

# Accent Group



Accent Group Limited  
**2025 Modern Slavery Statement**

For the Period 1st July 2024 to 30th June 2025

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This Statement was prepared by the reporting entity Accent Group Limited ('Accent Group', 'the Company') (ABN: 85 108 096 251). Accent Group is an Australian public company listed on the Australian Securities Exchange (ASX code: AX1). The Company's registered office and principal place of business is 2/64 Balmain Street, Richmond, Victoria, Australia. This Statement has been prepared in accordance with the *Modern Slavery Act (Cth) 2018* ('the Act') and outlines the actions taken by Accent Group to identify, assess, and address modern slavery risks across our operations and supply chains for the year ending 29 June 2025.

Accent Group Limited makes this single joint Statement on behalf of all reporting entities in the Accent Group and all other owned and controlled entities.<sup>1</sup> A list of all subsidiaries is included in Appendix A.

<sup>1</sup> In addition to Accent Group Limited, Platypus Shoes (Australia) Pty Ltd, The Athletes Foot Australia Pty LTD, Hype DC Pty Ltd and Accent Lifestyle Pty LTD are also reporting entities under the Act.

# 1. Introduction

At Accent Group, we acknowledge that modern slavery continues to be a significant global issue, and we remain committed to acting responsibly within our operations and supply chains. We recognise our responsibility to identify and manage potential modern slavery risks and continue to take steps to uphold ethical and transparent business practices.

This Statement covers the reporting period from **1 July 2024 to 29 June 2025**. During this period, Accent Group maintained its focus on the processes and frameworks established in previous years to help identify and address modern slavery risks within our operations and supply chains.

While our primary focus this year was on maintaining existing practices, we recognise there is ongoing work to strengthen our approach. In the year ahead, we aim to build on our existing foundations, continue follow-up on corrective action plans, and explore opportunities to further enhance awareness and due diligence across our business and supply chain through team member training.

Accent Group remains committed to continuous improvement and collaboration with our team members, suppliers, and partners as we work toward reducing the risk of modern slavery in our operations and supply chains.

During the reporting period, Accent Group continued to strengthen its commitment to ethical sourcing and the prevention of modern slavery across our operations and supply chains. Key areas of ongoing activity included:

- **Supplier Onboarding and Engagement:** We maintained consistent application of our supplier onboarding process across all Accent Group-owned brands. This included continued communication of our *Ethical Sourcing Policy* and reinforcement of our expectations regarding ethical trade and social compliance.
- **Supplier Portal:** We continued to utilise our supplier portal to effectively manage and record information on suppliers, factories, and subcontractors across all brands within the Group.
- **Audit Processes:** Our established audit programs remained in place to support transparency, enhance visibility, and strengthen our understanding of potential supply chain risks.
- **Supplier Engagement and Site Visits:** We increased direct engagement with suppliers and factories in key sourcing regions through in-person visits and on-site discussions.
- **New Distribution Agreements:** We shared our ethical sourcing expectations with new distribution partners to ensure alignment with our standards and commitment to responsible business practices.

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## APPROVAL OF THIS STATEMENT

This Statement was approved by the Accent Group Board on 20<sup>th</sup> November 2025.



**Daniel Agostinelli**  
Chief Executive Officer  
Accent Group Limited

## 2. About Accent Group

### OUR OPERATIONS

In the reporting year FY25, we operated 861 retail stores, 31 websites and represent 18 retail banners across Australia and New Zealand.



861

RETAIL STORES



31

WEBSITES



18

RETAIL BANNERS

In FY 25 we had a portfolio of 9 own brand labels along with our store brands and hold the exclusive distribution rights for 12 global brands across Australia and New Zealand.

All our operations are located within Australia and New Zealand, and include the following activities:

#### MULTI-BRAND RETAIL OPERATIONS:

The retail stores and websites through which we sell third-party and own-branded merchandise, including a range of Australian and global footwear and apparel brands.



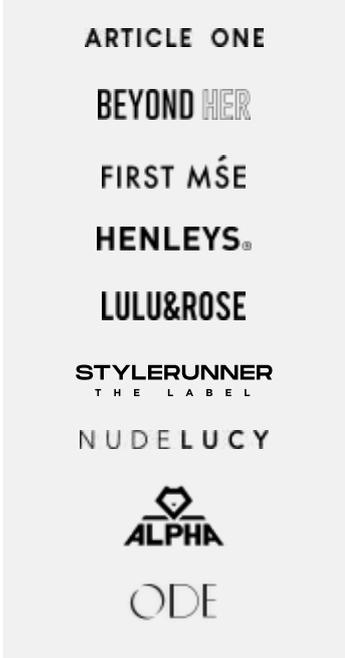
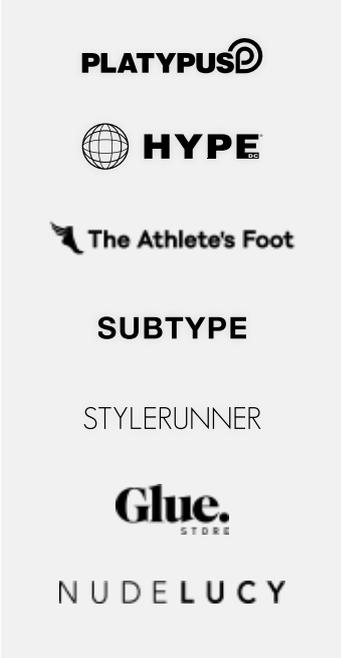
#### DISTRIBUTED BRANDS:

We hold exclusive distribution rights for a range of global footwear brands across Australia and New Zealand. We sell merchandise from these brands in our multi-brand and stand-alone retail operations and online. We also sell merchandise from these brands to other retailers on a wholesale basis.



