

A woman with dark hair pulled back, wearing dark sunglasses, large hoop earrings, and a brown shearling jacket over a light-colored crop top and dark jeans with a black belt. She is standing in front of a stone building with arched windows. The text is overlaid on the top half of the image.

PRINCESS POLLY

MODERN SLAVERY AND TRANSPARENCY IN SUPPLY CHAINS STATEMENT

Princess Polly Online Pty Ltd - ABN 43 169 210 520
Princess Polly USA, Inc. - EIN 83-2450052

ACKNOWLEDGEMENT OF COUNTRY

Princess Polly acknowledges Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of Country. We pay our respects to Elders past, present, and emerging. We acknowledge the Kombumerri people as the Traditional Owners of the land on which Princess Polly was founded and continues to work on today.

We acknowledge Aboriginal and Torres Strait Islander peoples' continuous connection to the land, and thank them for protecting the environment and ecosystems presently and for thousands of generations before. Princess Polly thanks Elders and Traditional Owners for sharing their stories of the land and of sacred sites within our community, and pays respects to their ancestors.



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1.0 INTRODUCTION

Our mission is to make on-trend fashion sustainable and accessible.

Here at Princess Polly, we understand the importance of building an inclusive, sustainable and resilient future that puts people, the planet and our community first. Our four impact areas, Ethical Sourcing, Sustainability, Environment, and Equality & Community, help us lead the movement for positive, lasting change in our industry. This is our fourth Modern Slavery statement issued under the California Transparency in Supply Chains Act 2010 and the Australia Modern Slavery Act 2018 (Cth).

Our Modern Slavery statement is a comprehensive exploration of the measures we take to identify, mitigate, and remedy the risks of modern slavery in our operations and supply chain. We have focused our efforts in the 2023 calendar year (our mandatory reporting criteria in Australia), and have included relevant activities from 2024 for California. This demonstrates our proactive approach and commitment to ensuring that modern slavery has no place in our business.

Corporations must prioritize ethics and sustainability in their decisions to ensure every human within their influence has their rights protected. Our close relationships with suppliers help us assess and improve our practices and protect those who work with us. We have aligned ourselves with partners and respected organizations that embody our values and embrace our commitment to respect human rights.

Rejection of forced labor, child labor and modern slavery in all its forms are singled out in our Human Rights Policy and Code of Conduct, applying to our team, supply chain and customers. We are participants of the United Nations Global Compact and have aligned ourselves and our Social Responsibility mission with the Ten Principles of the United Nations Global Compact and the United Nations Sustainable Development Goals (SDGs).

We are committed to collaborating and listening to our partners, suppliers, and customers to evolve our approach and create the best model possible. We are also committed to challenging and developing our effectiveness to create purposeful change and improve our actions over time to set an example for our industry.

The following are reporting entities for the purposes of this Statement under the Australia Modern Slavery Act 2018 (Cth) and the California Transparency in Supply Chains Act 2010:

Princess Polly Online Pty Ltd - ABN 43 169 210 520

Princess Polly USA, Inc. - EIN 83-2450052

Princess Polly is owned and controlled by the ultimate holding company, a.k.a Brands Holding Corp - EIN 87-0970919

This statement was approved by the Board of Princess Polly Online Pty Ltd on 19 June 2024.



Wez Bryett
Board Director and Co-CEO Princess Polly Online Pty Ltd

1.1 OUR APPROACH

To understand and respond to any risks of Modern Slavery in our supply chain, Princess Polly has developed an internal Modern Slavery process:

1. IDENTIFYING AND ASSESSING	2. ADDRESSING	3. AWARENESS	4. ACCOUNTABILITY
Understanding the risk of modern slavery	Undertaking due diligence to mitigate risks	Engaging everyone on the journey	Determining the effectiveness of our actions

KEY ACHIEVEMENTS IN 2023:

- ★ Maintained 100% of Tier 1 sites audited and grew our non-compliance closure to 77%.
- ★ Ten Tier 1 factories scored Gold on their Site Scorecard, indicating their dedication to our Ethical Sourcing Program.
- ★ Developed and distributed our own custom Code of Conduct e-learning module.
- ★ Achieved an 89% completion rate of our core training program for factory managers.
- ★ Visited 150 Tier 1, 2, and 3 sites in person and maintained 100% traceability of Tier 1 and 2 factories.
- ★ Progressed our Gender Equality roadmap by completing our pilot program of HERProject, reaching over 400 women.
- ★ Awarded the Best Ethical Sourcing Initiative at the NORA Sustainability Awards and were featured in Power Retail's Sustainability Spotlight.
- ★ Expanded to a ten-person dedicated Social Responsibility team; eight team members in our Australian office and two in China.



2.0 OUR BUSINESS AND OPERATIONS

Princess Polly is a global fashion retailer on a mission to make on-trend fashion accessible to everyone and to do so with lower environmental impact materials and operations. Born on the Gold Coast, Australia, in 2010, the Princess Polly team has grown to over 300 people across Australia, the USA, and China. In 2023, our team worked across six sites: an office, studio, and distribution center on the Gold Coast, Australia, plus an office, distribution center, and retail store in Los Angeles, USA. Princess Polly is wholly owned by a.k.a. Brands, based in San Francisco, USA.

Responsibility for human rights, including modern slavery, ultimately sits with the CEOs and the Chief Merchandise Officer. Social Responsibility is a ten-person dedicated team within the Merchandise team, reporting to the Social Responsibility Director. The Social Responsibility strategy has complete commitment from Princess Polly’s co-CEOs and the a.k.a. Board.

300+ Global Employees	6 Global Sites, including our Los Angeles store	3 Websites
2.2m Instagram Followers 900k TikTok Followers	15,000+ products	10 3rd Party Brands¹

2.1 SUPPLY CHAIN

There are three facets to Princess Polly’s global supply chain:

<p style="text-align: center;">MERCHANDISE</p> <p style="text-align: center;">Princess Polly Products All products designed or sourced in house by Princess Polly</p> <p style="text-align: center;">Branded Products All products purchased from 3rd party retailers</p>	<p style="text-align: center;">NON-MERCHANDISE</p> <p style="text-align: center;">All non-saleable products, including packaging</p>
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¹ In 2023, Princess Polly placed orders with the following 3rd party brands: Fame Accessories, Slick Hair Company, Peta & Jain, Lemonade Shoes, ROC, Therapy, Lipstik, Billini, Motel & Lioness.

