



PACT

Modern Slavery Statement

24th November 2025

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A message from our CEO

At Australian Defence Apparel Pty Ltd (ADA), we are unwavering in our commitment to upholding the highest standards of ethical conduct and human rights across every aspect of our business. Modern slavery, including forced labour, servitude, human trafficking, and child labour, remains a significant global challenge, particularly within the textile and apparel industry. As a leader in the development, manufacture, and distribution of uniforms and protective equipment, ADA recognises our responsibility to identify, prevent, and address the risks of modern slavery within our operations and supply chains.

This Modern Slavery Statement outlines the actions ADA has taken during the 2024–2025 financial year to assess and address modern slavery risks, in accordance with the requirements of the *Modern Slavery Act 2018 (Cth)*. Our approach is guided by our core values of accountability, transparency, and continuous improvement, and is further strengthened by PACT (Promoting Accountability, Community and Transparency), our ESG Program. Through PACT, we embed sustainability and ethical practices into every facet of our business, with a focus on eradicating modern slavery and promoting fair labour standards.

I am proud of the progress ADA has made in strengthening our governance, deepening our supplier engagement, and enhancing transparency throughout our operations. Over the past year, we have continued to consolidate our supplier base, increase oversight of our manufacturing partners, and invest in training and awareness for our employees. Our long-standing accreditation with Ethical Clothing Australia, combined with rigorous supplier due diligence and third-party audits, underpins our commitment to ethical sourcing.

We recognise that addressing modern slavery is an ongoing journey. ADA remains committed to continuous improvement, open dialogue with our stakeholders, and proactive engagement with our suppliers to drive positive change. I am confident that, together, we can make a meaningful contribution to the fight against modern slavery and set a standard for ethical business in our industry.



Chris Dixon
CEO
Australian Defence Apparel

ADA's Structure, Operations and Supply Chain

Structure

Australian Defence Apparel Pty Ltd (ADA) (ABN 67 006 898 906) is a leading provider of bespoke uniforms, load carriage, and protective personal equipment for Defence, government, and corporate clients. ADA employs 314 people across Australia and New Zealand.

Our key facilities include:

- Manufacturing: Bendigo, Victoria – producing combat uniforms and firefighting ensembles.
- Warehousing: Melbourne and Canberra – supporting national distribution.
- Sales and Support Offices: Melbourne, Sydney and Canberra.
- New Zealand Operations: Head office and warehouse in Palmerston North.

ADA is part of the Logistik Unicorp group, a Canada-based organisation serving commercial and defence industries globally, with approximately 1,200 employees.



1 Sydney Sales Office

2 Canberra Sales Office and Warehouse

3 Thomastown Head Office and Warehouse

4 Bendigo Factory

5 ADA NZ Head Office and Warehouse

ADA's Structure, Operations and Supply Chain

Operations

ADA delivers uniforms and protective equipment for Defence, government, and corporate clients through a combination of in-house manufacturing, accredited local subcontractors, and a global network of offshore partners.

Local Manufacturing:

Our Bendigo factory is the cornerstone of Australian production, supported by accredited subcontractors and value-add providers such as embroidery, screen printing, and alterations. All local sites and subcontractors are independently audited by Ethical Clothing Australia (ECA),¹ ensuring statutory entitlements and safe working conditions for all workers, including outworkers.

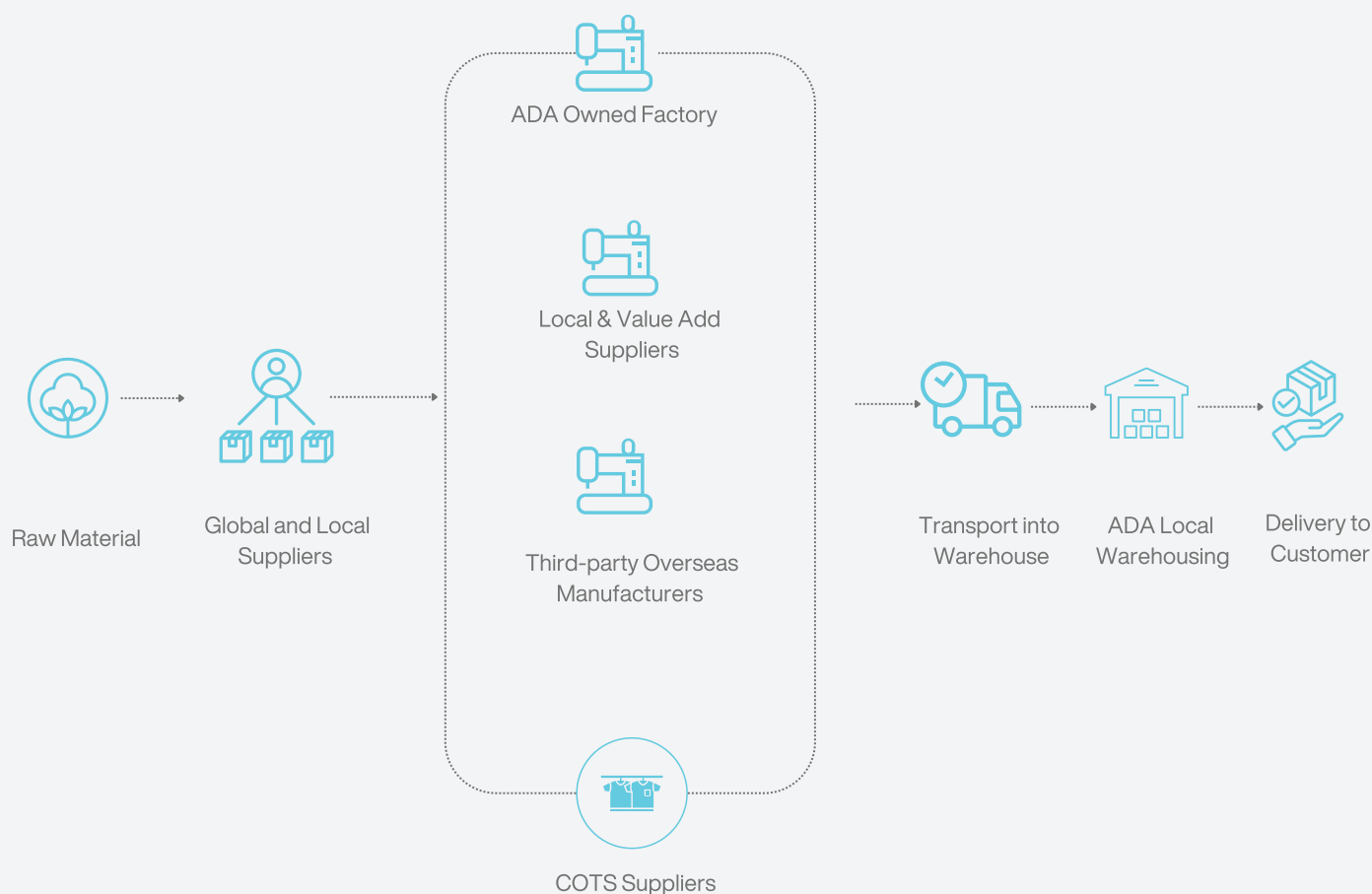
Offshore Manufacturing:

In FY2024–25, ADA consolidated offshore production within our parent company's Logistik Unicorp-owned factory in Vietnam, enhancing control and transparency over working conditions, audit processes, and supply chain traceability. Additionally, we partner with key subcontractors in China, Indonesia and Thailand to support our offshore manufacturing. All offshore partners must sign ADA's Ethical Sourcing Policy, provide current ethical audit reports (SMETA, BSCI, WRAP, or SA8000), and undergo rigorous onboarding and risk assessment, including site visits where feasible.

Online Retail:

ADA also operates the LEGEAR online platform, serving military, law enforcement, and security personnel.

ADA's Structure, Operations and Supply Chain



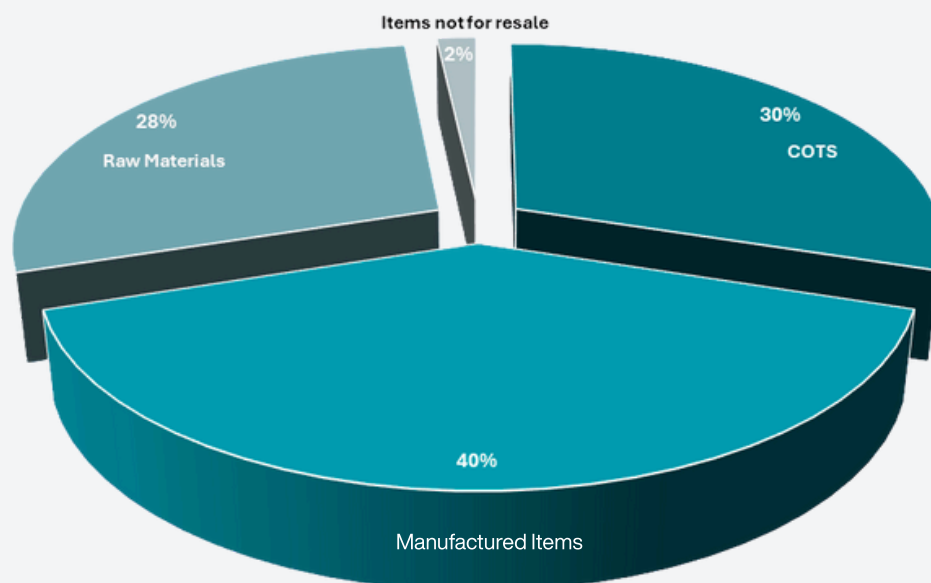
ADA's Supply Chain Footprint

During the 2024-2025 financial year, ADA supplied uniforms and equipment to over 450,000 military, first responder, health and corporate personnel. Our supply chain spans finished goods (Commercial off the shelf - COTS), Manufactured Garments (Outwork – Local/FG/OS) and Raw Materials (Fabric, Trims, Thread). In FY2024–25 ADA engaged 128 direct suppliers across these categories (including supporting services such as packaging, freight and equipment), with 95% of these suppliers being located in Australia, New Zealand, Vietnam, China, Indonesia, USA and the UK (refer to map).

The proportion of spend remained consistent with previous years: manufactured items represented 40%, COTS products 30%, raw materials increased slightly to 28%, and items not for resale (such as packaging and IT equipment) decreased to 2%.

