



**RODD & GUNN**<sup>®</sup>  
NEW ZEALAND

# MODERN SLAVERY STATEMENT

FY24

*FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS  
ACT S.C. 2023, C 9 ("THE ACT").*

*AUSTRALIAN MODERN SLAVERY ACT 2018, (CTH)*

*UNITED KINGDOM MODERN SLAVERY ACT 2015*

*THE CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT (STEINBERG, 2010) (THE "ACT")*



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## INTRODUCTION

This statement outlines the actions Rodd & Gunn are committed to taking to help identify, prevent, mitigate, and remediate modern slavery in our supply chain and business operations. Throughout this statement the term “modern slavery” has been used as an umbrella term that is referring to all forms of modern slavery such as forced labour, child labour, human trafficking, and bonded labour.

This statement has been prepared in accordance with requirements set out in the guidelines of the following legislations:

- *Australian Modern Slavery Act 2018, (Cth)*
- *Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act S.C. 2023, c9 (“the Act”)*
- *The California Transparency in Supply Chains Act (Steinberg, 2010) (the “Act”)*
- *United Kingdom Modern Slavery Act 2015*

In accordance with the requirements of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act S.C. 2023, c9 this statement is also available in French on our website (<https://www.rodandgunn.com/brand-story/sustainability>).

Rodd & Gunn are not required to submit a mandatory statement, in accordance with the Australian Modern Slavery Act 2018, (Cth) however we are submitting this statement voluntarily, to demonstrate our continued commitment to transparency and the eradication of modern slavery in all our business practices.

This is a joint statement prepared on behalf of and approved by the Board of Directors of Rodd & Gunn New Zealand Limited and applies to Rodd & Gunn New Zealand Limited, and all its subsidiaries as listed, during the Financial Year, ending 30 June 2024:

- Rodd & Gunn Australia Pty Ltd
- Rodd & Gunn USA Inc
- Ross & Gunn Canada Limited
- Rodd & Gunn UK Limited
- Rodd & Gunn France
- Rodd & Gunn Netherlands BV
- Rodd & Gunn Italy S.R.L
- Rodd & Gunn PTE LTD Singapore
- Rep. Office of Rodd & Gunn New Zealand Limited Ho Chi Minh City

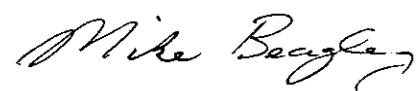
The Rodd & Gunn New Zealand Limited principal office is located at:  
Rodd & Gunn New Zealand Limited  
Level M, 17 Albert Street  
Auckland 1010

We acknowledge our responsibilities in relation to tackling all forms of modern slavery. We recognise that our business practices may have caused, contributed to, or been linked to modern slavery in the supply chain or through our business activities. This statement sets out the continued approach that Rodd & Gunn have taken to ensure that risks of modern slavery are mitigated throughout our supply chain and business operations. Consultation and guidance for this report was provided by Go Well Consulting Ltd, Auckland New Zealand.

Consultation and guidance for this report was provided by Go Well Consulting Ltd, Auckland New Zealand.

In accordance with the requirements of the legislations as listed previously, I attest that I have reviewed the information contained in the report for all the reporting entities. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of these reporting Acts, for 2024.

This statement has been reviewed and approved by the Rodd & Gunn Board of Directors and signed by Michael Beagley on the 1ST of November 2024. Michael Beagley is a Director of the Board and CEO of Rodd & Gunn New Zealand Limited and has the authority to bind Rodd & Gunn New Zealand Limited and the reporting entities as listed above.



Michael Beagley  
Chief Executive Officer and Director of the Board





## LETTER FROM THE CEO

I am proud to present Rodd & Gunn's Modern Slavery Statement for FY24, which reflects our unwavering commitment to ethical practices and social responsibility. As a proud New Zealand menswear brand, we have built our reputation on the foundations of integrity and transparency.

We are entering our 3rd year of voluntarily reporting under the Australian Modern Slavery Act, which was a decision made with full commitment and without hesitation. This decision propelled our work in this space and prepared the brand for the mandatory modern slavery and supply chain transparency reporting requirements that we now face across the UK, Canada and state of California. It is a welcomed development in the growing list of nations determined to combat modern slavery and improve supply chain transparency.

As we expand further across the USA, UK, Asian and European markets, so does our responsibility to ensure that every individual involved in our production processes is treated with respect and fairness and that our entire supply chain upholds these values. Maintaining this commitment must remain our central focus amidst our growth trajectories.

In an exciting development, we opened a new representative office in Ho Chi Minh City, Vietnam. Vietnam is not only geographically central to our global operations but places us in the heart of our supply chain and enables our teams to enhance the direct nature of our Tier1, 2 and 3 supplier relationships.

In alignment with our ethical framework, we have implemented a robust set of policies and due diligence processes aimed at preventing modern slavery within our business operations. This includes mapping our operational suppliers, supplier monitoring, direct supplier relationships, training and transparency through reporting mechanisms such as this statement.

Over the past 12 months we have established some new supplier relationships at every stage of the supply chain including regenerative Cotton and Wool producers through to progressive fabric and garment manufacturers who all share a strong sense of environmental and social responsibility. To read more about the actions we have taken to mitigate against modern slavery, go to [page 22](#).

Whilst we're proud of the progress we've made, we acknowledge that this is an ongoing journey, and we remain resolute in our commitment towards ongoing improvement, staying informed about emerging risks, and collaborating within the industry to drive meaningful change.

This statement is a testament to the combined efforts of our dedicated teams, the suppliers, mills and fibre producers we partner with and the investments we make in sourcing & designing high-quality, responsible products.

We welcome any feedback on this statement, please email: [sustainability@roddandgunn.com](mailto:sustainability@roddandgunn.com).

Regards,

A handwritten signature in black ink that reads "Mike Beagley".

Michael Beagley  
Chief Executive Officer and Director of the Board



# STRUCTURE, OPERATIONS & SUPPLY CHAIN

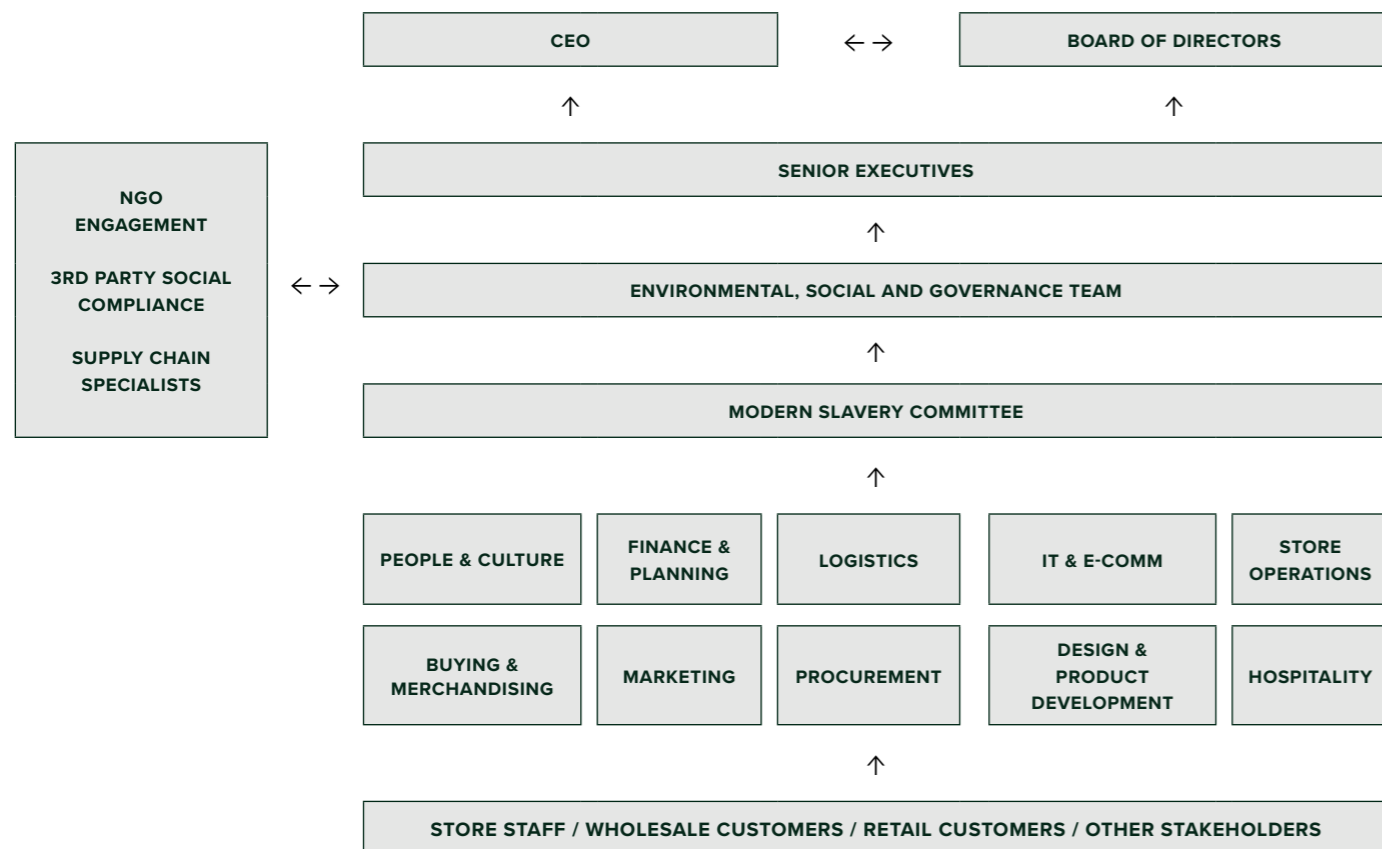
## OUR STRUCTURE

Rodd & Gunn New Zealand Limited is a corporation. We operate in the Retail, Wholesale, E-commerce, and Hospitality sectors. The Rodd & Gunn brand was established in 1987 when the first stand-alone store opened in Auckland, New Zealand. From that moment forward, the Rodd & Gunn brand became synonymous with premium high-quality menswear apparel, footwear, luggage, and accessories. We're a proud Kiwi brand, with an ever-growing global presence. Today, we have expanded our retail & wholesale network across both the Southern and Northern Hemisphere, adding to the already established origins of New Zealand.







We are governed by a Board of Directors and with our CEO also an active Director on the Board. Accountability for our action and progress on matters relating to Modern Slavery sits with our Board, and they are responsible for ensuring that fundamental human rights are upheld throughout all levels of the company. Our ESG Team work diligently to help limit the risks associated with any social or environmental issues that may occur in our supply chain. They work directly with our suppliers to ensure due diligence processes are followed through, and they help identify, prevent and mitigate potential risks of Modern Slavery.

In 2023, Rodd & Gunn established a Modern Slavery Committee that comprises of a representative from each area of the business whose role is to work cross-functionally at helping the business understand, identify, prevent, mitigate, and remediate the risks of Modern Slavery. Our Human Rights Governance Structure demonstrates the responsibility and reporting process on matters relating to ethical sourcing and human rights risks.

## HUMAN RIGHTS GOVERNANCE STRUCTURE



## OUR OPERATIONS

<p><b>MARKETS</b></p>  <p>NEW ZEALAND, AUSTRALIA, SINGAPORE, USA, CANADA, UNITED KINGDOM, EUROPE</p>	<p><b>STORES &amp; CONCESSIONS</b></p>  <p><b>249</b> ACROSS ALL MARKETS</p>	<p><b>FULLFILMENT CENTERS</b></p>  <p><b>6 DISTRIBUTION CENTRES</b> ACROSS ALL MARKETS</p>
<p><b>WHOLESALE PARTNERS</b></p>  <p><b>90</b> USA, CANADA, UNITED KINGDOM, EUROPE</p>	<p><b>THE LODGE GROUP</b></p>  <p><b>4 DESTINATIONS</b> QUEENSTOWN, AUCKLAND, BRISBANE, MELBOURNE</p>	<p><b>HEADQUARTERS</b></p>  <p>AUCKLAND, MELBOURNE, MILAN, HO CHI MINH CITY, NEW YORK, LONDON</p>

We have a retail network that has increased to 249 stand-alone stores and department store concessions compared to 180 in FY23 that span across both the Southern and Northern Hemispheres. Our wholesale network is only carried out in the Northern Hemisphere. A recent venture into the hospitality sector has seen the creation of The Lodge Group with four Dining and Bar destinations across New Zealand and Australia. The shared ethos between Rodd & Gunn and The Lodge Group is undeniable, both value quality, deliver a luxurious customer experience and promote the best of New Zealand.


## OPERATIONAL SUPPORT

Due to our growing presence, we have a distribution network made up of 6 fulfillment centres globally, two of which are solely occupied and operated by Rodd & Gunn, located in Melbourne and Auckland. The remainder are third party fulfillment centres servicing the USA, Canada, Netherlands and UK markets.

Rodd & Gunn's principal head office is in Auckland, New Zealand and we have support offices in Melbourne, New York and London. In January 2024 we opened a representative office in Ho Chi Minh City Vietnam to centralize the support to our global team and to enhance the direct nature of our supplier relationships. We also opened an office in Milan, Italy, exclusively dedicated to textile design, sourcing, and innovation. Every market we operate in now has direct access to on-the-ground operational support that provides training, recruitment, guidance and connectivity to our growing network of staff, stores, wholesale partners and suppliers.