#### ACCENT OWNED BRANDS:

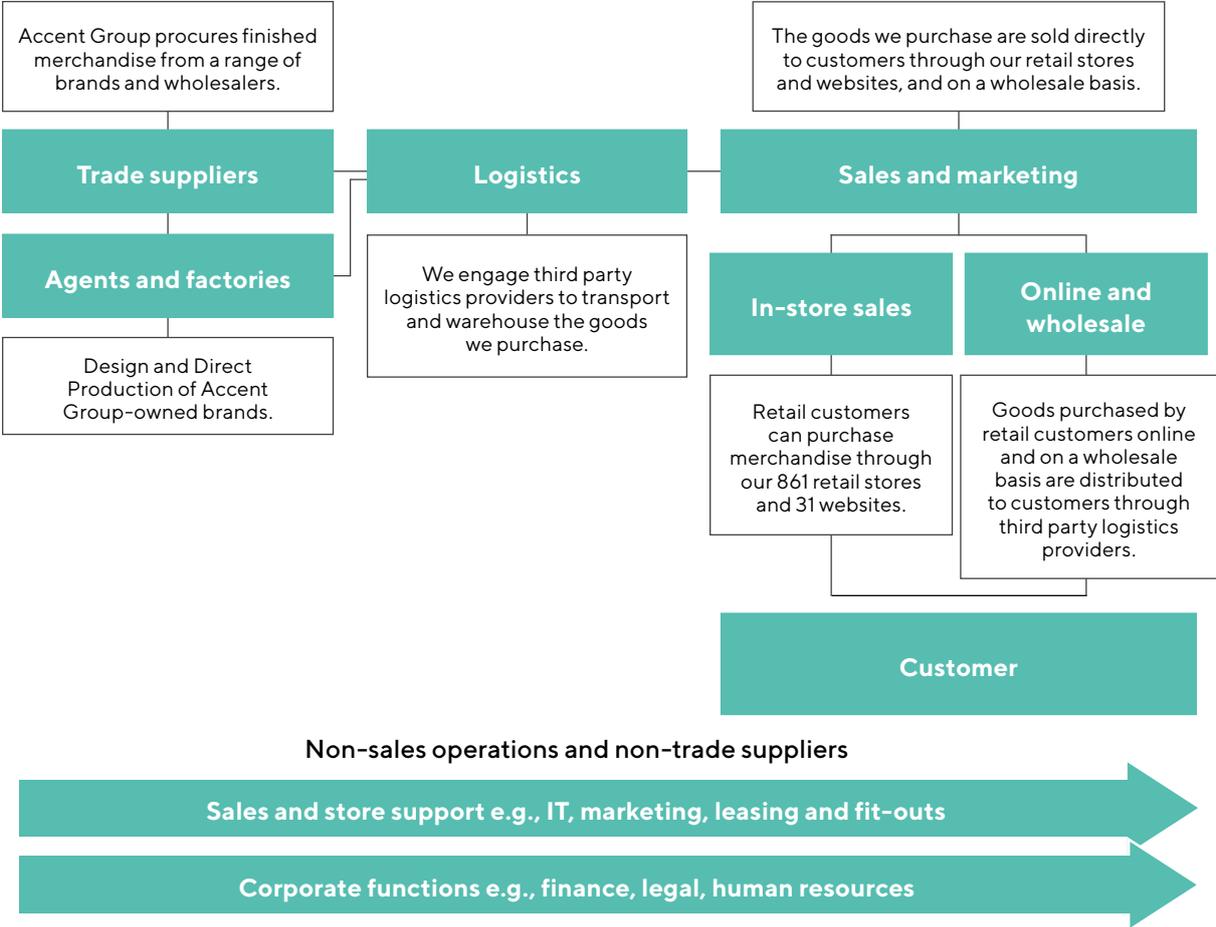
We source finished merchandise across footwear, apparel, and accessories, created specifically for Accent owned brands that we source directly from third party agents and factories for direct retail and wholesale distribution.



## 2. About Accent Group

### Our value chain

Figure 2 – Accent Group value chain



### Our workforce

Accent Group employs over **8,600 team members** across **Australia and New Zealand<sup>2</sup>**, working in a diverse range of roles across our retail network and support operations including our support centres, warehouses, wholesale, and shared services. The majority of our workforce is employed on a casual basis, primarily within our retail stores.

During the reporting period, our overall **female-to-male ratio remained steady at 66:34**, reflecting the continued representation of women across our workforce. We also continued to grow our female orientated Accent Group-owned brands, including Nude Lucy and Stylerunner.

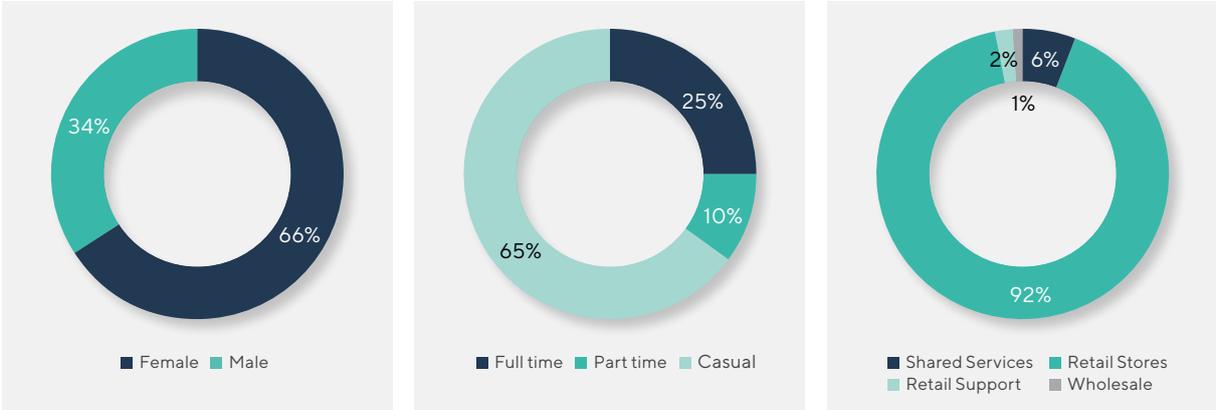
Our [Diversity and Inclusion Policy](#) and [Code of Conduct](#) guide our commitment to creating a workplace that values diversity, inclusion, and respect. We strive to foster an environment built on mutual respect, dignity, and openness to different cultures and perspectives. Our approach to diversity embraces a broad range of characteristics including age, gender, race, national or ethnic origin, abilities and disabilities, religion, language, family or marital status, and sexual orientation recognising that the strength of our business lies in the richness of our people.