2.1.1 MERCHANDISE

PRINCESS POLLY PRODUCTS

Customers worldwide can purchase Princess Polly products, namely apparel, footwear, and accessories, from our websites and our store in Los Angeles. In 2023, Princess Polly expanded into wholesale, creating partnerships with Pacsun, Boathouse, and Liverpool across the United States, Canada, and Mexico. Our products are primarily designed on the Gold Coast or in Sydney and are entirely manufactured by our partner factories in China, India and Mexico. We do not own or operate any of our factories, but we pride ourselves on creating long-lasting, strong relationships with our suppliers.

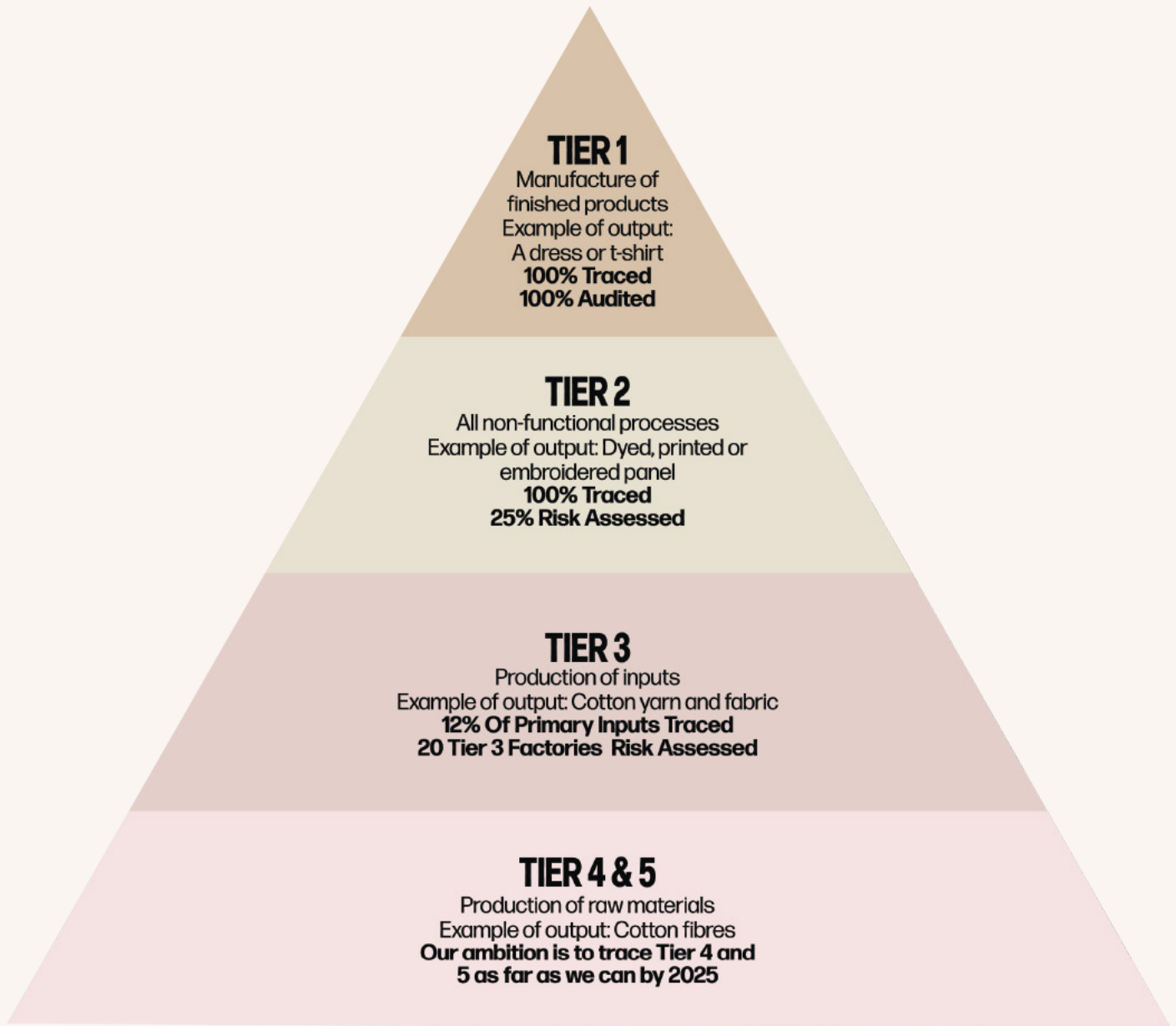
OUR SUPPLIERS

At the end of 2023, we sourced from 74 Tier 1 factories based in China, India, and Mexico.



OUR TIERS

To create a finished product, we consider there to be five supply chain tiers:



We do not outsource to other manufacturers where we can't be sure our ethical standards are upheld. We also have a strict 'no order subcontracting' policy for our suppliers, meaning our orders can't be sent to factories we don't have visibility of.

BRANDED PRODUCTS

In 2023, we worked with ten 3rd party brand suppliers. Our direct relationship lies with the 3rd party brands themselves rather than their factories or suppliers.

2.1.2 NON-MERCHANDISE

In addition to manufacturing our merchandise, our supply chain includes goods purchased as part of Princess Polly's operations, including IT equipment, furnishings, fabrics, and packaging. Therefore, Princess Polly encompassed non-merchandise suppliers in our modern slavery risk assessment. While we consider the greatest risks in our merchandise supply chain, we also extended our site-specific risk assessments to select offshore branded packaging manufacturers.

3.0 RISKS OF MODERN SLAVERY

Princess Polly conducts a multi-faceted risk assessment to understand the risks of human rights abuses in our supply chain. We prioritize our due diligence approaches, drawing on desktop research from globally recognized indices and resources, supply chain mapping, supplier and worker surveys, audit reporting, and site visit observations. We use this to evaluate our existing supply chain and to source new suppliers. We are committed to reviewing our risk assessment approaches, remaining well-informed on updated research, and continuously assessing our supply chain.