ADA's Structure, Operations and Supply Chain

ADA's Supply Chain Footprint



Proportion of ADA Spend by Item Category

ADA's Structure, Operations and Supply Chain

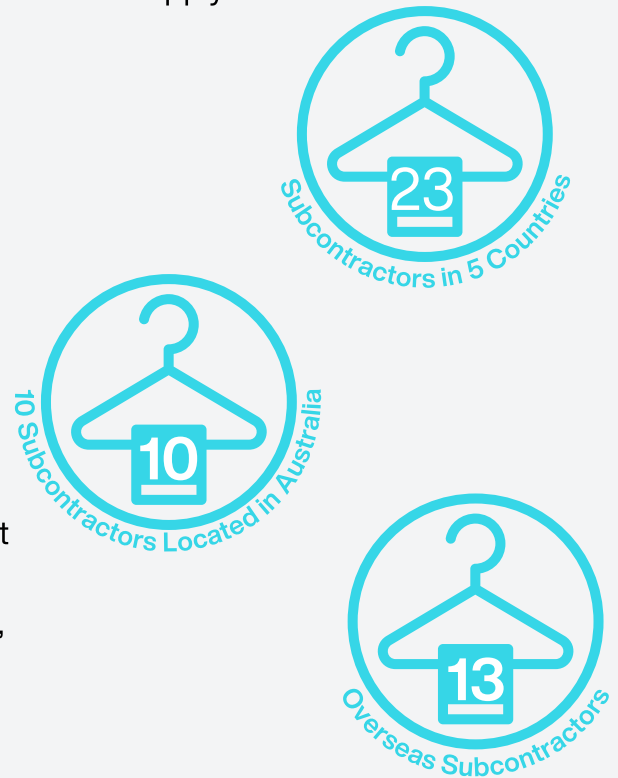
Manufacturing Supply Chain

ADA's manufacturing capability is supported by a combination of local and offshore partners, ensuring flexibility, quality, and resilience across our supply chain.

Local Manufacture

Production at ADA is led by our Bendigo factory, supported by a network of accredited subcontractors, delivering specialised services such as embroidery, screen printing, and garment alterations.

All local manufacturing operations, including subcontractors and value-add providers, are accredited with ECA. This accreditation ensures that workers throughout our Australian supply chain receive their statutory entitlements and work in safe, fair conditions. ECA accreditation involves annual third-party compliance audits conducted by the Textile, Clothing and Footwear (TCF) sector of the Timber, Furnishing & Textiles Union (TFTU).



Overseas Manufacture

The majority of ADA's overseas production is consolidated in Logistik Unicorp's facility in Vietnam to provide greater oversight and control. Additional subcontractors operate in China, Indonesia, and Thailand.

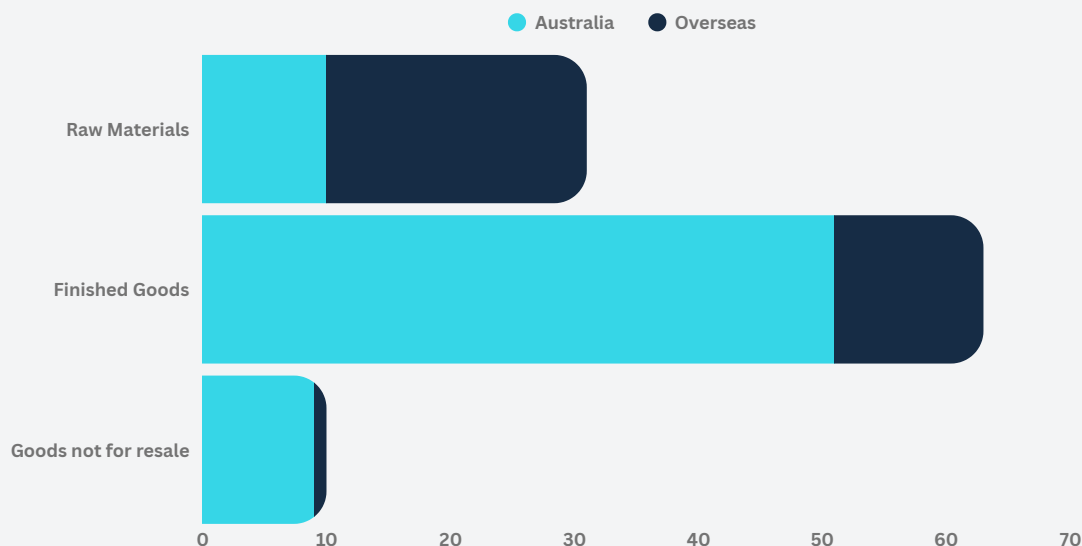
All overseas partners are required to:

- Agree to the terms of ADA's Ethical Sourcing Policy. This policy is based on the eight fundamental conventions of the International Labour Organization (ILO).⁴
- Provide up-to-date ethical sourcing assessments of their facilities, conducted against recognised standards such as SMETA, BSCI, WRAP, or SA8000.
- Undergo periodic audits and site visits by ADA personnel or approved third-party auditors.

ADA's Structure, Operations and Supply Chain

Purchased Items

- Finished goods were purchased from 63 suppliers. Businesses from Australia, Vietnam and China account for almost 90% of direct suppliers
- Raw materials were sourced from 31 suppliers; fabric and trims sourced from Australia, USA, UK/EU, China, India, Taiwan, Vietnam and others; mills and component suppliers often operate multi-country networks.
- Review of items not for resale include goods and services to support our operations such as packaging materials, IT equipment and services, stationary, transportation, cleaning and plant maintenance.