2 As at 29 June 2025

## 2. About Accent Group

A breakdown of our workforce is provided below:

**Figure 3 – Accent Group workforce**



### OUR SUPPLY CHAIN

Accent Group’s primary operations focus on the retail and wholesale of merchandise. This includes sourcing finished goods from trade suppliers, as well as designing and directly producing products for our Accent Group-owned brands through a network of agents and factories.

Our continued focus on brands such as Nude Lucy and Stylerunner has supported the ongoing growth of our apparel design and direct production capabilities within our supply chain. The range of trade and non-trade goods and services supporting our business operations has remained stable over last few reporting periods.

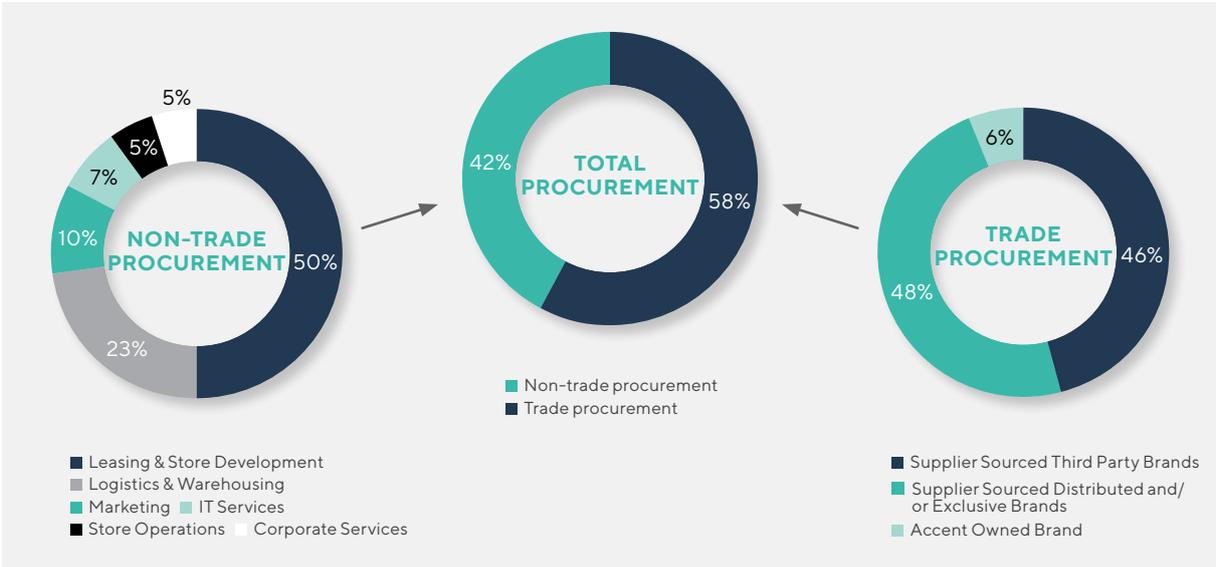
Table 1 below summarises the key types of trade and non-trade goods and services we procured in FY25.

**Table 1 – Main categories of goods and services procured in FY25**

| Supply chain segment                                    | Category   | Description   |
|---|--|---|
| Trade suppliers – merchandise for sale and distribution | Supplier sourced distributed and/or exclusive brands | Footwear and apparel merchandise that we source for direct retail and wholesale e.g. Skechers, Hoka, Ugg.   |
|   | Supplier sourced third party brands                  | Footwear and apparel merchandise that we source solely for direct retail e.g. Nike, Adidas.   |
|   | Accent Group-owned brands                            | Merchandise across footwear, apparel and accessories designed and directly produced for Accent Group-owned brands that we source from third party agents and factories for direct retail and wholesale e.g. Platypus-branded socks, Nude Lucy, Stylerunner the Label and brands under Glue stores such as Article One and Beyond Her. |
| Non-trade suppliers – goods and services not for resale | Logistics and warehousing                            | Freight and warehousing services used to transport purchased goods to our warehouses, store goods prior to sale and transport sold goods to customers.  |
|   | Leasing and store development                        | Leasing of retail stores from landlords as well as store design and fit out.  |
|   | IT services  | IT hardware and software used in retail stores and websites, and in the retail support services.  |
|   | Marketing  | Advertising and marketing services and products, including printing.  |
|   | Corporate services                                   | Professional services, corporate office operational services, employee recruitment, and banking.  |
|   | Store Operations                                     | Store operations such as electricity, cleaning, security and repairs and maintenance, and store consumables.  |

## 2. About Accent Group

Figure 4 – Accent Group supply chain spend in the 2025 reporting period



During FY25, Accent Group sourced over \$1 billion in goods and services from more than 2,100 suppliers. Trade suppliers accounted for 58% of this spend, with the top 20 suppliers making up 80% of total trade expenditure. Our supplier network includes both distributed and third-party brands as well as our owned branded merchandise. Although the value of Accent Group-owned brands remained steady in the reporting year, our focus continues to be on active oversight of suppliers where we hold the greatest influence.

### GOVERNANCE AND CONSULTATION

Accent Group owns and operates several entities across Australia and New Zealand, with a complete list of Accent Group Consolidated Entities as at 29 June 2025 provided in Appendix A. In addition to Accent Group Limited, the following entities also qualify as reporting entities under the Modern Slavery Act 2018 (Cth): Platypus Shoes (Australia) Pty Ltd, The Athlete’s Foot Australia Pty Ltd, Hype DC Pty Ltd, and Accent Lifestyle Pty Ltd.

All entities within Accent Group operate under a shared governance framework and central management system, ensuring a consistent approach to managing modern slavery risks across the Group. Representatives responsible for overseeing these risks act on behalf of both Accent Group Limited and its subsidiaries. Throughout the reporting period, Accent Group engaged with all owned and controlled entities to discuss the requirements of the Modern Slavery Act 2018 and the actions we plan to take to meet these obligations.

