



#### **ACKNOWLEDGEMENT OF COUNTRY**

We acknowledge the Traditional Owners of Country throughout Australia and that sovereignty was never ceded. We recognise the deep and enduring spiritual connections and relationship Aboriginal and Torres Strait Islander People have to community, as well as the lands, oceans, waterways, air, and sky. We pay our respects to Aboriginal and Torres Strait Islander cultures; and to Elders past, present and emerging. We also acknowledge and pay our respects to First Nations People, and other Traditional owners of the lands where Fashion Biz (Australia) operates globally.

#### **ABOUT THIS STATEMENT**

The submitting entity is Fashion Biz (Australia) Pty Ltd ('Fashion Biz') which qualifies as a reporting entity under the *Modern Slavery Act 2018 (Cth)*.

This Statement covers all business units within Fashion Biz and reports on the state of operations, structure, governance framework and activities during the reporting period covering FY2024 from 1 April 2023 to 31 March 2024. All business units are covered by Fashion Biz (Australia) policies, procedures and systems, including those relating to contracting, purchasing and human resources. The assessment of modern slavery risks in Fashion Biz's supply chain, as described in this Statement, includes suppliers procured by Fashion Biz on behalf of its subsidiaries or by the subsidiaries themselves.

This Statement has been prepared by subject matter experts in consultation with key Fashion Biz teams that collaborate to deliver our modern slavery risk identification, assessment, and management processes. In addition, the preparation of this Statement was overseen by our Modern Slavery Working Group, which includes inputs from procurement, legal, risk, compliance, sustainability, and governance teams.

All dollar figures presented in this Statement are in AUD.



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#### **ABOUT FASHION BIZ**

Fashion Biz was established in New Zealand in 1989 with a view to supplying garments to the local New Zealand market, originally importing woven shirts and polo shirts from Fiji.

Fashion Biz (Australia) is a trading entity of its parent company Fabizco which is headquartered in Auckland, New Zealand. Our directors, management and production team strive to supply the market with new, innovative, quality garments at the best possible price whilst maintaining our ethical and responsible principles. We have offices and warehouses in five locations across Australia, three in New Zealand and one in North America (Canada).

We distribute through several channels including agencies, promotional companies, embellishers, uniform

specialists and retailers. Fashion Biz has relationships with manufacturers and distributors in New Zealand, Australia, the USA, Canada, Fiji and the Pacific Islands.

Our manufacturing bases include China, Bangladesh and India. Throughout our supply chain (which includes manufacturers, decorators and other service providers) we are committed to working with the resources available to us to assess and address modern slavery and ethical sourcing risks. We recognise that our role in complex and diverse supply chains does not preclude us from the responsibility to instil a culture of transparency, and we work with suppliers and customers to address risks of ethical sourcing and modern slavery.



#### **OUR VALUES**

As a responsible and ethical business, we recognise the significant harm and injustice caused by modern slavery and human trafficking to vulnerable people globally. We are committed to ensuring that no such exploitation exists within our own operations, our supply chain, or in the communities touched by our business activities.

Fashion Biz is committed to sourcing products and services in an ethical and responsible manner, considering the welfare of workers, health and safety and potential environmental impacts. Our Mission "To provide superior quality garments at highly competitive price points while focusing on customer satisfaction at all times" is underpinned by our corporate values of:

- Professionalism
- **Ethics**
- Competitiveness
- Proactive

- Best in Class
  - Service
- Customer Commitment
- Productivity
- Fairness
- Teamwork

We have established a positive and supportive environment where our staff, suppliers and business partners may understand the importance of our corporate values and are expected to abide by our values, internal policies and procedures to respect human rights. We are guided by internationally recognised human rights principles outlined in global frameworks and codes, including the Ethical Trade Initiative (ETI) Base Code. Fashion Biz is an accredited ISO business holding the following certificates:

- AS/NZS 45001:2018 Health and Safety Management Systems
- ISO 14001:2015 Environmental Management System
- ISO 9001:2015 Quality Management System



#### STATEMENT FROM OUR BOARD AND MANAGING DIRECTOR

We are proud to submit Fashion Biz Australia's second Modern Slavery Statement as a reporting entity under the Modern Slavery Act 2018 (Cth).

This Statement outlines the steps taken to continuously improve and refine our approach to identifying, addressing and mitigating modern slavery risks in our operations and supply chains over the last twelve months. We have taken many practical steps to implement our ambitious three-year action plan set out in our FY2023 statement.

Modern slavery is a grave violation of fundamental human rights, and the fashion sector is widely regarded as being at high risk for forced labour, the worst forms of child labour and other forms of human exploitation. We believe our success is built on our respect for human dignity, and we are committed to creating a transparent, accountable, and sustainable business environment.

Our goal is to ensure that all people touched by our business activities are treated fairly and with respect and that our business practices uphold the highest standards of ethical conduct.

We acknowledge the dedication of our Modern Slavery Working Group in their pivotal role in implementing our Modern Slavery Action Plan.

This Statement was approved by the Fashion Biz Board on 30 September 2024.

Harmesh Khatri Managing Director



# 2024 REPORTING YEAR HIGHLIGHTS

- Repeated our modern slavery risk prioritisation to identify and confirm potentially high-risk procurement categories and suppliers.
- Repeated a Modern Slavery Gap Analysis to assess progress in implementing risk management actions across five business areas and assess our modern slavery governance maturity.
- Delivered webinars to potentially five priority high risk suppliers located in China and India.
- Engaged and educated twenty potentially high risk suppliers in Bangladesh, China and India.
- Undertook deep-dive assessments of potentially high risk suppliers.

- Reviewed and updated key policies to incorporate modern slavery risk management across our business operations.
- Incorporated modern slavery into our draft whistleblowing policy and process.







#### **REPORTING CRITERIA 1 & 2**

#### **OUR ORGANISATIONAL STRUCTURE**

Fashion Biz is a wholesaler of quality uniforms, workwear and promotional apparel (stock service and made-to-order) to New Zealand, Australia, Canada, USA, PNG and the Pacific Islands.

