



General Pants Co.

MODERN SLAVERY 2025

ACKNOWLEDGEMENT OF COUNTRY //

In the spirit of reconciliation, General Pants acknowledges the Traditional Custodians of this country throughout Australia and their connections to land, sea and community. We pay our respect to their Elders past and present and emerging.

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A NOTE FROM THE CEO //

At General Pants Co. we are helping to redefine what responsible retail looks like for the next generation. We're committed to building a future-focused business that champions sustainability, ethical practices, and positive impact across everything we do.

Our approach is grounded in strong governance, transparent partnerships, and continuous improvement, we work closely with our suppliers and partners to raise standards, strengthen accountability, and create lasting progress together.

Ethical sourcing is a critical role in how we operate, helping us increase visibility, traceability, and trust across every stage of our sourcing journey.

As a strong voice in youth fashion, we recognise the influence we have to inspire change, not only within our own business, but across the wider industry. We're committed to leading with purpose, challenging the status quo, and helping shape a more sustainable future for the next generation.

Scott Evans

Scott Evans
CEO

General Pants Co.





INTRODUCTION //

STATEMENT

General Pants Co. is part of the Alquemie Group Holdings Pty Ltd (the “Group”) (ABN 55 637 401 104) Alquemie Group is a retail and consumer brands investment and growth platform partnering with compelling brands across Australia and New Zealand. Registered at Level 1 / 409 George Street, Waterloo.

This statement has been made in accordance with the Modern Slavery Act 2018 (Cth) (“Modern Slavery Act” or the “Act”). This is the Group’s third statement under the Modern Slavery Act, and the sections that follow reflect the criteria required under the Act. This statement is made on behalf of the General Pants brand within the Group.

The statement has been reviewed and approved by the Board of Alquemie Group Holdings Pty Ltd (the “Board”).

Unless otherwise indicated, all information below is for the first reporting period of 1 January 2025 to 31 December 2025

INTENT

We are committed to conducting business with the highest standards of ethics when dealing with our employees, clients, customers, partners and suppliers.

Our Statement is an account of how we deliver on that commitment. We fully support the United Nations Guiding Principles on Business and Human Rights. We do not tolerate modern slavery within our business operations or supply chain.

General Pants Co. is committed to identifying and preventing any potential modern slavery risks within our operation and supply chains.

ABOUT GENERAL PANTS Co.



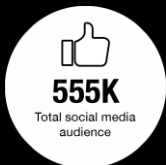
ABOUT GENERAL PANTS //

General Pants Co. is one of Australia's largest and most respected youth fashion retailers, with stores across Australia and New Zealand.

Starting from humble beginnings back in 1972 as a speciality denim store on Sydney's George Street, we are LED BY NONE, never defined, never boxed in. Delving into style, music and art, our team of culturally connected designers pioneer the latest trends and conversations. We like to mix things up; encouraging our community to bring together different genres, styles, and ideas.

Our omni-channel offering sees 12.5 million customers visit our stores yearly, and we have 10 million website sessions per year.

We own of a stable of 13 market leading brands and showcase these with both additional local and international cutting-edge brands.



<https://www.generalpants.com/au>

General Pants Co.





