Scorecard key**



Scoping or planning



Work commenced



Well advanced



Complete



Engagement point	Action	Objective	Reporting period outcomes	Progress against commitments
<b>Worker Voice</b>	Worker surveys	To create avenues for workers' voices to be heard and communicated to Premier	Anonymous Worker Sentiment Surveys completed in all sourcing locations across 44 factories.	
	Worker grievance channel	To create an avenue for workers to report possible illegal, unethical, or improper conduct in factories & any retaliation workers may face following an ERSA audit	Key themes included poor supervisor behaviour, excessive working hours and an absence of trusted grievance channels.	
	RSC Worker Help Line (Bangladesh)	To provide a grievance channel for workers to report issues related to fire & building safety in factories participating in the RSC	Scoping completed and first stage rollout of Amader Kotha helpline complete in Bangladesh. Remaining factories to be completed by end 2023.	
<b>Industry engagement &amp; training</b>	Premier team member modern slavery training	To continuously educate and create awareness in our own teams of modern slavery risks and improve the quality of that training year on year	Ethical Sourcing and Modern Slavery training completed by 80% of Just Group product team members trained, in addition to the Bangladesh support office, Finance and Commercial, People & Culture and The Just Group Executive.	
	Supplier modern slavery awareness training	To continuously educate and create awareness in supplier teams of modern slavery risks and improve the quality of that training year on year	In the next reporting period, supplier training will be run by the Ethical Sourcing team with the content designed based on key issues found in the reporting period and expectations that need further reinforcement.	
	Supplier capacity building	To address gaps and issues requiring remediation through audit program and grievance mechanism tools	Primary factories who completed ERSA audits were all assigned three e-learning modules; one on corrective action plan management, then the additional two were based on priority areas for improvement. There was a 78% completion rate of all three modules.	
<b>Policies &amp; contractual governance</b>	Maintaining policies & procedures	To adapt and update policies and procedures to reflect human rights issues in the supply chain	Rollout of Supplier Ethical Code of Conduct and Key Principles of Ethical Business Conduct in local language.	

Note: The self assessment is against our FY23 commitments, but we recognise at every engagement point and stage of our program there is room for further improvement.