We distribute our garments through several channels including agencies, promotional companies, embellishers, uniform specialists and retailers. We take pride in the craft of our clothing, remaining at the forefront of fabric development, maintaining adequate stock levels, and ensuring the latest business infrastructure is in place to enable us to offer and guarantee the best service to our customers.

Our business provides end-to-end apparel and workwear solutions, providing integrated services to our customers including:



**Stock Service:** each of our warehouses maintains high levels of stock to enable us to meet customer demands at short notice.



**Made-To-Order Custom Service:** our production department oversees custom orders from concept through to graphic design and completion.



**Print:** we develop and produce a print catalogue for each product range, showcasing each product/style



**Online:** each product line has a custom-built website to complement the print catalogue, featuring secure access for distributors, ordering and tracking functions.

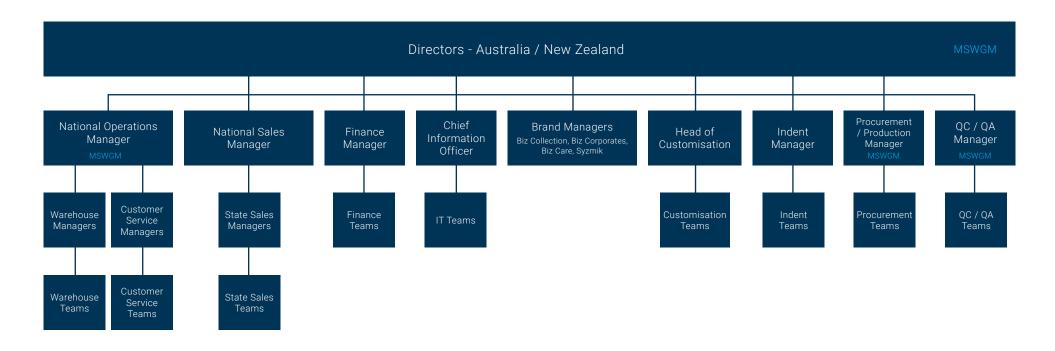


**Customer Service:** customer service consultants manage orders, liaise with customers and works with the warehouse team to fulfil orders.



**Logistics:** includes the receipt upload and storage within our warehouses, pick/pack systems and distribution of orders to customers.











#### **OUR GOVERNANCE FRAMEWORK**

Effective corporate governance is critical to the long-term success of Fashion Biz, and our Board and all levels of management are committed to maintaining and enhancing a strong governance framework that underpins our vision to be a leading provider of corporate fashion and workwear in Australia and New Zealand.

The purpose of our corporate governance framework is to assist our people to make good decisions that promote the longer-term success of our company. Fashion Biz is governed by a Board of six Directors, with five based in New Zealand and the other is our Managing Director for our Australian operations.

Our Board has ultimate responsibility for the approval and oversight of our modern slavery risk management program and approval of this Statement. The Board is kept informed on modern slavery issues via input from the Senior Management Team and is supported by our Working Group responsible for the development, implementation and monitoring of our modern slavery risk management program and performance.



# The Board is supported by the following Committees:

Quality Assurance / CSR Committee	Responsible for maintaining the high standard of our product and services and delivering tangible social benefits to the communities in which we operate. This team meets quarterly and includes members of our Australian and New Zealand QA teams, sales, production, and the Chair of our OHS Committee.  The committee also includes a representative from our Modern Slavery Working Group.
Occupational Health and Safety (OHS) Committee	Oversees our OHS program and commitments to promoting staff welfare. Meets quarterly with delegates representing each state office, and reports to our CSR Committee.
Senior Management Team (SMT)	Leads and guides our business towards our strategic objectives, while overseeing our operations and ensuring effective decision-making. The SMT meets three times a year and receives reports from all committees including key business areas and our Working Group.
Modern Slavery Working Group	Drives our Modern Slavery Action Plan and currently meets monthly as our formal program initially develops. The Working Group includes members from Operations, Quality Assurance, Sales, Procurement, Production and our Australian Managing Director.



#### **CASE STUDY A: Fashion Biz Ethical Sourcing Team**

Our Ethical Sourcing Team ensures that manufacturing base suppliers in China, India and Bangladesh comply with relevant international labour standards and local regulations. Since 2023, 72 supplier audits have been undertaken (32 internal audits conducted by Fashion Biz trained internal auditors and 40 via qualified 3rd party auditors) to verify fair wages, ensure safe working conditions, and prevent the exploitation of vulnerable workers in our extended supply chain. The team undertakes desktop and on-site audits of suppliers and as well as working through other social compliance platforms such as BSCI, WRAP, SEDEX and SA8000.

The Team works closely with suppliers to implement sustainable practices, including environmentally conscious production methods and responsible sourcing of materials. Additionally, the team monitors the implementation of corrective actions taken by suppliers to address issues identified by audits and reports on compliance to the SMT and Board.



#### Fashion Biz: Who We Are

What We Do	Stock service   Made to Order   Print Catalogues   Online Catalogues   Customer Service   Logistics		
Where We Do It	Australia   New Zealand   North America		
Our Values	Professionalism   Ethics   Competitiveness   Proactive   Customer Commitment   Productivity   Fairness   Teamwork   Best in Class Service		
Our Manufacturing Base	China   India   Bangladesh		
Our Relationship to Potential Modern Slavery Risks	Cause: Unlikely in Australia, New Zealand and North America.  Contribute: Unrealistic deadlines, peak seasons, downward cost pressures, lack of oversight.  Directly Linked: Manufacturing base companies/direct suppliers in high-risk countries, poor visibility of Tier 2 supply chain, outsourcing arrangements.		
How We Manage Risk And Undertake Due Diligence	Governance Framework: Board engagement and oversight, implementation of risk framework, formal Action Plan, policies and codes of conduct.  Due Diligence And Risk Management: Supplier risk prioritisation, supplier reviews, desktop and onsite audits, stakeholder engagement and monitoring.  Training & Engagement: Staff training, auditor training, gap analysis and relationship building.		