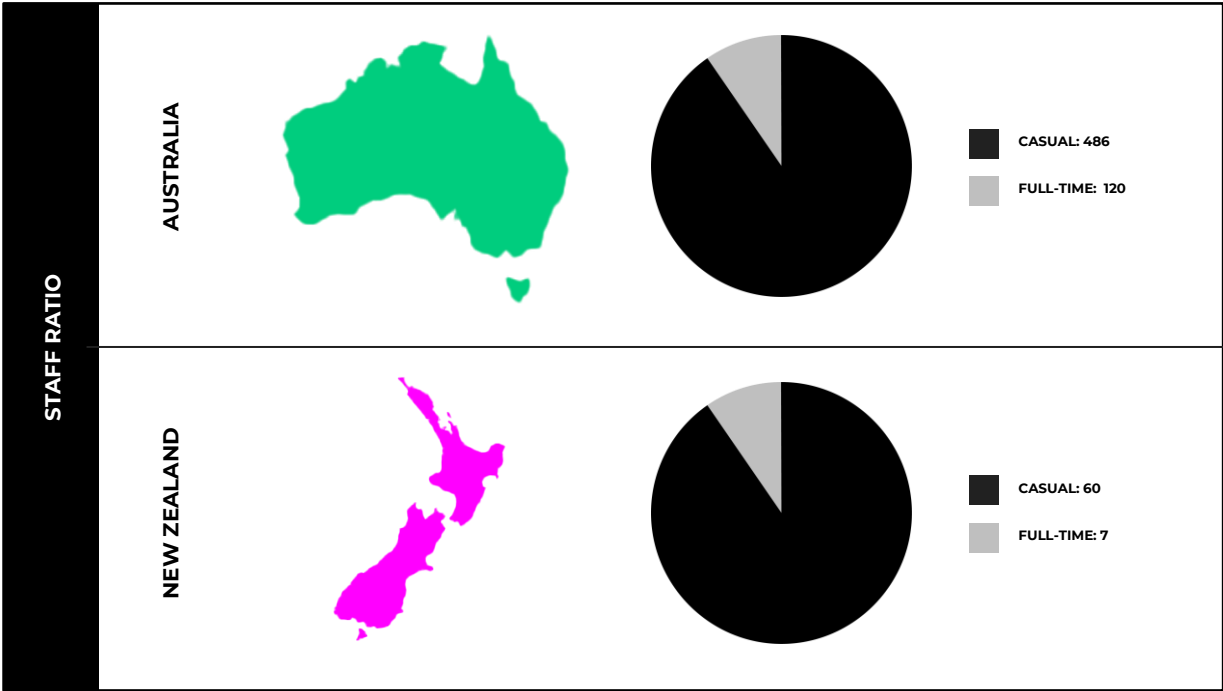
General Pants Co.

OPERATIONS AND SUPPLY CHAIN

General Pants Co. is one of Australia's largest and most respected youth fashion retailers of streetwear, casualwear and accessories.

Our operations include retail, marketing, and distribution of, apparel, footwear, accessories, and gifts through both brick-and-mortar stores and e-commerce.

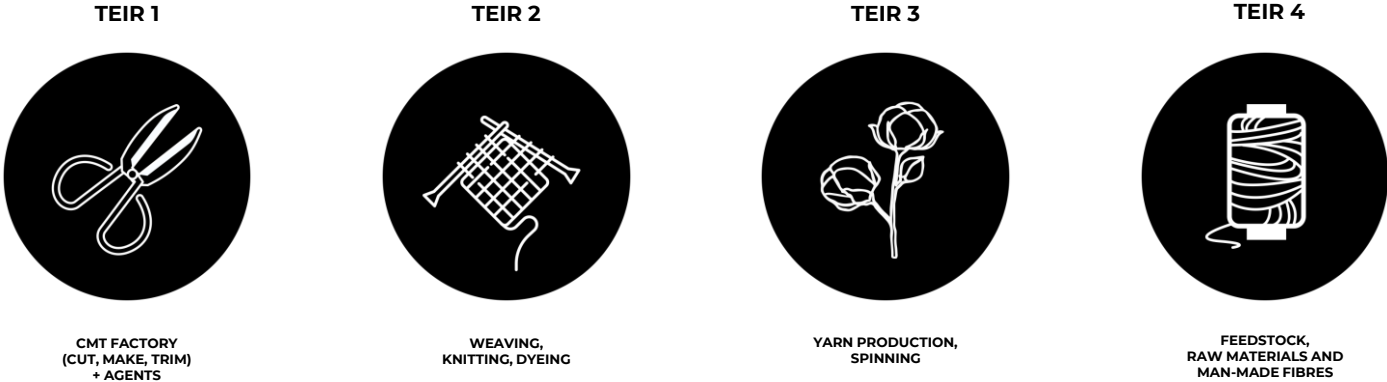
Across our 40 General Pants brick and mortar retail stores throughout Australia and New Zealand we have 673 employees, of which approx. 90% are based in Australia & 10% in New Zealand. This includes team members that work full time, part time and on a casual basis



OUR SUPPLY CHAIN FOR GENERAL PANTS //

We work with more than 60 partners across all areas of our business operations. Our international apparel and accessories supply chain includes over 25 suppliers. In this Statement, the term “Suppliers” refers broadly to all providers of goods and services, including any factory, subcontractor, agent, or affiliate involved in manufacturing or finishing products for retail within General Pants Co, as well as those from whom General Pants Co. sources goods and services for its own operational needs.