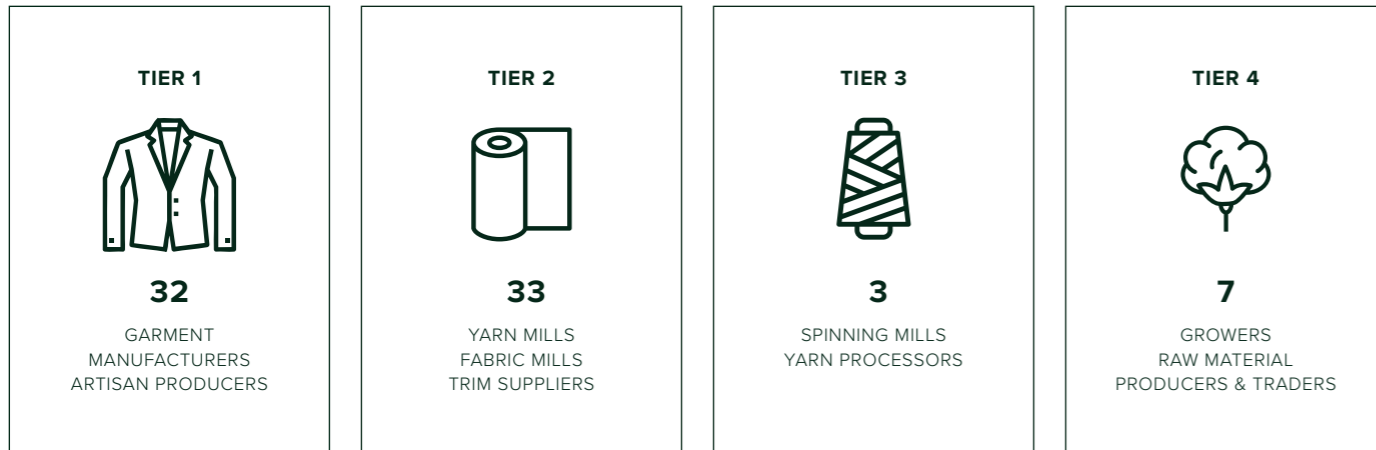
## WORKFORCE

We strive to build a passionate, motivated, and productive environment where our people are supported and respected. Our entire workforce across the company (and all the subsidiaries it controls), whether permanent or casual, are given an employment contract and are required to uphold our Employee Code of Conduct. This document highlights our position and expectations for all our staff on matters of Health and Safety, Anti-Bullying, Anti-Sexual Harassment, Equal Opportunities and Modern Slavery. Our workforce has increased by 18% since FY23 to 1113 people globally. For the multiple legislative requirements that this statement addresses, our workforce is split across the following jurisdictions:

<p><b>WORKFORCE</b></p>  <p><b>1113</b> PERMANENT 60% CASUAL 40%</p>	<p><b>SPLIT BY MARKET</b></p> <table border="1"> <tr><td>AUSTRALIA</td><td>53%</td></tr> <tr><td>NEW ZEALAND</td><td>21%</td></tr> <tr><td>USA</td><td>9%</td></tr> <tr><td>CANADA</td><td>8%</td></tr> <tr><td>EUROPE</td><td>3%</td></tr> <tr><td>ASIA</td><td>2%</td></tr> </table>	AUSTRALIA	53%	NEW ZEALAND	21%	USA	9%	CANADA	8%	EUROPE	3%	ASIA	2%
AUSTRALIA	53%												
NEW ZEALAND	21%												
USA	9%												
CANADA	8%												
EUROPE	3%												
ASIA	2%												

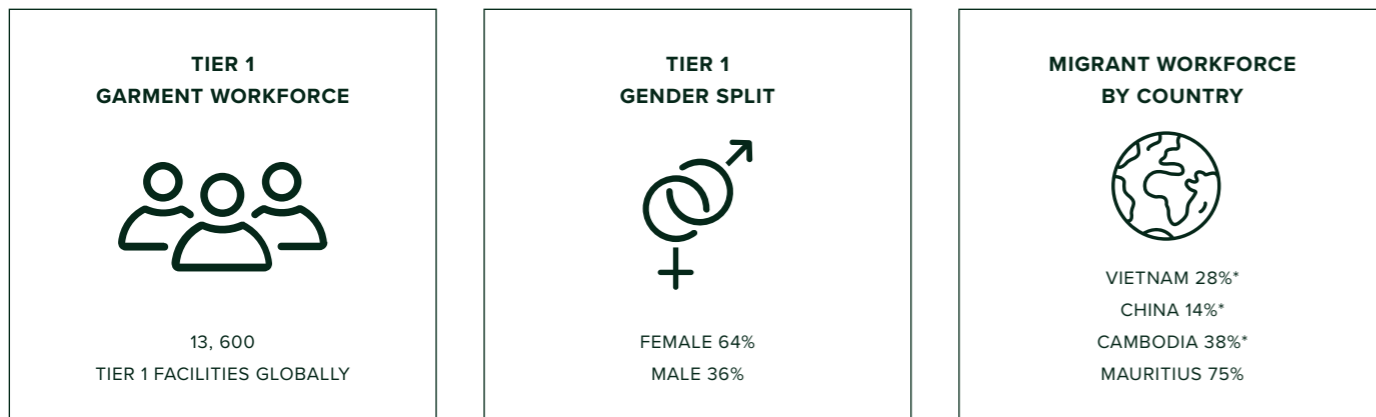
**OUR SUPPLY CHAIN**

The development of our apparel, footwear and accessories is designed exclusively in house by our talented design team in Melbourne, Australia and more recently our textile design team in Milan, Italy. Our products are manufactured through a global network of trusted suppliers with a focus on direct relationships. We distinguish each level of our supply chain with an industry recognized tier system that breaks down each stage of the production process into four tiers. Each supplier is carefully selected for their premium workmanship, integrity and approach to social and environmental accountability. You can review our recent supplier list available on our website (<https://www.roddandgunn.com/brand-story/sustainability>). In FY24 Rodd & Gunn worked directly with 75 suppliers, across 17 countries which is a 4% decrease on FY23 due to our focus on supplier consolidation at Tier 1 and Tier 2. Our supply chain has been broken down across the following four tier levels of production:



**GARMENT WORKERS**

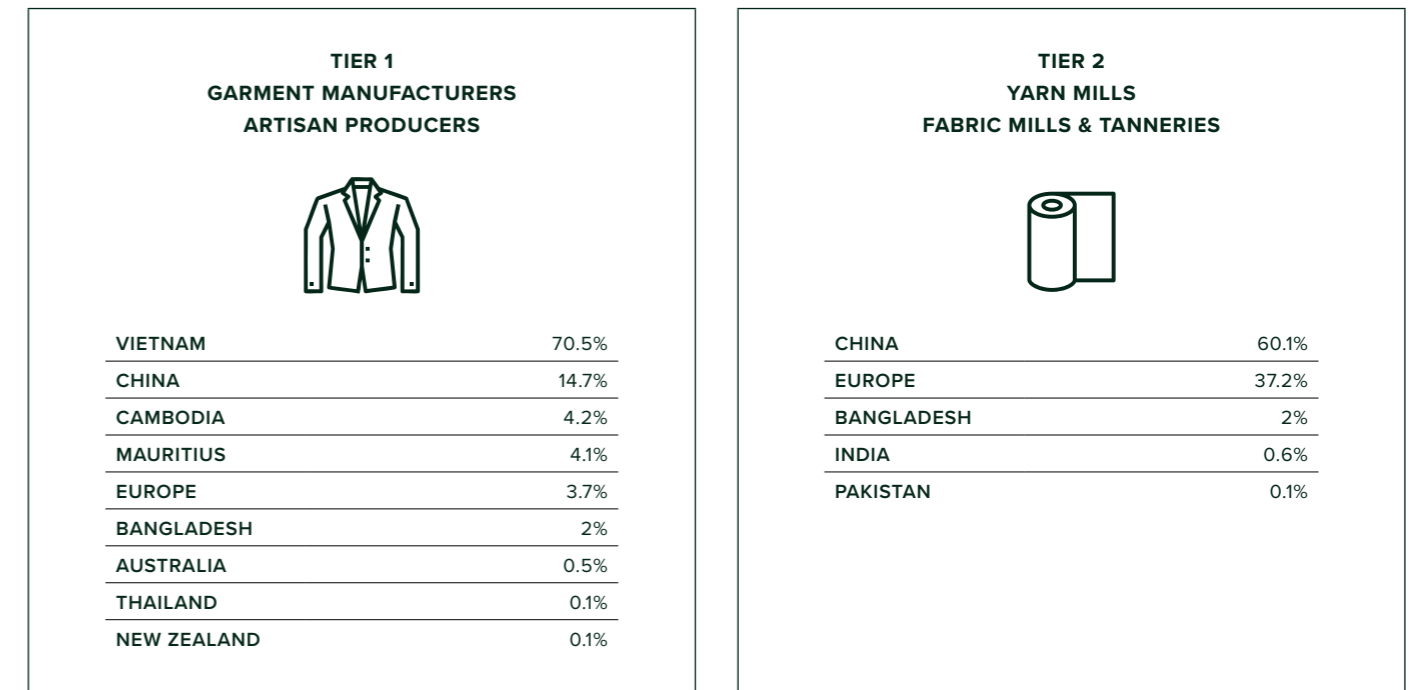
It is fundamental that our commitment to upholding human rights is extended to the very people who produce our products. A majority of the workforce are employed in small to medium sized manufacturing facilities however, we value the skills and craftsmanship of artisan production and aim to support traditional artisan producers where we can. Any form of exploitation is contrary to our brand values, and we believe that all garment workers have the right to be treated with dignity and respect, can afford to support their families, and live and work in a healthy and safe environment where their skill and contribution is celebrated and rewarded. Here is a snapshot of the garment workforce across our supply chain, noting that these workers are not exclusive to Rodd & Gunn but also make for many other brands within each facility. These figures were taken from our FY24 factory assessment portfolio and don't vary too much from the previous year, however the % of foreign migrant workers in Mauritius have increased to 75% from 59% in FY23 so it is important that our due diligence efforts and focus on this region reflect this increased risk.



\* internal migrant

**PRODUCTION BY REGION**

Transparency of our supply chain, at all levels, enables increased visibility into the supply chain, to help identify any human rights and modern slavery issues that maybe occurring. It also provides an understanding about where our financial resources are spread across the supply chain, which is important for evaluating impact, assessing risks, allocating resources, and responsible decision making. Below you can see how our geographical investment is allocated across Tier 1 and 2 of the supply chain. Our commitment to manufacturing in Vietnam for FY24 has seen a 16% increase in comparison to FY23 as we continue to consolidate our supply chain to this region. This also shows our investment in sourcing premium fabrics and yarns with 37.2% of our Tier 2 suppliers located in Europe, where some of the world's oldest and prestigious Mills are located:



**SUPPLY CHAIN MAP**

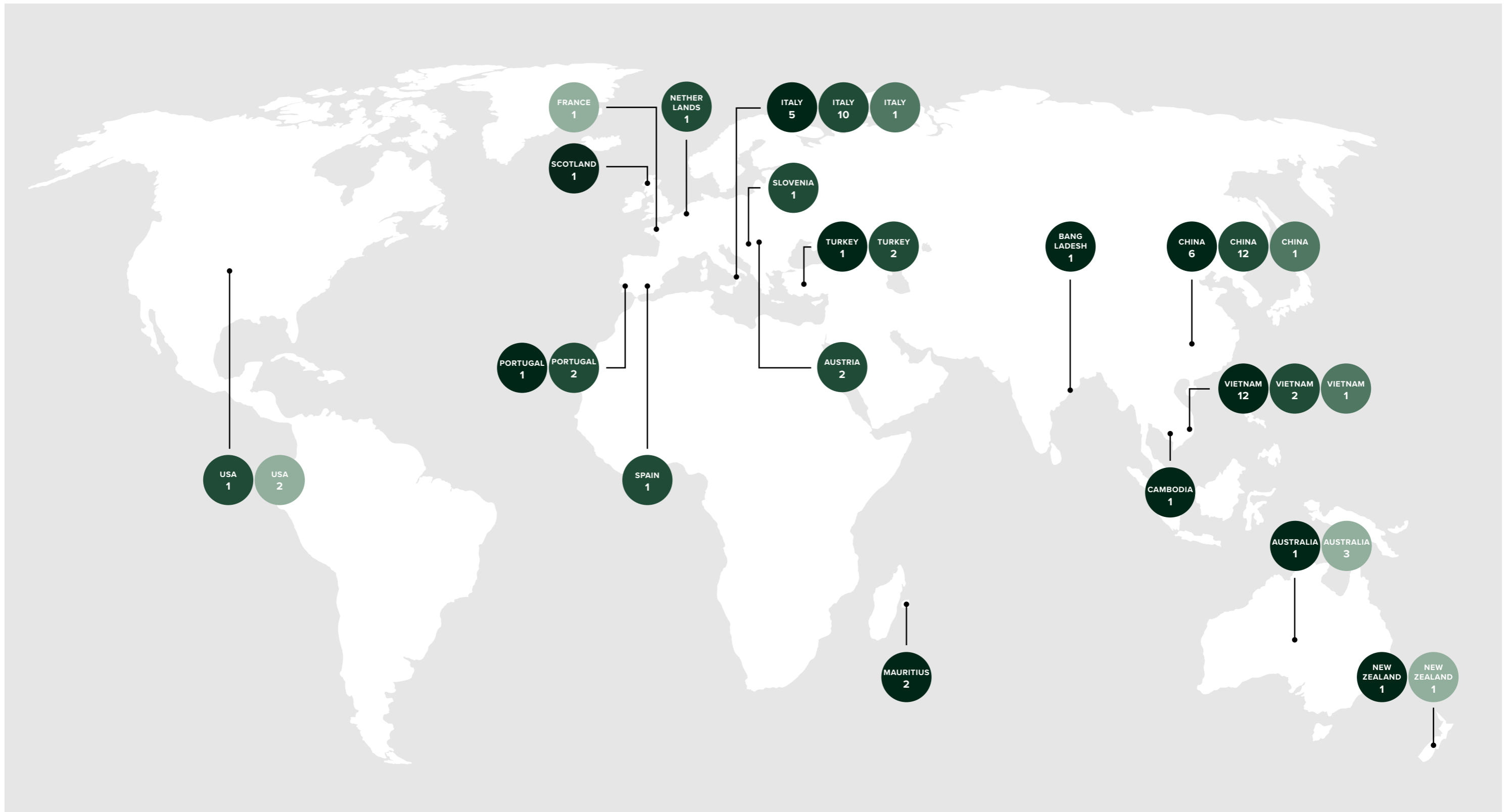
This Supply Chain Map highlights our direct supplier relationships across all tiers. This is not representative of all the traced facilities, for more on our traceability work please refer to [page 28](#).