#### **Our Policies**

We have several Group level policies, codes and guidelines which require our employees, suppliers, distributors and other business partners to protect and respect human rights as part of our day-to-day businesses. Policies apply to all Fabizco entities (Australia, New Zealand and North America) and contribute to our group mission and commitment to ethical sourcing and modern slavery risk management.



Policy and Procedures	Purpose
Code of Conduct	Provides guidance to staff and new employees on ethical standards and our corporate values. Outlines our expectations of ethical conduct and is used as a guide for making decisions in day-to-day activities.
Social Procurement	Outlines processes to embed social procurement in Group business activities and how these contribute to alleviating community disadvantages via provision of sustainable social and economic benefits.
Modern Slavery	Outlines the concepts and principles of respecting human rights within the Group, commits us to working towards assessing and addressing the risks of modern slavery and outlines expectations of all stakeholders to act responsibly and manage risks in operations and supply chains.
Ethical Sourcing	Applies to all facilities that produce goods or provide services to Fashion Biz. Based primarily on the Ethical Trade Initiative Base Code it outlines our commitment to conducting business ethically, manufacturing responsibly and demonstrating environmental consciousness.
Corporate Social Responsibility Audit Guidance Book	Provides guidance to staff and contractors on conducting social audits on partner suppliers to ensure they comply with Fashion Biz's expectations. Includes desktop Supplier Self-Assessment Questionnaire (SAQ), audit preparation and on-site audits at supplier sites (both announced and unannounced).



#### **Our Operations**

Fashion Biz was established in New Zealand in 1989 to supply garments from Fiji to the New Zealand market. In 1998 an office and distribution centre was established in Sydney, Australia, and in 2005 the Australian head office and distribution centre was established in Melbourne. Victoria. Subsequent facilities were opened in Brisbane, Adelaide and Perth.

In 2010 the Canadian head office and distribution centre was opened in Vancouver and in 2013 a second showroom was opened in Ontario.

We also have relationships with manufacturers and distributors in the USA, Australia, New Zealand, Canada and Fiji.

#### **Company Snapshot**

Number of Staff	Offices, Warehouses and Distribution Centres	Annual Turnover	Number of Garments in our Warehouses (Average)
AUS: 165 NZ: 77 CAN: 23	AUS: Sydney, Melbourne, Brisbane, Adelaide, Perth NZ: Auckland, Wellington, Christchurch CAN: Vancouver, Ontario	<b>≈AU</b> \$125M	<b>AUS:</b> 7.8M <b>NZ:</b> 2.8M <b>CAN:</b> 1.7M



# **OUR SUPPLY CHAIN**

#### At A Glance



\$88M



**Total Suppliers:** 542



**Total Categories:** 20



% Spend on Top Five Categories: 97%



Number of Supplier Countries:



Top Spend Category: 'stock and merchandise for sale' (72% of total spend)

#### Overview

Our total annual procurement spend is \$88 million with 542 direct (Tier 1) suppliers across 20 goods and services categories.

Further work will be undertaken in the FY2025 and FY2026 reporting periods to better understand our extended supply chain and inherent modern slavery risks in our indirect (Tier 2) suppliers.

#### What We Buy

Our supply chain consists of goods and services that support us as a major wholesaler of uniforms, workwear and promotional apparel. Broad categories of goods and services used in our sector and the known associated modern slavery and/or human rights risks are summarised in Table 1.

Table 1: Modern Slavery Risk Factors In The Fashion Sector

Good or Service Category	Material and Use or Purpose	Stage(s) of Production Potentially at Risk of Modern Slavery	Reported Forms of Exploitation/Modern Slavery	SD Strategies Modern Slavery Risk Index <sup>1</sup>		Potential Relationship with Operations and Supply Chain <sup>2</sup>					
				Country	Sector	Comm- odity	Work Force	Cause	Contrib- ute	Directly Linked	
Fabric Suppliers	Raw cotton, silk, wool, and synthetic materials such as polyester and nylon.	Growing, harvesting, processing, refining, and manufacturing of raw materials*	Bonded and forced labour, the worst forms of child labour, state-sponsored modern slavery (especially cotton) and underpayment of wages and dangerous working conditions.	High	High	High	High	Low	High	High	
Trims and Accessories Suppliers	Buttons, zippers, ribbons, buckles, and other decorative elements used to finish the clothing.			High	High	High	High	Low	Medium	High	
Thread and Yarn Suppliers	Key materials needed for sewing and knitting garments.	manufacturing, and sub- contracting or outsourcing	and components, manufacturing, and sub- contracting or outsourcing	Bonded and forced labour, the worst forms of child labour deceptive recruitment, other forms of modern	High	High	High	High	Low	Medium	High
Dyeing and Finishing Suppliers	Specialize in dyeing and finishing fabrics to achieve the desired colours, textures, and qualities.			slavery, the underpaymentof wages including mandatory overtime and unsafe working conditions	High	High	High	High	Low	Medium	High
Label and Tag Suppliers	Sewn into garments to display brand names, care instructions, and other important information.		conditions.		High	High	High	Low	Medium	High	
Packaging Suppliers	Provide the boxes, bags, and other materials used to package and ship the finished products.	Sources of raw materials, manufacturing, moulding, printing and finishing. Also significant risk in recycling and management of post-consumer waste.	Bonded and forced labour, deceptive recruitment, underpayment of wages and	Medium	High	High	High	Low	High	High	
Machinery Suppliers	Suppliers provide the machinery and equipment needed for cutting, sewing, and finishing the garments.	Manufacturing, upgrades, consumables, spare parts and maintenance services.	unsafe working conditions.	High	High	Medium	Medium	Low	Low	Medium	
Printing Suppliers	Specialize in printing designs, patterns, and logos on fabrics.	Use of raw materials (inks, dyes etc.), machinery and manufacturing/ printing process.	Labour exploitation, child labour, bonded/forced labour, unsafe working conditions and underpayment of wages including nandatoiry overtime.	High	High	High	High	Low	High	High	

<sup>\*</sup>Note: Significant labour exploitation and modern slavery risks are associated with warehousing, materials handling and transport of goods, especially to seafarers.

