



APG & CO
THE BRAND ASSEMBLY

Modern Slavery Statement – FY2020

January 2021

<https://www.apgandco.com/>



From the Chief Executive Officer of APG & Co

This is APG & Co's first modern slavery statement, produced to meet reporting requirements under the Australian Modern Slavery Act 2018 (Cth).

Our approach to corporate and social responsibility has always been founded on the principles of respect, accountability and continuous improvement. Our Social compliance program has been an integral part of our sourcing and procurement process for several years.

This statement outlines the work we have done to identify and address modern slavery risks in our supply chains and operations during our financial year which ended on 31 July 2020.

During FY20 we have been working consistently to review and assess our supply chains and operations. During this time, we sought to update and revise our foundational ethical sourcing policies which fundamentally underpin our entire procurement program. Robust research was undertaken in the area of forced or excessive overtime, child labour, debt bondage, unsafe or unhealthy working environments and restrictions on the right of workers to freedom of association. Through this research we began developing revised supplier code of conduct, global sourcing principles and supplier remediation guidelines, which will be distributed next year. APG & Co is firmly committed to maintaining our strong supplier relationships and to further improving transparency in our supply chains and operations.

APG & Co has worked very closely with our suppliers to responsibly manage the impact of the COVID-19 pandemic. We have offered to pay deposits on some garment styles or make payments earlier than as specified in our terms, in order to help some suppliers with their cashflow issues. In turn, our suppliers have supported APG & Co by providing rental abatements, trade discounts or extended payment terms. We will continue to do what we can to support our greatly valued suppliers, and to assist them during this tough time.

Moving forward, APG & Co will maintain a strong focus on our goal of identifying, preventing and mitigating modern slavery within our supply chain. We will continue to devote resources to the development of our modern slavery compliance program, and to do all that we can to promote respect for human rights and protect vulnerable workers from harm. APG & Co will be transparent and open about our efforts in this space and will not shy away from the challenge of tackling modern slavery in our business, and in our industry.

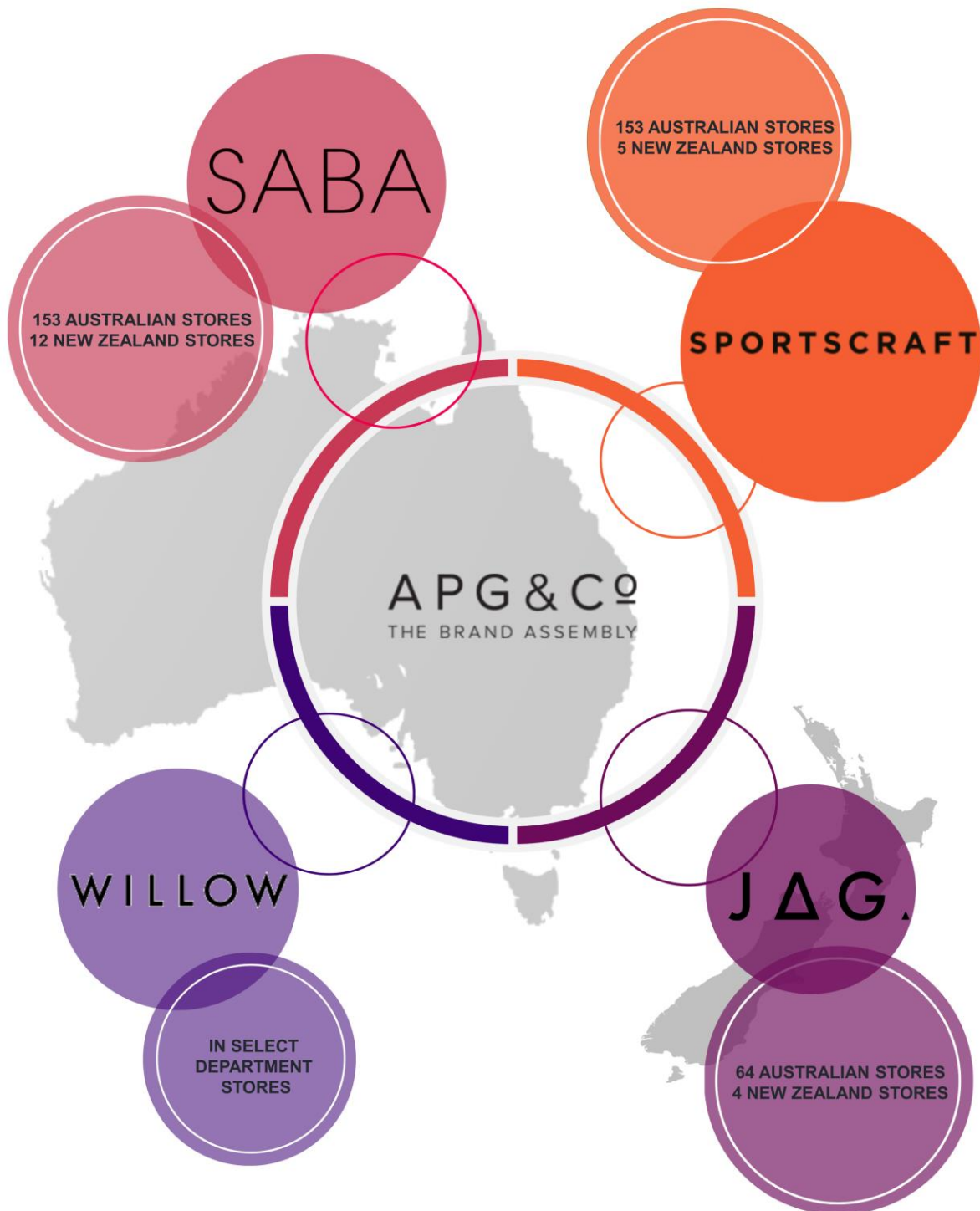
A blue ink signature of Martin Matthews, consisting of stylized initials and a surname.