**TIER 1 (32)**  
GARMENT MANUFACTURERS  
& ARTISAN PRODUCERS

**TIER 2 (33)**  
YARN MILLS, FABRIC MILLS  
& TRIM SUPPLIERS

**TIER 3 (3)**  
SPINNING MILLS  
YARN PROCESSORS

**TIER 4 (7)**  
GROWERS, RAW MATERIAL  
PRODUCERS & TRADERS





## MODERN SLAVERY RISKS

We recognise that by operating in the global apparel, footwear and accessories market, our activities could cause, contribute to or be linked to modern slavery practices in both our operations and supply chain. We have reviewed our current practices and identified possible risks that could arise for the people associated with our operations, and in our supply chains.

### What is Modern Slavery?

Modern slavery is the umbrella term used to describe the use of exploitive labour practices, which include, but is not limited to; servitude, forced labour, human trafficking, debt bondage, forced marriage, slavery, deceptive recruitment for labour or services, and child labour. According to Walk Free, the International Labour Organisation (ILO) and the International Organisation for Migration (IOM), 49.7 million people are currently trapped in modern slavery, including 27.6 million in Forced Labour and 12% (3.3 million) of them are children. Freedom from slavery is a fundamental human right and we believe that all people associated with our business should be treated with respect and dignity.

### OUR OPERATIONS

Our main corporate business operations are conducted in countries with strong regulation, and human rights compliance, such as Australia, New Zealand, Canada, USA, UK, and Europe. We consider the risk of modern slavery happening in our operations as low, and our higher risks to be associated with our product supply chain. However, certain countries like Vietnam and Italy are not immune to risks of exploitation, increased working hours and debt bondage with less strict labour laws than other jurisdictions such as Australia and New Zealand. Understanding the increased challenges and staying up to date with new and emerging risks as our business continues to grow will be paramount to the way in which we operate the business and carry out our due diligence.

Our operational risks can be identified across some of the following areas:

- Recruitment
- Third party service providers
- Shipping and Logistics
- The Lodge Group

### RECRUITMENT

All our team members are given an employment contract and are required to adhere to the operational standards, which include our Code of Conduct that outlines the policies, procedures and ethical standards that govern decisions and actions within our company. It serves as a blueprint for employees, guiding them in their daily interactions and decision-making processes. However, we are exposed to increased risks, due to the use of third-party recruitment providers for the temporary staff recruitment at our fulfilment centres, due to the lack of transparency of how and where these team members are recruited. Over the past 12 months we have moved away from this model of recruitment and allocated more resources internally so we can conduct recruitment in house, allowing us to apply our strict protocols for verifying the status of candidates. The opening of the Ho Chi Minh City representative office was a pivotal moment for the brand, and it now provides critical support to our growing global network. However, Vietnam presented a higher recruitment risk that challenged our HR processes and procedures due to cultural differences, longer working hours and a higher disparity between a minimum and living wage. To understand more about the due diligence that was carried out during the recruitment drive for Vietnam, please go to [page 23](#).

### THIRD PARTY SERVICE PROVIDERS

At Rodd & Gunn, we procure the services of a variety of facility management third-party businesses across our operations and store network. Due to the casual and physical nature of these jobs, there is a risk of sub-contracted and migrant labour is inherited through these third-party suppliers, which can increase the risk of debt bondage, exploitation, deceptive recruitment occurring. In the last financial year third party service providers were mainly used for:

- Cleaning contractors
- Alteration services
- Security contractors
- Construction
- Offshore data processing

### SHIPPING AND LOGISTICS

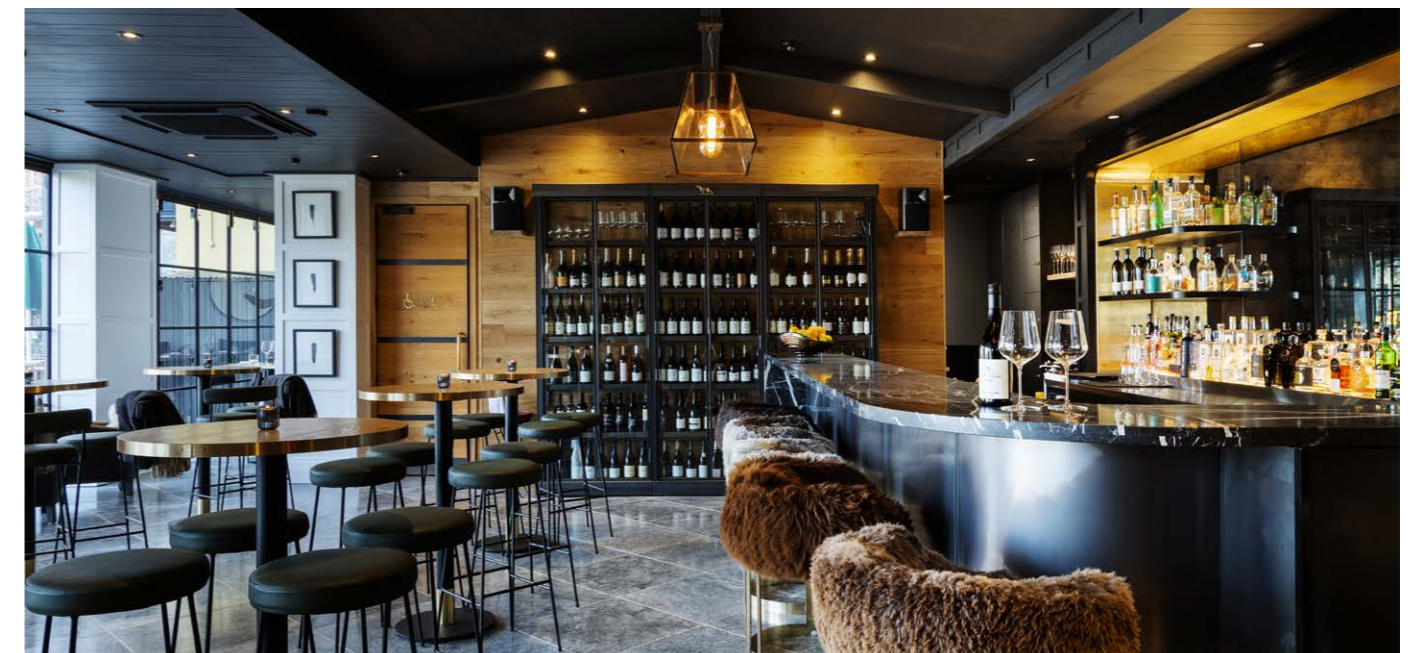
Shipping and logistics are an essential component of the global supply chain for transporting freight. Despite its importance, supply chain workers can face severe exploitation such as recruitment fees and debt bondage, enforced work beyond contract expiry, overtime at sea, threat of piracy and abandonment (*ILO Forced Labour Indicators 1, 2, 3, 7, 9 and 11*). Given the high volume of workers required for loading, unloading, navigating and other logistical tasks, the vast and complex supply chain is exposed to modern slavery risks. Rodd & Gunn partner with the following shipping and logistics providers for various transportation needs at various stages in the supply chain process:

- Kerry Logistics
- TNT, FedEx
- UPS
- DHL
- Stair Freight Logistics
- Albin & Pitigliani S.p.A. (AlpiWorld)
- Bergen Logistics
- Australia Post and New Zealand Post

Each of these providers have conducted their own modern slavery due diligence and implement grievance and whistleblowing mechanisms for Seafarers and other workers in ports, warehousing and transportation. However, these partners are not owned or controlled by Rodd & Gunn, therefore, we have minor influence over their recruitment and workplace practices.

### THE LODGE GROUP

The hospitality sector has a high-risk of exploitation due to the casual and vulnerable nature of the workforce and its complex and seasonal food and beverage supply chains that provide little transparency. This type of procurement can create a reliance on supply chains which may carry varying degrees of modern slavery risks. Agricultural industries such as wine, seafood, meat, dairy, and fresh produce are vulnerable to human rights violations such as temporary recruitment, migrant labour, poor conditions, and unstable wages due to poor pay structures like pick rates. A large portion of our fresh produce and wine suppliers come from New Zealand and Australia. According to Walk Free, migrant workforces face risks of exploitation in the horticulture and viticulture industries under seasonal employment and reportedly experience underpayment, withholding of wages, excessive work hours, passport retention, contract substitution, and health and safety violations. Despite New Zealand and Australia having some of the strongest government responses to combating modern slavery.



**OUR SUPPLY CHAIN**

There are risks of modern slavery at each stage of the garment supply chain, from growing and producing raw materials, to processing these into textiles, to manufacturing into garments. Garment workers, sometimes hidden deep within supply chains, can face poor or exploitative working conditions, including poor wages, forced and unpaid overtime, irregular work, health and safety risks, and lack of benefits such as maternity leave or social insurance payments. In their most extreme forms, these exploitative practices can lead to situations of forced labour and debt bondage.

Rodd & Gunn do not own any of our factories or mills, but we have spent many years building long-lasting relationships, and we continue to seek out partnerships that support and uphold our values. In an industry that typically faces pressure from fast delivery lead times and reduced profit margins, sub-contracting can become a real risk possibility, further reducing a brand’s ability to oversee their supply chains. Rodd & Gunn prohibits this practice. If not disclosed and communicated effectively, this can lead to inflating risks of exploitive practices happening in sub-factories that are not known to Rodd & Gunn. To read more about the actions we have taken to reduce the risks in our supply chain, please go to [page 26](#).

**LABOUR RIGHTS RISK ASSESSMENT**

Vietnam, China, Cambodia, and Mauritius make up 93.5% of our Tier 1 production. We understand that each of these countries has associated risks, and we have conducted a geographical labour rights risk assessment which is based on findings from our SGS third party audits and due diligence monitoring, industry reports and government responses. In building this assessment, we drew on the following industry-led publications and resources:

- International Labour Organization (ILO) <https://www.ilo.org/>
- Labour Rights Index 2024 <https://labourrightsindex.org/>
- Wage Indicator <https://wageindicator.org/>
- 2024 Global Slavery Index <https://www.walkfree.org/global-slavery-index/>
- Transparency International <https://www.transparency.org/en>
- Anti-Slavery International <https://www.antislavery.org/>
- 2024 Trafficking in Persons Report <https://www.state.gov/trafficking-in-persons-report/>



**LABOUR RIGHTS RISK ASSESSMENT TABLE**

RISK	RISK LIKELIHOOD			
	VIETNAM	CHINA	CAMBODIA	MAURITIUS
CHILD / FORCED LABOUR	LIKELY	LIKELY	LIKELY	LIKELY
WORKPLACE DISCRIMINATION	UNLIKELY	UNLIKELY	MODERATE	LIKELY
LACK OF FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING	RARE	LIKELY	LIKELY	LIKELY
UNSAFE WORKING CONDITIONS	UNLIKELY	MODERATE	MODERATE	LIKELY
PAID BELOW MINIMUM WAGE	RARE	MODERATE	MODERATE	MODERATE
EXCESSIVE OVERTIME	RARE	LIKELY	UNLIKELY	UNLIKELY
TEMPORARY / MIGRANT WORKFORCE	MODERATE	LIKELY	LIKELY	ALMOST CERTAIN
UNAUTHORISED SUB-CONTRACTING	UNLIKELY	MODERATE	MODERATE	RARE
COVID-19 IMPACT	UNLIKELY	UNLIKELY	UNLIKELY	UNLIKELY
GRIEVANCE MECHANISMS & REMEDY	MODERATE	MODERATE	MODERATE	MODERATE
SCORE	21	32	31	32
OVERALL COUNTRY RISK	MEDIUM	HIGH	HIGH	HIGH

**METHODOLOGY**

	RARE	UNLIKELY	MODERATE	LIKELY	ALMOST CERTAIN
RISK LIKELIHOOD	THE EVENT MAY OCCUR IN EXCEPTIONAL CIRCUMSTANCES	THE EVENT SHOULD OCCUR SOMETIMES	THE EVENT COULD OCCUR SOMETIMES	THE EVENT WILL PROBABLY OCCUR IN MOST CIRCUMSTANCES	THE EVENT IS EXPECTED TO OCCUR IN MOST CIRCUMSTANCES
POINTS PER RISK	1	2	3	4	5

	LOW	MEDIUM	HIGH	VERY HIGH	CRITICAL
OVERALL RISK RATING	ACCEPTABLE WITH PERIODIC REVIEW	TOLERABLE WITH PERIODIC REVIEW	TOLERABLE WITH CONTINUOUS REVIEW	INTOLERABLE - IMMEDIATE ACTION REQUIRED	INTOLERABLE - URGENT ACTION REQUIRED
POINTS RANGE	0 – 12	13 – 24	25 – 35	36 – 44	37 – 45

## VIETNAM – MEDIUM RISK

Vietnam is the second largest apparel manufacturer in Asia and employs over 2.5 million people, primarily in the southern and northern regions of the country. The country is a major supplier to international brands, with a particularly large share of exports going to the United States, EU, and Japan. Vietnam now receives the highest volume (70.5%) of order placement from Rodd & Gunn, a significant increase from 59% in our previous reporting period. The apparel industry in Vietnam still relies heavily on the use of migrant workers from rural regions, which increases the risks of trafficking, forced and child labour in the country's manufacturing sector. However, the updated version of the *2024 Trafficking in Persons Report* categorised Vietnam as a Tier 2 region, a slight improvement from the previous year's assessment. Rodd & Gunn's Vietnam suppliers employ local workers, except for a small number of domestic migrants (around 28%), which is why our risk rating remains low for migrant workforce. While Vietnam has a national trade union system under the Vietnam General Confederation of Labor (VGCL), these unions are closely aligned with the government and are not independent. They are often seen as extensions of factory management rather than true advocates for workers' rights, leaving employees without strong representation. All our Vietnam suppliers have trade union representation and collective bargaining agreements in place. Vietnam is yet to ratify ILO conventions on Freedom of Association and Protection of the Right to Organise (ILO Convention 87), Right to Organise and Collective Bargaining (ILO Convention 98), and Abolition of Forced Labour (ILO Convention 105).