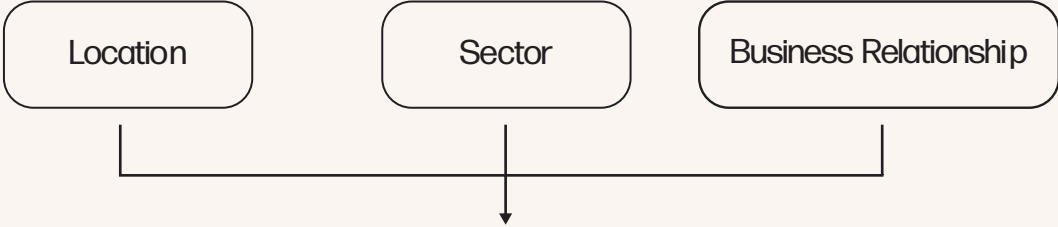
Through a bespoke methodology, we assessed the inherent risk of modern slavery in our supply chain operations, reviewing the following indicators:

- ★ Location risks
- ★ Sector risks
- ★ Business relationship and our level of direct control

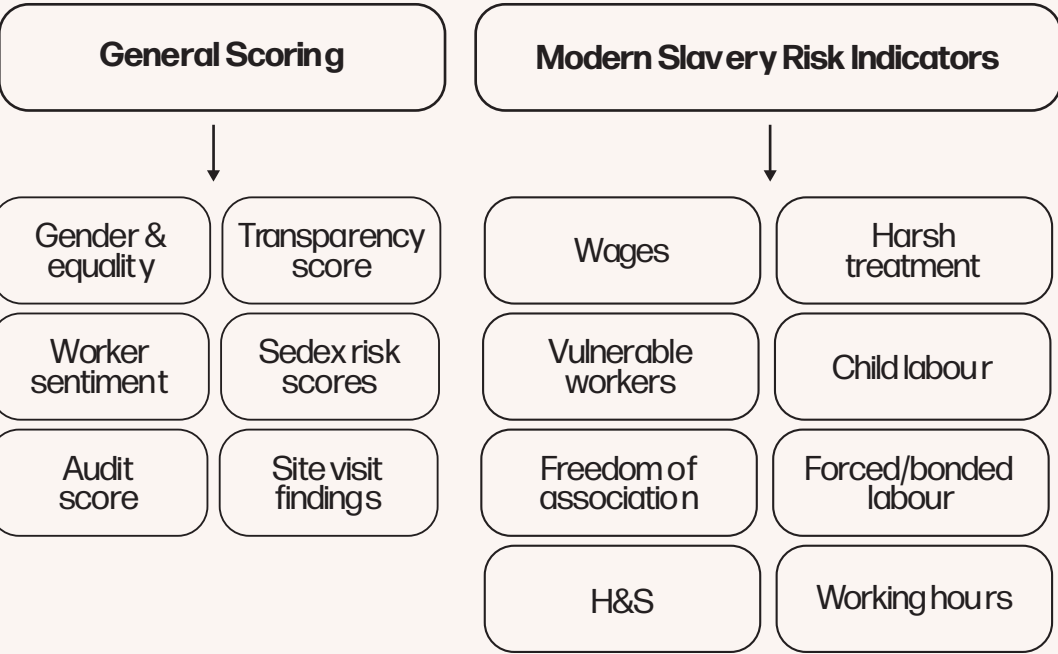
A numerical score was applied to each of these indicators in order to provide an overall inherent risk score. A more comprehensive site-specific risk assessment was also undertaken for Tier 1 suppliers of Princess Polly branded merchandise and select packaging.



INHERENT SUPPLY CHAIN RISK ASSESSMENT



SITE SPECIFIC RISK ASSESSMENT



In addition, Princess Polly also adopted the continuum of involvement framework by the UN Guiding Principles on Business and Human Rights (UNGPs). We use this to consider how we could be causing, contributing to, or directly linked to modern slavery risks.

Cause: A company can cause human rights risks when their actions increase the specific impact or their actions directly result in modern slavery practices occurring.

Contribute: A company contributes to human rights abuses when its actions have been so influential that the abuse would not have occurred without it, including where actions incentivise modern slavery.

Directly Linked: A company is directly linked to human rights abuses when it has established a relationship within its supply chain for mutual commercial benefit where the activities within the scope of that relationship, increases the risk of harm.²

Our assessment of this framework has demonstrated that Princess Polly could be directly linked to modern slavery risks rather than having caused or contributed to them. We aim to ensure our business decisions do not compromise or adversely impact human rights.

² Practical Definitions of Cause, Contribute, and Directly Linked to Inform Business Respect for Human Rights Discussion Draft, Debevoise Business Integrity Group, Enodo Rights.

Risk score	Supply Chain Relationships	Details of risks	Princess Polly's potential relationship to risk
High	Tier 1 Manufacturing	<p>Our Tier 1 sites remain our most high risk supply chain stage, due to the high risk locations and sectors, as well as our high leverage.</p> <p>The risks and further assessments associated with this stage are detailed in section 3.1.</p>	Directly linked
High	Tiers 2+	<p>As we move further down the supply chain, our visibility and leverage reduces, however the country and sector risks remain high. For any fabric mill or other non Tier 1 site where Princess Polly has a direct relationship, we undertake the same site-specific risk assessment as our Tier 1 manufacturing sites. Currently Princess Polly only has one site within this category, but is planning to expand in 2024 and beyond. For Tier 3 sites where we do not have a direct relationship, we have expanded our site visit program.</p> <p>Tracing Tier 3 is a challenge for the fashion industry. We have begun to trace the main inputs (fabrics, plastics and metals) of our Lower Impact products, by utilizing the production pathways recorded through material certifications. We also undertake qualitative assessment of our key inputs created through raw materials, production and processing, outlined in Input Risks in section 3.1</p>	Directly linked
Medium	Transport and Logistics	<p>This includes global custom clearance and freight forwarding services. Since 2022, we have consolidated over 99% of our upstream logistics to be performed by Toll Group who complete their own due diligence and reporting for Modern Slavery. 97% of our downstream transport consists of local couriers in low risk countries.</p> <p>We acknowledge the use of additional service providers in higher risk countries for a portion of our upstream and downstream transport, and therefore, this stage remains at a medium risk level.</p> <p>Risks include human trafficking, forced labor, high working hours, weak collective bargaining and low wages.</p>	Directly linked

Low	Indent Brands	We understand that the same location and sector risks exist within our brand partners' supply chains. In 2023 we worked with our key indent brands to review their environmental, social and governance (ESG) performance and current management systems using the Worldly Brand and Retail Module (BRM).	Directly linked
Low	Service Providers/ Contractors	Princess Polly uses contracted workers at our US Distribution Centre. Other professional service providers include models, IT and cleaners at our Australia and US sites. Risks include, high working hours and no or ineffective unions, high business fees, temporary work, H&S, failure to earn minimum wage and overtime and no social protection contributions.	Directly linked
Low	Princess Polly Employees	Our staff consist of those directly employed in our offices and distribution centers in Australia and the USA. The modern slavery risks are low as these are skilled and specialized roles where we have direct control. Our staff play a critical role in our work against Modern Slavery, enhanced through awareness training, detailed in section 5.1	Directly linked



3.1 PRINCESS POLLY BRANDED MERCHANDISE

Princess Polly has determined that our greatest opportunity to mitigate risk lies within the manufacture of our own branded merchandise and select packaging. As such, we have completed a detailed industry, location, factory, input and worker risk assessment:

INDUSTRY AND SECTOR RISK

The 2023 Global Slavery Index identifies Garments and Textiles at high risk of being produced by Modern Slavery. Short production deadlines, rapid style changes and poor payment terms in the apparel industry can result in excessive overtime, low salaries, working without breaks, and unpaid overtime. Managers and supervisors working under pressure can pass this onto workers in the form of harsh treatment and abuse. Additional revisions or mistakes in orders and failure to monitor the factory's capacity, may lead to unauthorized subcontracting or homeworking, as well as child labor. Sexual harassment and violence against women and gender discrimination are also prevalent issues reported, associated with higher numbers of women workers.