Martin Matthews
CEO APG & Co

(This Modern Slavery Statement has been approved by the Board of APG & Co – 28th January 2021).

1. APG & Co Structure, Operations and Supply Chains

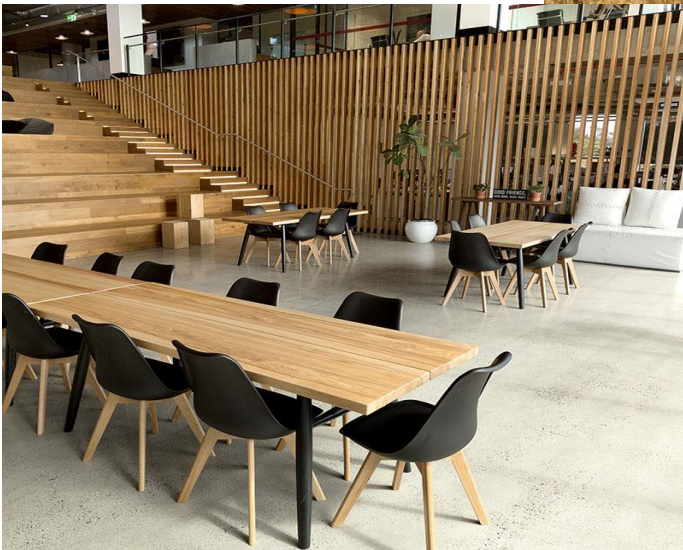
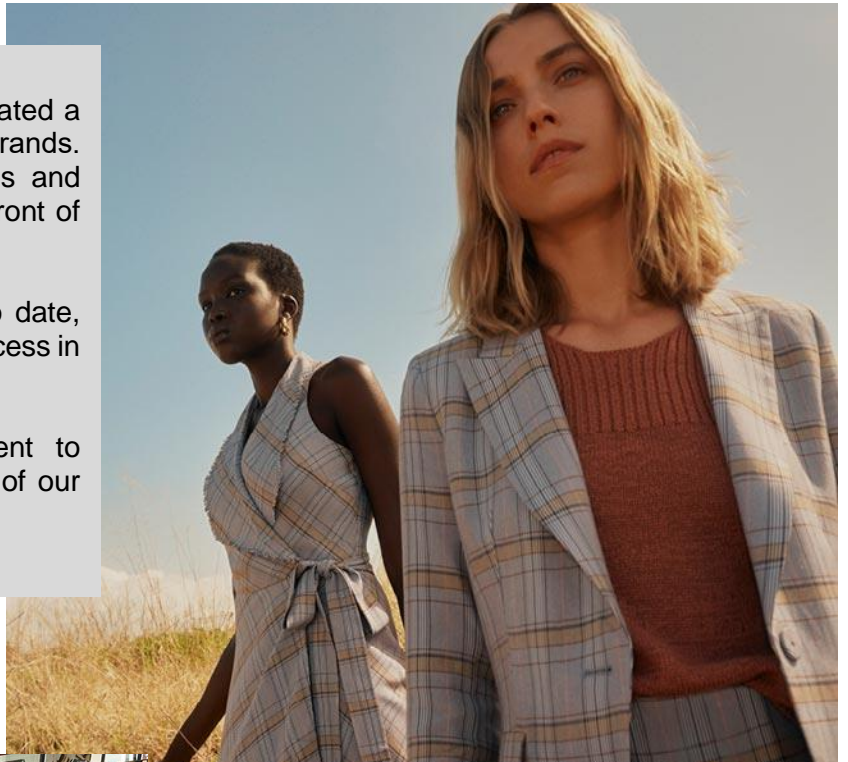
APG & Co is a privately held Australian company, which was established in the early 1950's. We derive our revenue from the manufacture and retail of clothing and accessories. APG & Co owns and manages four retail brands SABA, Sportscraft, JAG and Willow.



For over 50 years, APG & Co has curated a collection of Australia's great fashion brands. Our purpose is to grow these brands and guide their evolution to be at the forefront of Australian fashion.

We are proud of our achievements to date, and relentlessly strive for continual success in the future.

We have an unwavering commitment to design and quality across all aspects of our business.



APG & Co employs 1,109 staff (including casual workers). We have 145 head office staff, based at our headquarters in Alexandria, New South Wales.

APG & Co primarily designs women's and men's wear for the Australian and New Zealand market.

APG & Co also sells accessories (hats, hair accessories, scarves, pocket squares, ties, belts and watches) as a direct business.

APG & Co supplies products for Costco, which are managed by The Apparel Group.

APG & Co's brand, Sportscraft, has also been the supplier of the Australian Olympic Uniform for 7 past Olympics.

At APG & Co we take great care in selecting the partners who supply us with our products and services. We are known for our quality and craftsmanship, and we source the best fabrics from around the world.

We strictly control our supply chain to ensure each and every garment is of the highest quality. Each season we source the best textiles from across the globe, partnering with mills and manufacturers whose values closely align with our own. APG & Co is proudly committed to establishing long-term business partnerships and has been working with some of our overseas suppliers for more than 20 years.

Our Suppliers

During FY20 APG & Co engaged with a total of 400 goods and services suppliers in 22 countries.