## CHINA – HIGH RISK

China is the largest garment manufacturing country in the world. With our focus on moving production to Vietnam, China now only represents 14.7% of our order volume this reporting period, compared to 23% the previous year. However, China is also where most of our Tier 2 trim suppliers are located and therefore still signifies an important sourcing region for us. Due to the geographic size of the country, migrant work from rural communities is a regular occurrence, and the use of forced labour has been linked to the apparel sector, specifically in XUAR, where 80% of China's cotton is grown. The Chinese government also strictly control union organisation, with the *All-China Federation of Trade Unions* (ACFTU) being the only legally existing union in the country. Although all our Tier 1 factories in China have internal worker representation in place, only two of those have a Trade Union established for additional support (29%). Grievance mechanisms are difficult to implement effectively due to strict government oversight. The use of excessive overtime, and sub-contracted laundering, embroidery or print processes poses a risk of forced or debt bonded labour occurring in the more distant parts of our supply chain.

## CAMBODIA – HIGH RISK

This year, Cambodia has been added to our risk assessment as our 3rd largest manufacturing country in FY24, although only representing 4.2% of our total production volume. Cambodia's apparel sector is a key driver of its economy, contributing significantly to exports and employment. The sector is characterized by a large workforce, including a high proportion of female workers, and is heavily dependent on low-wage labour. Although Cambodia has ratified international conventions by prohibiting child labour, reports still indicate the use of underage workers, particularly in sub-contracted and informal supply chains. Migrant workers, especially those from rural areas and neighbouring countries, are at a higher risk of forced labour and trafficking due to the lack of formal labour protections, poor living conditions, and limited access to grievance mechanisms. According to the *Labor Rights Index 2024*, union density and collective bargaining coverage across Cambodia remain incredibly low, at 10% and 25%, respectively.

## MAURITIUS – HIGH RISK

A tropical island off the eastern coast of Africa, Mauritius has become a manufacturing hub for the global apparel industry. Mauritius is our fourth-largest country for Tier 1 garment manufacturing at 4.1%, down from 5% in the previous reporting period. Due to its island location, it is attracting migrant workers from countries such as Bangladesh, India, and Nepal. Mauritius offers a stable and regulated environment for garment manufacturing compared to other regions, but risks remain, especially concerning the exploitation of migrant workers, occupational health, and safety, living conditions and potential gaps in enforcement. The Mauritian apparel industry has been linked to risks of debt bondage and forced labour and according to the *2024 Global Slavery Index and Transparency International*, only 50% of reported cases are addressed by the government, leaving workers vulnerable and with lack of support.

## COTTON SOURCING

According to the *2023 Global Slavery Index* Cotton production has a long history of slavery and continues to be harvested by men, women, and children working in conditions tantamount to modern slavery. Child and forced labour have been linked to cotton farming in Benin, Burkina Faso, China, Kazakhstan, Pakistan, Tajikistan, Turkmenistan, and Uzbekistan, prompting governments to force change through legal clampdowns. In the United States, the Uyghur Forced Labor Prevention Act (UFLPA) came into force in June 2022 in response to the uncovering of severe human rights violations in the in the Xinjiang Province, which is the majority contributor of cotton in China, producing over 80% of the countries cotton.

Cotton is our most used raw material making up 82% of Rodd & Gunn's total fibre use and 86.2% of that comes from our top 2 preferred cotton sources Australia and USA. Currently only 2% of our cotton comes from China down from 5% in FY23. Please refer to [page 29](#) to understand the actions we have taken to reduce the risks associated with Cotton through our Responsible Cotton Sourcing Policy, Raw Material Partners, Farm > Floor programs and ongoing traceability work.

## LABOUR BROKER

Labour brokers in the garment manufacturing sector are typically subcontracted for the recruitment and hiring of migrants. They can however pose significant risks to workers' rights and well-being. While such intermediaries may operate legally in some contexts, they are often associated with exploitative practices, such as charging workers exorbitant recruitment fees, misleading them about the nature of their employment, and facilitating conditions that may lead to forced labour or human trafficking.

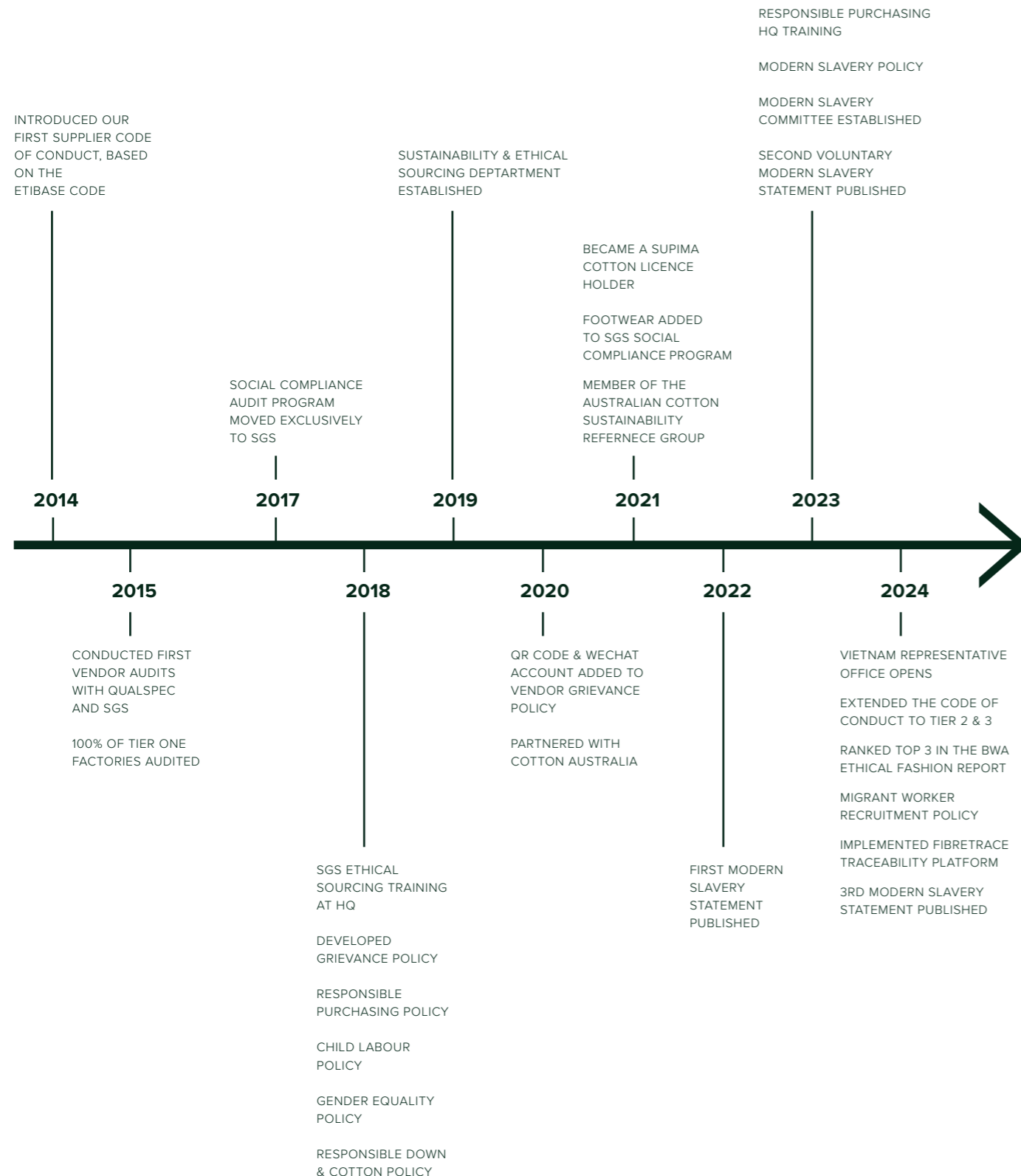
Labour brokers may operate in a legal grey area, and there's further risk of brokers engaging unlicensed or unauthorised subagents to facilitate the mobilisation of a workforce, making it difficult to hold them accountable for abuses or exploitation. In many cases, workers recruited by labour brokers have limited legal aid and are vulnerable to abuse due to their dependency on the broker for job placement, visa status and documentation. These issues are compounded by the lack effective government oversight and enforcement of labour laws in many garment-exporting countries. In the context of Rodd & Gunn's supply chain, labour brokers represent a significant risk for workers in Mauritius, where the manufacturing sector is reliant on foreign migrant labour to support the industry. Tracking internal and foreign migrant workforces is highly important due to the increased risk of exploitation through the recruitment process. To understand what steps Rodd & Gunn have taken to reduce this risk, please go to [page 34](#).

## UNAUTHORISED SUB-CONTRACTING

Sub-contracting is when a company outsources part or all the manufacturing process to a third party. Increased challenges such as rising production costs, labour shortages and faster delivery demands have contributed to the rise of unauthorised sub-contracting across the garment and textile sector. The use of an unknown factory means that the brand no longer has any visibility over the conditions found in that factory and the quality of the product being produced there, both of which pose a risk of serious exploitation and reputational damage. Increasingly fragmented supply chains create significant challenges for brands seeking to monitor social compliance and protect workers' rights. Lack of visibility and oversight of the lower tiers of the supply chain, where unauthorised sub-contracting tends to be found, make it difficult to monitor worker safety, and incidences of child labour or forced labour. To understand what steps Rodd & Gunn have taken to reduce this risk, please go to [page 26](#).

# OUR DUE DILIGENCE PROCESSES

Rodd & Gunn adopt the three pillars of the UN Guiding Principles on Business and Human Rights - to protect, respect and remedy - throughout our operations and supply chains. Our board are committed to collaborating with the ESG team, Modern Slavery Committee and all business and supply chain partners to identify, prevent, mitigate, and remedy any potential human right violation, and the board take responsibility for any modern slavery impacts including that of Forced Labour and Child Labour. Outlined here are some of the due diligence processes and actions taken to address the modern slavery risks in our business operations and supply chains. Our Responsible Business Journey highlights how the brand has sustained progress since 2014.



## OUR OPERATIONS

We are guided by the OECD Framework for Responsible Business Conduct which helps to raise awareness of any negative impacts of business operations whilst contributing to the sustainable development of the countries we source from. Each fiscal year we conduct a corporate self-assessment through the OECD Due Diligence GAP Analysis - a benchmarking tool that helps identify risks within the business and supply chain and areas that require focus and improvement.

Utilising the Modern Slavery Tender Clause and Guidance Tool provided by the Australia Government, we were able to strengthen our corporate contract process by introducing a Modern Slavery Clause into any new business contracts for FY24. This clause requires potential partners to disclose their prevention and mitigation efforts on modern slavery within their own business operations and asks for a commitment to ongoing improvement and due diligence. This was meaningfully implemented into the contract and tender process for our new representative office in Vietnam.

## VIETNAM RECRUITMENT

Careful consideration, research and specialised on-the-ground advisors were required to ensure the recruitment process maintained the level of integrity and assurance that our minimum standard demands. Before hiring commenced, we engaged RSM Vietnam (<https://www.rsm.global/vietnam/en>) as our legal advisory consultants who assisted us with understanding the practices and legal obligations under the Vietnamese Employment Law. Vietnamworks (<https://www.vietnamworks.com>) was chosen as the preferred recruitment advertising channel, based on its reputation for attracting suitable high-calibre talent to enable our merit-based recruitment practices. We have internal labour rules, company policies and training guidelines in place which have been checked and approved by governing authorities but also to ensure that we are creating a culture that reflects the rest of our business. Some of the employee benefits included above market average pay rates, 5-day week (instead of the common 6-day week in Vietnam), a non-compulsory 13th month lunar bonus, private health insurance and higher annual leave entitlements. Having a team who not only understand the local language but the cultural context and nuances of working and operating a business in Vietnam has been crucial to the successful implementation of this strategy.

## MAPPING OUR BUSINESS OPERATIONS

We engage with many different non-trade / third-party service providers. To increase our visibility of modern slavery risks within this sector of the business, the Modern Slavery committee and each business unit retrospectively work to map and identify these providers. An analysis is then conducted to understand more about their own due diligence practices, and in some cases, obtained copies of their own Modern Slavery Statements and Code of Conducts.