COUNTRY RISKS

In 2023, our own branded products were manufactured in China, India, and Mexico. These countries have vulnerable populations, with 4 victims for every thousand people in China, 8 for India, and 6.6 for Mexico.³

As the second-largest economy globally, China specializes in the production of labor-intensive, low-value goods for export, which can result in forced labor. Independent unions are outlawed in China, and the law does not protect the right to strike. As a result, there is no protection for workers who request or participate in collective negotiations with their employers. At the end of 2021, the US Congress adopted The Uyghur Forced Labor Prevention Act (UFLPA), which prevents goods produced in the Xinjiang Uyghur Autonomous Region (XUAR) of China from entering the United States. This is due to widespread evidence of state imposed forced labor in the region. Princess Polly has banned cotton from this region, and has established compliance monitoring.

Evidence of child labor and forced labor have been found in various Indian industries, including textile production. "Sumangali schemes" in the Tamil Nadu region were reported to use bonded labor, restriction of movement and sexual harassment towards young women and girls in spinning mills. Due to the large income disparity across regions, there is an increased prevalence of migrant workers. These workers often lack official identity documents which poses a greater risk of informal labor. Furthermore, there are limited anti-discrimination laws for certain individuals in India, increasing the risk of discriminatory practices in the workplace.

Mexico is vulnerable to modern slavery, exacerbated by mass migration in the world's largest migration corridor from Mexico to the United States (US). Risks of forced labor increase in this region due to high inequalities and effects of conflict. Key risks for apparel manufacturing in this region include extreme working hours and child labor.

³ <https://www.walkfree.org/global-slavery-index/map/>

SITE SPECIFIC RISKS

In partnership with Sedex and ELEVATE/LRQA, our Tier 1 sites (plus, Tier 2 and 3 sites that we have a direct relationship with) were assessed against the above risks, by analyzing information and findings from the following sources:

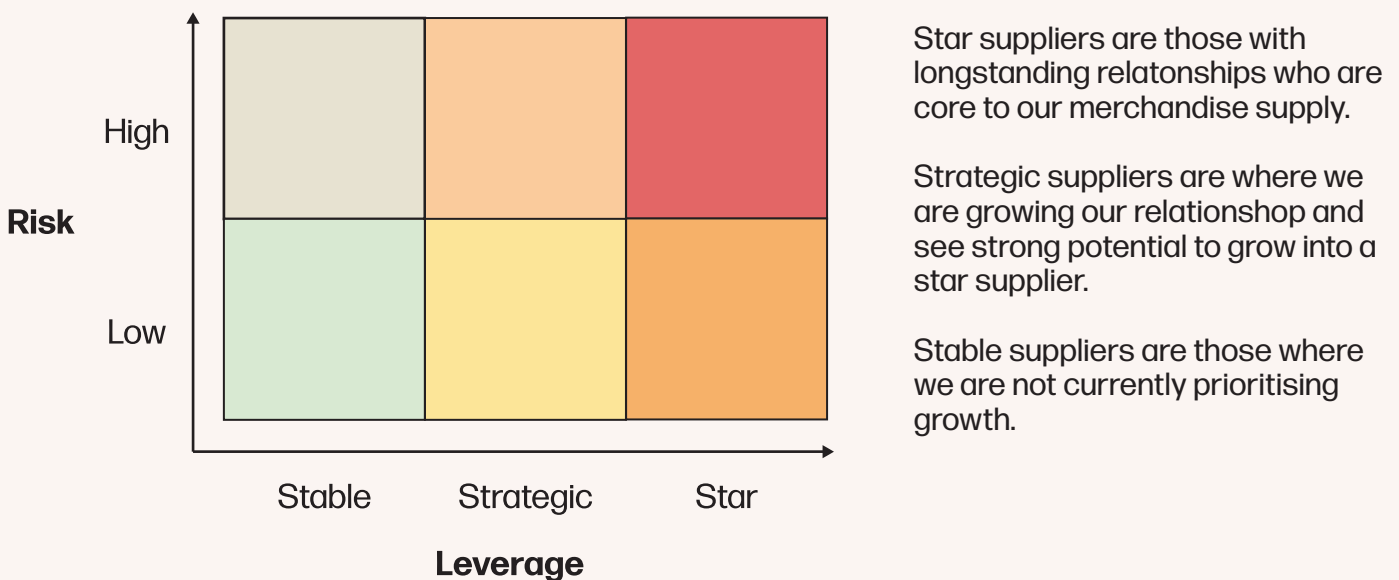
- ★ Internal transparency surveys and traceability requests
- ★ Verified Third Party Social Audits and site visits by Princess Polly team members
- ★ Sedex SAQ responses
- ★ ELEVATE/LRQA Worker Sentiment Surveys
- ★ Third Party Inline Inspection

Through our analysis of these sites on Sedex, the highest labor rights risks for our sites were found to be:

- ★ Forced labor
- ★ Working hours
- ★ Discrimination
- ★ Freedom of association
- ★ Children and young workers
- ★ Wages

Our most commonly identified high risks were related to emergency health and safety procedures/ equipment, documentation and record keeping. Princess Polly remains committed to addressing these through our remediation program. Child labor risks are taken very seriously at Princess Polly and we have many safeguards in place to monitor this risk. If any of these indicators are suspected, they are investigated thoroughly with the highest priority. We acknowledge that while our risk assessment tools are varied and thorough, they may not uncover all existing risks or violations at our supply chain sites. They reflect only a snapshot in time and full transparency is never guaranteed. As a result, we continue to build out our response and awareness measures (see sections 5 and 6 below).