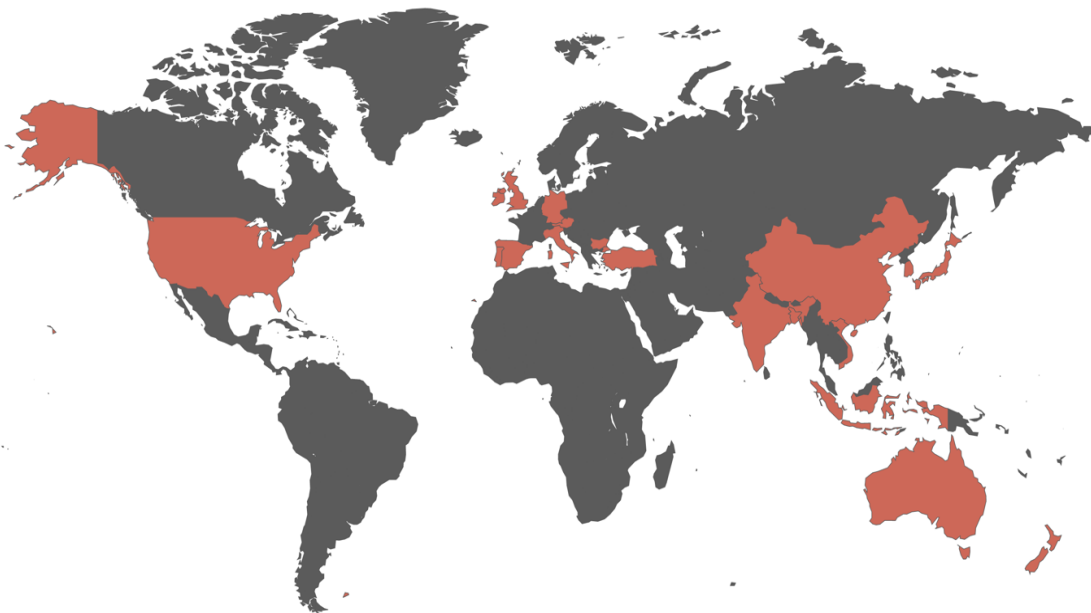
APG & Co's primary business model is directly sourcing products for resale (i.e. clothing and accessories). APG & Co also acquires not for resale goods such as IT equipment and retail store fit-outs as well as services such as warehousing, logistics, IT services, building maintenance and cleaning.

Goods for Resale

Tier 1 and 2 suppliers are a sub-set of our total suppliers:

Tier 1 suppliers are the facilities which produce our finished goods.

Tier 2 suppliers are those involved in the production and processing of our products such fabric vendors, fabric agents, dyeing facilities and trim vendors.



| | | | |
|------------|-----------|-------------|----------------|
| Australia | Germany | Japan | Thailand |
| Austria | Hong Kong | New Zealand | Turkey |
| Bangladesh | India | Portugal | United Kingdom |
| Bulgaria | Indonesia | Singapore | USA |
| China | Ireland | South Korea | Vietnam |
| | Italy | Spain | |

2. Risks of Modern Slavery Practices

APG & Co understands that all products and services have a possible risk of modern slavery in their supply chains. We have made a commitment to methodically review our operations to identify our modern slavery and vulnerable worker risks. We have worked to identify risks-based indicators through information provided by expert organisations, including the Global Slavery Index (GSI) and the International Labour Organisation (ILO).

We have categorised our operational risk into two key geographical areas;

- our overseas supply chain
- our Australian retail and distribution network.

We have principally focussed our FY20 modern slavery risk assessment on our overseas supply chain. It is here that we have found the risk of modern slavery to be highest. APG & Co usually does not have direct visibility and control over the hiring, terms or working conditions for these workers, which can limit our ability to monitor risk.

2.1 Risks in APG & Co's Operations – Overseas Suppliers

As APG & Co is part of the fashion industry which has global supply chains, we recognise that there is an inherent risk that we could potentially contribute to occurrences of modern slavery. APG & Co does not own any of the factories where its products are produced but does engage third party suppliers and factories.

If one or more of our suppliers, factories or third-party labour sources engages in:

1. slavery, forced labour or servitude;
2. the use of child labour;
3. debt bondage; and/ or

4. deceptive recruiting for labour or services;
5. human trafficking; or
6. forced marriage,

this would mean that APG & Co could be 'contributing' to modern slavery practices, even if this is happening without our knowledge. We consider, given the nature of our suppliers and their operations, that the top five risks are our most significant, as we have a lower risk of contributing to forced marriage.

The vast majority of APG & Co's garments, textiles and accessories are produced in China, Vietnam and Hong Kong. It is well recognised that modern slavery and labour exploitation is frequently detected in South and East Asia. Therefore, APG & Co has identified that some of our suppliers present a higher risk of potential modern slavery practices, through their geographical location.

There have been a range of potential risks of modern slavery identified throughout the entire supply chain, including the labour practices used by raw material suppliers (e.g. cotton producers). We are aware of allegations of forced labour of minority groups in Xinjiang and Dandong which has spread throughout China. APG & Co do not engage directly with any first-tier suppliers from those regions. We have begun the process of fully tracing our second (fabric & trims) and third tier (raw material) cotton suppliers, with the goal of ensuring that we are not knowingly using cotton sourced from those areas (or working with any suppliers who may be suspected of using forced labour).

APG & Co is also aware of the increased modern slavery risk due to the COVID-19 pandemic and its impacts on vulnerable people who may work as part of our supply chain and operations.

2.2 Risks in APG & Co's Operations - Australia

APG & Co's head office is located in Sydney, with a warehouse in Victoria and retail operations across Australia and New Zealand.