Oversight of modern slavery risk management is provided by the Audit and Risk Committee, which has been delegated responsibility by the Board of Directors to monitor the Group’s broader risk management framework. The Committee reports to the Board, which remains ultimately accountable for ensuring that modern slavery risks are appropriately managed. During the reporting year, the Board continued to support Accent Group’s efforts to strengthen our approach to responsible business practices and our commitment to addressing modern slavery.

Accent Group’s broader sustainability approach is guided by our ESG Framework, which focuses on three key pillars:

- **Our People Come First** – recognising that our success is built on the dedication and wellbeing of our team members.
- **Our Responsibilities** – maintaining integrity and acting ethically in all aspects of our business.
- **Our Environment** – caring for the planet by taking active steps to reduce our environmental impact.

## 2. About Accent Group

Figure 5 – Accent Group ESG Framework



Figure 6 – Modern Slavery governance at Accent Group



### 3. Risks of modern slavery in our operations and supply chain

#### COMMITMENT TO ETHICAL OPERATIONS

Accent Group is committed to conducting business responsibly and upholding high standards of ethics and integrity. We acknowledge that modern slavery risks may exist deeper within our supply chain, and we remain focused on identifying, managing, and, where necessary, remediating these risks through ongoing assessment and engagement.

Within our own operations, the risk of modern slavery is considered lower, though not entirely absent. We are committed to ensuring that all team members, customers, and community stakeholders are treated with fairness, respect, and dignity, and are not exposed to any form of exploitation.

During the reporting period, Accent Group’s operations were based in Australia and New Zealand. While we recognise the potential for operational risks, we consider these to be limited given the strong legal and regulatory frameworks in both regions. As such, our focus remains on addressing higher-risk areas within our extended supply chain, where our actions can have the greatest impact.



### 3. Risks of modern slavery in our operations and supply chain

#### RISKS IN OUR SUPPLY CHAIN

We recognise that risks of modern slavery continue to exist within our supply chain. The complexity, multi-tiered nature, and global reach of the apparel and footwear industry make it challenging to precisely identify where these risks may occur. As a relatively small player in the global market, our ability to influence third parties remains limited. However, we continue to focus on enhancing the quality and completeness of our supplier data, enabling a more comprehensive assessment of inherent risks and allowing us to target our due diligence activities more effectively.

Within the footwear and apparel sector, modern slavery risks can occur throughout the entire value chain from the harvesting and processing of raw materials to the final stages of product manufacturing. Common areas of concern include the potential use of forced labour in cotton and leather supply chains, and exploitative labour practices in production. In our retail operations, modern slavery risks may also arise during new store development (such as in the sourcing of construction materials) and operational services (including cleaning and security). These activities typically involve low-skilled, labour-intensive workforces, which may include more vulnerable workers and therefore represent areas of higher potential risk. We remain attentive to these areas as part of our ongoing monitoring and management processes.

We have greater visibility and leverage when sourcing products for Accent Group-owned brands, and this continues to be a key focus area where we can create the most meaningful impact. We also acknowledge that our responsibility extends to our distributed and exclusive brands, and we continue to work with these partners to ensure their sourcing practices align with Accent Group’s ethical and social compliance expectations.

Table 2 below outlines the inherent risks of modern slavery across our primary procurement categories, the level of inherent risk identified through our assessments, and how these categories have been prioritised for further due diligence.

**Table 2 – Indicative risk factors by supply chain segment**

| Supply chain segment                                    | Category   | Inherent risk rating | Identified risk factors   |
|---|--|----------------------|---|
| Trade suppliers – merchandise for sale and distribution | Supplier sourced distributed and/or exclusive brands<br><br><i>Representing approximately 26% of total spend and 1% of total suppliers by number</i> | High                 | Our trade procurement encompasses finished footwear, accessories, and apparel merchandise, all of which are industries at a heightened risk for various forms of modern slavery, including child labor, forced labor, and human trafficking. The labor-intensive manufacturing processes and low-skilled nature of the work increase the likelihood of excessive hours and deceptive recruitment practices.<br><br>The inherent risk in this category is particularly high due to a significant portion of sourcing from suppliers in regions like Vietnam and China, where labor laws are less strictly enforced. Given our exclusive distribution rights for brands in this sector, Accent Group is closely linked to these risks and has a greater opportunity to influence supplier performance. Additionally, this category accounts for a substantial portion of our overall procurement spend, concentrated among a limited number of suppliers.<br><br><b>Priority for action: High – continued due diligence to be actioned in the next 12 months.</b> |

### 3. Risks of modern slavery in our operations and supply chain

| Supply chain segment  | Category   | Inherent risk rating | Identified risk factors   |
|---|--|----------------------|---|
| Trade suppliers – merchandise for sale and distribution (continued) | Supplier sourced third party brands<br><i>Representing approximately 30% of total spend and 12% of total suppliers by number</i> | High                 | As noted above, inherent risks of modern slavery are likely present in the footwear and apparel manufacturing sector. Again, the higher inherent risk identified is due to the high-risk production locations of our suppliers in countries such as Vietnam, Brazil and China. Unlike our distributed brands, there is a less direct relationship to the risk. The vast majority of suppliers in this category are major International and Australian brands, generally with a good understanding of their supply chains and established due diligence and risk mitigation practices in place. This category represents a large proportion of our overall procurement spend, spread across a relatively large number of suppliers and is therefore considered a secondary priority.<br><br><b>Priority for action: Medium – continued due diligence to be actioned in the next 12 months.</b> |
|   | Accent Group-owned brands<br><i>Representing approximately 2% of total spend and 2% of total suppliers by number</i>             | High                 | As noted above, inherent risks of modern slavery are present in the footwear and apparel manufacturing sector. This category is rated high overall due to the volume of sourcing from high-risk locations, such as China. The nature of Accent Group’s relationships with suppliers of Accent Group-owned brands differs to those of other trade suppliers, as we generally purchase this merchandise directly from factories or from third party agents. Given that we have a closer relationship, we continue to prioritise our due diligence activities here.<br><br><b>Priority for action: High – due diligence activities remain focused here.</b>  |
| Non-trade suppliers – goods and services not for resale             | Logistics and warehousing<br><i>Representing approximately 10% of total spend and 2% of total suppliers by number</i>            | Low to Moderate      | Inherent risks of modern slavery are associated with transport, warehousing, and distribution activities. Although our suppliers are in Australia and New Zealand, these risks often stem from the use of labour hire services which have been linked to deceptive recruitment and forced labour of vulnerable populations, including migrant and low-skilled workers. This category represents a small proportion of spend and total suppliers. We will continue to engage with suppliers in this category (especially landlords and our warehousing partners) to assess any changes to our risk assessment.<br><br><b>Priority for action: Low – continue with current approach to supplier monitoring.</b>   |
|   | Leasing and store development<br><i>Representing approximately 21% of total spend and 13% of total suppliers by number</i>       | Moderate             | Inherent risks of modern slavery are associated with store fit outs, repairs and maintenance and the construction materials used in them. Although most of the suppliers are in Australia and New Zealand, risk factors include the frequent use of migrant or lower-skilled labour, and poor or dangerous working conditions. This category represents a large amount of total spend and total suppliers.<br><br><b>Priority for action: Medium – continued due diligence to be actioned in the next 12 months.</b>  |