Our key sourced product categories include apparel, accessories, and footwear. General Pants Co. has 13 in-house apparel brands, sourced through more than 25 international manufacturers that supply our apparel and accessories. Our apparel and accessories supply base spans Tiers 1 to 3 of the supply chain. Some suppliers operate solely at Tier 1, while others manage additional stages of production, including yarn spinning and fabric manufacturing, encompassing Tiers 2 and 3.



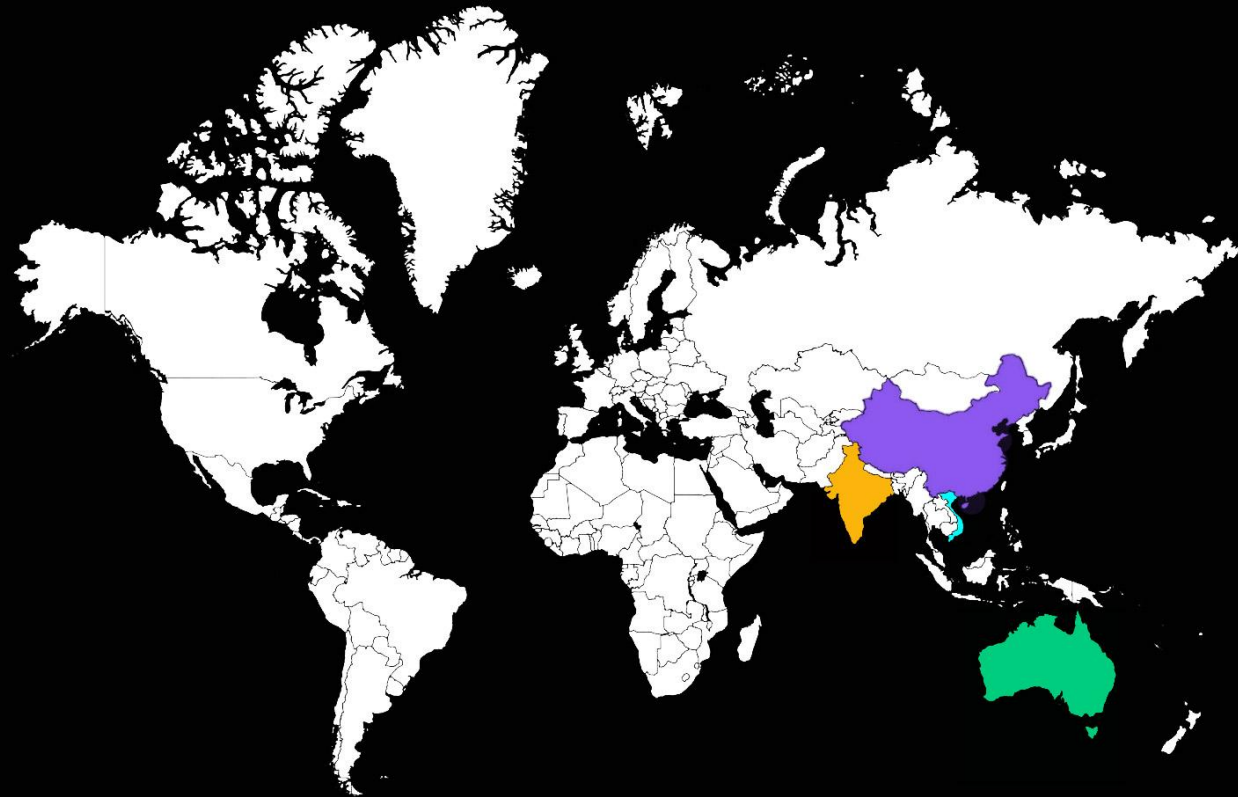
OUR SUPPLY CHAIN //

General Pants Co. are currently expanding the supply base into Vietnam and India to further increase our sourcing capacity, speed and quality.