Consideration has been given to whether there are risks for APG & Co when engaging labour-intensive services to support its head office, facilities management, retail facilities and logistics such as:



Whilst opportunities to exploit or traffic workers within Australia are limited - because of its strong migration controls, geographic isolation, high degree of regulation, and strong compliance and enforcement - we have recognised that many workers in the above sectors and industries may be from vulnerable populations. We consider that there may be modern slavery risks for us when we contract for cleaning services, security arrangements, freight, distribution, construction, store fit outs and logistics. We are aware that these service providers often rely on a workforce that includes migrants, low-skilled workers or people from cultural or linguistically diverse backgrounds.

APG & Co may also rely on recruiters or third-party labour hire services, which increases our modern slavery risks, especially if the workers we rely on come from vulnerable backgrounds.

Whilst we have not identified any specific instances of modern slavery harm in our domestic supply chains or operations during FY20, we are realistic in our expectations that instances of modern slavery and non-compliance with our supplier code of conduct and global sourcing principles may be found in the future. We are also aware that we will need to continue to work with our suppliers on remediation of non-compliance with our code and principles from time to time, and we have therefore developed processes for this.

3. Actions Taken to Address Modern Slavery Risks

We have taken the following actions in FY20 to address our identified modern slavery risks. We will continue to review and assess the modern slavery risks in our operations and supply chains moving forward.

We view our ongoing work in this space as a process of continuous improvement.

3.1 Board Level Commitment

The APG & Co Board is committed to the enforcement of its modern slavery expectations and requirements as outlined in our code and principles. These fundamental requirements apply not just to products sourced from our factories and suppliers overseas - but for all products and services in the entire APG & Co supply chain.

We have implemented Board level responsibility for APG & Co's modern slavery impacts. We are working to ensure that our Board and management team are informed about any modern slavery risks that are identified in APG & Co's supply chain and operations, so that these can be appropriately addressed. Reports on modern slavery compliance and reporting were made to the Board on a regular basis during FY20.

APG & Co has also established a modern slavery working group, and committed resources to this process, to ensure that APG & Co has a strong modern slavery compliance program in place.

3.2 Improving Our Transparency

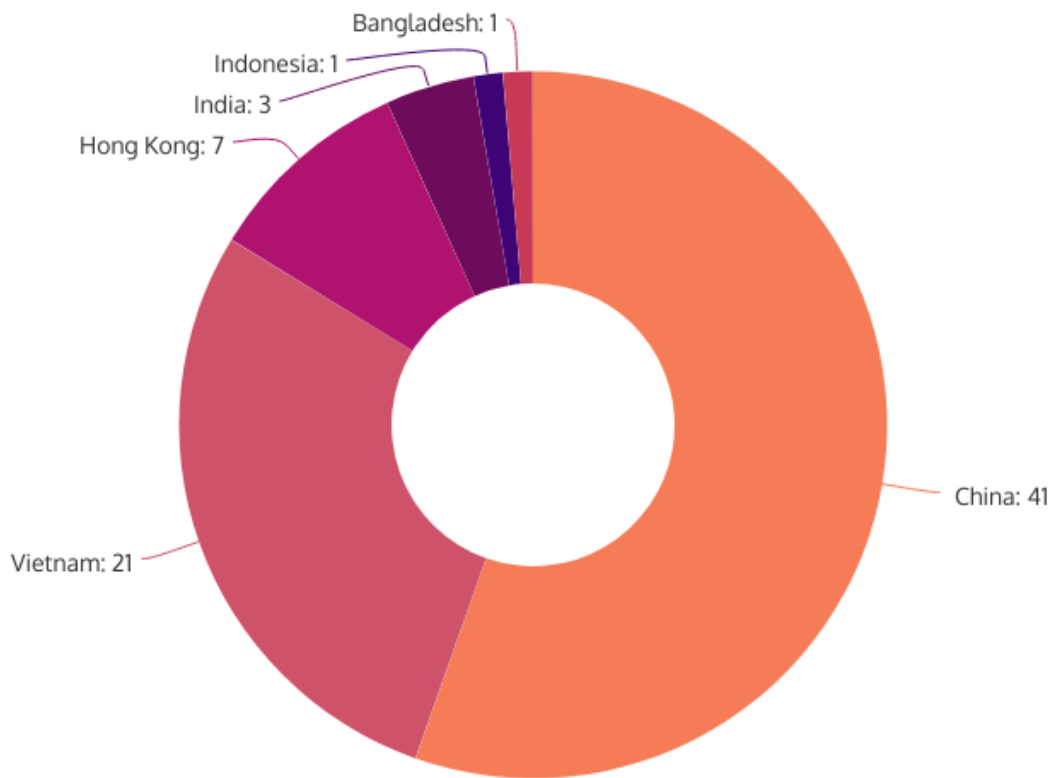
During FY20 we conducted a detailed desktop review of our first and second tier suppliers. We are now in the process of developing an updated supplier list for publication on our website.

APG is committed to a process that will allow the further identification and review of our suppliers (into the second and third tiers of our supply chain) over time. This will include taking steps to trace all our suppliers of cotton and other raw materials.

3.3 Supply Chain Review, Assessment and Transparency

APG & Co is focussed on continuously working to promote best practice within our business and its supply chains and operations. We aim to be an industry leader in ethics, transparency and responsible business dealings. We understand the need to conduct due diligence into all levels of our supply chains and are focussed on this as part of our process of continuous improvement.

