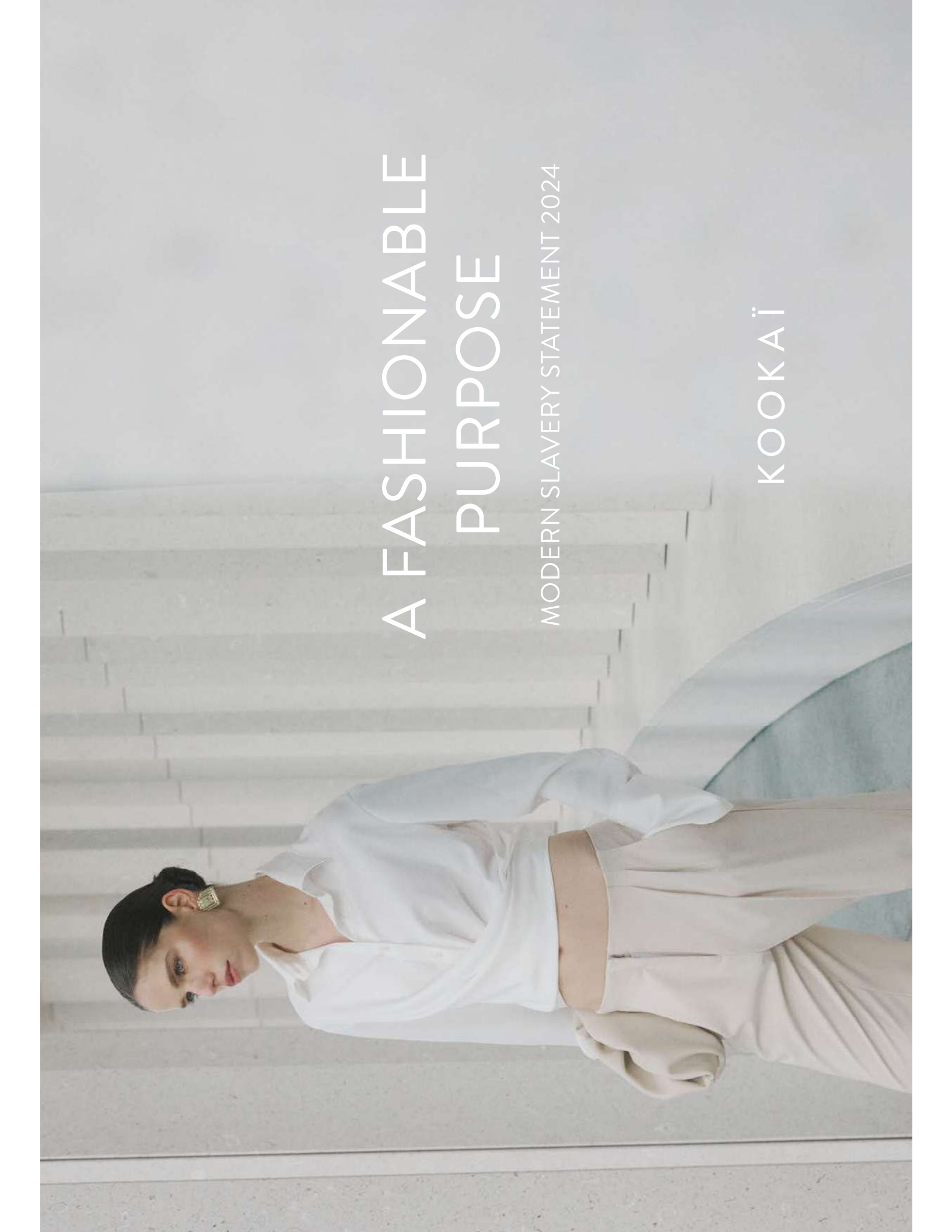


A woman with dark hair pulled back, wearing a white long-sleeved shirt and light pink trousers, stands in a modern architectural space with large windows and concrete pillars. She is looking towards the camera with a slight smile. The text is overlaid on the right side of the image.

A FASHIONABLE PURPOSE

MODERN SLAVERY STATEMENT 2024

KOOKAI

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KOOKAI

01. INTRODUCTION / OUR COMMITMENT

“As a leading women’s fashion business operating within the garment and textile industry, KOOKAÏ acknowledges our responsibility in contributing towards efforts to combat the prevalence of modern slavery.”