### 3. Risks of modern slavery in our operations and supply chain

| Supply chain segment  | Category   | Inherent risk rating | Identified risk factors  |
|---|--|----------------------|--|
| Non-trade suppliers – goods and services not for resale (continued) | IT services<br><i>Representing approximately 3% of total spend and 4% of total suppliers by number</i>         | Low to Moderate      | Inherent risks are associated with IT equipment manufactured offshore, particularly forced labour. Limited inherent risks are identified in IT support services provided by Australian-based suppliers. This category represents a small proportion of spend and total suppliers. We will continue to refine our risk assessment of this category.<br><br><b>Priority for action: Low – continue with current approach to supplier monitoring.</b>   |
|   | Marketing<br><i>Representing approximately 4% of total spend and 25% of total suppliers by number</i>          | Low                  | Limited inherent risk factors identified. Accent Group source primarily Australian based services.<br><br><b>Priority for action: Low – continue with current approach to supplier monitoring.</b>   |
|   | Corporate services<br><i>Representing approximately 2% of total spend and 26% of total suppliers by number</i> | Moderate             | While Accent Group primarily sources services from Australian-based providers, certain Corporate Services functions including finance and customer service have, over recent years, been supported by providers located in Southeast Asia and South Africa. Accent Group recognises that sourcing services from these regions may present an increased risk of modern slavery due to varying labour practices and regulatory environments. The Group continues to undertake due diligence and engage with suppliers to ensure fair and ethical working conditions throughout its supply chain.<br><br><b>Priority for action: Medium – continued due diligence to be actioned in the next 12 months.</b> |
|   | Store operations<br><i>Representing approximately 2% of total spend and 15% of total suppliers by number</i>   | Moderate             | Inherent risks of modern slavery are associated with migrant and vulnerable workers in cleaning and security services. These include debt bondage, forced labour and human trafficking. Although total spend is relatively low, a large proportion of the suppliers here are often smaller businesses.<br><br><b>Priority for action: Medium – continued due diligence to be actioned in the next 12 months.</b>   |

# 4. Our approach to managing risks of modern slavery

## RISKS IN OUR OPERATIONS

Through an internal review of our operations, Accent Group has determined that the risk of modern slavery within our direct operations remains low. Our activities are based in Australia and New Zealand, where we operate in accordance with applicable industrial relations laws and employment regulations. As outlined in Section 4, the majority of our team members are employed under formal Awards, primarily the General Retail Industry Award, and supported by a robust policy framework that governs our corporate conduct and employment practices.



We acknowledge that approximately 65% of our workforce is employed on a casual basis, which may present a higher inherent risk. However, in both Australia and New Zealand, casual employees are protected under the same industrial relations frameworks as permanent team members. Accent Group remains committed to fostering sustainable employment practices, being an employer of choice, meeting customer expectations, and delivering long-term value to shareholders.

We also believe that the individuals working within our supply chain deserve to be treated with fairness and respect, work in safe environments, and have their human rights protected. To support this commitment, we expect all Accent Group team members to uphold the highest legal, moral, and ethical standards in their work, and we expect our suppliers to take proactive steps to minimise any adverse impacts their operations may have on people or the environment.

During the reporting period, Accent Group reviewed existing policies and engaged directly with key suppliers to reinforce expectations and accountability.

# 4. Our approach to managing risks of modern slavery

## CONDUCTING DEEPER DUE DILIGENCE OF SUPPLIERS

During the reporting period, Accent Group’s primary focus remained on strengthening supplier due diligence practices. We undertook a range of activities to engage with our trade suppliers and gain deeper insight into how they identify and manage modern slavery risks. These activities concentrated primarily on suppliers of Accent Group-owned brands, suppliers of our Store Fitouts and our exclusive distribution supplier arrangements.

### Suppliers of Accent Owned Brands

For Accent Group-owned brands there is a structured onboarding process in place for new suppliers and manufacturing facilities. This process includes a formal, staged approval procedure to assess the supplier’s capability and compliance before any business engagement. Once an assessment is satisfactorily completed, the relevant entity’s General Manager must approve the onboarding request.

Before onboarding, suppliers are required to:

- Sign and return the Accent Group Ethical Sourcing Policy; and
- Provide evidence of a valid, independent third-party social compliance audit conducted within the last 12 months.
- The Accent owned brands team member then conducts an internal assessment of the audit findings.

In addition, all suppliers receive our Manufacturing Agreement, which sets out our expectations for ethical conduct, working conditions, and compliance requirements. This agreement must be signed and returned before production commences.



Accent Group accepts a range of recognised social compliance audits that align with the SA8000 standard, which ensures suppliers maintain socially acceptable workplace practices. We continue to support our internal teams to interpret audit results effectively, identify potential risks, and develop Corrective Action Plans (CAP) where required through training and guidance from experienced professionals.