Tier 1 Suppliers - we have identified that during FY 20 we worked with **74 Tier 1 facilities in 6 countries.**

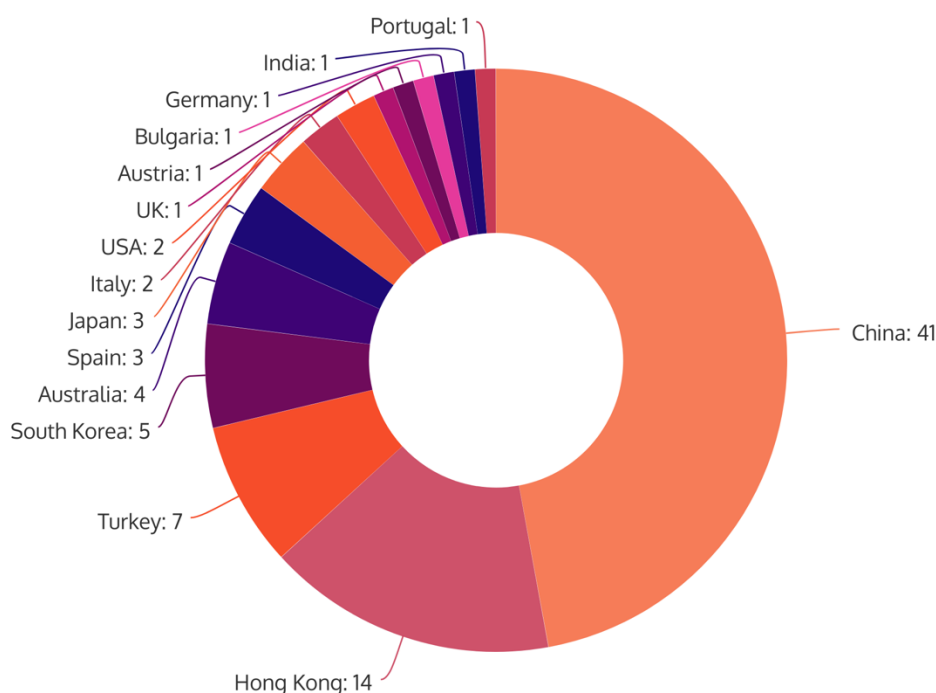


| Country | Number of Facilities | % | Country | Number of Facilities | % |
|-----------|----------------------|-----|------------|----------------------|----|
| China | 41 | 56% | India | 3 | 4% |
| Vietnam | 21 | 29% | Indonesia | 1 | 1% |
| Hong Kong | 7 | 10% | Bangladesh | 1 | 1% |

Tier 2 Suppliers - we have so far identified that during FY20 we worked with **86 Tier 2 facilities** in **15 countries**. These include fabric vendors, fabric agents, and trim vendors.

This does not account for all Tier 2 suppliers used by APG & Co. We are continuing to work closely with our Tier 1 suppliers who directly manage and source fabrics and raw materials to gain further transparency to minimise the risk of Modern slavery amongst Tier 2 suppliers.

We will continue to work on this process as part of our commitment to developing a better understanding of our full supply chains and operations.



| Country | Number of Facilities | % | Country | Number of Facilities | % |
|-------------|----------------------|-----|----------------|----------------------|----|
| China | 41 | 48% | USA | 1 | 1% |
| Hong Kong | 14 | 16% | United Kingdom | 1 | 1% |
| Turkey | 7 | 8% | Austria | 1 | 1% |
| South Korea | 5 | 7% | Bulgaria | 1 | 1% |
| Australia | 4 | 5% | Germany | 1 | 1% |
| Spain | 3 | 3% | India | 1 | 1% |
| Japan | 3 | 3% | Portugal | 1 | 1% |
| Italy | 2 | 2% | Vietnam | 1 | 1% |

3.4 Update and Development of Internal Policies and Processes

During FY20, APG & Co devoted considerable time and resources to the updating and development of its range of corporate and social responsibility policies. These policies communicate our standards and requirements to the business partners in our supply chain.



Supplier Code of Conduct

This code sets out fundamental requirements for all of our suppliers and business partners (including all authorized sub-contractors or raw materials suppliers). The requirement of this Code of Conduct will need to be satisfied by all suppliers to APG & Co.



Global Sourcing Principles

These principles set out the fundamental requirements and minimum standards that must be followed by our suppliers. Suppliers will be required to apply these Principles at all times and be able to demonstrate and provide evidence to APG & Co (upon request) that they are doing so.



Critical Path Policy

This policy maps out timelines that are sufficient for suppliers to produce APG orders without detriment to their workers (in terms of having to do overtime etc). This policy gives a minimum of four weeks for production. This policy is built on:

- the stable and long-standing relationships APG & Co has with its suppliers;
- consistent transparency (with target prices and margins disclosed to APG & Co suppliers);
- realistic production time frames (in line with all category lead times);
- consistent quality standards (i.e. APG & Co is clear from the outset on requirements); and
- the specification that no changes are made to the order after it is uploaded into APG & Co's system where possible.



Supplier Remediation Guidelines

These guidelines provide general guidance to APG & Co staff and its auditors if there is a need to remediate or address issues that are identified as non-compliance with the fundamental requirements of the code or principles.



Critical Path Policy

This plan sets out our compliance audit findings and summarises corrective action that our suppliers need to take to ensure conformity with the code and principles.