At KOOKAÏ, we are committed to respecting and upholding human rights and adopting a **zero-tolerance approach to any form of modern slavery or worker exploitation**. We are dedicated to acting ethically and transparently across all areas of our operations and supply chain, with a focus on empowering individuals and preventing harm.

As a family-owned fashion brand based in Melbourne, KOOKAÏ has operated with a strong sense of purpose since it was established in 1992: to pursue an ethical and meaningful existence in the fashion world.

This mantra governs the way we conduct our business across all facets of KOOKAÏ. Fashion is so much more than creating beautiful clothing and an engaging in-store experience, it’s also about the footprint we leave on the planet and the impact we have on all those who contribute to the creation of the KOOKAÏ collection.

We recognize that modern slavery is a complex and systemic global issue, the nature of which is often hidden yet widespread across international borders, industries and jurisdictions. This necessitates a multifaceted and united approach across both private and public sectors.

As a leading women’s fashion business operating within the garment and textile industry, KOOKAÏ acknowledges our responsibility in contributing towards efforts to combat the prevalence of modern slavery.

Worker welfare is of paramount importance to us, therefore we continue on the journey of refining modern slavery centric procedures. We are committed in our efforts to mitigate and remediate the risk of any form of exploitation identified within our operations.

KOOKAÏ adopts an ethical and transparent approach to business, working collaboratively with our suppliers and business partners, and listening to our customers. We welcome the opportunity to collectively grow our understanding of modern slavery, strive for improvement, strengthen our due diligence, better prevent worker exploitation and create lasting, purposeful change.

01. INTRODUCTION / OUR ACTIONS

OVERVIEW OF FY24

In our third year of modern slavery reporting, KOOKAÏ has reviewed our operations and supply chain to ensure an accurate understanding of our risk profile. We continue to prioritise transparency and traceability as core elements of our strategy to prevent worker exploitation.

We have further consolidated our supplier base, allowing us to deepen relationships with a smaller group of long-standing partners. This has enhanced our ability to engage directly, increase visibility into their operations, and promote consistent ethical standards.

Maintaining strong, open communication with suppliers has been essential to our approach. These partnerships are built on mutual trust and enable collaborative risk management efforts and continued improvement.

Whilst our actions to address and assess modern slavery are substantively similar to prior years, our commitment to progress and responsible practices remains unchanged.

FOCUS FOR THE COMING YEAR

KOOKAÏ remains committed to strengthening our ethical business practices and improving our ability to assess and address modern slavery risks over time. Continuous improvement is a key pillar of our approach.

This coming year, we will:

- Review and refine our risk identification strategies
- Keep up-to-date with emerging risks and trends in the garment and textiles industry, and in the geographical locations in which we operate, to be proactive and adaptive in our labour risk mitigation practices
- Continue to collaborate closely with our company owned and controlled manufacturing facilities in Fiji and Sri Lanka, to ensure the established ethical business practices are maintained
- Appoint a Global Head of People & Development based in Australia to work closely with local HR teams in our manufacturing facilities.
- Further develop our internal frameworks – at onboarding and over the lifetime of each supplier relationship – to better support supplier accountability.

01. INTRODUCTION

OUR COMPANY

This Modern Slavery Statement ('Statement') was prepared by the reporting entity Magi Enterprises Pty Ltd trading as 'KOOKAI' (ACN 154 423 613) (the 'Company'). The Company is an Australian privately owned company, and the main operating entity of a corporate group of companies that operate the global KOOKAI business across various jurisdictions. References to KOOKAI throughout this Statement refer to the Company, and the aspects of the supply chain it manages.

The Company's registered office is located at 8-14 Hall St, Hawthorn East, Victoria, Australia.

This Statement has been prepared pursuant to the Modern Slavery Act (Cth) 2018 ('the Act') and associated guidelines, as a single reporting entity statement, in relation to the financial year ending 30 June 2024. In accordance with the Act, KOOKAI makes this statement to publicly announce our commitment to tackle modern slavery and explain the measures we have established, whilst providing a detailed overview of the Company and our actions taken to identify, assess and address the risk of modern slavery within our supply chain and across our business operations.