Suppliers are assigned a risk rating of High, Medium, or Low. Those assessed as High risk are required to implement a CAP and may be subject to further review to ensure compliance expectations are met. Where a supplier does not take appropriate steps to address identified issues, Accent Group reserves the right to terminate the relationship. Any such decision would be made with care and in alignment with the Accent Group Non-Compliance and Risk Management Framework to ensure a fair and responsible approach.

### Corporate Services

Accent Group has continued to engage with providers of skilled customer service and finance services located outside Australia. A key element of onboarding these suppliers involved conducting due diligence on their labor practices and workforce management. We reinforced our expectations by sharing Accent Group’s ethical sourcing policies and conducting site visits to observe operations firsthand. This ongoing process has increased awareness of our ethical trade standards and encouraged open, transparent dialogue about creating safe, fair, and respectful workplaces for all individuals working on behalf of Accent Group.

## 4. Our approach to managing risks of modern slavery

### CONTINUED FOCUS: INHERENT MODERN SLAVERY RISKS IN ACCENT OWNED BRANDS

During the reporting period, Accent Group-owned brands remained a key area of focus as the business continued to expand its direct-to-consumer and apparel capabilities. The majority of suppliers in this category continue to present inherently higher risks of modern slavery, primarily due to the countries of manufacture and the nature of the products produced (footwear and apparel).

Building on the foundations established in previous reporting years, we continued to use the processes established to identify, assess, and manage these risks. Our key activities during the year included:

- **Supplier Onboarding Process:** We maintained our structured onboarding process to assess and approve factories manufacturing for Accent Group-owned brands. This process enables us to identify factories that may present higher levels of risk than we are willing to accept and to redirect production where necessary.
- **Investment in Technology:** Accent Group continued to invest in the *Our Supply Chain (OSC)* platform, which enhances our ability to manage supplier and factory data, track audit results, and monitor corrective action plans. The system has significantly improved traceability and transparency across our supply chain, enabling more efficient collaboration with suppliers to address identified risks.
- **Supplier Engagement and Site Visits:** We increased our in-person engagement with suppliers and factories across key sourcing regions, including China. Visits were undertaken for brands such as Nude Lucy, The Athlete’s Foot, Stylerunner the Label and across the Accent Lifestyle division. These visits strengthened relationships, provided first-hand insight into working conditions, and supported continuous improvement across supplier facilities. We also extended these visits to include suppliers supporting our store design and corporate services, ensuring ethical sourcing principles are applied consistently across both product and non-product supply chains.

Figure 7 – Location of Factories used across Accent Owned Brands

### Location of the Factories Used Across Accent Group Owned Brands



Key outcomes for Accent-owned brands during the reporting year:

- **67 manufacturing suppliers** have been approved and integrated through Accent’s supplier onboarding program.
- These suppliers operate across **80 factories, with 90% located in China.**
- **73 factories** are classified as **Tier 1** (Cut, Make, Trim) and **all of these** have submitted a social compliance audit.
- **65% of factories** are classified as moderate risk, having three or more major findings but no critical findings in their audit reports.

## 4. Our approach to managing risks of modern slavery

### STORE DESIGN AND DEVELOPMENT

Over the past year, we have continued to follow the ethical sourcing practices of Accent Group-owned brands into our Store Development team, further strengthening our commitment to responsible sourcing across our operations. The team now consistently engages with our partners in China, reviewing factory audit documentation and conducting due diligence to ensure alignment with our ethical standards.

This ongoing integration reflects our progress in embedding ethical sourcing into broader areas of the business. By maintaining regular supplier engagement and upholding transparency in our sourcing practices, we continue to reinforce Accent Group's commitment to accountability and strong, values-based supplier relationships.

### SUPPLIERS OF DISTRIBUTED AND/OR EXCLUSIVE BRANDS

We recognise that our responsibility extends beyond our own operations to include the brands we distribute and those with whom we hold exclusive agreements. This remains an area requiring continued attention and focus. In previous years, our Brand Managers who oversee relationships with global brand partners have been asked to collect key documentation from these partners such as:

- Ethical Sourcing Policy or Statement
- Cotton Sourcing Policy or Statement on Cotton Sourcing
- Animal Welfare Policy
- Restrictive Substances List
- Supplier Code of Conduct
- Carbon Emissions statement
- Packaging Policy

Over the coming year, we will renew our focus and provide additional support to strengthen this aspect of our business.



# 4. Our approach to managing risks of modern slavery

## ONGOING INITIATIVE: OUR SUPPLY CHAIN (OSC) PORTAL

During the reporting period, Accent Group continued to use the *Our Supply Chain (OSC)* platform across our business. The system remains central to managing supplier, factory, and subcontractor information, supporting our efforts to strengthen traceability and transparency across our end-to-end supply chain.

A key capability of OSC is its ability to record and monitor social compliance information, including audit reports, corrective action plans (CAPs), certifications, environmental data, and chain of custody documentation. This functionality allows our teams to maintain a more complete and accurate picture of supplier performance and risk.

Throughout the year, our teams have continued to use the OSC platform to track audit outcomes and implement CAPs where required. This process ensures that findings identified through audits are reviewed, assigned actions, and followed up in a timely manner. The most common issues identified during this period related to working hours, machinery safety guards and safety signage. With this insight, we continued to work with our suppliers to drive improvements in these areas.

While our work in this area continues to evolve, OSC has become an established part of how we manage supplier relationships, assess compliance, and monitor progress toward improved social and ethical performance within our supply chain. For further information on the OSC platform visit [www.oscdata.com](http://www.oscdata.com).



- Supplier Information
- Audit Management
- Corrective Action Plans
- Follow Up Tasks
- Factory Information
- Supply Chain Reporting
- Supplier/Factory Relationships
- Collaboration
- Document Vault

## 4. Our approach to managing risks of modern slavery

### OUR POLICY FRAMEWORK

Our policies and procedures reflect Accent Group's values, operational practices, and the expectations we hold for our team members and suppliers. They form the foundation of our approach to ethical and responsible business conduct.