Scorecard key



Scoping or planning



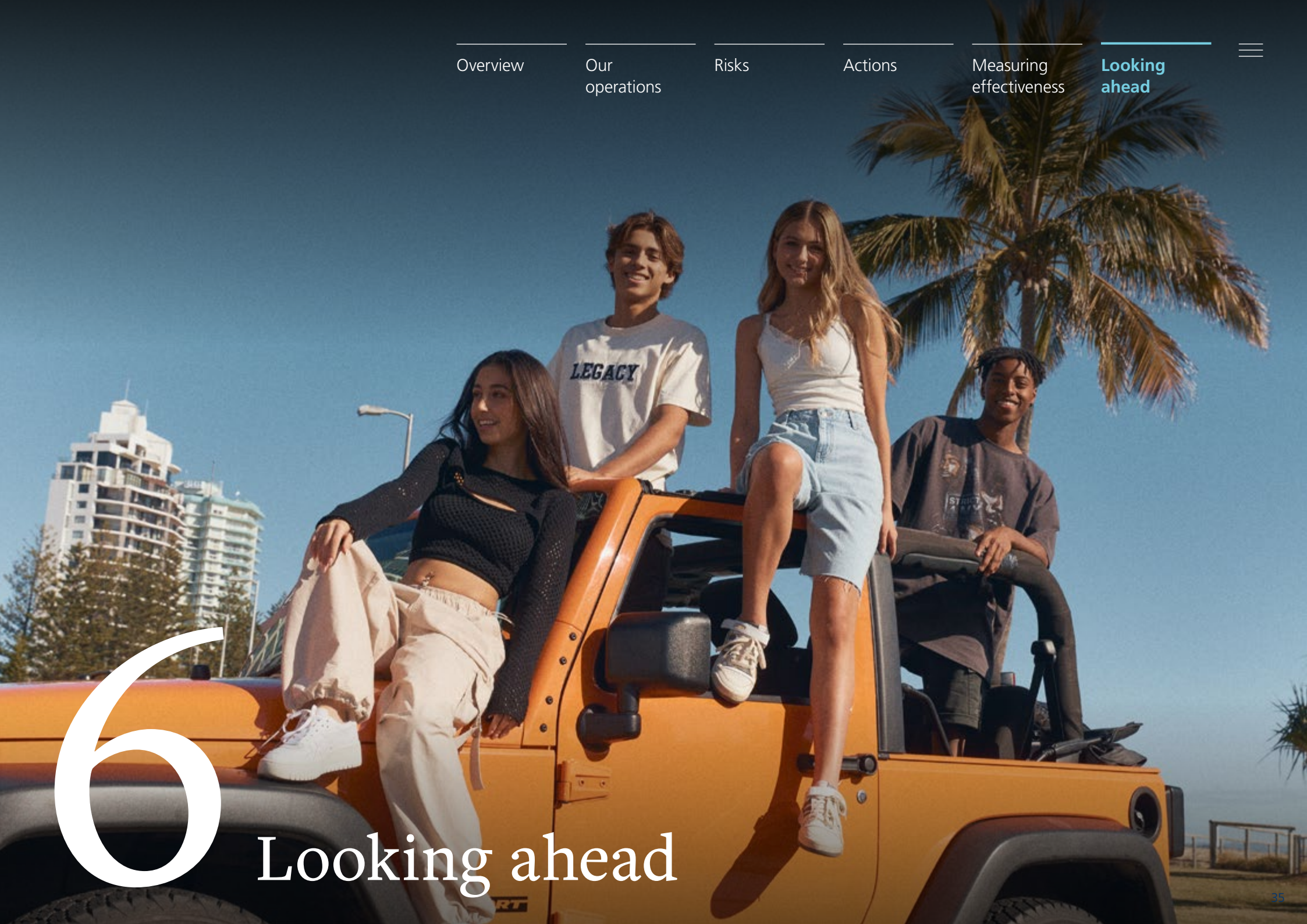
Work commenced



Well advanced



Complete



# 6 Looking ahead





## Risk assessment

- Expand scope of Sentinel to capture nominated Tier 2 sites scoped from suppliers
- Continue to map our clothing and textile supply chain beyond Tier 1 and assess working conditions of top 5 spinning and or fabric mills across the region
- Further assess and improve due diligence on our goods and services not-for-resale suppliers
- Amplify in-person factory visits by our sourcing and production teams
- Conduct industry benchmarking of non-merchandise supplier due diligence to further understand best practice

## Audit, due diligence & worker rights

- Continue to expand importer participation in our Ethical Sourcing Program beyond traceability and verification
- Complete wage gap analysis pilot in selected Bangladesh factories and assess results for further rollout in Indian sites
- Run responsible purchasing practices refresher training and continue rollout of anti-bribery and corruption training
- Ensure official wage increases in all sourcing markets are adequately accounted for in open cost breakdowns with suppliers

## Remediation & corrective actions

- Improve reporting, remediation and supplier assessment through addition of analytical role within Ethical Sourcing team
- Redevelop existing Modern Slavery Incident Remediation Policy to be both inward and outward facing and to operationalise the remediation process and build awareness with internal team and suppliers
- Increased focus on reducing the number of inconclusive and inconsistent findings in audit reports through improved supplier education and engagement

## Worker Voice

- Rollout Amader Kotha helpline to remaining Tier 1 sites in Bangladesh whilst continuing to scope suitable grievance mechanisms in other sourcing countries we operate in
- As worker exposure to external grievance mechanisms mature, increased feedback and insights will inform future program activities and capacity building

## Industry engagement & training

- Enhance the Better Cotton partnership, including the appointment of an external auditor to strengthen KPI accuracy
- Participation in the ILO designed Bangladesh Employee Insurance Scheme Pilot where in the case of work-related injuries, compensation payments would be provided for the permanently disabled and the dependants of deceased workers
- Deliver working hours management training through LRQA, which addresses the root cause of inadequate working hour management for factories in China and Bangladesh
- Continue Ethical Sourcing & Modern Slavery training with all nominated team members

## Policies & contractual governance

- Develop cotton position statement to communicate with suppliers on the risks associated with cotton sourcing, expectations and preferred sources of cotton
- Develop responsible recruitment and overtime hours guidance for suppliers
- Review existing suite of company policies to ensure environmental, social and governance best practice





# Glossary



<b>APSCA</b>	Association of Professional Social Compliance Auditors
<b>CAP</b>	Corrective Action Plan
<b>Code of Conduct</b>	Just Group's Ethical Code of Conduct
<b>ERSA</b>	Responsible Sourcing Assessment Standard
<b>FY23</b>	the reporting period
<b>ILO</b>	The International Labour Organisation
<b>importers</b>	Suppliers to the Just Group that import finished goods into Australia, principally on a free-in-store (FIS) basis
<b>International factory or factory</b>	A manufacturing facility that is in a location (premises) outside of Australia that manufactures product for the Just Group, principally on a free-on-board (FOB) basis
<b>International supplier or supplier</b>	A supplier of product to the Just Group is located outside Australia, principally on a free-on-board (FOB) basis, that may own or have arrangements with one or multiple factories
<b>Just Group</b>	Just Group Limited (a wholly owned subsidiary of Premier)
<b>Just Group brands</b>	Dotti, Jacqui E, Jay Jays, Just Jeans, Peter Alexander, Portmans and Smiggle
<b>LRQA</b>	LRQA Group Limited (formerly ELEVATE)
<b>modern slavery</b>	a comprehensive term used to describe certain offences and other prohibited conduct, including forced labour, child labour, slavery, people trafficking, deceptive labour recruitment practices, forced marriage and debt bondage
<b>Modern Slavery Act or the Act</b>	Modern Slavery Act 2018 (Cth)
<b>NGO</b>	Non-governmental organisation
<b>Premier</b>	Premier Investments Limited
<b>PVA</b>	Production Verification Audit
<b>raw materials</b>	an unprocessed material or commodity used to produce finished goods. For Premier's products, this includes natural fibres such as cotton (eg. used in apparel), and man-made and synthetic material such as polyethylene terephthalate (PET) (eg. used in water bottles) and polyester (eg. used in apparel and in backpacks and other school supplies)
<b>reporting period</b>	31 July 2022 to 29 July 2023 (being FY23 for Premier)
<b>RSC</b>	RMG Sustainability Council
<b>UNGP</b>	United Nations Guiding Principles on Business and Human Rights
<b>we, our or similar expressions</b>	Premier, including Just Group
<b>WSS</b>	Worker Sentiment Survey



peteralexander



portmans

dotti.

JACQUIE