This Statement was approved by the Sole Director of Magi Enterprises Pty Ltd.



RATU QATIVI ROBERT CHARLES SIMON CROMB

Sole Director/Secretary
Magi Enterprises Pty Ltd

02. OUR OPERATIONS

KOOKAI is a family-owned and operated business, established in 1992 and headquartered in Melbourne. KOOKAI is a renowned women's fashion label, defined by an essence of femininity, confidence, allure, and independent style, specialising in women's apparel, footwear and related accessories.

We operate 45 retail boutiques across Victoria, New South Wales, South Australia, Queensland, Western Australia, and online.

Our products are designed in-house and manufactured through both KOOKAI-owned facilities and third-party suppliers. We currently source product from the following countries:

- Australia
- China
- Fiji
- Italy
- Japan
- Korea
- Sri Lanka
- Turkey
- Indonesia

Our Melbourne office is the creative and operational hub of the business. We employ 85 office staff with roles in design and patternmaking, production, supply chain management, IT, customer service, merchandising, leasing, store design, legal, risk, finance, HR, retail services and management. We pride ourselves in our focus on nurturing talent and professional development. Around 70% of our head office staff started their careers with KOOKAI working in our stores.

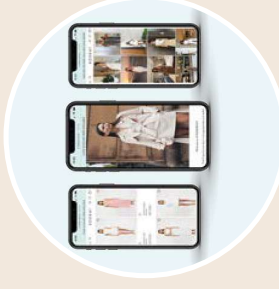
In September 2023, we brought our online fulfillment operations in-house for improved visibility, governance and to achieve operational efficiencies. We rely on a third-party logistics provider to support fulfillment operations.

Across Australia, we employ around 850 retail team members in full-time, part-time or casual positions.



45

PHYSICAL
STORES



ONLINE BOUTIQUE
FULFILLED IN-HOUSE



850+

EMPLOYEES
IN AUSTRALIA

KOOKAI

02. OUR SUPPLY CHAIN

KOOKAÏ recognises the importance of supporting workers across our supply chain and is committed to taking proactive steps to promote responsible purchasing practices. As we continue our journey, we aim to drive meaningful change, mitigate the risks of modern slavery, and contribute to a more ethically focused fashion industry.

KOOKAÏ's supply chain is comprised of two main categories:

MERCHANDISE	NON-MERCHANDISE
KOOKAÏ branded apparel and accessories designed or sourced by our Melbourne team.	Goods and services procured to support business operations including logistics, IT, and other indirect services.



OUR MERCHANDISE

It is commonly accepted that each stage in the clothing industry's value chain is referred to as a certain 'tier'. Our supply chain can broadly be set out in the following categories:

TIER 1 FINAL STAGE PRODUCTION	Consists of manufacturing or procuring finished goods, also referred to as Cut-Make-Trim (CMT) manufacturing (cutting, sewing, printing).
TIER 2 INPUTS PRODUCTION	Refers to the textiles production (including fabric mills, spinning, knitting, dyehouse weavers, embroidery, leather tanning).
TIER 3 RAW MATERIALS	Consists of raw material production (including farms and forests which grow particular fibres, and animal husbandry).

Each tier in our supply chain carries varying levels of inherent risk, which has been a key consideration in our labour risk management strategy over the reporting period.

KOOKAÏ products are sourced from a combination of suppliers. A significant portion of our final stage production occurs within our company-owned and operated manufacturing facilities. The remainder of our finished goods are sourced from trusted and vetted third party suppliers offshore.

A significant portion of our fabrication used in our Basics Collection is sourced within Australia, whilst the majority of our inputs and raw materials are sourced from third-party suppliers.

02. OUR SUPPLY CHAIN

“Approximately 80-85% of our finished goods are produced in our privately owned factories. This vertical model allows us greater control over labour conditions, working hours, health and safety standards, and wages.”

KOOKAI-OWNED MANUFACTURING FACILITIES

Supporting our workers is embedded in our ethos at KOOKAI. Working conditions and worker welfare is of paramount importance and is why we choose to own and operate our own manufacturing facilities in Fiji and Sri Lanka. Dissatisfied by the working conditions at some of the end production factories we had visited internationally, we wanted to improve visibility over working conditions in our supply chain and the quality of goods produced.