#### The Accent Group Ethical Sourcing Policy

At Accent Group, we value ethical sourcing and maintain our commitment to a responsible and transparent supply chain.

During the reporting period, we continued to distribute our Ethical Sourcing Policy to new suppliers and brand partners. Suppliers of Accent Group-owned brands are required to review, sign, and return the Policy, confirming their commitment to meeting our standards. Guided by international frameworks, the Policy outlines four key expectations of our suppliers:

- **Business Integrity and Ethics:** Suppliers must comply with all applicable laws and regulations and operate with honesty, integrity, and accountability.
- **Labour Standards and Human Rights:** Suppliers and factories must uphold workers' rights, ensure employment is freely chosen, and provide fair and lawful compensation. We strictly prohibit child labour, forced labour, discrimination, and any form of inhumane treatment.
- **Healthy and Safe Working Conditions:** All workplaces must maintain safe conditions, minimising occupational hazards through emergency preparedness, training, and protective measures.
- **Environmental Protection:** Suppliers and factories are expected to reduce their environmental impact, manage resources responsibly, and demonstrate continuous improvement over time.



You can view our [Ethical Sourcing Policy and Modern Slavery Statements](#) on our website.

#### Supporting Policies

Accent Group's policy framework collectively outlines the standards of behaviour expected of our team members, the working conditions to which they are entitled, and the mechanisms available for reporting concerns. These include:

- **Code of Conduct** – outlines our expectations for lawful and ethical behaviour, including fair treatment, non-discrimination, and ensuring a safe work environment.
- **Whistleblower Policy** – explains the protections provided to individuals who raise concerns about potential misconduct and offers clear guidance on how to report concerns safely and confidentially.
- **Diversity Policy** – reaffirms Accent Group's commitment to fostering a diverse and inclusive workplace that is free from unlawful discrimination, bullying, or harassment.

We also maintain Bullying and Harassment and Grievance Policies. As part of our Digital On-Boarding process, team members receive these policies, along with the Employee Code of Conduct and standard employment conditions. Accent Group has zero tolerance for harassment (including sexual harassment), bullying, discrimination, or any behaviour inconsistent with our Code of Conduct.

## 4. Our approach to managing risks of modern slavery

### Respecting and Protecting Our People

At Accent Group, we are committed to maintaining fair, safe, and respectful workplaces across all areas of our operations. Our policies and practices are designed to uphold the rights and wellbeing of our people, ensuring alignment with legal, ethical, and social responsibility standards.

### Adherence to Employment Awards

Accent Group continues to meet the standards and protections outlined in relevant Employment Awards. Our retail store, warehouse, and shared services team members are generally employed under the applicable Award for their role. The majority of our employees are covered by the *General Retail Industry Award*, with smaller groups covered by the *Cleaning Services Award*, *Storage Services and Wholesale Award*, and *Clerks Private Sector Award*. These frameworks underpin our approach to fair pay, working conditions, and employee protections.

### Training and Development

Investing in the growth and safety of our team remains central to Accent Group's culture and long-term success. Throughout FY25, we focused on embedding our learning programs to strengthen understanding of workplace safety, compliance, and ethical behaviour across all areas of the business.

All team members are required to complete core digital training modules on **Workplace Safety**, **Customer Aggression**, and **Bullying and Sexual Harassment**, ensuring a consistent foundation of awareness and accountability. New employees also undertake the foundation **Safety training program**, which builds capability in key areas such as manual handling, stress management, and incident reporting.

### Respect at Work

In FY24, we introduced our *Respect at Work* training module in line with the *Anti-Discrimination and Human Rights Legislation Amendment (Respect at Work) Act 2022 (Cth)*. This training reinforces our positive duty to prevent workplace misconduct and foster a respectful, inclusive culture. Throughout FY25, we extended this training to Area Managers and developed a supporting *Respect at Work Policy* to further strengthen our approach.

### Sexual Harassment Prevention and Response

We also launched a national *Sexual Harassment Prevention and Response Plan* providing clear guidance, resources, and pathways for support. This initiative reflects our ongoing commitment to ensuring that every team member feels safe, respected, and empowered to speak up. Looking ahead, we will roll out an online *Respect at Work* learning plan for retail team members in FY26, embedding these values further across our business.

### Fair Work Governance

Accent Group maintains robust internal processes to ensure compliance with the Fair Work Act and associated Awards. During the reporting period, 2 employee claims were raised through the Fair Work Commission. Both matters were reviewed in line with our policies and were resolved without findings of modern slavery or breaches of ethical employment standards.



## 5. Assessing the effectiveness of our actions

During FY25, Accent Group maintained its existing processes for assessing the effectiveness of actions taken to manage modern slavery risks. While our approach remains consistent with the previous year, we recognise that measuring effectiveness is an ongoing process that requires continued attention and refinement over time.

To assess our approach during the reporting period, we:

- **Continued use of the OSC (Our Supply Chain) platform:** The platform remains our central tool for managing supplier audit data and monitoring corrective action plans, helping us maintain oversight of supplier performance.
- **Maintained supplier engagement:** Our central Ethical Sourcing inbox continues to provide a clear communication channel for suppliers to raise questions or concerns. In addition to this, we increased the frequency of in-person supplier and factory visits across key sourcing regions to strengthen relationships and gain first-hand insight into working conditions.
- **Ensured governance oversight:** Our modern slavery activities and due diligence updates have been presented to the Audit and Risk Committee and Accent Board ensuring continued oversight at a governance level.

No grievances or complaints relating to potential modern slavery incidents were received during the reporting period through any of our escalation channels, including the Whistleblower Hotline, Ethical Sourcing inbox, or supplier audit reviews. We will continue to monitor these processes and maintain oversight of our approach to managing modern slavery risks across our operations and supply chain.



## 6. Future actions

Accent Group continues to take a continuous improvement approach to managing modern slavery risks. This approach remains aligned with the Modern Slavery Act and our ESG Framework commitments to fostering responsible and sustainable business practices. We recognise that addressing modern slavery is an ongoing and complex challenge, and we remain committed to refining our processes over time and seeking opportunities for collaboration across our industry.