## THE LODGE GROUP

The hospitality branch of our business, The Lodge Group, has expanded across both New Zealand and Australia since the first opening in Queenstown in 2016. Rodd & Gunn manages the recruitment process internally for all hospitality staff across our venues and they are subjected to the same inductions, training, and onboarding processes as all other Rodd & Gunn staff. Due to the elevated experience created at our venues, The Lodge Group demands a highly skilled workforce that is paid above the average hospitality wage and places a strong focus on training and development. Internally we have worked cross functionally to better understand the Food and Beverage supply chain that services each location. Master Sommelier Cameron Douglas has curated the wine list exclusively for each venue. Michelin starred Chef Matt Lambert designed the menu, handpicking each supplier that meets the demand for the finest and freshest produce. Having such an esteemed team behind the curation of each menu has resulted in an impressive list of premium food and beverage suppliers situated locally to each location where most goods are produced or harvested. Given the direct and local nature of the suppliers to each Lodge Group location, visibility has been easier to achieve and in some cases our food & beverage team have visited the farms and vineyards of our many producers. Mapping this sector of our business has helped establish a supply chain register that tracks each supplier and allows us to assess their level of transparency across sustainable and ethical practises.

### **RODD & GUNN PINOT NOIR X MISHA'S VINEYARD**

In 2024 Rodd & Gunn launched our own branded Pinot Noir. The vineyard behind the label is a single-vineyard estate located in Central Otago, the Pinot capital of New Zealand. Named as one of New Zealand's Top 20 Wine Producers, Misha's Vineyard takes a no-compromise philosophy for everything from production methodologies, viticulture, winemaking through to the hiring, marketing and distribution. The vineyard is fully certified "Sustainable" under the New Zealand Winegrowers certification program and use only certified sustainable contract service suppliers. Sustainable Winegrowing New Zealand has an external audit structure that has integrity and rigour to comply with industry expectations. Misha's have a rigorous recruitment and induction program that provides all employees with a full employment contract that not only meets New Zealand employment law but also pays above minimum wage, provides a reporting channel for grievances and extensive health and safety training. This collaboration was crafted with the same due diligence that we apply to other business areas and is a testament to our uncompromising commitment to sustainability and ethical sourcing. Misha's Vineyard represents the best of what New Zealand has to offer.



## NGO ENGAGEMENT AND DISCLOSURE REPORTING

We collaborate with advocacy groups and NGOs to help drive change in the industry and to encourage the brand to continually improve our social and environmental impact.

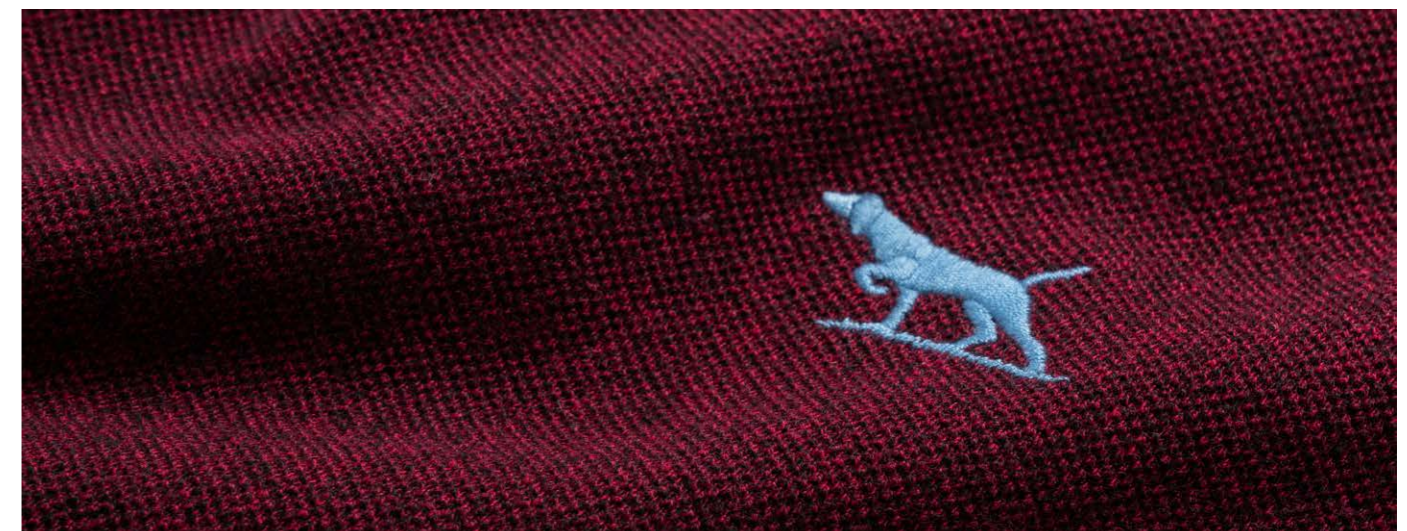
Since 2018 we have voluntarily engaged with Baptist World Aid (BWA) on the Ethical Fashion Report. The Ethical Fashion Report is a bi-annual research piece that ranks apparel and footwear companies from around the world on their efforts to eradicate modern slavery and worker exploitation and minimise their environmental impact. The report is available to the public as a way of empowering consumers to make stronger purchasing decisions, but also to hold the brands accountable for their impact and to drive industry progress forward. In 2024 Rodd & Gunn was ranked in the top 3 performing brands and whilst we're proud of this result, we also recognise that the challenges of this industry are constantly presenting themselves and collectively we have a lot of work to do. You can download the most recent report at [www.baptistworldaid.org.au](http://www.baptistworldaid.org.au).

Good on You (GOY) is a social impact platform that uses their revenue to drive change at scale. GOY is an online comprehensive brand rating system on a scale of 1-5 (1 "avoid" and 5 "great"). They have a database of over 6,000 fashion and beauty brands, all assessed against their impact on People, Planet, and Animals. They aim to empower both industry and consumer with the knowledge to make sustainable purchasing decisions. Brand ratings are based on transparency and publicly reported information on key sustainable issues gathered from company websites, credible third-party reports and certification schemes. Because of this rating methodology Rodd & Gunn is currently rated 2 "not good enough". Whilst we don't feel this reflects our efforts overall as a brand, we do recognise the importance of public disclosure and further transparency, giving us a best practise framework to aspire to. Over the past 6 months we have been in communication with GOY about how we can participate in disclosing more information about the work that we do and have provided guidance on ways we can improve our engagement with consumers that will achieve a rating that is reflective of our practices.

Since 2022, we have been reporting voluntarily under the Australian Modern Slavery Act 2018, (Cth). FY24 will be our third voluntary Australian Modern Slavery Statement, which outlines the actions we are committed to taking to help identify, manage, and remedy modern slavery risks in our supply chain + operations. Rodd & Gunn is not mandated to report, as a responsible brand, we choose to submit an annual statement voluntarily, to demonstrate our commitment to transparency and ending modern slavery in all our business operations and supply chain.

## MODERN SLAVERY COMMITTEE

In 2023, we established a Modern Slavery Committee which has been an important initiative in driving a holistic business approach to modern slavery awareness and action. The committee meets annually to discuss goals & progress for each department, proposed initiatives and any cross-functional support that is required to carry out those initiatives. Throughout the year, the ESG team works directly with various business units on matters that impact on that department specifically. These conversations have elevated the awareness on modern slavery across the business and initiated a collaborative culture of engagement.



**OUR SUPPLY CHAIN**

We work closely with our suppliers to identify and mitigate any potential risks of forced / child labour. We conduct and regularly review our labour rights risk assessment across our Tier 1 supply chain, and we have implemented a Grievance Mechanism across all our Tier 1 and 2 facilities. We continue to map our entire supply chain right back to raw material providers and focus on supply chain consolidation through the elimination of high-risk regions, such as implementing Farm > Floor programs based on the strength of their social and environmental indicators and performance.

**ONBOARDING NEW SUPPLIERS**

We undertake thorough due diligence checks on all suppliers, including verifying existing social compliance audits and certifications, checking relevant policies, reviewing public profiles and websites, reviewing how they engage with their workers and other stakeholders. This is actioned through the Rodd & Gunn Minimum Sourcing Requirement Checklist covering the following four areas that the supplier must confirm their commitment to:

- Governance & Transparency
- Supplier Certifications & Standards
- Traceability & Raw Material Sustainability
- Packaging & Materials
- Environmental & Chemical Management

Once this assessment is complete and the supplier is approved for engagement, the new supplier is required to read and sign our Supplier Code of Conduct and other responsible policies before commencing production (refer to Policies on page 32). From there on, our ESG team engages continuously with suppliers to ensure all due diligence checks are maintained, reviewed and updated regularly over time. In addition to our desktop-based due diligence processes, Rodd & Gunn team members from various departments visit new suppliers’ offices & manufacturing locations to establish face-to-face connections and lay the foundations for successful and long-lasting partnerships. Equally, our locally based teams in the Vietnam Ho Chi Minh office support the development of close connections on the ground and as such, provide instrumental insight on the implementation of our Code and Policies, or potential breaches thereof.

**SUPPLIER MONITORING**

Rodd & Gunn continue to work with SGS, one of the world’s leading verification, testing and inspection company, to help monitor our suppliers & factories for social compliance and environmental standards. In addition to our brand commissioned audits, we recognise the need for mutually acceptable standards to reduce factories’ burden of audit duplication. This means that where available, we will assess our factories against any verifiable standards or certifications they may already have in place, such as WRAP, SMETA, BSCI, SLCP, SA8000 etc. If no such standards or certification are available, we enlist our audit partner SGS to conduct an independent audit at least once every two years. Factories are selected based on volume produced and their risk profile (e.g. country, worker demographic, activity carried out). By applying this combined monitoring approach, we can track and respond to a broader scope of indicators related to performance, corrective actions and potential & actual risks across our supply chain. The table below provides an overview of the key protocols of our monitoring program:

<b>PRE-REQUISITE</b>	Rodd & Gunn only work with factories who demonstrate full cooperation with our monitoring program and due diligence screening process.
<b>ASSESSMENT CONTENTS</b>	Our checklist scans factories on local, national & international laws, in conjunction with our Code of Conduct & other brand specific requirements. Other verifiable standards / certifications may be accepted in lieu of SGS brand audit.
<b>AUDIT TYPE</b>	On-site only for all new & initial audits. On-site or remote desktop review for follow-up audits. Industry recognised standards/certifications may be accepted in lieu of SGS brand audit.
<b>AUDIT FREQUENCY</b>	Approx. every 2yrs, subject to meeting Rodd & Gunn’s performance expectations. Industry recognised standards / certifications are collected & reviewed annually, or in accordance with the standard’s validity period.
<b>AUDIT DATE</b>	Semi-unannounced. We provide a 4-week window to our factories during which the auditor(s) arrive on any given day. Industry recognised standards/certifications may vary in their approach.
<b>AUDITORS</b>	All SGS auditors are fully trained & APSCA accredited, speak the local language of the regions we audit in and collectively share many years of experience.

We assess and review every audit or certification that is conducted or shared with us. We collaborate with each supplier on the expectations around managing and maintaining their Corrective-Action-Plan (CAP) to ensure any findings are communicated, discussed, and closed off within an agreed period. Any non-compliant findings are given a weighted rating of either **MINOR**, **MAJOR** or **CRITICAL** - depending on the severity and impact they have on the workers or on the environment. In FY24, we assessed the audit reports & certifications of a total of 13 factories, of which 4 were commissioned by SGS / Rodd & Gunn. All except one factory were issued with a CAP and 80% of findings were minor in nature.

TOP 5 NON-COMPLIANCE CATEGORIES FY24		NUMBER OF FINDINGS FY24	CAP CLOSED & VERIFIED (WITHIN 12 MTHS FROM AUDIT)
HEALTH & SAFETY – 52%			
SECURITY – 11%			
WORKING HOURS – 8%			
MONITORING OF COMPLIANCE – 8%			
WAGES & BENEFITS – 6%			
<b>MINOR</b>		80%	MINOR – 76%
<b>MAJOR</b>		18%	MAJOR – 78%
<b>CRITICAL</b>		2%	CRITICAL – 100%
		<b>TOTAL:</b>	<b>75% CLOSED &amp; VERIFIED</b>

We verify any corrections made through desktop review directly with the supplier or certification scheme or, in cases of high-risk non-compliances, through an independent onsite follow-up. In FY24, one factory had undergone a 3rd party follow-up audit to verify the correction of two previously detected critical findings related to attendance record keeping and wage verification. Through close collaboration & education of factory management, the new system was successfully implemented and verified via this independent review. We continuously track and analyse all non-compliances from audits/certifications which enables us to assess any imminent or emerging risks and understand the systemic challenges and limitations in our factories and the industry at large.

Sub-contracting in any bulk production, in whole or in part is prohibited. However, some stages of fabric and garment production require a technical skill or machinery that the contracted facility itself may not be able to facilitate. In such circumstances, we mandate that any supplier who requires a sub-contracted process to fulfil an order to seek prior approval. For our Tier 1 production, the only sub-contracted services we approve is the use of specialist laundries, embroiders and printers. Suppliers must complete our Sub-Contractor Approval Form which outlines the location and details of the sub-contractor and all traceability requirements. The sub-contractor must also read and adhere to the Supplier Code of Conduct and Supporting Policies before work is commenced, and we verify this compliance through our third-party audits.