KOOKAI is proud to have a vertically integrated manufacturing model – from design, to manufacture, to retail. Each of our garments starts its life in our Australian head office, where it is designed by our in-house design team, brought to life by our pattern makers and machinists, sampled and fitted – all occurring within Australia. From there, we manufacture our finished goods in our privately owned factories (which produce approximately 80-85% of the KOOKAI collection) in Fiji and Sri Lanka.



02. OUR SUPPLY CHAIN

WHERE ARE OUR PRIMARY MANUFACTURING FACILITIES LOCATED?

MAGI ENTERPRISES FIJI, SUVA, FIJI

Daniva Rd Vallee, Nasinu, Fiji

Our Fiji manufacturing facilities employ around 850 Fijian residents, approximately 88% female employees who produce the majority of the KOOKAI basics collection, as well as having an executive and head office team. No migrant workers, or temporary workers are employed within these facilities.

MAGI ENTERPRISES LANKA, HANWELLA SRI LANKA

Suduwella, Kaluggala, Hanwella

Our Sri Lankan manufacturing facilities employ just under 850 Sri Lankan residents, including approximately 80% female employees who produce the majority of the KOOKAI fashion collection, as well as an executive and head office team. No migrant workers, or temporary workers are employed within these facilities.

1700
EMPLOYEES
IN OUR
FACTORIES

FAIR WAGES
AND SOUND
WORKING
CONDITIONS

NO MIGRANT
WORKERS

NO TEMP
WORKERS

88% FEMALE
WORKFORCE
IN FIJI

80% FEMALE
WORKFORCE
IN SRI LANKA

KOOKAI

02. OUR SUPPLY CHAIN

THIRD-PARTY SUPPLIERS

The remaining majority of our merchandise production process is supported by third-party suppliers, particularly at the input stage of production (Tier 2) and raw materials (Tier 3).

Our sourcing decisions prioritise trust, traceability, and ethical performance. We actively align our business with suppliers who embrace our ethos and are committed to our values and ethical standards. We are proud of our long-standing relationships with our key suppliers, which we continue to build upon.

We remain aware of the heightened modern slavery risks with engaging third-parties given they are not company-owned and operated, which impacts our visibility.

NON-MERCHANDISE SUPPLY CHAIN

We acknowledge that our responsibility to identify, mitigate and remediate modern slavery risk extends to our non-merchandise supplier relationships. Our business engages a broad range of goods and services providers- such as logistics, IT and digital marketing. We apply the same level of scrutiny in selecting suppliers across all business functions and equally prioritise building long-standing and trustworthy relationships with ethically aligned partners.



KOOKAI

03. OUR MODERN SLAVERY RISKS

Identifying risk areas within our business is a critical foundation for effectively addressing and preventing modern slavery.

At KOOKAI, we are dedicated to understanding how we may be causing, contributing to, or directly linked to modern slavery.

As part of this commitment, we have undertaken a risk assessment during the reporting period, with a focus on the internal and external elements of our operations and supply chain.

RISK OF MODERN SLAVERY IN OUR OPERATIONS

In our assessment, the risk of modern slavery within KOOKAI's internal operations is very low. However, we rely on third-party providers to support various aspects of our operations. This includes sectors such as logistics, which are considered higher risk due to industry-wide labour challenges.

RISKS OF MODERN SLAVERY IN OUR SUPPLY CHAIN



INDUSTRY RISK

KOOKAI operates in the garment and textiles industry, which is considered a high-risk sector. This is due to the complex nature of apparel supply chains, particularly in Tier 2 and Tier 3, which pose challenges in traceability and accountability.

KOOKAI has considerably mitigated this risk through vertical integration. Manufacturing the majority of our merchandise in company-owned and operated facilities allows for effective oversight and governance of working practices and conditions.

However, we acknowledge there is still residual risk of contributing to or being directly linked to modern slavery where we engage third-party suppliers.

This is particularly prevalent in the input stage and raw materials production, but there are also instances where third-party Tier 1 suppliers are engaged.