This expansion will further support our business sustainability goal in line with the five UN sustainability pillars, economic, social, environmental, cultural and security aspects

In addition to our 13 owned brands, General Pants Co. also retails market leading third-party brands within its stores and digital platform. Brands such as Birkenstock, Levi, Havaiana & Ray Ban.

All third-party brands have their own sourcing due diligence processes in place and need to comply with General Pants Co. supplier agreement and policies.



 AUSTRALIA

 INDIA

 CHINA

 VIETNAM

SUBTITLED

A R V U S T

SPENCER PROJECT

alice in the eve.

⬆ *blacknoise/whiterain*

love
NOTES

General Pants Co.
B A S I C S

STUDIO

NEON HART

Rue De Lune

STANDARD

Abrand Jeans



insight 



ROLLA'S TM



NEUW

Wrangler TM

crocs TM



BIRKENSTOCK [®]

Ray-Ban

SUPPLY CHAIN // VERTICAL BRANDS

General Pants Co. vertical brands and products are exclusively designed and developed in house in Australia. These designs are then produced by factories that specialise in the manufacturing of apparel and accessories. Currently our factories are based in China & Australia, with further expansion to Vietnam and India in progress

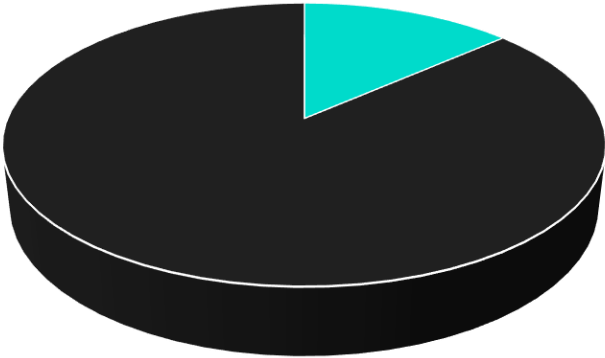
SUPPLY CHAIN // THIRD-PARTY BRANDS

Our portfolio of third-party brands is managed by our buying team who liaise with relevant parties withing their organisations.

SUPPLY CHAIN // NON-COMMERCIAL GOODS AND OPERATIONS

At General Pants Co. we categorise our non-commercial goods suppliers as those that provide, packaging, logistics, marketing and cleaning. We partnered with over 110 non-commercial goods partners during the reporting period.

GENERAL PANTS RETAIL



■ VERTICAL BRANDS ■ THIRD PARTY BRANDS

General Pants Co. respects and works closely with its supply chain partners to build long-term relationships and collaboratively eliminate modern slavery.

Our Supplier Code of Conduct (SCoC) sets out the expectations for direct suppliers of our in-house brands in relation to labour standards and human rights. It outlines the policies, processes, and personnel required to ensure these standards are met. The SCoC was developed with reference to the Ethical Trading Initiative (ETI) Base Code, which is founded on the conventions of the International Labour Organization. Compliance with the SCoC is a mandatory condition of doing business with General Pants Co.

A copy of the SCoC must be prominently displayed in the local language at each workplace and factory, and workers must be informed of its provisions both verbally and in writing.

Suppliers are required to comply with all relevant local and national laws and regulations, including applicable immigration and labour laws relating to foreign and migrant workers. Under the SCoC, we reserve the right to request details of any workers employed by suppliers, including subcontractors, such as their names and position descriptions.

The SCoC requires all suppliers to take the necessary steps to eliminate worker exploitation, deceptive practices, child labour, and forced labour within their operations and throughout the operations of their supply chain partners. Our suppliers do not source cotton from Turkmenistan, Uzbekistan, or Xinjiang due to the elevated risk of modern slavery associated with these regions.





IDENTIFYING MODERN SLAVERY RISKS

GENERAL PANTS CO. DOMESTIC AUSTRALIAN AND NZ EMPLOYEES

- **CODE OF CONDUCT**
- **GRIEVANCE POLICY**
- **WHISTLE BLOWER POLICY**

Our Code of Conduct outlines requirements for ethical behaviour and safe working conditions and applies to any place where work is carried out on behalf of the General Pants Co.

New employees are provided with definitions of key concepts and our expectations regarding victimization, harassment including sexual harassment, and non-discrimination. All employees are required to review and acknowledge our Code of Conduct, Grievance Policy and Whistleblower Policy (see Grievance mechanism below).