Risk Factors

Sector and Geographic Risks²

ADA operates in the textile, apparel, and personal protective equipment (PPE) industries. These industries are high-risk for modern slavery due to complex, multi-tiered supply chains and vulnerable worker populations. Key risks include forced labour, child labour, debt bondage, deceptive recruitment, excessive overtime, and restrictions on freedom of association.

Based on supplier country of manufacture and raw material origin, risk ratings have been identified for Modern Slavery:

- High-risk: China, Vietnam, India, Pakistan, Bangladesh, Laos, Cambodia—documented risks include forced labour, excessive overtime, debt bondage, and weak enforcement of labour standards.
- Medium-risk: Indonesia, Türkiye, Mexico, Brazil.
- Low risk: Australia, United States, United Kingdom, EU countries (with ongoing vigilance for migrant worker risks).

While Australia is generally considered low risk, outworker arrangements and the use of migrant labour can increase vulnerability to underpayment, excessive hours, and unsafe conditions.

Supply Chain Tier Risks

- Tier 1 (Direct Suppliers): ADA maintains strong visibility and control, particularly through the Logistik-owned factory in Vietnam and ECA-accredited local subcontractors. All Tier 1 suppliers are required to sign ADA's Ethical Sourcing Policy and provide current ethical audit reports.
- Tier 2 (Manufacturers' Suppliers): Visibility is improving, especially for key offshore partners, but remains incomplete. ADA collects information on Tier 2 suppliers via questionnaires and audit reports, though full spend or operational control is not yet possible at this level.

Risk Factors

Supply Chain Tier Risks

Tier 3 Supply Chain Mapping



ADA recognises the importance of transparency beyond direct (Tier 1) and manufacturing (Tier 2) suppliers. Significant progress has been made in collecting and analysing Tier 3 information (e.g., yarn spinners, dye houses, raw fibre sources). While some gaps remain, particularly for offshore suppliers and multi-country mills, ADA's current Tier 3 data provides a more comprehensive profile of upstream risk than in previous years. This information has been used to:

- Identify high-risk regions and facilities further upstream.
- Prioritise supplier engagement and audit activities.
- Inform spend-weighted risk analysis and reporting.

ADA remains committed to closing remaining Tier 3 gaps, working with suppliers to improve disclosure and traceability, and leveraging our relationship with Logistik Unicorp in Vietnam to drive best practice across the Group.

Risk Factors

Key Risk Scenarios

Local Context

- Outworker arrangements in Australia can heighten vulnerability due to language barriers, underpayment, long hours, and inadequate workplace health and safety.
- Unauthorised subcontracting poses a risk of undisclosed third-party production, both locally and overseas.
- Post-pandemic labour dynamics, including workforce shortages, may incentivise excessive overtime and increased reliance on migrant labour.

Overseas Context³

- Unauthorised subcontracting can obscure working conditions and increase the risk of exploitation.
- Migrant and contract labour in high-risk countries may face recruitment fees, document retention, or lack of grievance mechanisms.
- Post-pandemic labour shortages can lead to excessive overtime or greater reliance on vulnerable workers.
- Raw material sourcing from high-risk countries, particularly where Tier 3 traceability is incomplete, presents additional challenges.

Risk Factors

Country	Modern Slavery Risk ²	Tier 1 Supplier	Tier 2 Supplier	Tier 3 Supplier	ADA Risk Mitigation (Tier 1 Level)
Australia	Forced labour, debt bondage	Finished garments, fabric	Finished garments	Wool	ECA membership, Ethical Sourcing Policy
Vietnam	Forced overtime	Finished garments	Fabrics, trims	N/A	Ethical Sourcing Policy, supplier agreement, ethical audits
China	Freedom of association, forced labour, excessive hours	Finished garments, fabric, trims	Finished garments, fabric, trims, footwear manufacture	Fabric, trims	Ethical Sourcing Policy, supplier agreement, ethical audits
USA	Forced labour, migrant labour, debt bondage	Finished garments, fabric	Finished garments, trims	Fabric, trims	Ethical Sourcing Policy, supplier agreement, ethical audits
UK	Forced labour, migrant labour, debt bondage	Fabric	Fabric	N/A	Ethical Sourcing Policy, supplier agreement, ethical audits
Indonesia	Forced labour, bonded labour, forced overtime, child labour, forced marriage	Finished garments, fabric	Finished garments	N/A	Ethical Sourcing Policy, supplier agreement, ethical audits
India	Forced labour, bonded labour, forced overtime, child labour, forced marriage, human trafficking	Fabric	Finished garments, fabric	Fabric	Ethical Sourcing Policy, supplier agreement, ethical audits
Pakistan	Forced labour, bonded labour, forced overtime, child labour, forced marriage, human trafficking	N/A	Finished garments	N/A	Developing policies to assist with Tier 2 and Tier 3 oversight
Bangladesh	Forced labour, bonded labour, forced overtime, child labour, forced marriage, human trafficking	N/A	Footwear	Footwear	Developing policies to assist with Tier 2 and Tier 3 oversight
Türkiye	Forced labour, child labour, excessive overtime, wage theft, bonded labour	N/A	N/A	Leather	Developing policies to assist with Tier 2 and Tier 3 oversight
Brazil	Forced labour, debt bondage, excessive overtime, child labour, wage theft	N/A	N/A	Cotton	Developing policies to assist with Tier 2 and Tier 3 oversight
Laos	Forced labour, debt bondage, child labour, forced overtime	N/A	Finished Goods	N/A	Developing policies to assist with Tier 2 and Tier 3 oversight
Cambodia	Deby bondage, forced labour, child labour, excessive overtime	N/A	Footwear	N/A	Developing policies to assist with Tier 2 and Tier 3 oversight
Mexico	Forced labour, child labour, wage theft, excessive overtime	N/A	Footwear	Leather	Developing policies to assist with Tier 2 and Tier 3 oversight