These risks could include:

- Forced labour
- Bonded labour
- Exploitation of vulnerable workers
- Unauthorised sub-contracting and outsourced labour
- Deceptive recruitment practices including charging of recruitment fees
- Child labour
- Temporary and migrant workers
- Excessive overtime
- Underpayment of wages, overtime and entitlements

KOOKAI continues to prioritise transparency to identify, monitor and address these risks in a meaningful way.

03. OUR MODERN SLAVERY RISKS



GEOGRAPHICAL RISK

The inherent level of risk varies between countries. To better understand the increased risk in our supply chain due to geographical location, we analysed the data from the Global Slavery Index 2023. Of the countries in which KOOKAÏ manufactures and sources product across all known tiers of the supply chain, we identified several regions that carry higher risk, as indicated in this table.



PRODUCT RISK

Certain materials used in the garments and textiles industry carry a higher inherent risk of modern slavery. In particular, there is evidence of forced labour and child labour in the harvesting and cultivation of cotton. Although we have not identified any instances of this within our own supply chain, we remain cognisant of this risk in our supplier selection and ongoing practices.

GLOBAL SLAVERY INDEX 2023: DATA ON COUNTRIES INVOLVED
IN KOOKAÏ'S MERCHANDISE SUPPLY CHAIN

COUNTRY	ESTIMATED PROPORTION LIVING IN MODERN SLAVERY (% OF POPULATION)	VULNERABILITY (OUT OF 100)
AUSTRALIA	0.16%	7
CHINA	0.4%	46
FIJI	NOT SPECIFIED	NOT SPECIFIED
ITALY	0.33%	22
JAPAN	0.11%	11
KOREA	0.35%	29
SRI LANKA	0.65%	56
TURKEY	0.16%	51
INDONESIA	0.67%	49
INDIA	0.8%	56

03. OUR MODERN SLAVERY RISKS

GEOGRAPHICAL RISKS OF MODERN SLAVERY & WORKER EXPLOITATION



This map visually represents KOOKAI source countries in our supply chain and the prevalence of their associated risk of modern slavery.

Estimated proportion living in modern slavery (percentage of total population) Vulnerability rating (out of 100)

04. ACTIONS TO ASSESS AND ADDRESS RISK – INTERNAL

KOOKAI recognises the importance of taking meaningful action to respond to modern slavery risks. We have adopted a broad range of policies, procedures and practices to support our global team and suppliers in understanding the ethical standards expected in all dealings with the KOOKAI business.

KOOKAI takes great pride in its social governance and labour practices in its manufacturing facilities in Fiji and Sri Lanka.

These include but are not limited to:

LOCAL HR TEAMS

The HR teams in our manufacturing facilities have a focus on strong governance and accountability practices, workforce engagement and adherence to occupational health and safety standards.

FAIR WAGES

All employees in Fiji and Sri Lanka are paid fair wages – at or above the local minimum wage levels. Wages are reviewed on an annual basis, or more regularly as required. We ensure we respond quickly to all legislative changes to wages in the jurisdictions in which we operate.

FAIR WORKING HOURS & LEAVE ENTITLEMENTS

Employees' working hours and leave entitlements align with local labour laws, including the availability of optional paid overtime.

RESOURCES AVAILABLE TO WORKFORCE AT MANUFACTURING FACILITIES

To support our workforce, we supplied a number of in-house services including:

- Transportation
- Accommodation
- Healthcare
- Book and stationary donations

PEOPLE-CENTRIC CULTURE

The executive teams at our manufacturing facilities promote a people-centric culture. Employees engage in training and awareness programmes, team building events and long service recognition.

MEMBER REPRESENTATIVES AND INTERNAL REPORTING CHANNELS

Both facilities have bespoke internal reporting channels to submit ideas, complaints or give feedback, and appoint member representatives to address employee matters with the executive team.

04. ACTIONS TO ASSESS AND ADDRESS RISK – INTERNAL

While full transparency is still a work in progress given the challenges involved with a complex supply chain, we are committed to improving oversight through long-term supplier engagement, responsible sourcing practices, and initial and ongoing due diligence. We continue to invest in mapping and tracing our supplier network, recognising the limitations that currently exist in achieving full visibility.