Operating in line with the Code of Conduct ensures compliance with Australian and New Zealand's workplace legislative framework including employment, human rights and anti-discrimination legislation, such as, but not limited to; Australian state and federal human rights and anti-discrimination legislation, the Fair Work Act 2009 Australia, the Employee Relations Act 2000, and Amendment Acts, Human Rights Act 1993 and Harassment Act 1997 New Zealand and New Zealand and Australia's Work, Health & Safety laws.



Certain groups are at higher risk of modern slavery, including women, migrant workers, contract and agency workers, marginalized groups and seasonal or temporary workers. We look for the presence of these groups of workers in our operations and supply chain to incorporate these risks into our due diligence processes.

**DOMESTIC
RISK**

- Our operations primarily involve retail and e-commerce in Australia and New Zealand. The nature of our business and the locations of our operations have lower intrinsic risks of modern slavery. General Pants employees are employed directly and are under contracts governed by Australian and New Zealand employment laws. Risks of forced labour are further reduced through the onboarding process. All new hires are required to provide official identification including proof of age, mitigating the risk of employing underage staff, and taxpayer identification information which ensures employees are legally allowed to work. Training is provided for all our retail staff including seasonal staff.
-

**INTERNATIONAL
SUPPLY CHAIN
RISK**

We recognise the potential risk of forced labour and child labour within our global apparel supply chain. Our primary sourcing location is currently China, and we have expanded into India and Vietnam to strengthen our supply chain capabilities. These countries have been identified as carrying heightened modern slavery risks. To help mitigate these risks within our supply chain, we require our factories to maintain current ethical audit documentation and to complete an annual modern slavery self-assessment questionnaire.

INDUSTRY SECTOR SPECIFIC RISK

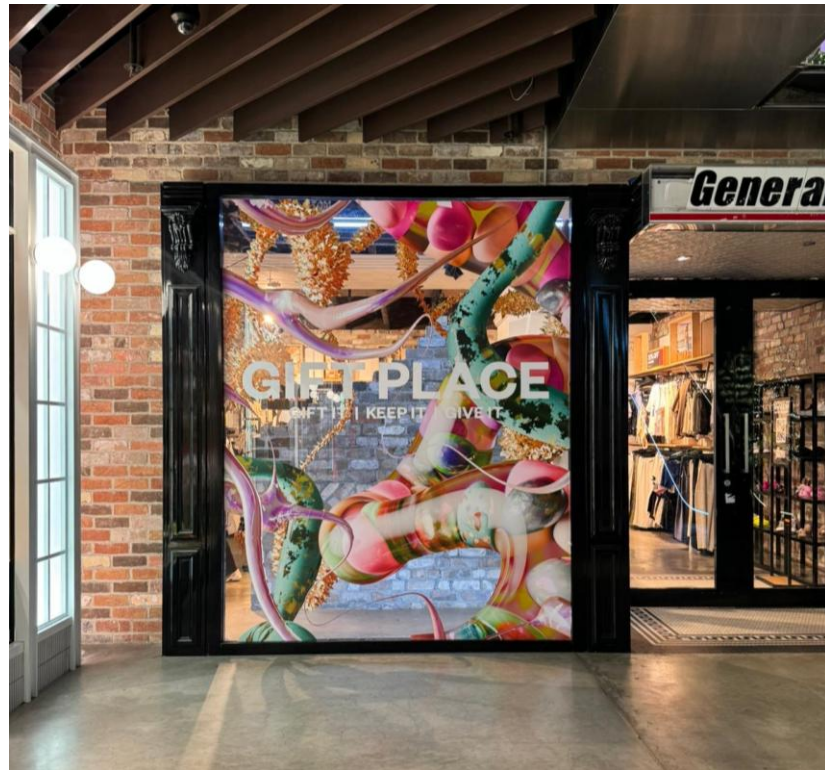
- The fashion Industry sector is at risk of the following areas of Modern slavery Human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and child labour.

PRODUCT AND SERVICE SPECIFIC RISK

- A high percentage of our garments are made from cotton, so therefore we have a high level of risk that the factories could be supplying cotton sourced from Turkmenistan, Uzbek and Xinjiang cotton. These countries have been identified as having high levels of risk of Modern slavery.