### GRIEVANCE MECHANISMS

Ensuring the workers in our supply chain have a voice is a crucial step to help identify any human rights breaches. In 2018 we developed our *Grievance Policy*, which outlines the steps a worker can take to confidentially communicate directly with Rodd & Gunn. In 2020, we increased the accessibility of our grievance mechanism, by adding a QR code, email address and WeChat account to allow workers to contact us more easily. All suppliers are directed to display the Grievance Notice in a prominent staff location, outside of the view of management and CCTV - such as break rooms, dormitories, or rest rooms. We follow up on the display of the Grievance Notice by our auditing partners and during factory visits. To date, we have received no grievances through our email, or WeChat account. A robust grievance mechanism is a crucial tool for elevating the worker voice, so investigating other mechanisms that we can adopt to encourage worker engagement will remain a key focus for us.

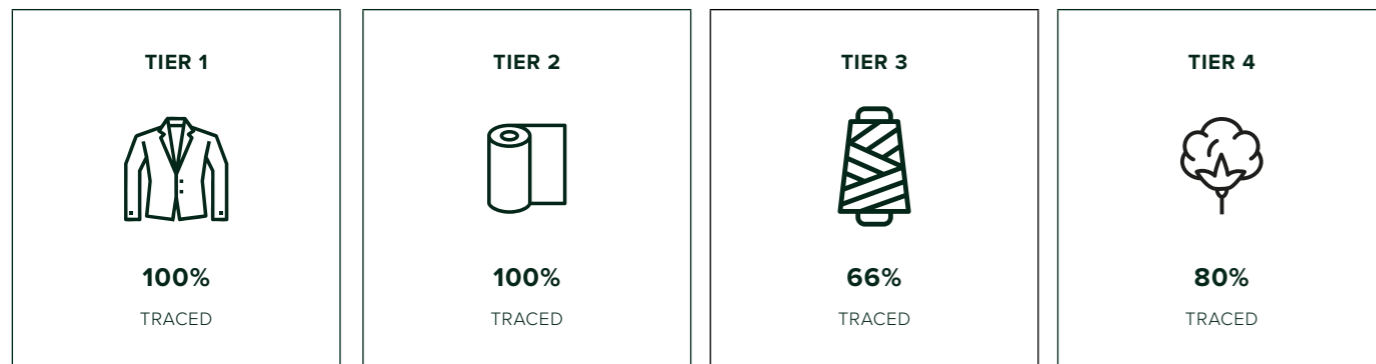
### TRANSPARENCY AND TRACEABILITY

Traceability allows you to assess the strengths and weaknesses of your supply chain. Without it you cannot effectively make the best business decisions. Poor visibility of your supply chain exposes the business and the people in the supply chain to possible risks of poor working conditions, excessive overtime, forced labour, child labour, poor environmental management, excessive waste and so on.

It is important for us to continuously map our supply chain and strive for the full traceability of all our products. To hold ourselves accountable, and to be a transparent business, we publish our Tier 1, 2, 3 & 4 supplier list on our website (<https://www.roddandgunn.com/brand-story/sustainability>). This list is updated annually and allows our customers and other business stakeholders to view vital information about our supply chain such as factory / mill location, services provided, employee data, audit data and certifications held by our suppliers.

We continuously review and collaborate with our suppliers to trace the lower tiers of our supply chain, including raw materials, to identify and build relationships with all suppliers that help produce Rodd & Gunn products. We keep a traceability register by style for each season, where we record the chain of custody and other relevant information. Verification of the disclosed information is achieved through review of various document submissions, and communication with our suppliers, in the form of Certificate of Origin, Transaction Certificates, Spinner/Supplier Declarations, Invoices, Bill of Lading, Packing Lists, and Spinner and Bale Code Declarations.

Verified traceability back to country of origin by supplier tier:



### RESPONSIBLE MATERIAL SOURCING

Through increased transparency, audit results and supplier risk analysis, we can focus our resources on the factories, countries or fibres that have a higher risk of forced / child labour and help us identify and mitigate any potential risks before they occur. However, we do recognise that the greater exposure to instances of modern slavery is more likely to occur in the lower tiers of the supply chain where our direct visibility is reduced, such as farms, gins, and mills that spin, weave and produce the fabrics and yarns.

### RAW MATERIAL PROVIDERS

We work with a range of premium raw material producers and organisations that help us implement Farm > Floor traceability programs and verify the origin of our raw materials. Natural fibres make up 97% of the raw materials we source, our top 3 fibres are: Cotton 82%, Linen 10% and Wool 5%. With the high risks associated with sourcing cotton, in 2018 we developed the Responsible Cotton Sourcing Policy (<https://www.roddandgunn.com/brand-story/sustainability>) which aims to address specific geographical areas which have been identified as high risk to human rights violations and to ensure that the chain of custody of our cotton products could be verified. Achieving full traceability to farm level can be difficult, especially when cotton is traded as a commodity and individual farm output changes every season dependent on many factors such as climate, yield, quality etc. Thanks to our mills & direct cotton partnerships (listed below), we have achieved full traceability of 94% of our cotton, back to Country of Origin and in some cases right back to the raw material processor themselves.

To have the most impact, we built direct relationships with raw material providers and organisations that are working on the ground to improve environmental, and social practices at farm level. Rodd & Gunn have been able to assign several Farm > Floor programs to our core product. These programs are particularly important in reducing our exposure to modern slavery and help provide transparency, verification, and assurance through their own human rights due diligence, upholding local legislation and driving best practice. We have established partnerships with the following premium raw material providers:

- **Good Earth Cotton** ([www.goodearthcotton.com](http://www.goodearthcotton.com)): A modern regenerative farming program that produces climate positive, physically and digitally traceable, Australian cotton. Our most recent farm > floor partnership that started with the procurement of 300 tons of raw cotton from the 2023 harvest that made up 46% of the Spring Summer 2024 range. Every garment produced with GEC is fully verified & traceable with FibreTrace® technology. FibreTrace® embeds traceable IDs into raw fibres, creating verified products and secure supply chain maps, in real-time ([www.fibretrace.io](http://www.fibretrace.io)).
- **Cotton Australia** ([www.cottonaustralia.com.au](http://www.cottonaustralia.com.au)): Cotton Australia is the peak body for Australia’s cotton growing industry. Their cotton to market brand engagement program verifies the claim of Australian cotton through our supply chain from cotton merchant to garment manufacture. This invaluable partnership started in 2019 and has seen our traceable Australian cotton grow from 0% in 2019 to 55% of our total Cotton buy for FY24.
- **Cotton USA** ([www.cottonusa.org](http://www.cottonusa.org)): We have collaborated with Cotton USA to verify the origins of our cotton since 2022. USA cotton now represents 33% of our total Cotton buy for FY24, making it our second biggest sourcing cotton sourcing region. USA grown cotton is mechanically harvested and does
- **The New Zealand Merino Company** ([www.nzmerino.co.nz](http://www.nzmerino.co.nz)): We partnered with NZM in 2023 to forward secure 3 years of raw New Zealand merino wool through their regenerative agriculture program ZQRX. Known as the world’s leading ethical wool, this program sets the highest standards for fibre quality, animal welfare, as well as environment and social responsibility. ZQRX accounts for 20% of our wool buy in FY24.
- **European Flax**: 95% of our linen is sourced from premium European Flax growers in France, Belgium, and the Netherlands. European Flax supports the local European agricultural community, promotes a highly skilled and qualified workforce, compliant with the International Labour Organisation and traceable to small European strip of land that stretches from Caen, to Amsterdam and France.



**KEYTAH STATION, NSW, AUSTRALIA**

Covering 65,000 acres, Keytah Station is a large scale, sustainable cropping operation in rural western NSW. Known as one of the largest cotton producing properties in Australia, Keytah Station produces up to 78,000 bales a year under the brand of Good Earth Cotton. Third party partnerships and accreditations with Carbon Friendly and Downforce verify the sustainable and innovate farming practices making Keytah Station one of the world’s most productive and water efficient cotton properties and Good Earth Cotton the world’s first carbon positive traceable cotton. In 2024, Rodd & Gunn has been fortunate to tour Keytah Station and Wathagar Gin at the exact moment the cotton for our 2025 product was being harvested. The commitment to sustainable agriculture, environmental conservation, biodiversity, and the undertaking responsibility for the welfare and health of their workforce and local community highlights the true values of this organisation whilst cementing Rodd & Gunn’s commitment to the responsible cotton sourcing.

**CERTIFICATIONS**

Certifications have emerged as a powerful tool to help guide the brand and our supply chain toward environmentally and socially responsible practices. The role certifications have on our responsible sourcing is pivotal, serving as the catalysts for positive change and the bases for sustainability claims. They set benchmarks, foster transparency, ensure quality and safety indicators are met, help us meet regulation, protect workers, and empower our consumers to make informed choices aligned with their values. Rodd & Gunn seek out partnerships with specialised industry collaborations and multistakeholder initiatives (MSI), designed to support industry-wide changes and improvements. We strongly endorse and encourage our suppliers to adopt a preferred range of certifications (listed below). These standards cover various aspects, including material sourcing, production processes, labour practices, environmental management and overall ethical conduct. For FY24, 73% of our apparel range was sourced to one or more of the below certifications / standards which is a large increase from 29% in 2021:

SOCIAL	ENVIRONMENTAL	MATERIAL	ANIMAL WELFARE
SMETA	OEKO-TEX STANDARD 100	GOOD EARTH COTTON	RESPONSIBLE WOOL STANDARD (RWS)
SA8000	OEKO-TEX STEP / MADE IN GREEN	MYBMP AUSTRALIAN COTTON	RESPONSIBLE DOWN STANDARD (RDS)
WRAP (Gold / Premium)	BLUESIGN	SUPIMA COTTON	RESPONSIBLE ALPACA STANDARD (RAS)
ISO 45001	ZDHC	EUROPEAN FLAX	GOOD CASHMERE STANDARD
	ISO 14001	MASTER OF LINEN	
	LEATHER WORKING GROUP (GOLD)	ZQ MERINO / ZQRX	
	FOREST STEWARDSHIP COUNCIL (FSC)	GLOBAL ORGANIC TEXTILE STANDARD (GOTS)	
		ORGANIC CONTENT STANDARD (OCS)	
		GLOBAL RECYCLE STANDARD (GRS)	
		RECYCLED CONTENT STANDARD (RCS)	



## POLICIES

### OUR OPERATIONS

Rodd & Gunn is committed to providing all stakeholders with a healthy and safe work environment that is free from bullying and exploitation. Rodd & Gunn values a fair, equitable and diverse workplace. Any conduct which threatens personal health, wellbeing, security of employees, customers or third-party providers is outside of acceptable behaviour.

### EMPLOYEE CODE OF CONDUCT

All Rodd & Gunn team members receive an employment contract, which outlines their rights and responsibilities. All team members are also required to adhere to our Employee Code of Conduct built on the twelve guiding principles that have been established to provide a safe work environment. In addition to the Code of Conduct, employees are also expected to abide by the Rodd & Gunn Anti-Bullying, Anti-Discrimination, Anti-Harassment and Equal Opportunity Policy. Our human resource framework helps to identify any human rights breaches early on, and each team manager is required to monitor and manage any reported incidences through our Human Rights Governance Structure.

### MODERN SLAVERY POLICY

To further support and enhance the employee protection measures, in 2023 we established Rodd & Gunn's first Modern Slavery Policy. The purpose of this policy is to educate and raise awareness amongst Rodd & Gunn employees about modern slavery, what it is and our responsibility to mitigating the possibility of it occurring in our supply chain and business operations. In the past 12 months, the focus shifted to distributing the policy to all our employees and integrating it into our business practises. The policy was made available in 5 languages to accommodate the diverse culture of our global workforce, and it has been built into the Employee Code of Conduct and Induction Handbook onboarding process. The Modern Slavery Committee and the ESG team govern the ongoing implementation of this policy, with final oversight by the CEO and Board of Directors (as per our Human Rights Governance Structure on page 10). This policy is reviewed annually to understand the key modern slavery risks, define preventative measures and to propel action plans. To view this policy in more depth, please visit our website (<https://www.roddandgunn.com/brand-story/sustainability>).

### RESPONSIBLE PURCHASING POLICY

Rodd & Gunn have built strong relationships with our suppliers over time, but we understand that our purchasing decisions could lead to an increase in human rights violations. In 2018, we first developed our Responsible Purchasing Policy, which outlines our strategies and actions for all staff at Rodd & Gunn, to help uphold human rights and alleviate pressure on our suppliers. The policy outlines guidelines for our team members on how to interact with our suppliers, without causing negative environmental or social impacts, and covers strategies for the following business areas: planning and forecasting, design and development, price and price negotiation, payments, and responsible exit strategies. In 2023, we launched internally The Five Principles of Responsible Purchasing E-Learning Course facilitated by Better Buying. All Buying, Design, Procurement and ESG teams took part in this training. As a result, we have established a stronger understanding of what will impact future engagement and decision making. As part of our commitment to continually monitor this policy and review its effectiveness, the Buying and ESG teams meet annually to discuss the policy in direct comparison to our purchasing practises throughout the year. You can view our Responsible Purchasing Policy on our website (<https://www.roddandgunn.com/brand-story/sustainability>).



### OUR SUPPLY CHAIN

#### SUPPLIER CODE OF CONDUCT

Our Supplier Code of Conduct ("The Code") outlines our commitment, standards, and values that we expect, as a minimum, of our supplier partners. The Code is made available to our suppliers in 11 different languages that are spoken across our supply chain. We work with our auditing partner to ensure these are well displayed. The Code is aligned to the Ethical Trade Initiative (ETI) Base Code Guidelines and the International Labour Organisation (ILO) Principles. The Code is reviewed and updated regularly according to industry best practice guidelines. You can view our Supplier Code of Conduct on our website (<https://www.roddandgunn.com/brand-story/sustainability>).