Actions Taken to Assess and Address Modern Slavery Risks

ADA adopts a risk-based approach to modern slavery, underpinned by robust policies, comprehensive due diligence, active supplier engagement, and mechanisms for worker voice.

Policies and Governance

- Ethical Sourcing Policy: All Tier 1 suppliers are required to sign and comply with ADA's Ethical Sourcing Policy.
- ADA also has its Code of Conduct, Whistleblower Protection Policy, Conflict of Interest and Fraud & Corruption Control Plan which are embedded in onboarding and annual training for all employees, reinforcing ADA's commitment to ethical conduct.
- PACT ESG Program: Modern slavery controls are integrated with broader sustainability and governance initiatives.

Policy	Purpose
Code of Conduct	To provide guidance of the behaviours ADA expects of its Directors and employees
Ethical Sourcing Policy	To emphasise the importance placed on building long term relationships with suppliers that promote and support ethical practices within Australia and offshore. It outlines our expectations to Tier 1 suppliers (both local and overseas) of ADA's requirement that they meet the eight fundamental human rights conventions identified by the International Labour Organisation. ⁴
Whistleblower Protection Policy	To provide a mechanism for the reporting of any instances of suspected illegal, immoral, or fraudulent practices involving ADA business processes, whilst providing protection and measures so that anyone making a report can do so confidentially, without fear of reprisal.
Conflict of Interest Policy	To ensure employees and others acting on ADA's behalf understand the requirement that they must be free from conflicts of interest that could adversely influence their judgment, objectivity, or loyalty to the company in conducting ADA business activities.
Fraud and Corruption Control Plan	This Plan sets out the standards for accountability that ADA expects from our Employees and sub-contractors. It is a proactive approach to enable the business to manage fraud and corruption risks in an environment that is becoming increasingly complex.

Actions Taken to Assess and Address Modern Slavery Risks

Supplier due diligence and onboarding

- Supplier onboarding: All new suppliers undergo a risk assessment, must sign the Ethical Sourcing Policy, and provide current ethical audit reports (SMETA, BSCI, WRAP, or SA8000).
- Supplier questionnaires: ADA collects information on country of origin, labour practices, audit history, and visibility into Tier 2 and Tier 3 suppliers.
- Site visits and audits: ADA personnel and third-party auditors conduct site visits for key suppliers, prioritising those in high-risk regions and facilities.
- ECA accreditation: All Australian manufacturing sites and subcontractors are independently audited under the Ethical Clothing Australia (ECA) scheme.

Audits and site visits

- Local (Australia): ECA audits are conducted across ADA's manufacturing, warehousing, and subcontractor operations, including outworkers and value-add providers.
- Overseas: Ethical audits and inspections by ADA or third-party auditors are conducted for key facilities in Vietnam, China, Indonesia, and other countries, with follow-up actions where issues such as excessive overtime or safety concerns are identified.

Tier 2 and Tier 3 Transparency

- Tier 2: ADA requests disclosure of key Tier 2 suppliers and reviews audit reports where available. While spend allocation at this level is not possible, this information is used to prioritise engagement and risk assessment.
- Tier 3: ADA has begun collecting information on Tier 3 suppliers (mills, spinners, dye houses) for strategic and high-risk suppliers. Although gaps remain, this data helps build a more accurate risk profile and informs supplier engagement and audit priorities.

Actions Taken to Assess and Address Modern Slavery Risks

Case Study 1:

Due Diligence - Modern Slavery Risk Review of Customer Product Range

As part of ADA's commitment to ethical sourcing and compliance with the Australian Modern Slavery Act, we conducted a comprehensive review of a customer's product range supplied in 2025. This assessment involved mapping the supply chain for each item, identifying the countries of origin for Tier 1 and Tier 2 vendors, the country of manufacture, and the sources of raw materials.

Our analysis revealed a diverse sourcing footprint, with products manufactured in Australia, China, Vietnam, Bangladesh, and several other countries. Raw materials were traced to a broader set of regions, including high-risk countries such as China, India, Bangladesh, Vietnam, Pakistan, Cambodia, and Indonesia, as identified by the Global Slavery Index. These regions are known for elevated risks of forced labour and other forms of modern slavery, particularly within the textiles, apparel, and footwear sectors.