To manage risks among our third-party suppliers, we have implemented the following:

SUPPLIER ONBOARDING

All third-party suppliers are required to review and sign our Environmental and Social Governance documents which outline the minimum standards of labour practices and responsible business operations expected of all suppliers when entering and engaging in business with KOOKAI. Our Terms of Trade also include expectations that extend to any sub-contractors engaged by our suppliers to undertake any work in the production of goods and services.

RELATIONSHIP-BASED OVERSIGHT

We maintain open and direct lines of communication with key third-party suppliers to build trust, strengthen traceability, promote responsible purchasing practices, and increase alignment with KOOKAI's risk mitigation objectives.

AUDITING AND MONITORING

KOOKAI requires evidence of independent audits and retains the right to conduct our own assessments. Findings are escalated to KOOKAI's executive team when necessary, and corrective actions are followed up on.

DUE DILIGENCE ON THIRD PARTY TIER 1 SUPPLIERS

In the instances where KOOKAI engages third party Tier 1 Suppliers, KOOKAI takes the same actions it does for Tier 2 and 3 Suppliers.

04. ACTIONS TO ASSESS AND ADDRESS RISK – INTERNAL

The following policies assist in managing social governance compliance within our operations.

CODE OF LABOUR PRACTICES	The Code of Labour Practices ('Code') sets out our expectation of suppliers in relation to labour rights and integrity. The Code draws upon international standards and is specifically based on the Ethical Trade Initiative ('ETI') Base Code, which covers the International Labour Organisation ('ILO') Fundamental Principles and Rights at Work. The Code applies to all known suppliers across all stages of production in the supply chain with the expectation that the Code will be adhered to.	Through social compliance audits, we monitor whether our third- party suppliers adhere to our Code, and whether they require similar standards of their own in alignment with the ETI Base Code. Compliance with our Code is built within our contractual dealings and is specified within our standard terms of trade which is required to be signed by all suppliers, and service providers.
CHILD LABOUR AND REMEDIATION POLICY	Child labour has no place in our supply chain, and we are firmly opposed to all forms of child exploitation. KOOKAI believes the future development of children and that of their communities and countries in which they live, is best served through education and not child labour. The Policy applies to all known suppliers across all stages of production in the supply chain with the expectation that the Policy will be adhered to.	In the circumstance that child labour is identified, we expect that suppliers will genuinely work in partnership with KOOKAI and the appropriately qualified organisations to develop a responsible solution that is in the best long-term interests of the child. In developing a remediation plan we will seek advice and guidance from a credible civil society organisation that deals with child labour or the welfare of children to ensure that the best interest of the child is at the centre of any decision/ redress. In addition to company policies and comprehensive recruitment processes, we monitor the risk of child labour through independent third-party audits to ensure it does not occur and is eliminated throughout our supply chain.
RESPONSIBLE PURCHASING PRACTICES POLICY	KOOKAI maintains a Responsible Purchasing Practices Policy, this operates as an internal policy which applies to all of our designers, product, buyers, production and supply chain teams. This sets out the ethical code that governs our purchasing decisions, providing guidance in ensuring we choose to work with suppliers who act ethically and responsibly and in turn ensures that we consciously manage our purchasing behaviour when dealing with suppliers.	As part of our overall ethos, we maintain a strong focus on developing rapport and engaging with suppliers directly, knowing our suppliers and building relationships to increase visibility and aid in monitoring responsible purchasing. We are in a unique position owning our manufacturing facilities, which gives us the ability to base our purchasing practices upon our factories' capacity so as to ensure that all purchases are managed carefully and effectively.

04. ACTIONS TO ASSESS AND ADDRESS RISK – INTERNAL

WHISTLEBLOWER POLICY	We hold ourselves to very high standards of integrity and professional conduct. We are committed to fostering a culture of good corporate governance and ethical behaviour.	This policy applies to any suspected or actual instances of illegal, unethical or otherwise improper or unacceptable conduct, including breaches of our internal KOOKAI Code of Conduct.
RESTRICTED SUBSTANCES LIST (RSL) AND MANUFACTURING RESTRICTED SUBSTANCES LIST (MRSL)	KOOKAI is committed to minimising the environmental impact of its business. The RSL identifies the chemicals we will not permit in our finished products due to their potential impact on consumers, workers and the environment. The MRSL identifies the chemicals we will not permit to be used in the manufacturing of materials, components and finished products.	Suppliers must read, agree to and sign the RSL and MRSL as part of KOOKAI's onboarding process. Suppliers are expected to communicate the RSL and MRSL to their raw material suppliers and others involved in the supply chain, who may not have a direct contractual relationship with KOOKAI. The MRSL and RSL are kept up to date and are published on our website.