One of our biggest achievements over the last reporting period, has been our work to extend the reach of our Supplier Code of Conduct further down our supply chain. During the reporting period, we have increased the number of Tier 2 suppliers that have signed and displayed our Code of Conduct from 27% to 78%. This now extends the reach of our standards and ensures more of the workers in our supply chain have access to our values and grievance mechanism. We have managed to reach one of our major raw material suppliers (Tier 3), who have also signed our code. We will continue to extend this work throughout the next reporting period to ensure we reach as many suppliers as possible.

#### SUPPORTING POLICIES

Rodd & Gunn require suppliers to adopt a range of social, environmental, animal, chemical and material sourcing policies which are also important to the health, protection, and wellbeing of all workers and animals in the supply chain. This suite of policies is to not only drive best practice within our supply chain, but to continue to hold ourselves accountable to these high standards. To access these policies in more depth please visit our website (<https://www.roddandgunn.com/brand-story/sustainability>).

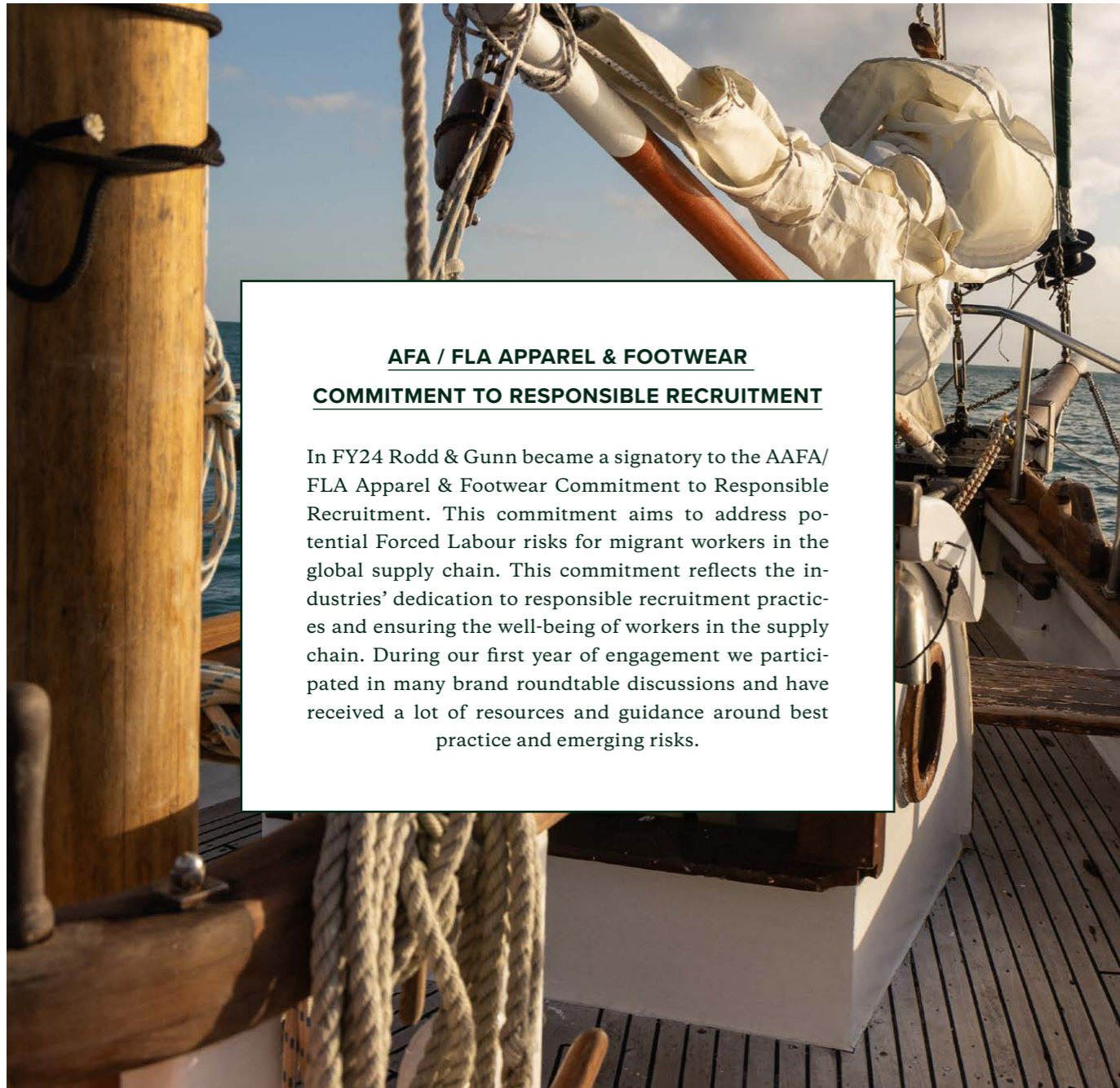
Below is a list of policies that we developed to strengthen and reinforce our Code and supplier practises:

- No Child and Forced Labour Policy
- Gender Equality Policy
- Migrant Worker Recruitment Policy (new)
- Responsible Cotton Sourcing Policy
- Worker Grievance Policy
- Sub-Contractor Policy
- Animal Welfare Policy
- Chemical Management Policy (improved)



## MIGRANT WORKER RECRUITMENT POLICY

As part of our commitment to eradicate modern slavery, Rodd & Gunn has been focusing on the regions in our supply chain that have a higher risk of forced labour violations, more specifically around the recruitment practices for migrant workers. A small part of that work has included a review of our Supplier Code of Conduct and the development of a new Migrant Worker Recruitment Policy. This policy was peer reviewed by an NGO partner to ensure a best practice and robust approach to implementation. The aim of the policy is to set clear expectations of our suppliers regarding the responsible recruitment of migrant workers for our supply chain and minimise associated risks through the adoption of specific principles laid out in this policy. As a direct result of implementing this policy we are now carrying out a due diligence process that involves engaging in open and proactive conversations with our supply chain partners about how best to prevent and mitigate against human rights violations occurring through the recruitment process.



# REMEDATION

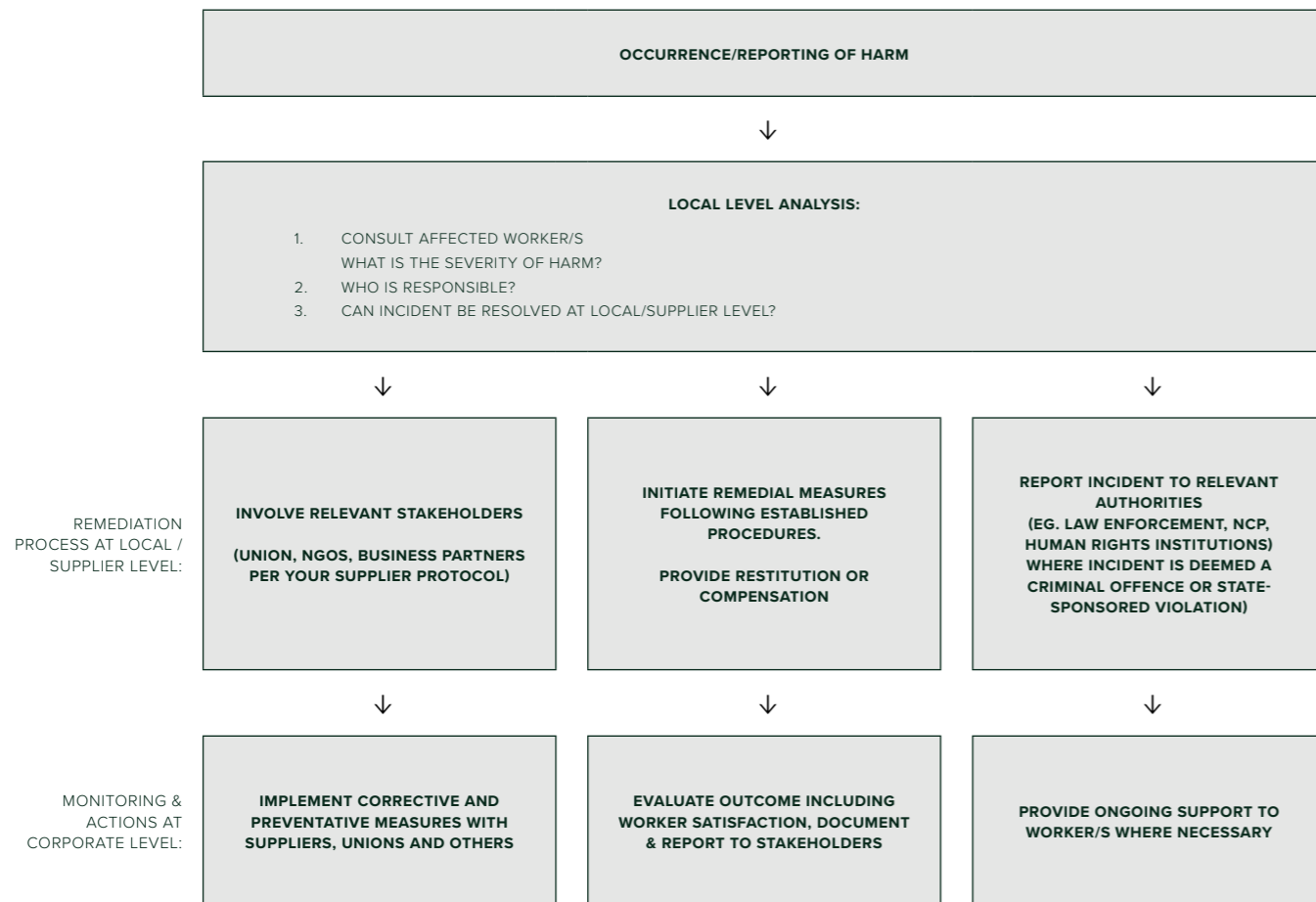
## REMEDATION METHODOLOGY

Remediation can take on many different forms, and we collaborate closely with our suppliers and third-party auditors to help remediate any non-compliances or breaches from our Code of Conduct when issues occur.

Once audits have been completed, a Corrective Action Plan is developed for the factory based on any non-compliances found during an audit. These non-compliances are rated according to their severity (minor / major / critical) and root causes are defined. We then review the results and compare them with previous audits. We engage with suppliers directly to discuss the root causes and appropriate course of corrective action for addressing the non-compliances. Critical non-compliances must be corrected immediately on the Audit Day or within an agreed timeframe. All other non-compliances are addressed in order of priority and recurrence, but typically within a 6-12-month period. We believe this direct communication greatly enhances our relationships with suppliers and builds our understanding of the root causes, as well as potential systemic challenges. For any non-compliances that cannot be accurately verified by our team internally, we request a follow-up audit to ensure these non-compliances have been officially assessed.

Where possible we attempt to collaborate with other brands, industry specialists, NGOs, and local civil society to remediate on a large scale. This type of engagement can provide further insight into a wider range of issues and causes, and allow for more effective remediation and a collaboration of experience and resources. If a case of modern slavery or forced labour is identified through our supply chain, either through our grievance mechanism, third party audit company or other external avenues, we adopt the Ethical Trading Initiative (ETI), Access to Remedy ([https://www.ethicaltrade.org/sites/default/files/shared\\_resources/Access%20to%20remedy\\_0.pdf](https://www.ethicaltrade.org/sites/default/files/shared_resources/Access%20to%20remedy_0.pdf)).

## REMEDATION PROCESS MAP



## REMEDATION LOSS OF INCOME

We have not been able to identify any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains. However, to avoid from this happening we take full responsibility and pay in full for all finished goods and goods in production. This also includes any raw materials and trims purchased by suppliers for future productions. We ensure these materials are used for future production so that suppliers, factories, and mills are not left out of pocket. We do not cancel cancelled purchase orders and in no cases have force majeure clauses been enforced. We continue to be guided by industry-led organisations and their approach to prevention and remediation of human rights abuses such as:

- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- Ethical Trade Initiative (ETI) > Access to Remedy Guidance
- International Labour Organisation (ILO)

Rodd & Gunn believe it is a right for every person to earn a fair wage, which is most often higher than the government set minimum wage in many countries. We understand that low wages are often a key indicator of forced labour abuses, so we consistently monitor and record minimum, actual wage received and living wage data from our production countries, to compare with wage records supplied to us through our third-party auditors. We ensure that the suppliers we choose to work with uphold our values, to ensure all workers have enough income to live safely and freely, with some discretionary income, and are working towards paying a living wage for all workers.



### REIMBURSEMENT TO MIGRANT WORKERS IN MAURITIUS

During a supplier monitoring exercise it was uncovered that migrant workers at two of our Mauritian factories incurred out of pocket expenses (land transportation costs) as part of their recruitment process. Rodd & Gunn requires all suppliers to uphold the International Labour Organization’s (ILO) guidelines for Fair Recruitment, ensuring that no workers bear the cost of recruitment or related fees, and that all such costs are covered by the supplier / factory as part of their labour agent agreements. Whilst these recruitment related fees were minor in nature, reimbursement to the workers was of high priority. Both factories agreed on the remediation and reimbursement to all workers. Adoption of the Employer Pays Principle by all the suppliers is fundamental to combatting exploitation, forced labour, and trafficking of migrant workers in global supply chains.