Princess Polly created a framework to categorize sites according to risk and leverage. It uses a combination of our risk assessment and a leverage analysis based on spend, growth potential, and length and significance of relationships. As a result, it assists us in identifying where to prioritize



We acknowledge the modern slavery risks associated with less visible tiers of our supply chain. Princess Polly has now expanded our Transparency Surveys and Site Visits to Tiers 2 and 3, including trading companies.

INPUT RISKS

While our comprehensive site-specific risk assessment currently considers our Tier 1 sites and Tiers 2 and 3 with direct relationships only, we acknowledge that further along our supply chain, where we have less visibility, the risk of modern slavery increases. We have expanded our internal site visit approach to Tier 2 and 3 sites within our supply chain in order to introduce our Ethical Sourcing Program and conduct a site risk assessment in line with SMETA and ELEVATE/LROA ERSA standards. In 2023 we risk-assessed 25% of our mapped Tier 2 sites and 20 Tier 3 sites. The key findings and associated risks identified through these visits were wages or working hour risks due to incomplete record keeping and management systems, and health and safety risks due to lack of H&S training.

All inputs sourced for our manufacturing have their own complex supply chains. Princess Polly aims to keep informed about the risks of our main inputs; in 2023, our primary materials were polyester, recycled polyester, cotton, recycled nylon and PU.

According to the Global Slavery Index, garments and textiles are two of the five most at-risk products to Modern Slavery globally, with the US Department listing 16 countries with potential forced or child labor, including China and India. Conversely, the synthetic materials we use have very low risk of modern slavery. Princess Polly is transitioning our material sourcing to certified Lower Impact materials, such as organic cotton and recycled polyester. We only accept and source sustainable materials from certified factories that can provide valid scope & transaction certificates. In 2023, over 30% of our materials were certified.

We are also aware of the potential health and safety risks associated with processing and finishing apparel. For example, the health risks associated with improper Personal Protective Equipment and long hours exposed to chemicals. In 2021, Princess Polly adopted and enforced a restricted substances list, which bans the use of dangerous substances in the production of and finished products. In 2022, we began expanding our site risk assessment to Tier 2 and 3, and plan to continue building this out in 2024 and beyond.

When it comes to accessories, which make up approximately 10% of our product range, World Vision notes forced and child labor is prevalent in many stages of the jewelry supply chain, including mining, with an estimated 1 million children working in the mining industry globally. In 2023, the most commonly used metals in our accessories were recycled zinc and recycled steel, which according to Sedex's commodity risk tool, have no evidence of forced or child labor violations in China or India, nor does fashion accessories in general. Princess Polly aims to strengthen our risk assessment by conducting more specific analysis on the raw materials and Tier 4 processes used in our products and the associated human rights violations that occur in their supply chains.



VULNERABLE WORKERS

The identified risks disproportionately impact some workers more than others. The following workers are the most vulnerable to these risks in our supply chain:

Women

Women are considered at high risk of human rights violations, including discrimination, forced labor, trafficking, sexual abuse and exploitation. The Global Slavery Index revealed that 71% of modern slavery victims are female. We take responsibility to protect our worker's rights and to focus education programs on empowering women.

Migrant workers

The extreme wealth disparities across regions in both China and India drive a large migration of workers to different regions. In China, migrant workers account for 67% of the urban workforce, while India sees an annual migrant flow of nine million.⁴ Migrant workers can be exposed to vulnerability and forced labor as they have limited access to legal protection, benefits and services compared to local workers.

Child workers

In China, many children are left behind in poverty-stricken rural areas due to their parents working as migrants in urban provinces. In India, children of migrant workers lack access to education in isolated work sites and often work alongside parents. Moreover, evidence of child labor in "Sumangali schemes" is a key risk. Princess Polly has zero-tolerance for child labor, and has a Child and Forced labor Policy to investigate and mitigate any instance of child labor that may occur.

Contract, Agency and Home Workers

Workers hired indirectly through recruitment agencies are at greater risk of deceptive recruitment and bribery. These workers are more vulnerable to forced overtime and underpayment of wages. Homeworkers who work outside the formal system are also more vulnerable to exploitation. Princess Polly does not allow home working arrangements, and maintains open communication and conducts intermittent checks on high risk processes with suppliers, such as crochet.

Ethnic and Religious Minorities

State-imposed forced labor allegedly continues to occur in RTL centers, with ethno-religious minorities at high risk. The lack of anti-discrimination laws based on skin color or national origin in India also place these minorities at greater risk. Moreover, there are noticeable patterns of modern slavery associated with religion and ethnicity.

⁴ Global Slavery Index



3.2 BRANDED MERCHANDISE

We acknowledge that similar risks exist within our brand partners' supply chains. We worked with ten third-party brands in 2023, and are continuing to consolidate this. Currently, our direct and immediate control lies with our unbranded suppliers, this is where Princess Polly prioritized our risk assessment and due diligence. In 2023, Princess Polly piloted the Worldly BRM with our three key indent brands to assess their ESG performance and management systems against Princess Polly's due diligence.

In addition, we rolled out the BRM with our US based Distribution Centre Service Providers to review their systems and identify initial risks and opportunities. Princess Polly plans to collaborate with these partners in the future to improve assessment methods and findings.



4.0 ASSESSING

Princess Polly recognizes that we are responsible for responding to our specific risks by undertaking due diligence and remediation in line with the United Nations Guiding Principles. We prioritize our efforts by the most salient risks to human rights and where we have the greatest capacity to positively impact the lives of our workers and communities where we and our partners operate.

4.1 ONBOARDING

In 2023, we maintained a stringent onboarding process ensuring any new potential suppliers meet our requirements upfront, enabling us to identify human rights risks early on, while maintaining the integrity of our Ethical Sourcing program.

Our onboarding process includes three phases, and we only work with suppliers that satisfy all requirements:

1. Transparency phase - We ask suppliers to share the following as our initial introduction:
 - a. Transparency Survey of all primary & subcontracted sites, including detailing factory capabilities and machinery involved.
 - b. Ethical Audit Reports. Where not provided, we support the supplier to organize their first audit.
 - c. A linked Sedex membership.
 - d. A valid business license.
 - e. Sustainable Material Certification, if applicable.
2. Onboarding phase - We get to know our new suppliers, and they get to know us, through:
 - a. An onboarding call.
 - b. An invitation to our Vendor Portal. This includes access to all standards, policies and our Supplier Trading Terms to read and sign. All available in English and Mandarin.
3. Engagement phase - Production may now start, while we work with suppliers over 60 days to:
 - a. Complete a Self Assessment Questionnaire (SAQ) on the Sedex platform.
 - b. Conduct a site visit by a Princess Polly team member.
 - c. Receive a Site Scorecard and grade for each factory.
 - d. Complete core training modules on the EiQ platform inclusive of our Code of Conduct, Forced labor Prevention and Corrective Action Plans (CAP).