Whistleblower Policy

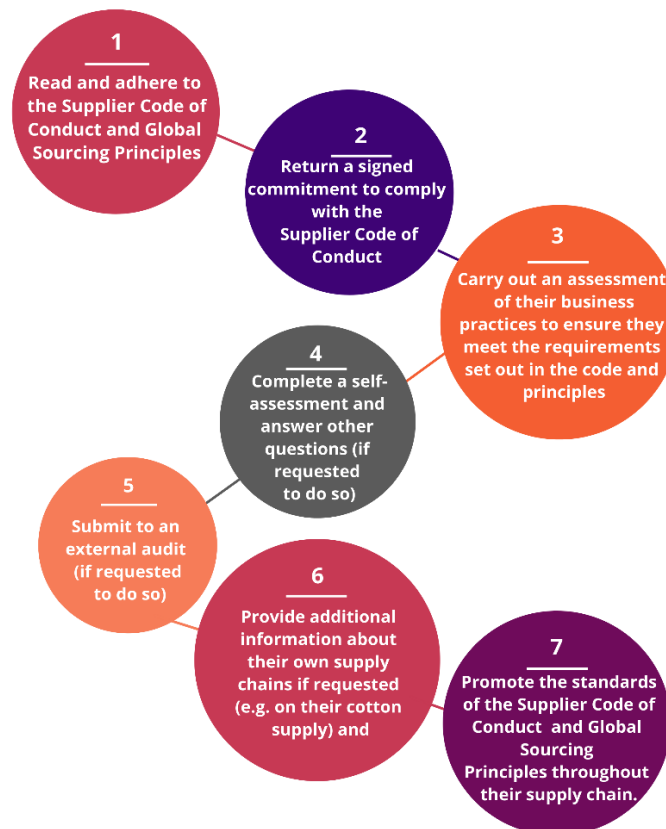
This policy supports the disclosure by individuals of wrongdoing occurring within APG & Co and its operations and supply chains so that appropriate action can be taken to address this. This policy includes a no-retaliation clause for the protection of those who use it, and is used to record and handle complaints that identify occupational risks to health or safety or incidences of modern slavery and human trafficking.

3.5 Supplier Approval Processes

APG & Co has a supplier approval process during which we will communicate the standards we expect of our suppliers. This process has been in place since 2015 for all Tier 1 suppliers, and during FY20 we have further updated and improved our process and will continue to roll this out to Tier 2 and Tier 3 suppliers.

When we choose our suppliers, we strive to work with suppliers who have an alignment with our stated standards and values on ethical sourcing and labour practices along with quality, price, quantity and lead times. We train our staff to be aware that there is a heightened risk in sourcing products from certain areas of the world. APG’s supplier approval arrangement sits with our Global Manager of Global Sourcing who is based in our Sydney head office. This role sits under the Creative Director who reports to our CEO. A physical visit is conducted by an APG Staff member (either the Global Manager of Global Sourcing, Head of Production or Head of Development) before any business can be engaged with a factory.

Since March 2020 - we have worked to continue the process as best we can, given pandemic-related travel restrictions. For any suppliers where we cannot do an inspection, we either use a third-party inspection and testing service and/ or review the audit documentation that they have completed for other retailers. Labour standards are also audited externally using SEDEX, BSCI, ITS Workplace assessments and Worldwide Responsible Accredited Production (WRAP) principles. APG & Co reviews its vendors on a regular basis and keeps its suppliers updated on our future business plan e.g. if there is growth or decline, we ensure the vendor is aware of APG & Co’s plans. Moving forward, all new APG & Co suppliers will be required to:



We have updated and distributed our Supplier Code of Conduct to our Tier 1 and Tier 2 suppliers; and are in the process of distributing the amended Global Sourcing Principles. It is within these principles we outline our expectations around honest and transparent dealings, along with a commitment to making continuous improvements in their operations. We also require that suppliers fully comply with the legal requirements of the country in which they operate.

3.6 Supplier Remediation Processes

During FY20 we have updated and further developed our supplier remediation processes, and have put in place procedures to address supplier conduct and practices that may not meet the requirements of the code and principles (e.g. situations of forced labour, labour trafficking, use of child labour etc).

The APG & Co process of supplier remediation will vary in the circumstances of each instance of non-compliance, but will generally involve the following steps:



3.7 Development and Continuation of Strong Supplier Relationships

APG & Co has a strong focus on direct dealings with suppliers and maintaining excellent working relationships.

Prior to the COVID-19 pandemic – APG & Co held regular supplier conferences in China and Vietnam (its major countries of production) to discuss key strategic initiatives for the business to keep its suppliers up to date. During the COVID-19 pandemic, we have had constant communication with all our vendors and have been sending regular business updates relating to APG & Co’s position during the pandemic.

APG & Co did request and receive discounts from their suppliers in order to reduce cancellations and ensuring a longstanding business relationship could be maintained.

In addition, we worked closely with each individual vendor to ensure that any unused fabrics and trims from previous or cancelled orders were reallocated into new styles. We have also worked on the re-instatement of orders where we could and offered to pay deposits on some styles to help suppliers with cashflow issues where the suppliers have requested payments earlier than our terms. We have tried to accommodate all reasonable supplier requests where we can.

We have been keeping all vendors updated with our forward projections and plans, to assist them to manage their production schedules.

3.8 Development of Modern Slavery Training

During FY20, and to address the challenges of the COVID-19 environment, APG & Co has developed online Modern Slavery Training modules for relevant staff or suppliers. This training is designed to assist

staff to understand modern slavery and reporting requirements, and to allow the identification of modern slavery related 'red flags' in APG & Co's supply chain and operations. Training has commenced and is underway for over 30 key staff. APG & Co will keep a record of all training offered and completed by its staff and suppliers during the full training roll-out in FY21.