¹Refer to Reporting Criteria 3 for definitions ²Definitions as per the United Nations Guiding Principles for Business and Human Rights (UNGPs) and Commonwealth Guidance for Reporting Entities.



Just over 72% of our spend is on stock and merchandise we sell via our sales channels. The main categories of goods and services we procure from our direct suppliers and the percentage of total spend with each supplier are included in Table 2.

Table 2: Key Goods and Services Procured

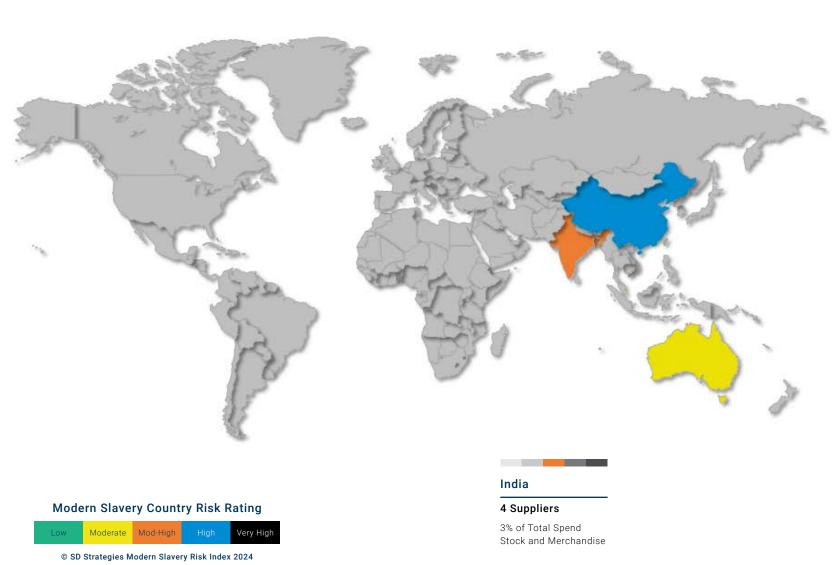
Procurement Category	Per Cent Total Spend FY2024
Stock and merchandise	72
Corporate fees, services and expenses	17
Courier, haulage and transport services	6
ICT Software, networking and support	1
Advertising, media and marketing	1
Hire cars, fleet and maintenance	1
Other	2

#### **Supplier Countries**

We source our goods and services from direct (Tier 1) suppliers in four countries with over two-thirds ( $\sim$ 69%) of our total procurement spend being with suppliers in China. The remaining spend is with suppliers in Australia ( $\sim$ 28%), India ( $\sim$ 3%) and Bangladesh (<1%).

The map on page 21 provides an overview of our global supply chain. Information on each country includes the number of suppliers, per cent of total spend in each country and the main categories of goods and services procured. The map provides an indication of modern slavery risk in each country based on the SD Strategies Modern Slavery Country Risk Index.

# Tier 1 Global Supplier Map



#### Bangladesh

#### 1 Supplier

<1% of Total Spend Stock and Merchandise

#### China

#### 32 Suppliers

69% of Total Spend Stock and Merchandise

#### Australia

#### 505 Suppliers

28% of Total Spend Advertising, Media and Marketing Corporate Fees, ICT Software, Networking and Support, Hire Cars, Fleet and Maintenance, Courier, Haulage and Transport Services\*

\*Top five categories by spend. Percentage figures rounded up.



# REPORTING CRITERIA 3

MODERN SLAVERY RISKS IN OPERATIONS AND SUPPLY CHAIN

**OPERATIONAL RISKS** 

SUPPLY CHAIN RISKS



#### **REPORTING CRITERIA 3**

# MODERN SLAVERY RISKS IN OPERATIONS AND SUPPLY CHAIN

Our focus in FY2024 (refer to Modern Slavery Action Plan, page 37) was to expand our due diligence program and obtain a better understanding of how we may cause, contribute to, or be directly linked to modern slavery practices in our operations or supply chain. Our focus this year continued to be on understanding modern slavery risks posed by our Tier 1 (direct) suppliers.

#### **Operational Risks**

With the support of external experts, we repeated the modern slavery Gap Analysis initially undertaken in FY2023 (refer page 27). Members of our Modern Slavery Working Group attended the workshop, representing governance,

risk, finance, ICT, human resources and communications divisions across our ANZ operations.

Repeating the Gap Analysis assessment enabled the Working Group to:

- Assess progress made in implementing our risk management program over the 12 months since the initial gap analysis assessment;
- Identify gaps or opportunities within each of the five business areas assessed in the analysis;
- Inform and update as necessary our Modern Slavery Roadmap and action plan.

#### **Supply Chain Risks**

In FY2024, we built upon our supplier risk assessment program reported in 2023, enhancing our due diligence of major potentially high risk Tier 1 suppliers. We engaged external experts to help us document, assess and prioritise our suppliers against key modern slavery risk indicators





(see pages 28 - 29) and undertook deep dive assessments of five priority suppliers located in China (4 suppliers) and India (1 supplier).

We acknowledge that the fashion and apparel sector is known to be associated with modern slavery practices and exploitation of vulnerable workers and that there is potential modern slavery risk associated both with our direct suppliers and those in our extended supply chain.

#### **OPERATIONAL RISKS**

As reported in our FY2023 statement, Fashion Biz has a professional level and largely office-based workforce in Australia, New Zealand and North America (Canada). While we consider the risk of modern slavery to be relatively low within our direct business operations, we recognise that the potential risk of modern slavery increases through our international supply chains and business partnerships.



#### Modern Slavery Gap Analysis

The Working Group repeated the gap analysis undertaken in our last reporting period to identify progress made in implementing modern slavery risk management actions across five key business areas:

- Management Systems
- Human Resources And Recruitment
- Procurement and Supply Chain
- Risk Management
- Customers And Stakeholders

Figure 1 provides the results of our second modern slavery gap analysis and indicates a change compared to 2023 gap analysis outcomes.