THIRD PARTY SUPPLIER SPECIFIC RISK

- Our third-party brands face the same modern slavery risks that General Pants Co. face.
- The third-party Suppliers sign a Supplier Agreement which states that they comply with all the modern slavery codes of conduct and risk management.



ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS



SUPPLY
CHAIN
GOVERNANCE

General Pants Co. vertical suppliers' factories agree to following polices stated in our supplier manual and complete a modern slavery self- assessment questionnaire (SAQ)

- SUPPLIER CODE OF CONDUCT
- SUPPLIER ENGAGEMENT: QIMA MEMBERSHIP
- TRACING SUPPLIERS AND AUDITING POLICY
- ANTI-BRIBERY AND CORRUPTION POLICY
- TEMPORARY WORKERS POLICY
- LABOUR BROKERS AND RECRUITERS' POLICY
- GENDER EQUALITY POLICY
- YOUNG WORKER AND CHILD LABOUR POLICY
- GRIEVANCE POLICY
- RESTRICTED SUBSTANCES POLICY
- ANIMAL HUSBANDRY POLICY
- RESPONSIBLE SOURCING POLICY
- POLICY ON COTTON FROM UZBEKISTAN, TURKMENISTAN & XINGJING

THIRD PARTY SUPPLIER
GOVERNANCE

General Pants Co. third party suppliers agree to following polices stated in the supplier manual and complete a modern slavery self- assessment questionnaire (SAQ)

- SUPPLIER CODE OF CONDUCT
- SUPPLIER ENGAGEMENT: QIMA MEMBERSHIP
- TRACING SUPPLIERS AND AUDITING POLICY
- ANTI-BRIBERY AND CORRUPTION POLICY
- TEMPORARY WORKERS POLICY
- LABOUR BROKERS AND RECRUITERS' POLICY
- GENDER EQUALITY POLICY
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- RESPONSIBLE SOURCING POLICY
- POLICY ON COTTON FROM UZBEKISTAN, TURKMENISTAN & XINGJING

SUPPLIER REVIEW

- General Pants Co. constantly reviews the supply base and if engaging any new suppliers ensures they sign the supplier Manual and follow the policies and submit up-to-date Ethical Auditing Documentation.
 - Current factories for vertical operations cover Tier 1 factories, along with Tier 2 and tier 3 factories that knit and spin their own fabric. This allows clearer traceability and ownership of the modern slavery risks
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MODERN SLAVERY SURVEY

- Our supplier modern slavery self-assessment survey is completed each year and reviewed.
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ETHICAL AUDITING DOCUMENTATION REVIEW

- General Pants Co. has engaged QIMA to manage our factories Ethical Auditing Documentation and factory inspections . QIMA is an independent leading global compliance company.



We recognise the potential risk of forced labour and child labour within our global apparel supply chain. Our primary sourcing location is currently China, and we have expanded into India and Vietnam to strengthen our supply chain capabilities. These countries have been identified as carrying heightened modern slavery risks. To help mitigate these risks within our supply chain, we require our factories to maintain current ethical audit documentation and to complete an annual modern slavery self-assessment questionnaire.

When onboarding new suppliers, we request access to their ethical audit documentation.

We accept globally recognised ethical audit documentation, including BSCI, SEDEX, and QIMA assessments.

Existing suppliers are required to keep their documentation current in order to continue supplying General Pants Co.

All suppliers must complete a self-assessment form and a mutual recognition QIMA audit, which requires disclosure of any existing Ethical Trading Initiative (ETI) assessments and information on how the supplier is managing indicators of forced labour.

Based on the information provided, any disclosure gaps identified or issues raised in the supplier's responses may result in requests for clarification or further information before General Pants Co. enters into a business relationship. Examples of matters that may warrant further investigation include incomplete or inadequate responses on topics such as migrant workers or forced labour.

We continually seek opportunities to strengthen our supply chain due diligence processes, and development in this area has been included as part of General Pants Co.'s five-year plan

An **Ethical Trading Initiative (ETI)** audit assesses a company's processes, suppliers, and facilities against the nine principles of the ETI Base Code, as well as ensuring compliance with relevant national and international legislation. Meeting ETI standards instils confidence that a supplier operates in a fair and ethical manner.