3.9 Cooperation with External Agencies and Initiatives

We have implemented requirements for doing business with APG & Co that are based on the United Nations Guiding Principles on Business and Human Rights, the Universal Declaration on Human Rights, the International Labour Organisation's (ILO) Core Conventions, the Ethical Trading Initiative (ETI) Base Code (which is founded on the conventions of the ILO), national legislative requirements and accepted best ethical and sustainable business practice. We also support and work with the following industry initiatives and organisations.

COVID-19: Action in the Global Garment Industry (ILO) – APG & Co signed this Call to Action which aims to generate action across the global garment industry to protect workers' income, health and employment and establish sustainable systems of social protection for a more just and resilient garment industry. It sets out urgent priorities and specific commitments for organisations across the industry to endorse as the first step to collective action to achieve these goals.

Accord on Building and Fire Safety in Bangladesh - APG & Co is a signatory to the Accord which is an independent, legally binding agreement between brands and trade unions to work towards a safe and healthy garment and textile industry in Bangladesh. After the Rana Plaza factory building collapsed on 24 April 2013, killing 1133 people and critically injuring thousands, the accord was created to enable a working environment in which no worker needs to fear fires, building collapses, or other accidents that could be prevented with reasonable health and safety measures.

Uzbek Cotton Pledge Signatory – APG & Co has signed the Cotton Pledge with the Responsible Sourcing Network, signifying a public commitment to not knowingly source Uzbek cotton for the manufacturing of any of their products until the Government of Uzbekistan ends the practice of forced labour in its cotton sector.

Ethical Fashion Report (Baptists World Aid Australia) – APG & Co took the opportunity to be involved in this report which looks at what the fashion industry and individual companies are doing to address forced labour, child labour and exploitation. APG & Co had reported for the past 6 years, but was unable to participate in 2020 due to COVID-19, as it was necessary to focus staff time on working directly with our suppliers and managing the impact of the pandemic. APG & Co received the following scores in 'overall grades' in the 2019 report – 'Policies' (A+), 'Transparency and Traceability' (A+), 'Auditing and supplier relationships' (A), 'Worker empowerment' (B-), Environmental management (B).

Commitment to a Living Wage - APG & Co is committed to promoting conditions that support every worker's opportunity to receive a 'living wage' (i.e. remuneration for their work that allows a decent standard of living including food, water, housing, education, healthcare, transport, clothing and other essential needs).

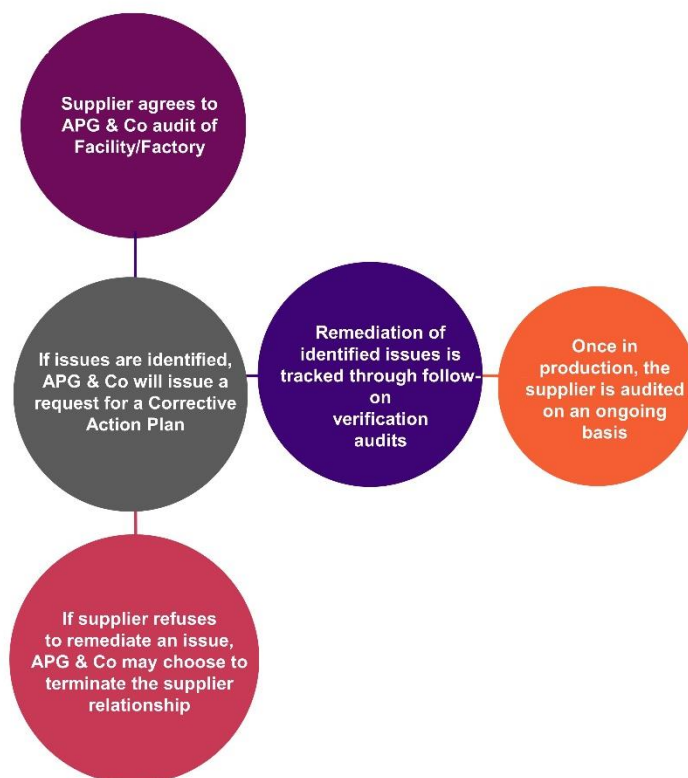
We require that our suppliers work to ensure that all workers are paid a fair wage for the region in which they work – which should be at least the minimum wage required by applicable laws. We are working on living wage programs to increase worker incomes to align with global living wage frameworks.

4. Assessment of Actions Taken to Address Risks

We are focused on measuring and evaluating the effectiveness of the actions we have taken to address modern slavery risks in our supply chains and operations. This will continue to be our focus moving forward. One of the ways we currently we track our performance is to conduct audits and checks on the compliance by our suppliers with our expected standards. We are also committed to addressing any issues that come to our attention through our Whistleblower process, and to providing and promoting an avenue for workers to bring any issues of non-compliance with our code and principles to our attention.

4.1 Supplier Audits

Stages of Supplier Assessment and Issue Remediation at APG & Co.



During FY20 we continued to conduct audits on our supply chain and operations as part of our due diligence process. This has been an integral part of APG & Co's corporate socially responsible process for nearly 10 years. This included announced or unannounced on-site visits to a supplier's facilities by our on-staff auditor. APG is open and transparent about its supplier expectations and works to build strong supplier relationships. As a result, our auditors have been able to conduct approximately 75% of the required audits 'unannounced', without push-back or concern expressed by suppliers.

The stages of supplier assessment and issue of remediation at APG & Co are as illustrated.

During the COVID-19 pandemic, our audit processes were interrupted for some months due to factory shutdowns, but we have worked around some of those challenges to get our processes back on track. Usually, our audit document is updated on a weekly basis by our on-staff auditor in China and is used by APG & Co as a tracking tool to ensure all follow-up audits are done within the timeframe planned, as determined by the results of the previous audits.