A comparison of results between 2023 and 2024 indicated a marked improvement in our modern slavery governance maturity and capacity to manage modern slavery risks. Improvements were identified in 50% of the 22 categories of actions assessed:

- Human Resources (3 out of 4 actions) and Management Systems (3 out of 5 actions) showed improvements.
- Half of the Risk Management (2 out of 4 actions) improved.
- Supply Chain Management (2 out of 5 actions) and Customers and Stakeholders (1 out of 4 actions) showed improvements.

In collaboration with key representatives from across our organisation, our Working Group developed our Modern Slavery Action Plan and Roadmap in 2023 based on results from our initial gap analysis. Repeating the Gap Analysis enabled us to fine-tune our three-year Roadmap providing a pathway to deliver tangible human rights benefits to our staff, workers in our immediate supply chain and other vulnerable stakeholders. Criteria 4, 'Actions Taken to Assess and Address Risk,' below, details elements of the action plan and roadmap.



#### CASE STUDY B: Reducing Potential Risk Through Supplier Due Diligence And Risk Assessments

In 2024 we expanded our supplier due diligence program focussing on five potentially high-risk suppliers who account for approximately 55 per cent of the annual high risk spend. All suppliers participated in our due diligence program, providing information and documentation on:

- 1. Business operations, workforce and supply chain
- 2. Governance and due diligence

- 3. Risk management and labour operations
- 4. Reporting, grievance and remedy

Our Ethical Sourcing Team collaborated with external experts and the selected suppliers to educate them on modern slavery and Australia's legislative requirements. Suppliers were provided with access to a bespoke supplier portal providing information on the Modern Slavery Act 2018 (Cth) and our commitment to managing modern slavery risks. The portal included detailed guidelines on the survey questions and the type of supporting documentation required.

A risk-based report with improvement recommendations (corrective actions) was prepared for each supplier and our Ethical Sourcing Team continues to work with suppliers to implement corrective actions and monitor progress. Our supplier due diligence efforts will continue throughout FY2025 with an ongoing deep dive assessment of high-risk suppliers planned. We are committed to continuing to work with our manufacturing base including finding new ways to engage, identify, assess, and mitigate risks posed by our suppliers' activities.

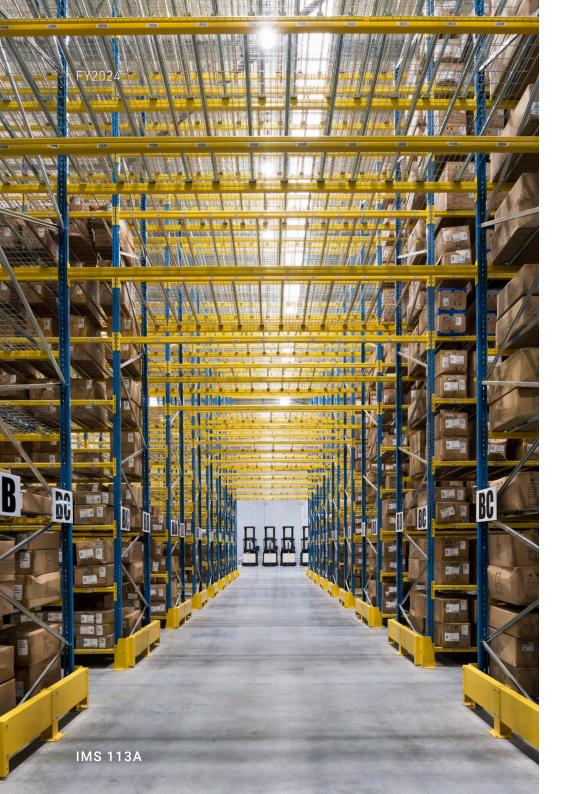
Figure 1: Gap Analysis Results

		FY2023	FY2024
	Governance		
IENT 1S	Commitment		
MANAGEMEN' SYSTEMS	Business Systems		
MAN SY	Action		
	Monitoring/Reporting		
누	Risk Framework		
RISK MANAGEMENT	Operational Risk		
RISK ANAGEN	Identifying External Risk		
Š	Monitoring/Reporting		
	Policy/Procedures		
<b>≻</b> →	Contract Management		
SUPPLY	Screening/Traceability		
S	Supplier Engagement		
	Monitoring/Corrective Action		
s/ RS	Customer Attitude		
CUSTOMERS/ STAKEHOLDERS	Information Provision		
USTO AKEH	Feedback Mechanisms		
ST	Worker Voice		
(0	Awareness		
HUMAN RESOURCES	Policies and Systems		
HUN	Training		
<b>X</b>	Labour Hire		

	RESULTS
Starting Out	
Making Progress	
Good Practice	
Leading Practice	



**IMS 113A** 





# **SUPPLY CHAIN RISKS**

#### High Level Findings At A Glance

- Seventy-four per cent (\$64.9M) of our total procurement spend is potentially high-risk for modern slavery.
- Forty per cent (216) of our 542 suppliers are potentially high risk for modern slavery.
- Our highest-risk spend category is 'stock and merchandise for sale,' accounting for 98% of our potentially high-risk spend.
- Goods and services procured from suppliers located in countries ranked as high risk for modern slavery are recognised as a key risk factor.

#### **Supply Chain Overview**

Our procurement team, supported by external experts, analysed \$88 million of procurement spend for potential modern slavery risk against four key risk indices:



- Industry Sector: Specific industry sectors (deemed as high risk in international and national guidance documentation. This includes sectors with high-risk business models such as using labour-hire workers and outsourcing, seasonality, franchising and aggressive pricing.
- Commodity/Product: Specific products and commodities deemed as high risk by the US Department of Labor's 2022 List of Goods Produced by Child and Forced Labor, the Global Slavery Index (GSI) and other international guidance materials.
- Geographic Location: Based on the estimated prevalence of modern slavery and the government responses as outlined in the 2023 GSI and using the SD Strategies country risk matrix which assesses risks against 13 global indices. High risk geographies include those with a weak rule of law, corruption, displacement,

- conflict, and the State's failure to protect human rights. While we predominantly source stock for distributors based in Australia, we recognise that our manufacturing base is in countries that are at high risk for modern slavery.
- Workforce Profile: In undertaking our supplier analysis
  we considered the type of labour involved in the
  production of our goods and services, particularly
  where base skill, vulnerable, or temporary migrant
  labour is used.