BUSINESS ETHICS AND COMPLIANCE



EVERY EMPLOYEE SHOULD BE TREATED WITH RESPECT

CODE OF CONDUCT



TRAINING



GRIEF MECHANISM & REMEDIATION



WHISTLE BLOWER POLICY



POLICIES AND TRAINING OF GENERAL PANTS CO STAFF

Our Code of Conduct outlines requirements for ethical behaviour and safe working conditions and applies to any place where work is carried out on behalf of the General Pants Co.

New employees are provided with definitions of key concepts and our expectations regarding victimization, harassment including sexual harassment, and non-discrimination. All employees are required to review and acknowledge our Code of Conduct, Grievance Policy and Whistleblower Policy (see Grievance mechanism below).

Operating in line with the Code of Conduct ensures compliance with Australian and New Zealand's workplace legislative framework including employment, human rights and anti-discrimination legislation, such as, but not limited to; Australian state and federal human rights and anti-discrimination legislation, the Fair Work Act 2009 Australia, the Employee Relations Act 2000, and Amendment Acts, Human Rights Act 1993 and Harassment Act 1997 New Zealand and New Zealand and Australia's Work, Health & Safety laws.

GRIEVANCE MECHANISM AND REMEDIATION

Establishing effective grievance mechanisms can provide critical information on human rights and modern slavery risks that can feed into our due diligence processes.

The General Pants Co. Whistleblower Policy currently relates to general business activities and tax affairs and applies to all General Pants employees, contractors, and sub-contractors.

It is the responsibility of the Board to ensure that all employees receive training on the policy during induction, and to ensure eligible disclosures are investigated. Currently, our Whistleblower Policy is made available to those within the Group.

SPEAK UP

Individuals can report malpractice to the Group's officers or human resources, to any supervisor or direct report, or to an available auditor. Individuals can also email (whistleblower@alquemiegroupp.com) to make a report confidentially.

General Pants Co. offers multiple Health and Well-being programs and incentives which creates an environment that help the staff feel supported please see some examples of the programs listed below.

- **EMPLOYEE ASSISTANCE PROGRAM**
- **FITNESS & WELLNESS PROGRAM**
- **SAFETY 360 SAFETY PROGRAM**
- **TEAM MEMBER INCENTIVES AND BENEFITS**



As we continue to grow, our operations and supply chain will expand & as such we will evolve & continually review our processes to ensure we are able to identify and address potential modern slavery risks .

- Regulate modern slavery self-assessment questionnaires (SAS) with all suppliers
- Plan to have greater transparency with our supply base on General Pants Co. Website
- Continue to source sustainable fabrications for our brands such as BCI and Oeko-tex approved products and recycled fabrications.
- Continual education and training of General Pants employees and supply chain
- Identifying and preventing modern slavery risk.



OUR CONSULTATION WITH GROUP ENTITIES

The Board has overall accountability for overseeing all areas of business risk, including modern slavery, at the Group level. Identified risks are socialized through direct communications with the General Managers, the CEO, and at Board meetings.

These risks are communicated through our annual Modern Slavery Statement which is circulated with management at each of our subsidiaries to provide input and verify the contents before final approval by the Board.

REGULATORY DISCLOSURE MATRIX

- This statement was prepared to meet our regulatory disclosure requirements for the Australian Modern Slavery Act 2018 (Cth). This table references where the mandatory criteria are disclosed.

MANDATORY CRITERIA	DISCLOSURE REFERENCE
Criterion 1: Identify the reporting entity	Page 4-7
Criterion 2: Describe the structure, operations, and supply chains of the reporting entity	Page 8-15
Criterion 3: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Page 16-19
Criterion 4: 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	Page 20-22 Pages 24-28
Criterion 5: Describe how the reporting entity assesses the effectiveness of such actions	Page 23
Criterion 6: Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Page 29-30

A man and a woman are sitting back-to-back on a blue surface against a brown wall. The woman, on the left, has curly hair, wears glasses, a striped long-sleeved shirt, and light blue jeans. The man, on the right, wears a black cap, a black long-sleeved shirt with white stripes on the sleeves, and light blue jeans. The text 'THANK YOU' is written in large white letters on the left side of the image.

THANK YOU