While our approach has remained consistent during FY25, we continue to build on the foundations established in previous years and acknowledge that there is still more to do.

**Table 3 – Progress against commitments in FY25**

| FY23 Commitment  | Our Progress in FY25  | Our FY26-27 Commitment  |
|--|---|---|
| <i>Formally setting expectations with our suppliers</i>                                      | We distributed the Accent Group Ethical Sourcing Policy (available in English and Chinese) and prioritised suppliers of Accent Group-owned brands.  | We will continue to distribute the Accent Group Ethical Sourcing Policy to suppliers, prioritising those of Accent Group-owned brands. Additionally, we will review the policy to assess whether any changes are necessary.               |
| <i>Undertaking a deep dive assessment of higher risk supply chain categories</i>             | We have utilized the OSC system to refine our Supplier Register across Tier 1 and, where possible, Tier 2 suppliers.  | Our focus will be to leverage the audit data to enhance our risk assessments and develop corrective action plans in collaboration with our suppliers.<br><br>We will continue to train and support our team members in this area.         |
| <i>Implementing targeted due diligence activities in higher risk supply chain categories</i> | We have conducted a workshop training session for our team on how to assess audits, determine risk and develop corrective action plans with suppliers.  | We will continue to collaborate closely with suppliers to implement and track these corrective action plans.  |
| <i>Gaining a deeper understanding of the activities of brand partners</i>                    | We have had minor collaborative discussions with on modern slavery with our exclusive and non-exclusive brand partners. We will be placing greater emphasis on this issue in FY26-27.                             | We will provide support for key team members across our Distribution Brands to ensure they are equipped to effectively engage in discussions with suppliers across Accent Group.  |
| <i>Delivering training for our people</i>  | During the calendar year, we hosted a Modern Slavery workshop for team members managing merchandise across Accent owned brands. We focused on identifying issues and how to work through corrective action plans. | Modern Slavery workshops will be extended to the Executive team.<br><br>We will also develop a Modern Slavery and Ethical Sourcing training module and make it available to team members via the Accent Group Learning Management System. |

## 6. Future actions

| FY23 Commitment  | Our Progress in FY25   | Our FY26-27 Commitment   |
|--|--|--|
| <i>Developing our grievance mechanisms and approach to remediation</i>   | Upon reviewing our grievance mechanism, we identified the need to recommunicate to suppliers to ensure its effectiveness.  | We will reset our grievance mechanisms with suppliers.   |
| <i>Adjusting our due diligence process to formally consider modern slavery before entering into any significant supply contracts</i> | We shared our Modern Slavery Statement and Ethical Sourcing Policy with suppliers when we entered our expended our distribution agreements. This also include suppliers or our Corporate services. | We will continue to integrate the formal assessment of modern slavery into our due diligence process, ensuring that potential risks are identified before entering into new distribution agreements or significant supply contracts. |



## 7. Appendix A – list of Accent Group Consolidated Entities

The list of Accent Group Consolidated Entities for the year for the year ended 29 June 2025.

| <b>Name</b>                          | <b>Principal place of business/<br/>Country of Incorporation</b> | <b>% of share<br/>capital held</b> |
|--------------------------------------|--|------------------------------------|
| Accent Group Limited                 | Australia  | N/A                                |
| The Athlete's Foot Australia Pty Ltd | Australia  | 100%                               |
| RCG Brands Pty Ltd                   | Australia  | 100%                               |
| Accent Ozsale Pty Ltd                | Australia  | 100%                               |
| Accent Brands Pty Ltd                | Australia  | 100%                               |
| Platypus Shoes (Australia) Pty Ltd   | Australia  | 100%                               |
| 42K Pty Ltd                          | Australia  | 100%                               |
| Accent Store Development Pty Ltd     | Australia  | 100%                               |
| RCG Accent Group Holdings Pty Ltd    | Australia  | 100%                               |
| Hype DC Pty Ltd                      | Australia  | 100%                               |
| Subtype Pty Ltd                      | Australia  | 100%                               |
| Sports Direct Pty Ltd                | Australia  | 100%                               |
| Accent Lifestyle Pty Ltd             | Australia  | 100%                               |
| Accent Active Pty Ltd                | Australia  | 100%                               |
| Accent Group Ltd                     | New Zealand  | 100%                               |
| Subtype Limited                      | New Zealand  | 100%                               |
| Accent Active (NZ) Limited           | New Zealand  | 100%                               |
| Accent Lifestyle (NZ) Limited        | New Zealand  | 100%                               |
| Platypus Shoes Ltd                   | New Zealand  | 100%                               |
| Accent Footwear Ltd                  | New Zealand  | 100%                               |
| Hype DC Ltd                          | New Zealand  | 100%                               |
| TAF New Zealand Ltd                  | New Zealand  | 100%                               |

## 8. Appendix B – Mandatory Reporting Criteria

The below table identifies the location of material aligned to the mandatory reporting criteria in the Act within this Statement:

| MRC# | Mandatory Reporting Criterion   | Section   | Page Number        |
|------|---|---|--------------------|
| MRC1 | Identify the reporting entity   | Introduction  | Inside Front Cover |
| MRC2 | <i>Describe the structure, operations and supply chain of the reporting entity.</i>   | About Accent Group  | 2                  |
| MRC3 | <i>Describe the risks of modern slavery across the operations and supply chain of the reporting entity.</i>                                     | Risks of modern slavery in our operations and supply chains | 7                  |
| MRC4 | <i>Describe the actions taken by the reporting entity to assess and address these risks, including due diligence and remediation processes.</i> | Our approach to managing risks of modern slavery            | 11                 |
| MRC5 | <i>Describe how the reporting entity assesses the effectiveness of its actions.</i>   | Assessing the effectiveness of our actions                  | 18                 |
| MRC6 | <i>Describe the process of consultation with any entities that the reporting entity owns or controls.</i>                                       | About Accent Group: Governance and Consultation             | 5                  |
| MRC7 | <i>Provide any other information that the reporting entity considers relevant.</i>  | Not Applicable  |                    |



# **Accent** **Group**

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