If an existing supplier wishes to bring on a new factory for our production, Princess Polly first investigates the cause, the necessity for the additional factory and its capabilities. The existing supplier must provide the following in order for the new factory to be approved for production:

- ★ An updated Transparency Survey with the new factory details.
- ★ A valid Ethical Audit Report.
- ★ Join and link to Princess Polly on Sedex.
- ★ Received a Site Scorecard and grade for the factory.
- ★ Agreement to complete SAQ within 60 days.
- ★ Conduct a site visit within 90 days by a Princess Polly team member.

In 2023, we transitioned all Tier 1 sites over to the new Sedex SAQ and have now incorporated the responses and findings into our site specific risk calculator.

STANDARDS AND POLICIES

Our approach to social responsibility is underpinned by our standards and policies. As a part of our growth, we regularly review and update our standards & policies to ensure they best reflect our values and nuances within our Ethical Sourcing program.

There are five strategic focuses that inform the activities within our Ethical Sourcing Program. These strategic focuses are:

- 1. Modern Slavery**
- 2. Gender Equality**
- 3. Responsible Purchasing**
- 4. Living Wage**
- 5. Respect**

To achieve the activities and goals within these strategic focus points we must consistently:

- ★ Establish supplier ownership
- ★ Empower factories to meet our standards
- ★ Build visibility of the whole supply chain
- ★ Embed honesty over perfection
- ★ Prioritize orders with preferred suppliers
- ★ Focus programs where they are most needed

All policies and standards are provided to suppliers through our Vendor Portal, in Mandarin and English, and include guidelines on how to put our requirements into practice. Each time a new document is added or updated, we notify all our suppliers of this update.

1. OUR HUMAN RIGHTS POLICY

Applies to the team, our supply chain and our customers.

2. OUR CODE OF CONDUCT

3. OUR ETHICAL SOURCING GUIDELINES

4. OUR CHILD FORCED LABOUR POLICY

These documents apply to our suppliers - including our factories and others in our supply chain - and outline our standards and expectations for the treatment of workers.

5. OUR ROUTING MANUAL

6. OUR ANIMAL WELFARE POLICY

These documents outline our standards and expectations for how our products are made, including the treatment of animals and use of animal products.

7. OUR GENDER EQUALITY POLICY

This document guides our team to create better experiences for women in our supply chain.

8. OUR RESPONSIBLE PURCHASING POLICY

This document establishes a standard for how we interact with all our suppliers.

9. OUR COMMITMENT TO A LIVING WAGE

This document outlines our commitment to a living wage including our next steps to drive change.

Since 2020, Princess Polly has clearly set and defined our expectations for our Ethical Sourcing program through our Ethical Sourcing Guidelines. This includes our requirements on:

- ★ *Visibility & traceability*
- ★ *Auditing, site visits & remediation*
- ★ *Response to COVID-19*
- ★ *Participation in training*
- ★ *Subcontracting*
- ★ *Feedback and engagement*

ALL AUDITS MUST INCLUDE THE FOLLOWING:

- ★ Labour Standards
- ★ Health and Safety
- ★ Management Systems
- ★ Entitlement to Work
- ★ Subcontracting and Homeworking
- ★ Environment Assessment

In 2023, Princess Polly updated our Subcontracting Policy, outlining rehabilitation measures for various subcontracting findings, including regular inspections, targeted training for the supplier and factory managers and donation of tarnished stock.



4.2 MONITORING

OUR AUDIT PROGRAM

An ethical audit is one way that Princess Polly can monitor how our factories implement our Code of Conduct. Princess Polly prefers to accept semi-announced audits (14 day window) conducted by ELEVATE/LRQA to the SMETA methodology.

Princess Polly has a reduced onboarding process for specialty factories who complete limited, specialized production that no other factory can provide based on technical capabilities, as well as existing suppliers in the process of being exited to allow for a gradual and responsible phasing out of production. These factories still require a valid social audit, however a wider scope of auditing firms and methodologies are accepted.

We have partnered with ELEVATE/LRQA since August 2020 as they represent our commitment to transparency. Using a third-party service enhances the objectivity and effectiveness of due diligence procedures with our suppliers, whilst maintaining and fostering our strong supplier relationships.

	Held a valid audit during reporting period in Australia			
	Announced	Semi Announced	Semi Announced	Total
Tier One Factories	10%	88%	2%	100%

The subsequent procedures are as follows for after an audit has occurred:

Grading	Grading Requirements	Production Approval
Gold	No or only minor outstanding non-compliances	Approved for production
Silver	Two or less outstanding major non-compliances	Approved for production
Bronze	Three or more outstanding major non-compliances	Approved for production
Red	One or more outstanding critical non-compliances	Long term supplier relationship: Production can continue for 6 months.
		New supplier: Not approved for production.
Red: Production on Hold	One or more outstanding highly critical non-compliances	Not approved for production

The factory, the supplier and Princess Polly receive a copy of the audit report. We explore the root cause and potential risk for every finding in the report, applying one of four gradings based on the severity and immediacy of any threat to factory workers, the local community or the environment; minor, major, critical or highly critical. In 2021, we undertook a review of all Sedex Issue Titles against our Code of Conduct and realigned certain gradings to more accurately represent our internal values. Some examples of non-compliances from our audit reports (during the reporting period in Australia) included overtime of up to 72 hours, a lack of social insurance and a lack of needle guards on sewing machines.

COVID-19 AUDITING PROCEDURE

When an audit is due for a site that cannot be reached because of COVID, Princess Polly implements the following response plan.

- ★ If the site is operational but an auditor cannot enter, we perform an ELEVATE/LRQA Virtual Audit
- ★ If the site is in lockdown or under restrictions, we allow a postponement of the audit deadline. This lockdown is confirmed with ELEVATE/LRQA and we ensure we will not reschedule until the area is open.
- ★ ILO Training Links are sent to the supplier and factory manager, which cover a Safe Return to Work series.
- ★ We remain in communication with the Supplier and Buying Team to ensure the order delivery schedule is delayed and respected.