ADA's due diligence process included cross-referencing supplier declarations with independent risk indices and reviewing supplier policies and certifications. Where high-risk countries were identified in the supply chain, ADA engaged with suppliers to obtain further transparency, including evidence of ethical sourcing practices, third-party audits, and certifications such as Oeko-Tex and Global Recycle Standard. For products with raw materials sourced from high-risk regions, ADA prioritised suppliers with robust compliance frameworks and actively monitored for red flags, such as lack of traceability or opaque subcontracting.

This review enabled ADA to map risk exposure across the product range, identify priority areas for further investigation, and demonstrate ongoing progress in supply chain transparency. ADA continues to collaborate with suppliers to improve traceability, support remediation where risks are identified, and ensure that procurement decisions reflect our commitment to human rights and ethical business practices.

This case study highlights ADA's proactive approach to modern slavery risk management, evidencing both due diligence and continuous improvement in line with our ethical sourcing objectives.

Actions Taken to Assess and Address Modern Slavery Risks

Training and Awareness

- ADA delivers annual training to Compliance, Procurement, and Operations teams, focusing on modern slavery risks, key indicators, and response protocols.
- Management receives regular briefings on sector and geographic risks, emerging scenarios, and lessons learned from audit findings.

Worker voice, grievance and remediation

- An independent Whistleblower Hotline is available to employees, suppliers, and contractors, with all reports investigated promptly and confidentially.
- Remediation protocols are aligned with legislative guidance, prioritising victim rights, non-retaliation, and corrective action plans.

Continuous Improvement

- ADA conducts quarterly and annual reviews of risk mapping, audit outcomes, and supplier disclosures.
- We maintain ongoing engagement with suppliers to enhance Tier 2 and Tier 3 transparency and address any remaining gaps.
- ADA's Modern Slavery Statement is submitted to the Register and published on our website, supporting public accountability.

Reviewing the Effectiveness of our Actions

ADA is committed to continuously improving the effectiveness of our actions to identify, assess, and address modern slavery risks. We use a combination of quantitative and qualitative indicators to monitor progress, inform decision-making, and drive accountability across our business and supply chain.

Insights from effectiveness reviews guide ADA's continuous improvement efforts. Actions to address identified gaps and emerging risks are detailed in the previous section, ensuring our approach remains robust and responsive.

Activity	Measurement	Status FY24-25	Effectiveness Review
Governance	<ul style="list-style-type: none"> Reviewed and revised policies to ensure compliance to Modern Slavery requirements. 	✓	<ul style="list-style-type: none"> Policies reviewed against current legislation. Issued to new employees at onboarding.
	<ul style="list-style-type: none"> Review of Ethical Sourcing Policy. 	✓	<ul style="list-style-type: none"> Ethical Sourcing Policy reviewed issued to new suppliers.
	<ul style="list-style-type: none"> The number of identified risks and mitigating controls in place. 	✓	<ul style="list-style-type: none"> Number of risks reviewed updated to reflect consolidation of Tier 1 suppliers.
	<ul style="list-style-type: none"> Training delivered to all Operations Team members. 	✓	<ul style="list-style-type: none"> Training delivered.
Participation	<ul style="list-style-type: none"> Existing Suppliers' acceptance of ADA's Ethical Sourcing Policy. 	✓	<ul style="list-style-type: none"> Suppliers have signed and returned Ethical Sourcing Policy.
	<ul style="list-style-type: none"> All new suppliers agree to ADA's Supplier Agreement and Ethical Sourcing Policy. 	✓	<ul style="list-style-type: none"> Procedures are in place to ensure that we do not begin work with a new supplier until Supplier Agreement and Ethical Sourcing Policy are returned.
	<ul style="list-style-type: none"> Requirements for all Tier 1 Suppliers to complete the Ethical Sourcing Questionnaire. 	✓	<ul style="list-style-type: none"> 100% complete for Tier 1 sourcing.
Monitoring	<ul style="list-style-type: none"> Annual risk review of Suppliers to identify risk profile. 	✓	<ul style="list-style-type: none"> This has been completed and updated to reflect the consolidation of suppliers.
	<ul style="list-style-type: none"> Ethical Audits conducted for new and existing suppliers. 	✓	<ul style="list-style-type: none"> Ethical Audits completed for new suppliers and current manufacturing suppliers. Reviewed Suppliers' Modern Slavery Statements where available.
	<ul style="list-style-type: none"> Site Visits and Audits - ADA/ Third-party visits for key suppliers, prioritising high risk regions 	✓	<ul style="list-style-type: none"> Conducted for all Strategic partners
	<ul style="list-style-type: none"> ECA Accreditation for local subcontractors. 	✓	<ul style="list-style-type: none"> ECA Accreditation renewal completed.
Training	<ul style="list-style-type: none"> Update and deliver training to Operations employees. 	✓	<ul style="list-style-type: none"> Training reviewed to update for any changes in legislation and delivered to employees.

Reviewing the Effectiveness of our Actions

Case Study 2

Responding to Allegations of Modern Slavery within ADAs Supply Chain

In April 2025, ADA's parent company, Logistik, was contacted by a third-party organisation specialising in supply chain investigations regarding allegations of modern slavery risks within the supply chains of Logistik Unicorp and Australian Defence Apparel Pty Ltd (ADA). The allegations specifically referenced potential links between ADA's procurement for Australian government contracts and suppliers in Taiwan flagged for forced labour risks.