Our focus in FY2024 continued to be understanding risks across our supply chain and those posed by higher spend Tier 1 (direct) suppliers. We recognise that there may be high risk amongst our lower spend suppliers and our extended supply chain and will incorporate these into future risk assessments.



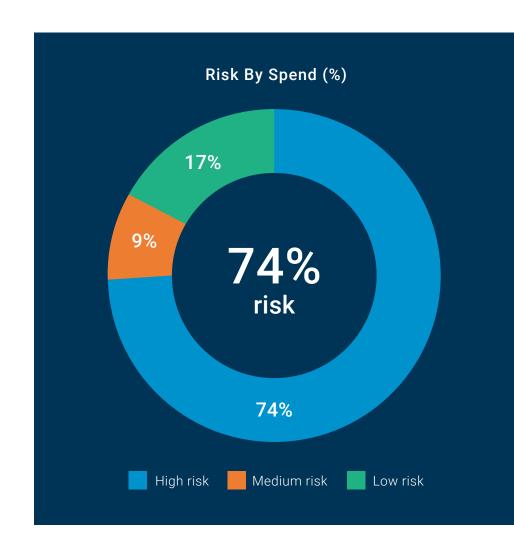
#### Risk By Spend

Analysis of procurement spend across our operations in Australia and New Zealand identified 74% of spend as potentially high risk for modern slavery (down from 88% in FY2023). This risk level is almost entirely attributable to spend on stock and merchandise for sale.

A further 9% of spend was categorised as medium risk for modern slavery and 17% as lower risk (up from 4% in FY2023). The reduction of high risk spend is attributed to the significant increase in the corporate finance, fees and services categories.

The percentage of potentially higher risk spend is typical for a company operating in the apparel manufacturing sector. Our supply chains extend into countries, industry sectors and commodities known to be at higher risk for modern slavery.

Ongoing assessment of our operations and engagement of potentially high-risk suppliers will provide a more detailed understanding of actual risk and practical management actions we can take.



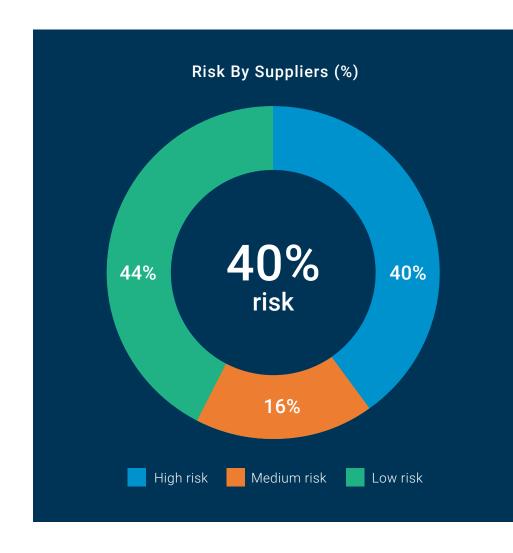


#### **Risk By Suppliers**

Analysis of 542 Tier 1 (direct) suppliers used across our Australian and New Zealand operations indicates that 40% of our suppliers (216 suppliers) are potentially high risk for modern slavery.

A further 16% of suppliers (85 suppliers) are categorised as medium risk for modern slavery and 44% (241 suppliers) as lower risk. While some of our direct suppliers based in Australia represent a lower risk of modern slavery practices, suppliers located in higher risk countries, operating in high-risk industry sectors, and using more vulnerable workers pose higher risks for modern slavery.

We will continue to gather data on the modern slavery risk (including dynamic and emerging risks) associated with the goods and services we procure. By engaging our direct suppliers, we better understand potential risks in our extended supply chain in Australia and internationally.

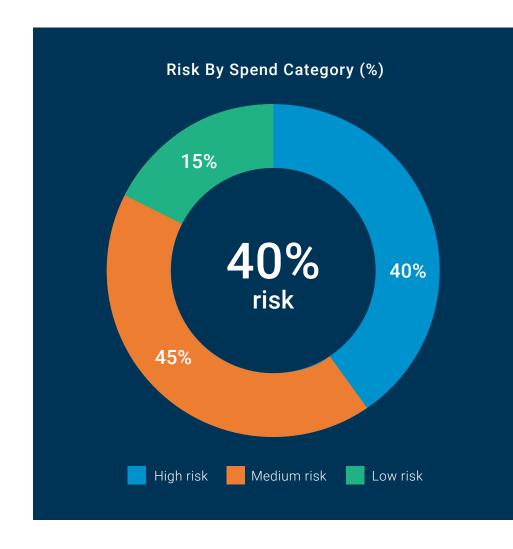




#### **Risk By Spend Category**

Based on the four risk factors outlined above (geography, industry sector, commodity and workforce profile), eight of the twenty categories of goods and services we procure are potentially high risk for modern slavery. As indicated, our potentially highest risk spend category is 'stock and merchandise'. This category makes up 98% of our potentially high risk spend.

Other lower spend, potentially high-risk categories for modern slavery include packaging materials, building and construction, travel, labour hire, international freight, ICT hardware and facility management services. These categories collectively accounted for the remaining three per cent of potentially high risk spend.





#### **Risk By Supplier Country**

We purchase a wide range of goods and services from four countries: Australia, Bangladesh, China and India. According to the Global Slavery Index 2023 and SD Strategies' Country Risk Index 2022, three of our supplier countries are either 'Moderately High Risk' (orange) or 'High Risk' (blue) for modern slavery: China, Bangladesh and India (see Global Supplier Map page 21). The largest number of suppliers in high-risk countries are in China (32 suppliers), with four suppliers in India and one in Bangladesh.

The number of suppliers and respective percentage of spend within each country is summarised in the table below.