WORKER VOICE

In collaboration with ELEVATE/LRQA, Princess Polly distributes anonymous worker sentiment surveys to our factories in China & India. The survey includes 20 questions designed to provide detailed analysis and visibility of the working conditions at a factory. This ensures that Princess Polly can proactively identify issues impacting workers beyond the scope of an ethical audit. In 2023, we increased coverage from 57% to 94% of Tier 1 factories, capturing the voices of 2,632 workers. Through site visits conducted by Princess Polly team members, we extended our worker sentiment surveys to our Tier 2 and 3 factories, surveying 18% of our Tier 2 and 3 factories capturing the voices of 296 workers.

Through our worker sentiment surveys, our factories are graded from A-D where A indicates a strong performance in the factory whereas D indicates the factory needs significant improvement. The categorization aims to help Princess Polly identify high-priority improvement areas and key topics for additional support.



		OVERALL FACTORY GRADINGS			
		A STRONG PERFORMANCE	B SATISFACTORY PERFORMANCE	C NEEDS IMPROVEMENT	D NEEDS SIGNIFICANT IMPROVEMENT
TIER 1	2023	60%	40%	0%	0%
	2022	44%	51%	5%	0%
TIER 2	2023	44%	56%	0%	0%
	2022	18%	64%	18%	0%
TIER 3 ⁵	2023	56%	33%	11%	0%

TRACEABILITY

Mapping our supply chain is the first step to knowing who made our clothes, and assists us in ensuring every person who contributes to creating Princess Polly products is respected, protected and healthy. Our focus is on identifying Tier 2 and 3 facilities, as well as verifying the capabilities of each site to ensure no order subcontracting is occurring without our knowledge. While the importance is on our suppliers to truthfully share all production processes with us, we continually assess the factories of all suppliers on an order-by-order basis.

To maintain and accurately map our Tiers for each product, we refined our internal programs and software. In 2023, Princess Polly continued tracking raised Purchase Orders (POs) to the factory it belongs to, generating an automatic response to 'confirm' the factories capabilities for every PO. The system also flags any product that requires investigation to approve a product or factory capability. In unison, we have a software to list each factory involved in a product that our Merchandise team can fill out when creating a product. In addition, our tracing process is comprised of four main steps:

1. Capability review - Each factory is approved for production based on the technical capabilities possible at the site.
2. Product construction review - Each of our products is reviewed for its construction in order to understand what processes are required to produce that item.
3. Purchase Order information request - Suppliers must confirm which of their onboarded factories is producing each Purchase Order, including any Tier 2 sites.
4. Information comparison - The Purchase Order information and product construction is compared to the factory's capabilities. If any discrepancies are found in the expected data and actual data, we ask suppliers detailed questions to gain further clarification and remediate where required.

To further verify tracing data given by suppliers, we continued inline inspections. Princess Polly worked with an accredited third-party to customize these inspections to include production verification.

⁵ There are no 2022 records, as Tier 3 visits began in 2023.

CASE STUDY: MAPPING THE CAPABILITIES OF OUR TIER 1 FACTORIES

Through routine inline inspections, we discovered one of our Tier 1 factories was sending our final products to another factory for production that was not disclosed to or approved by Princess Polly. Over a three-month remediation plan, we worked closely with the supplier and factory and achieved the following:

1. Met with the supplier to discuss the findings and remediation plan.
2. Gained visibility of all sites involved in our final production through ongoing communication and a site visit from our China-based representative.
3. Assessed the new factory and found it did not meet Princess Polly's requirements. As a result, we moved the orders back to the approved factory and conducted inline inspections.
4. For any products in production or finished, we canceled the orders and issued a chargeback for the cost of goods.
5. Assigned compulsory supplier training.
6. Resumed orders in the approved factory, while increasing future inline inspections, monitoring capacity and providing further support to the supplier.

To further verify tracing data given by suppliers, we continued inline inspections. Princess Polly worked with an accredited third-party to customize these inspections to include production verification.

Tracing our POs and conducting inline inspections allows us to maintain up to date records and visibility over our supply chain, helping to alert us of any risk of subcontracting while managing modern slavery risks.

CERTIFICATION OF MATERIALS

In addition, Princess Polly actively traces the sites that produce our main sustainable inputs, and ensures each material is correctly certified or tested.

We only accept and source sustainable materials from certified factories that can provide valid scope & transaction certificates. Since 2022, we have worked to order fabrics directly from our certified factory mills to build a fabric 'stock market' for our merchandise team and suppliers, which supports the visibility of our Tier 3 sites.



SITE VISITS

In 2023, Princess Polly continued our bespoke site visit program at Tier 1, 2 and 3 sites. The visits include a document review and on-site observation according to SMETA and ELEVATE/LRQA ERSA standards, a confidential worker sentiment survey, gathering additional wage data, assisting with training modules, confirming factory capabilities, and providing any additional support with existing CAPs. The purpose of these visits is dependent on the site’s place within our supply chain and their progress with our framework

Site	Purpose
Existing Tier 1 site	<ul style="list-style-type: none"> ★ Offer support and engagement in understanding and meeting our Ethical Sourcing Program requirements ★ Review current state against our Code of Conduct and recorded capabilities ★ Provide supporting risk assessment data
New Tier 1 sites	<ul style="list-style-type: none"> ★ Introduce our Ethical Sourcing Program ★ Assess the site against our Code of Conduct and the proposed capabilities ★ Provide supporting risk assessment data
Tier 2 and 3 sites	<ul style="list-style-type: none"> ★ Introduce our Ethical Sourcing Program ★ Conduct a site risk assessment in line with SMETA and ELEVATE/LRQA ERSA standards

In the 18 months prior to Jan 2024, our team members conducted over 150 visits; 76% at Tier 1 sites, 12% Tier 2 and 12% Tier 3.



In 2023, we developed a grading system for the site visit findings, that follows a similar structure to our audit grading. This ensures suppliers understand the significance of the site visit process. The table below lists out the site visit grading criteria:

Site Visit		
Grading	Grading Requirements	Production Approval
Gold	Only 2 regular findings (overtime and social insurance)	Approved for production
Silver	Only outstanding major or minor findings	Approved for production
Bronze	One or more outstanding critical findings (except subcontracting and lack of records)	Approved for production
Red	One or more outstanding critical subcontracting or lack of records findings, or any highly critical	Production can continue for 6 months
Red	Denied access	Approved - falls into larger warning



5.0 ADDRESSING

5.1 ENGAGING

REMEDIATION

After each audit and site visit, Princess Polly prepares a Site Scorecard to support the factory to clearly understand:

- ★ The severity of each non-compliance or finding
- ★ Recommended steps to address both the immediate threat and root cause of non-compliances
- ★ The timeframe over which remediation is expected, based on reasonable periods to address every individual issue
- ★ Instructions on how to formally close each issue with an auditor by desktop review, follow-up audit, or new audit
- ★ Assigned Training Modules to understand and improve specific non-compliances