ADA treats such allegations with utmost seriousness and immediately initiated a comprehensive investigation to assess the validity of the claims. ADA and Logistik conducted a thorough review of supply chain records, focusing on the period and suppliers identified by the third-party organisation. This process included direct engagement with the Tier 1 suppliers named in the allegations. Both suppliers provided detailed shipment data and confirmed that, for the relevant timeframe and contracts, none of the nominated high-risk Tier 2 suppliers were involved in the manufacture of products supplied to ADA for Australian government contracts.

Throughout the investigation, ADA required suppliers to provide evidence of their ethical sourcing policies and compliance with international labour standards. Tier 1 suppliers confirmed that all their suppliers are required to sign and adhere to robust ethical sourcing policies. ADA also reviewed supplier selection processes and contractual obligations to ensure that forced labour and other modern slavery risks are proactively addressed.

The outcome of ADA's investigation confirmed that no materials supplied by the nominated high-risk suppliers were used in products delivered to Australian government agencies or any other ADA contracts. This response demonstrates ADA's commitment to transparency, rigorous due diligence, and continuous improvement in supply chain management.

This case study highlights ADA's proactive approach to managing modern slavery risks, evidencing that allegations are taken seriously, investigated thoroughly, and addressed appropriately. ADA remains committed to ongoing monitoring and engagement with suppliers to uphold human rights and ethical business practices across all operations.

Impacts of COVID

The COVID-19 pandemic has continued to affect global supply chains, with lingering disruptions in manufacturing, logistics, and workforce availability. These disruptions have heightened the vulnerability of workers, particularly in high-risk countries, to modern slavery risks such as forced labour, excessive overtime, and exploitative recruitment practices. Factory closures, border restrictions, and labour shortages have led to increased reliance on migrant and contract workers, sometimes under precarious conditions.

ADA responded by maintaining close engagement with suppliers, prioritising transparency, and actively monitoring for red flags—including unauthorised subcontracting, reduced audit access, and changes in workforce composition. ADA remains vigilant to the ongoing impacts of COVID-19 and continues to adapt its due diligence and risk management processes to address emerging risks in the post-pandemic environment.

Consultation

During the reporting period, ADA did not own or control any other entities and therefore this criteria is not applicable.

Planned Activities 2025-2026

Building on our progress in FY2024–25, ADA will undertake the following actions to further strengthen our approach to modern slavery risk management:

- Strengthen Tier 2 and Tier 3 mapping for all strategic and high-risk suppliers, with a focus on improving raw material traceability and identifying upstream risks.
- Enhance spend-weighted risk monitoring through quarterly updates, enabling prioritisation of audits and supplier engagement in high-risk countries.
- Expand worker-voice channels by increasing hotline accessibility, conducting worker interviews during audits, and implementing safe-speak mechanisms for migrant workers.
- Support supplier capability building in high-risk jurisdictions, with emphasis on overtime controls, safety standards, and ethical recruitment practices.
- Refresh policy and training annually to incorporate new legislative guidance and relevant case studies.

KPIs for FY2025–26

- High-risk spend: reduce year-on-year (baseline established FY2024–25)
- Audit coverage: 100% of Tier 1 overseas manufacturers; ≥90% of tier-2 mills in high-risk jurisdictions.
- Raw material disclosure: ≥90% for overseas-manufactured products
- Suppliers with full country disclosure: ≥95%
- Corrective Action closure: 100% of material non-conformances closed within agreed timeframes.

Our Progress

2020

- Increase organisational awareness of modern slavery risk.
- Embed Australian Modern Slavery Act Policy within ADA Ethical Sourcing Policy.
- Initial assessment of Tier 1 supply chain..
- Provide training on modern slavery to ADA Production Purchasing employees

2021

- Improve and increase supply chain assessment activities
- Survey Tier 1 suppliers to identify their oversight of their supply chain.
- Provide training on modern slavery to ADA all Purchasing employees

2023

- Develop Modern Slavery Training risks as part of employee training
- Improve and increase supply chain assessment activities
- Focus on continuous improvement Activities

2022

- Review Modern Slavery risks in Suppliers of non-stock items
- Focus on ensuring that Tier 1 Suppliers understand their Modern Slavery Risks
- Resume site visits of overseas suppliers by ADA staff
- Identify Continuous Improvement activities for Tier 2 Modern Slavery risks

2024

- Improve and increase supply chain assessment activities
- Consolidate suppliers for raw materials and COTS items where possible.
- Gain greater visibility over supply chain through increased manufacturing at Logistik Vietnam.

2025

- Continued consolidation of suppliers for raw materials and COTS items where possible.
- Gain more transparency over COTS and raw material supply chain.
- Work with Logistik facility in Vietnam to achieve greater oversight of manufactured garment supply chain.

2026

- Reduce High-risk spend year-on-year
- Audit coverage: 100% of Tier 1 overseas manufacturers; ≥90% of tier-2 mills in high-risk jurisdictions.
- Raw material disclosure: ≥90% for overseas-manufactured products
- Suppliers with full country disclosure: ≥95%
- Resolve 100% of Corrective Actions within agreed timeframe.