**SUPPLIER EXIT STRATEGY**

We aim to support, educate, and collaborate with our suppliers to help drive sustained business, continuous improvement, and positive change. In the rare circumstance where we decide to exit a supplier, we ensure the supplier is provided with sufficient notice and a long-term phase-out plan is determined with a clear period that is in line with their production and worker schedule. We understand that terminating relationships with suppliers can impose further distress for workers and will only resort to this if the attempts to remediate have been unsuccessful. Exiting a supplier is considered when one or more of the following circumstances occur:

- A decline in workmanship resulting in elevated customer return rates.
- Inability to meet a design/spec requirement.
- Rodd & Gunn is unable to meet a supplier requirement or minimum quantity.
- No longer commercially viable such as changes in trade regulations and logistical challenges.
- An unwillingness to resolve non-compliances to our Social Compliance or the transparency and traceability requirements laid out at the beginning of the relationship.
- A change in supplier practice where the human rights impacts are too great.



**TRAINING AND AWARENESS**

Educating our team members on modern slavery, and human rights occurrences ensures our business is accountable for identifying any potential cases of modern slavery. In the past 12 months key operational teams have engaged in several events, educational workshops, and collaborations throughout the reporting period to strengthen and upskill their knowledge on matters concerning modern slavery. To highlight a few:

- A full day induction for all staff in the new Ho Chi Minh City representative office on Rodd & Gunn’s Supplier Code of Conduct, supplier policies and modern slavery commitments.
- BWA Ethical Fashion Report engagement, in particular Worker Empowerment: Elevating Worker Voice facilitated by BWA in partnership with Stop the Traffick and Australian Human Rights Institute at UNSW.
- The Five Principles of Responsible Purchasing E-Learning Course facilitated by Better Buying.
- The OECD Due Diligence for Responsible Business Conduct online course for the Garment and Footwear sector.
- The Future of Modern Slavery Reporting in Australia workshop. Facilitated by Fair Supply in partnership with the Attorney General’s Department and Walk Free.
- Member of the Australian Cotton Sustainability Reference Group, a group of internal and external industry stakeholders that provide input to the industry’s sustainability framework across their three pillars PLANET. PEOPLE. Paddock.
- 2024 Cotton Australia Camp Cotton, a four-day event that included a forum on ethical and sustainable cotton procurement, sustainable farming practises, labour practises on farm, a tour of research and development centre and several cotton farm field trips.
- 2024 Good Earth Cotton Farm Tour in rural NSW. A workshop into modern regenerative agriculture that included a tour of Keytah Station and Wathagar Gin, the key research and development hub for Good Earth Cotton and the farm that harvested the cotton for our 2024 Spring Summer collection.
- 2024 Buying, Design and ESG team tour of Vietnam visiting Tier 1 suppliers and spending valuable time in their facilities and meeting the workers who make our clothing.
- Across FY24 Design and ESG team tour of several Italian fabric / yarn mills and artisan footwear producers, observing production processes and working conditions, and learning about the skilful workmanship that has been passed down from generation to generation.



## ASSESSING OUR EFFECTIVENESS

Our ESG Team together with The Board, Senior Management and the members of the Modern Slavery Committee continuously monitor our risks, implement action, and identify areas for further resources and interrogation. Here are some of the actions, objectives and tools used to assess our effectiveness.

	OBJECTIVES	EFFECTIVENESS INDEX
OUR OPERATIONS	MODERN SLAVERY COMMITTEE	<ul style="list-style-type: none"> <li>Cross-functional engagement</li> <li>Mapping of domestic suppliers</li> </ul>
	INTERNAL GRIEVANCE MECHANISMS	<ul style="list-style-type: none"> <li>Confidential Whistle Blower Policy</li> </ul>
	POLICIES & CONTRACTS	<ul style="list-style-type: none"> <li>Implementation of new policies</li> <li>New contracts issued with Modern Slavery Clauses</li> </ul>
	RISK ASSESSMENTS	<ul style="list-style-type: none"> <li>Voluntary and / or mandatory modern slavery reporting</li> <li>Risk assessments of operational suppliers</li> </ul>
	NGO ENGAGEMENT	<ul style="list-style-type: none"> <li>Baptist World Aid Fashion Report (BWA)</li> <li>Carbon Disclosure Project (CDP)</li> <li>Good on You (GOY)</li> </ul>
	TRAINING & AWARENESS	<ul style="list-style-type: none"> <li>Voluntary and / or mandatory modern slavery reporting</li> <li>OECD Due Diligence Gap Analysis</li> <li>Induction training of modern slavery related policies</li> </ul>
		OBJECTIVES
SUPPLY CHAIN	TRANSPARENCY & TRACEABILITY	<ul style="list-style-type: none"> <li>Public vendor list</li> <li>Voluntary and / or mandatory modern slavery reporting</li> <li>Supplier mapping of all tiers, including sub-contractors</li> <li>Supplier / Factory / Farm on site visits</li> </ul>
	RESPONSIBLE MATERIAL SOURCING	<ul style="list-style-type: none"> <li>% of Cotton traced</li> <li>% of raw materials aligned to a sustainability attribute</li> <li>Implementation of Farm &gt; Floor programs across all fibres</li> </ul>
	CODE OF CONDUCT & SUPPLIER POLICIES	<ul style="list-style-type: none"> <li>Number of Tier 1, 2 and 3 suppliers signed</li> </ul>
	RISK ASSESSMENTS & SUPPLIER MONITORING	<ul style="list-style-type: none"> <li>Annual audit reporting</li> <li>NGO engagement</li> </ul>
	TRAINING & AWARENESS	<ul style="list-style-type: none"> <li>Measure completion rate, feedback and comprehension</li> <li>Track supplier training</li> <li>NGO engagement</li> </ul>
	GRIEVANCE MECHANISM	<ul style="list-style-type: none"> <li>Number of grievances received</li> <li>Direct worker engagement mechanisms</li> </ul>

## MOVING FORWARD

We recognize that continuous improvement is about setting goals and integrating them into our business practices, but also having mechanisms that regularly assess their effectiveness. We have identified the following key focus areas to further improve our mitigation and remedial actions of modern slavery risks across our operations and supply chain:

### OUR OPERATIONS

- Continue mapping our operational suppliers and build on the operational supply chain register.
- Increased transparency and public disclosure through NGO engagement and public reporting.
- Increased engagement with the food and beverage suppliers that service The Lodge Group.
- Centralise procurement in Vietnam for all non-apparel goods, providing further insight to the supply chain and opportunities to align acceptable operating standards.
- Utilise the Learning Management System (LMS) to deploy training modules on identifying the risks of Modern Slavery, reporting mechanisms and the implementation of our Modern Slavery Policy.
- Upgrade and enhance the internal grievance mechanism with a new Whistleblower Policy and review with HR any complaints or issues reported.
- Conduct an annual corporate self-assessment through the OECD Due Diligence GAP Analysis and the Walk Free Modern Slavery Benchmarking Tool.

### OUR SUPPLY CHAIN

- Invest in supplier awareness training across our Tier 1 supply chain.
- Continuing to expand farm > floor programs across our product range by partnering with leaders in the raw material and textile innovation space.
- Continuing the implementation of our Supplier Code of Conduct to as many lower tiers as possible.
- Implement further brand-level certifications aligned to our top 3 fibres.
- Vietnam production team to establish a regular factory access schedule across our Tier 1 supply chain.
- Improve product traceability and provide more insight into the labour practices of the lower levels of our supply chain.
- Strengthening our Grievance Mechanisms and increasing worker representation by conducting direct worker surveys and collaborating with local NGOs on worker/factory capacity building and migrant labour risks.
- Review and implement a new approach to our supplier monitoring program that is tailored to the specific risk profile of each country that we manufacture in.
- Continue to work towards full visibility of the cotton supply chain to ensure no cotton is procured from conflict regions.

We are committed to staying informed on emerging risks, applying a metric-based index to benchmark our effectiveness, and communicating our progress in 2025 and beyond.

## GLOSSARY OF TERMS

### **The American Apparel & Footwear Association (AAFA)**

A national trade association representing apparel, footwear and other sewn products companies, and their suppliers, which compete in the global market.

### **Anti-Slavery International**

Founded in 1839 the oldest international human rights organisation in the world who work to eliminate all forms of slavery and slavery like practices throughout the world.

### **Artisan Production**

An establishment or business where an artist, artisan, or craftsperson teaches, makes, or fabricates crafts or high-quality products by hand or using traditional methods, with minimal automation and in small batches.

### **Baptist World Aid (BWA)**

A Christian charity organisation based in Australia, helping to reduce poverty in communities around the world.

### **Carbon Disclosure Project (CDP)**

A not-for-profit charity that runs the global disclosure system for investors, companies, cities, states, and regions to manage their environmental impacts. The world’s economy looks to CDP as the gold standard of environmental reporting with the richest and most comprehensive dataset on corporate and city action.

### **Chain of Custody**

In the legal context, is the chronological documentation or paper trail that records the sequence of custody, control, transfer, analysis, and disposition of materials, including physical or electronic evidence.

### **Code of Conduct**

A statement that describes a minimum set of behaviours, rules, responsibilities, and practises which an organisation expects of its suppliers and staff to uphold. It may extend to the supply chain and may include commitments on how the organisation will work with its suppliers to build trust and ensure compliance.

### **Due Diligence**

Refers to an ongoing management process to identify, prevent, mitigate, and account for how an entity addresses actual and potential adverse human rights impacts in their operations and supply chains, including modern slavery.

### **Ethical Fashion**

An umbrella term describing the efforts within the fashion industry or a brand to reduce its environmental impacts, provide protection for garment workers, and uphold animal welfare.

### **Ethical Sourcing**

Products and services from each point of a business’s supply chain are obtained in an ethical way, which includes upholding rights, decent working conditions, health and safety, good business ethics and more.

### **Ethical Trade Initiative (ETI)**

The Ethical Trading Initiative is a UK-based independent body, which brings together companies, trade unions and non-governmental organisations to ensure compliance with international labour standards in the global supply chains of member companies.

### **Fair Labor Association (FLA)**

A non-profit collaborative effort of universities, civil society organizations, and businesses. It describes its mission as promoting adherence to international and national labour laws.

### **Fair Wage**

Is the wage which is above the minimum wage but below the living wage.

### **Governance**

The process of making and enforcing decisions within an organization or society. It is the process of interactions through the laws, social norms, power, or language as structured in communication of an organized society over a social system.

### **Global Slavery Index (GSI)**

The Global Slavery Index is a global study of modern slavery published annually by the Minderoo Foundation’s Walk Free initiative.

### **Grievance Mechanism**

A grievance mechanism is a procedure that provides a clear and transparent framework to address complaints in recruitment and the workplace.

### **Human Trafficking**

The unlawful act of transporting or coercing people to benefit from their work or service, typically in the form of forced labour or sexual exploitation.

### **International Labour Organization (ILO)**

A United Nations agency whose mandate is to advance social and economic justice by setting international labour standards.

### **International Labour Organization Forced Labour Indicators**

Represent the most common signs that point to the possible existence of a forced labour case. The 11 indicators of forced labour are abuse of vulnerability, restriction of movement, deception, withholding of wages, retention of identity documents, intimidation and threats, physical and sexual violence, isolation, abusive living and working conditions, excessive overtime, and debt bondage.

### **Labour Broker**

An intermediary or agency that recruits, arranges, and sometimes supplies workers to employers. These brokers are typically responsible for facilitating the hiring process, including job placement and migration of workers, particularly in sectors like manufacturing, agriculture, and construction.

### **Labour Rights Index**

A de jure index that measures major aspects of employment regulation affecting a worker during the employment life cycle in 135 countries.

### **Migrant Worker**

A person who moves away from his or her place of usual residence, within a country (Internal) or across an international border (Foreign), temporarily or permanently, and for a variety of reasons.

### **Modern Slavery**

Situations of exploitation in which a person cannot refuse or leave because of threats, violence, coercion, deception, or abuse of power. Throughout this statement the term “Modern Slavery” has been used as an umbrella term that is referring to all forms of modern slavery such as forced labour, child labour, human trafficking, and bonded labour.

### **Multistakeholder Initiatives (MSI)**

MSI’s are frameworks for engagement between businesses, civil society and other stakeholders such as governments. They seek to address issues of mutual concern, including human rights and sustainability.

### **NGO**

A non-profit organization that operates independently of any government, typically one whose purpose is to address a social, environmental, or political issue.

### **The Organisation for Economic Co-operation and Development (OECD)**

An intergovernmental organisation with 38 member countries with market-based economies collaborate to develop policy standards to stimulate sustainable economic growth and world trade.

### **Subagent**

An individual or entity appointed by a primary agent to perform specific tasks or duties on their behalf. The subagent works under the authority or instructions of the main agent but does not have a direct relationship with the principal (the person or party for whom the primary agent is acting).

### **Supplier Tiers**

Supply chains can be broken down into a system of “Tiers” based on closeness to your business or final product. Tier 1 suppliers are the direct garment manufacturers for the final product. Tier 2 suppliers provide all the input materials for production. Tier 3 suppliers are the sub-contractors to your Tier 2 and tend to be spinning mills. Tier 4 suppliers are the providers and traders of the raw materials.

### **Trafficking in Persons Report (TIP)**

An annual report issued by the U.S. State Department’s Office to Monitor and Combat Trafficking in Persons. It ranks governments based on their perceived efforts to acknowledge and combat human trafficking.

### **Traceability**

Supply chain traceability is the process of tracking every commercial transaction in the end-to-end supply chain to account for the time and place where every step occurred in the supply chain of a unit, batch, or lot of finished good.

### **Transparency**

Supply chain transparency is the process of disclosing suppliers to private customers and other stakeholders.

### **United Nations Guiding Principles on Business and Human Rights**

An instrument consisting of 31 principles implementing the United Nations’ “Protect, Respect and Remedy” framework on the issue of human rights and transnational corporations and other business enterprises.

### **Voluntary Reporting**

The reporting person or entity, without any legal or administrative requirement to do so, submits a voluntary report because they chose to do so and not because they were forced.





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