As part of the audit process, we gather information relevant to modern slavery, human trafficking and other risks and conduct checks on general compliance matters such as factory licences, building layouts, fire drill records, health and first aid certificates, working hours, wage records, pay slips, injury records and environmental impact assessment reports and approvals.

4.2 Audit Follow-Ups

Where the APG & Co due diligence or audit process finds supplier non-compliance issues we will require the supplier to identify corrective actions and timeframes for completing these actions. The auditor will need confirmation that the corrective actions have been completed to achieve compliance. Depending on the nature of the issue, the auditor may need to make a follow-up site visit.

The Corrective Action Plan is submitted to APG & Co after each audit. It lists the action points to be followed up and improved, and the required timeframe for this to happen. Any case of Modern Slavery is considered a critical issue, which is immediately handled by our on the ground team following the strict remediation guidelines we have produced. After the issue has been rectified, re-audit and checks are regularly undertaken to ensure it does not happen again.

Audit Follow-Up Guidelines

| | Audit Results | Criteria | Criteria |
|---|---------------|---|-----------------|
|  | GREEN | No more than 5 minor issues | After 1 year |
|  | YELLOW | 6 to 10 minor issues | Within 6 months |
|  | ORANGE | Any major issue; or 11 or more minor issues | Within 3 months |
|  | RED | Any critical issue; or denied audit; or 10 or more major issues | Within 1 month |

Case study -Tier 1 - Garment Factory

APG & Co started working with the Ningbo Fusheng Knitting Co Ltd (Kashion Industry), Ningbo, Zhejiang Province, China in 2010.

APG & Co's auditor conducted 4 audits of this factory within 12 months (in November and December 2018, and in March and September 2019), with the result that the factory's rating was improved from orange to green in 10 months.

During the unannounced 4th follow-up audit in September 2019, the factory received a green rating with only 3 minor health and safety issues. Issues that were identified in previous audits were remedied such as:

- the workers in cutting position were provided with metal gloves; and
- evacuation routes and fire extinguishers were unblocked.

Case study - Tier 2 - Fabric Mill

APG & Co started working with the Shunchang Fabric Mill Co, Shaoguan, China in 2012.

APG & Co's auditor worked with the factory to improve some safety issues that were identified – and the previous multiple orange ratings were changed to a yellow rating following an unannounced visit to the mill in August 2018.

At the unannounced 6th follow-up audit in 2019 a green rating (no more than 5 minor issues) was given to the mill with 2 minor issues on H&S and environment recorded. The factory supplied APG & Co with details of how they had fixed the previous issues which included:

- fire facilities unblocked;
- all fire certificates provided for review;
- occupational hazardous factor test conducted in the factory;
- material Safety Data Sheet of chemicals posted onsite; and
- exit signs with power.

APG & Co will continue to work with these and all its other current suppliers in FY21, to improve standards where it can, and to ensure the requirements of the code and principles are adhered to.

5. Moving Forward

During FY21 we will continue to proactively and regularly conduct due diligence for modern slavery risks internally and within our supply chains and operations.

5.1 Supplier Relationships

We will continue to work in partnership with our suppliers to facilitate ongoing improvement in order to benefit both their workers and to improve our business practices. Throughout FY21 we will endeavour to have all our first tier and all known second tier suppliers commit in writing to adherence with our new Code of Conduct and Global Sourcing Principles.

APG & Co have also invested and hired an additional full-time staff member in Sydney to work to improve the transparency in our supply chain with a view to identifying all our second tier suppliers (and then move onto third tier etc).

5.2 Monitoring and Awareness

Our modern slavery working group will continue to monitor media and news from industry groups to identify emerging human rights risks in the geographic locations from which we source our products. This will include assessment of any reports on cotton sourcing in China (especially from the Xinjiang region) and on supplier treatment of workers during the COVID-19 situation.

5.3 Audits and Supplier Remediation

We will be working with our on-staff auditor in China to further develop our audit processes and to implement our Supplier Remediation Guidelines. Any single serious or persistent breaches of the code, principles or applicable laws may result in termination of the contractual relationship with the supplier and/or reporting to the relevant authorities.

APG & Co will also be working to review the modern slavery clauses that are in its supply agreements.

5.4 Partnerships

In future we will seek further opportunities to work with our overseas suppliers and community organisations that can assist us to mitigate modern slavery risks.

We are also committed to, and can see the benefits of, working with likeminded fashion retailers to address risks. For example, currently, if we cannot do an inspection of a particular supplier, we have come to arrangements where we can review the audit documentation that the supplier may have provided to other suppliers. We can see the limits and benefits of this process but see it as a valuable tool to gain insight into our supply chain and operations.

5.5 Ongoing Commitment to Transparency

During FY21 we will be further updating our 'Practices and Policies' page to include our revised modern slavery related policies and our updated supplier lists.

We feel that this publication is a valuable way for APG & Co to communicate the elements of its modern slavery and human rights program, and to also demonstrate our commitment. This will allow our customers to make informed decisions and show that APG & Co is working towards its goal of being an industry leader in ethics, transparency and responsible business dealings.

5.6 Improving factory data collection

Throughout FY21 we will extend the scope of our factory reviews to gather additional information for publication, including data on:

- number of workers;
- percentage of female workers;
- percentage of male workers;
- percentage of migrant workers;
- presence of workplace agreements;
- access to trade unions;
- whether the supplier has provided a signed commitment to our Supplier Code of Conduct; and
- measures that have been taken by the supplier to assist workers who have been impacted by the COVID-19 pandemic.