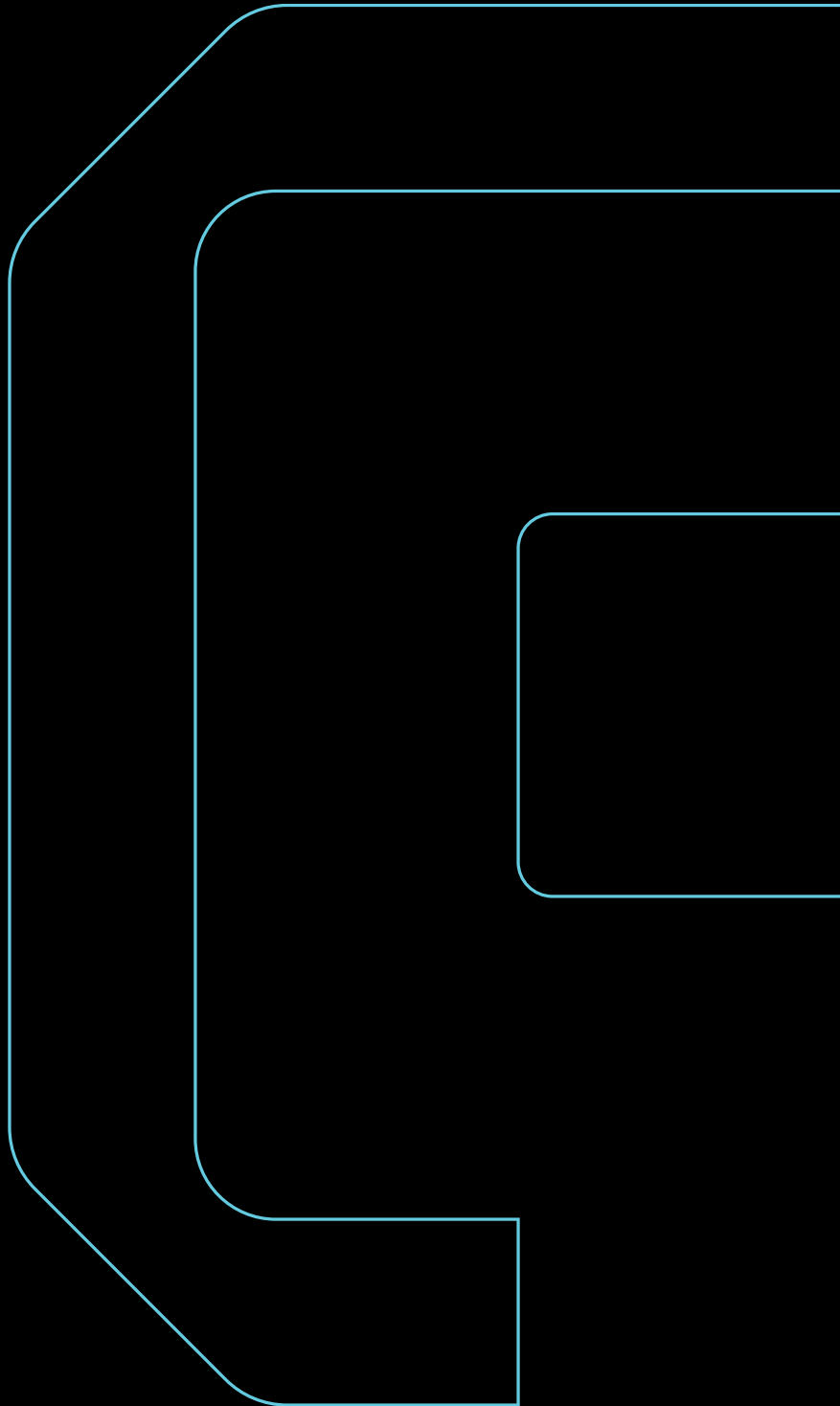
Statement of Approval

This statement was approved by the Board of Directors of ADA in their capacity as the principle governing body on 24th of November 2025.

This statement is signed by Chris Dixon in his role as Chief Executive Officer of Australian Defence Apparel Pty Ltd on 24th of November 2025.

Reference Index

1. Ethical Clothing Australia: <https://ethicalclothingaustralia.org.au/about/>
2. Walk Free Foundation - Global Slavery Index : <https://www.walkfree.org/global-slavery-index/>
3. Walk Free Foundation - Beyond Compliance in the Garment Industry: <https://www.walkfree.org/reports/beyond-compliance-in-the-garment-industry/>
4. Internal Labour Organisation Declarations: <https://www.ilo.org/resource/ilo-declarations>
5. More information on our PACT program and our commitment to ESG can be found on our website: <https://ada.com.au/pact/>





Modern Slavery Statement



Let's make a PACT!

PACT is ADA's ESG program. It is a movement towards Promoting Accountability, Community and Transparency. Through this innovative initiative, PACT and its partners are not just contributing to global ESG standards - they're reshaping them.

The PACT Program includes 4 pillars and tangible pathways to achieve our vision.

ESG Program Name	PACT			
4 Pillars Sits under ESG	 Planet	 People	 Practice	 Performance
Pathways Sits under Pillars	Designing for End of Life Circularity Waste Reduction	Indigenous Partnerships Diversity & Inclusion Employer of Choice Responsible Supply Chain Corporate Social Responsibility	Ethical Trade Transparency Risk Management	Job Growth Exceeding Customer Expectations Research, Development & Innovation Responsible purchasing and sourcing

Join us as we define what it means to do business in the 21st century!

Learn more about PACT
ada.com.au/pact



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