While 28 per cent of our spend is with 505 suppliers in Australia (see Global Supplier Map page 21) we recognise that these are Tier 1 (direct suppliers) and that there may be considerable risk associated with Tier 2 suppliers and beyond. Our modern slavery action plan will work towards identifying and managing risk in our indirect supply chain in future reporting years as resources allow.

Country	Percent of Total Spend	No. of Suppliers	High Risk Spend Categories
China	69	32	Stock and merchandise for sale
India	3	4	Stock and merchandise for sale
Bangladesh	<1	1	Stock and merchandise for sale





# **REPORTING CRITERIA 4**

# **ACTIONS TAKEN TO ASSESS AND ADDRESS RISK**

The following actions were completed in the FY2024 reporting period.

#### **Modern Slavery Working Group**

Our Modern Slavery Working Group, formalised in 2023, includes representatives from across our Australian and New Zealand operations and is responsible for leading our modern slavery risk management program and implementing our action plan and road map. The Group continued to meet regularly during this reporting period to discuss the implementation of our action plan, to update our policies and operating procedures and to identify opportunities to continuously improve our modern slavery risk management program.

#### **Modern Slavery Gap Analysis**

With the support of external consultants, we repeated the Modern Slavery Gap Analysis of our systems, policies and overall modern slavery governance maturity (initially undertaken in 2023). Results of our Gap Analysis are included under Reporting Criteria 3 (see page 27) and demonstrated improvements in all five business areas assessed, most notably in the management systems, human resources and risk management categories.

#### Supplier Risk Identification and Prioritisation

We repeated our review of suppliers against modern slavery risk indicators and spend categories to better understand our supply chain risk profile. Results of the risk prioritisation were largely consistent with findings in 2023 (see Criterion 3 'Modern Slavery Risks in Operations and Supply Chains' above) and were used to undertake additional due diligence on our highest risk, high spend suppliers.



#### **Enhanced Supplier Due Diligence**

In FY2024 we conducted enhanced due diligence on selected manufacturing base suppliers in China and India. Our ethical Sourcing Team invited five high-risk suppliers (four in China and one in India) to participate in a detailed 'deep dive' modern slavery risk assessment (see Case Study A page 13). These suppliers represented 55% of our high-risk spend and were selected from the key potentially high-risk category of 'stock and merchandise' (see Case Study B page 26).

#### **Updated Policies and Processes**

We updated and refined several of our key policies and processes to ensure new and emerging modern slavery (and broader human rights) issues are addressed. Updates were made to the following documents:

- Employee Handbook
- Whistleblower Policy
- Modern Slavery Policy
- · Standard Manufacturing Agreement
- Ethical Sourcing Policy
- · Risk Appetite Statement

#### **Education and Engagement**

Building awareness and understanding of modern slavery among our workforce and engaging external stakeholders is a key commitment documented in our 2023 Action Plan. We delivered a modern slavery awareness eLearning module to our Board, senior managers and key staff on modern slavery risks and opportunities across our areas of operation (see Case Study C page 38).

We delivered a modern slavery training webinar to five potentially high spend, high-risk suppliers, outlining key risks and our expectations for managing these risks. These suppliers were further engaged as part of our enhanced supplier due diligence program and each received a modern slavery corrective action plan based on responses provided to our modern slavery self-assessment questionnaire (SAQ).

A modern slavery eLearning module was successfully completed by an additional twenty key suppliers that are potentially high risk for modern slavery that were not required to complete the modern slavery SAQ in FY2024.



Area of Focus	FY2024	FY2025	FY2026
Governance & Due Diligence	Incorporated modern slavery risk management into relevant business systems and processes.	Formalise responsibilities /accountabilities for managing risk into employee roles and position descriptions.  Review outcomes and overall effectiveness of our program and update the Modern Slavery Action Plan to strive for continuous improvement.	Update the modern slavery program to reflect identified new risks and revised legislative reporting requirements (as required).
Risk Management	Integrated modern slavery into our risk management systems and processes and risk appetite statement.  Commenced development of a formal monitoring program to identify operational and supply chain risks.	Review and report on the integration of modern slavery risk management actions into our operational systems and processes.	Conduct a broad strategic effectiveness review of modern slavery risk management systems and processes.
Procurement & Supply Chain	Integrated risk screening into procurement processes. Develop modern slavery management requirements to be included in all contracts.  Undertake additional due diligence on priority high risk, high spend suppliers.	Review the effectiveness of modern slavery risk management actions in procurement systems and requirements in supplier contracts.  Consider expanding risk assessments to our extended supply chain.	Extend supply chain risk mapping to the highest risk products or services (beyond Tier 1 and Tier 2 suppliers).  Identify opportunities for building modern slavery risk management capacity among lower-spend suppliers.
Engagement, Training & Education	Undertook internal training needs analysis and delivered modern slavery eLearning modules to key staff, managers and our board.	Assess levels of internal and external stakeholder awareness of modern slavery risks and actions.	Update online training courses to reflect legislative changes in Australia and internationally.
Grievance & Reporting	Develop a framework for a formal whistleblower or grievance mechanism and seek input from key business areas.  Scope a modern slavery remediation framework for victims of modern slavery.	Roll out whistleblower and grievance mechanisms and communicate to suppliers.  Develop a transparent and accountable modern slavery remediation program.	Seek key stakeholder input on the effectiveness of the whistleblower hotline and other grievance mechanisms.  Investigate the practical application of worker voice data collection and reporting systems.



#### **CASE STUDY C: Educating our Suppliers**

We delivered a bespoke modern slavery webinar for five priority high-risk suppliers outlining the forms of modern slavery, key risks in the fashion and garment sector and drivers for managing this risk. Our expectations that suppliers will effectively manage modern slavery and other human rights risks in their own operations and supply chains were also covered.

Other potentially high risk, high spend suppliers identified during our supplier prioritisation process were invited to complete an online modern slavery training module. 20 Representatives from key suppliers in Bangladesh, China and India completed the modern slavery awareness eLearning module developed by external experts.











#### **REPORTING CRITERIA 5**

#### **EFFECTIVENESS ASSESSMENT**

We have established a process to develop internal capabilities and iteratively improve our understanding of modern slavery risk and update our systems and processes.