05. ASSESSING EFFECTIVENESS

KOOKAÏ is committed to ensuring risk mitigation practices are upheld and maintained, and to ensuring that improvement opportunities can be identified and implemented. KOOKAÏ has several measures in place to assess the effectiveness of its efforts.

REGULAR VISITS TO MANUFACTURING FACILITIES

The Australian office works closely with the teams in Fiji and Sri Lanka on a day-to-day basis and visit the factories several times a year. The Australian executive team is regularly briefed and can ensure that suggested changes or improvement opportunities are actioned.

POLICY AND PROCEDURE CONTROLS

KOOKAÏ has an extensive set of policies and procedures which our employees and suppliers must read, understand and agree to. Some of these directly relate to and address the modern slavery risks in our operations and supply chain.

We continually review our policies and procedures to identify opportunities for improvement in our practices and overarching framework to ensure ethical and social governance standards are up-to-date and complied with.

WORKING WITH SUPPLIERS

We work collaboratively with our suppliers to strengthen traceability, ensure accountability to upholding KOOKAÏ's ethical standards and to build trust.

TRAINING AND AWARENESS

We ensure our team are always equipped with the most up to date knowledge and training on issues connected to modern slavery; creating a culture of awareness, compliance and accountability.

SOCIAL COMPLIANCE AUDITS

Including in our manufacturing facilities, in addition to requiring audit documentation for third party suppliers to monitor worker exploitation or any real or suspected risk of modern slavery.

INITIATIVES FOR THE COMING YEAR

GLOBAL HR OVERSIGHT

We will appoint a Global Head of People & Development to oversee HR departments in both factories to further reinforce global alignment of employment practices.

DEDICATED RISK MANAGER

We will appoint a Risk Manager to oversee compliance, conduct risk assessments and drive continuous improvement initiatives across the business.

06. OTHER RELEVANT INFORMATION

GENDER EQUALITY

Gender inequality, discrimination and rights violations are commonly faced by women in the apparel industry. Women are particularly vulnerable and at high risk of being victims of modern slavery. As a business we are committed to empowering women and introducing measures to address and combat gender inequality, these overarching efforts strengthen and reinforce our efforts to mitigate modern slavery.

We maintain comprehensive policies against workplace discrimination and harassment. Discrimination on any basis, including gender, is not tolerated in any of our privately owned facilities. Our policies and procedures prohibit discrimination on the basis of gender, additionally our policies provide a strategy and process on how to report, address and resolve any such circumstance should it arise.

We are proud of the initiatives that we have in place, we go beyond the documented policy and live and breathe gender equality in practice, aspiring to create opportunities for females at all levels with a significant proportion of our workforce being women.

Our efforts to proactively address discrimination faced by women can be evidenced in our efforts to successfully provide equal opportunities – over 70% of our employees are female, extending to the management level, including at executive level. Our executives have implemented programs that specifically consider many of the issues faced by women to uplift the standard of living for our female workers through various educational programs run at the workplace.

Additionally, our Code of Labour Practices incorporates provisions which specifically address and take into consideration issues relating to gender inequality, particularly faced by women, which are likely to be experienced within the garment and textile industry. In addressing discrimination faced by women in the apparel industry, our strategy is based upon working together with our suppliers to support them in addressing and remedying breaches, particularly on issues regarding gender inequality.

We welcome your feedback or any queries relating to our actions to assess and address modern slavery risks in our business operations and supply chain. To learn more about KOOKAI, and our commitment to mindful manufacturing, ethics and sustainability please visit our website <https://www.KOOKAI.com.au/>, or for additional information on our policies and procedures please contact us.

legal@KOOKAI.com

KOOKAI