We continue to monitor the implementation of our modern slavery risk management program and assess the effectiveness of the actions we are taking to understand, manage and mitigate modern slavery risks in our operations and supply chain.

Our modern slavery risk management action plan and due diligence processes are regularly reviewed as part of our corporate commitments to ethical sourcing and risk management through:

- Reporting to the SMT and Board, monitoring the effectiveness of our risk management system and measures taken to manage risk, researching the latest information on issues and emerging threats, and making improvement recommendations;
- Investigating and responding to issues or reports through our staff or reporting channels;
- Assessment and reporting of modern slavery risks across our operations and supply chain and ensuring improvements are implemented;
- Engaging with and educating our manufacturing base suppliers beyond compliance with our policies and 'business as usual'; and
- Delivering relevant and practical training to staff and suppliers on modern slavery issues and risk management.

As we continue to implement our Action Plan, we will assess the effectiveness of our actions against the following quantitative and qualitative indicators.



Area of Focus	Activity	Qualitative Indicators	Quantitative Indicators
Governance & Due Diligence	<ul> <li>Integration of policies, standards and processes across operating areas</li> <li>Management system implementation and review</li> <li>Practical implementation and enforcement of staff Code of Conduct, Ethical Sourcing and Modern Slavery Policy and Social Procurement Policy</li> </ul>	Standing item in regular management meetings     Modern slavery included in relevant company policies and procedures     Engagement and education of internal staff and base manufacturing suppliers as a priority	Number and type of modern slavery and human rights issues raised or questions asked in management meetings Per cent policies relevant reviewed, updated and integrated Number of internal staff and external suppliers undertaking training
Risk Management	Risk management program communicated and integrated into business systems  Monitoring and communication of existing dynamic modern slavery/ human rights risks and emerging threats	SMT/Board review and update of risk approach and outcomes  Enhanced internal understanding and discussion of modern slavery risks and expectations to manage risk  Increased supplier understanding of risks relevant to their country of operation and our expectations to manage them	Number of modern slavery and human rights issues identified and documented  Number of risk mitigation actions implemented including the application of remedy to identified victims
Procurement & Supply Chain	Supplier risk assessments (focus on base manufacturing suppliers) Identification of Tier 2 suppliers and third-party outsourcing arrangements by manufacturing suppliers Screening for risk including during supplier prequalification and onboarding Risk management requirements incorporated into new supply agreements and contract renewals	Ongoing engagement and education of suppliers Enhanced due diligence of high-risk suppliers including self-assessment questionnaires (SAQs) Issues and opportunities identified in supplier to SAQ responses.	Per cent suppliers engaged and trained Per cent supplier responses to SAQs and number of documents provided as evidence Modern slavery risk dashboard profile Number of corrective actions identified Per cent of supplier contracts with modern slavery clauses
Engagement, Training & Education	<ul> <li>Board, SLT and employee engagement and training</li> <li>Supplier engagement as part of ongoing relationship management</li> <li>Awareness raising and engagement of all stakeholders regarding modern slavery issues and opportunities.</li> </ul>	Enhanced organisational awareness and knowledge of modern slavery risks     Increased Board and SLT and support of modern slavery risk management program     Engagement of distributors and other business partners regarding risk management	Per cent Board, SLT and employees trained Per cent new staff trained Results of the annual staff climate survey Number of Board / SLT papers, engagements and discussions per annum.
Grievance & Reporting	Reporting hotline (whistleblower)     Prepare Modern Slavery Statement     Develop marketing collateral and public information on our modern slavery risk management program	Reporting channels actively communicated     Per cent of issues effectively addressed     Modern Slavery Statement submitted on time	Total number of issues raised     Per cent of issues effectively addressed





#### **CONTINUOUS IMPROVEMENT**

In FY2024 we implemented key elements of our Action Plan and continued to enhance our understanding of existing and emerging modern slavery risks, developed the capabilities of our cross-functional Modern Slavery Working Group and engaged our staff, management team and key external stakeholders.

Our Working Group, led by our Quality Assurance Lead and supported by our Board, monitored our progress as we continue integrating modern slavery risk management into all aspects of our operations and purchasing decisions.

Our approach will mature and evolve as we and the business community learn more about the risks and impacts of modern slavery globally.



#### **REPORTING CRITERIA 6**

# PROCESS OF CONSULTATION WITH ENTITIES OWNED OR CONTROLLED

Fashion Biz does not own or control any other entities. Fashion Biz is an entity of its parent company, Fabizco Limited, headquartered in New Zealand. It is one of three entities owned and controlled by Fabizco:

- Fashion Biz Ltd (New Zealand entity)
- Fashion Biz (Australia) (this reporting entity)
- Fashion Biz Wholesale (Canada) Ltd (Canadian entity)

We are working closely across our business units and teams to ensure a harmonised approach to managing modern slavery risk across the organisation and identify opportunities to share learnings from our program.



# MODERN SLAVERY ACT 2018 (CTH) - STATEMENT ANNEXURE

#### **Principal Governing Body Approval**

This modern slavery statement was approved by the principal governing body of

Fabizco Limited

as defined by the Modern Slavery Act 2018 (Cth)1 ("the Act") on

30 September 2024

#### Signature of Responsible Member

This modern slavery statement is signed by a responsible member of

Fabizco Limited Board

as defined by the Act2:

Harmesh Khatri Managing Director

#### **Mandatory Criteria**

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory Criteria	Page Number(s)
a) Identify the reporting entity	1 - 7
b) Describe the reporting entity's structure, operations & supply chains.	8 - 21
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	22 - 33
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	34 - 38
e) Describe how the reporting entity assesses the effectiveness of these actions.	39 - 42
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	43 - 44
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	-

<sup>\*</sup>If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement 'Do not own or control any other entities' instead of a page number. \*\*You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribedbody within the entity, or a prescribed member or members of the entity.

<sup>2</sup>Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within themeaning of the Corporations Act 2001—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of thisparagraph—a prescribed member of the entity.