In 2023, we incorporated our site visit program and findings into our overarching site scoring system in tandem with our audit scoring system. This allows for a more holistic picture of the site, including audit and site visit findings, SAQ, training and CAP completion, and Worker Sentiment Survey participation. Below is the overarching scoring system:

Score	Audit	Site Visit
Platinum	Gold + Social insurance improved	Gold
A	Gold	Gold
B	Gold or Silver	Silver
C	Gold, Silver or Bronze	Bronze
D	Bronze	Red
E	Red	Findings N/A
F	Highly criticals	Findings N/A

All SMETA audits are booked including a desktop CAP review, inviting our sites to build a Corrective Action Plan, and provide the right evidence within our time frames. After a site visit is conducted, observations and opportunities for improvement are recorded and an internal corrective action plan is created with the factory. This allows for remediation of additional findings between audit windows and offers more hands-on support for progressing in our program. Our suppliers and factory managers are also engaged in non-compliance training related to issues found in their audit or site visit. Our Princess Polly Social Responsibility team and ELEVATE/LRQA provide guidance through regular emails, WeChat, calls and virtual meetings.

Princess Polly has a zero-tolerance policy for any highly critical non-compliance (relating to the most serious issues, including child labor, forced labor, precarious employment, threats and discrimination). In these instances, all new production is paused and the factory is provided weekly support, including digital training and support from ELEVATE/LRQA, to aim to close all such issues with immediacy. To date, Princess Polly has never found a case of forced or child labor within our factories, but if this did

occur, our Child and Forced Labor policy outlines our specific remediation process, with a focus on supporting the victim/s.

WARNING SYSTEM

We developed a warning system to provide consistent and fair communication with our suppliers while also upholding our Ethical Sourcing program requirements. The purpose of the system is to communicate our expectations and timeline for remediation in addition to a responsible exit strategy in situations where the expectations cannot be met. It is important to Princess Polly that exiting a site or supplier is a final resort. We have robust systems to offer comprehensive support to avoid this whenever possible. A site may receive its first warning after one month of consistent requests and no progress. Princess Polly provides support and guidance to work towards remediation. If no further progress has been made, it will be followed by two more warnings before ceasing our relationship. In 2023, 83% of issues were resolved after the 1st warning and the remaining 17% were resolved after the 2nd. The warning system has proven an effective measure to help suppliers resolve these issues before termination is necessary.

It is important to note the warning system runs parallel to our CAP and site scorecards. If we receive a critical or a highly critical non-compliance, Princess Polly immediately addresses it, and our recommended protocols are followed to ensure the critical issues are resolved.



5.2 RESPONDING

VICTIM VOICE & REPARATIONS

Every victim has a voice and a story. At Princess Polly, we are committed to providing for and cooperating in victim-centered remediation responses. Attending government-led conferences emphasized the importance of survivors' voices in reparation, and, as a result, we reflected the importance of victims' voices in our remediation approach.

If we were made aware of a human rights violation, Princess Polly would immediately cease placing orders and appropriately intervene. We would then seek victim remediation by providing immediate support and assistance while ensuring the victim is safe from harm. Our Social Responsibility team will then work to find and address the root cause and record and report on the incident. In any case, Princess Polly will always prioritize victim reparation, such as justice and compensation.

We believe adopting survivor-informed practices is beneficial and crucial to inform and develop responses to modern slavery in various ways that support the victim and mitigate any remaining impact. Princess Polly also recognizes and understands that survivors are not obligated to engage in activities that seek to inform and change responses to remediation.

GRIEVANCE PROCEDURE

We firmly believe that workers should have access to robust and effective grievance channels that aid in identifying and addressing any potential impact or risks. As a result, from 2022 to 2023, we piloted a Speak Up Helpline in partnership with ELEVATE/LRQA to offer an anonymous worker grievance channel in factories where we have identified ineffective or no existing grievance procedures.

To improve the effectiveness of our Speak Up Helpline, we rolled out additional uptake activities in November 2023 to increase its accessibility and awareness through an on-site or online refresher training session (in the workers' native language). Three focus factories participated in the training, which included:

- ★ Reintroduction to the Speak-Up Helpline.
- ★ How to use the Helpline (workers sent test messages to demonstrate how to use it and have the number saved on their phones).
- ★ Explanation of the remediation process.
- ★ Redistributed Helpline material (business cards with a QR code and posters in the factory).

We found that collectively, over 50% of workers across the three factories received the training for the first time due to factory turnover. Princess Polly has encouraged and reinforced factory management to include the Helpline in new workers' inductions. In 2024, we aim to better understand effective grievance channels through our Preferred Factory Program.

THE PRINCESS POLLY PREFERRED FACTORY PROGRAM

The Preferred Factory Program is our tool to go beyond compliance and engage our most important factories in ethical empowerment. This new initiative will promote lasting positive change and become the standard for leading practices within supply chains. Princess Polly has carefully selected factories to engage in activities that support ethical and environmental developments within 18 months.

To prioritize worker well-being and environmental impact, the program is centered across four focus areas:

1. **Production:** Improving output through practices that protect the environment and promote product quality.
2. **Sourcing:** Selecting and prioritizing sustainable materials and extending the visibility of the supply chain.
3. **Worker Experience:** Providing equal opportunities through activities that promote, protect, and educate workers.
4. **Worker Voice:** Ensuring safe and confidential channels to express feedback and achieve quick, fair, and effective resolution.

We developed and introduced the Preferred Factory Program in October 2023, and celebrated the kick-off in April 2024.

SPOTLIGHT: SOCIAL INSURANCE

Social Insurance is essential to protect workers if they cannot work and/or need medical support. Although both employer and factory workers are obligated to make contributions, the employer must register all new employees with the Social Insurance Bureau and correctly calculate and withhold the payments for both parties. There are five types of social insurance in China: pension, medical, unemployment, occupational injury insurance, and child-bearing.

In 2023, Princess Polly conducted an extensive review of the barriers to social insurance to understand how we can best support this common non-compliance. Through meaningful conversations and research with our suppliers and factory managers, we found three significant barriers to social insurance.

1. One of the most pressing issues is the challenge workers face in transferring their insurance funds when they move, whether back to their hometown or a different province. A 2014 report highlighted this issue, revealing that a mere 0.3% of workers managed to transfer their pensions when moving between provinces.⁶
2. The classification of a factory as either urban or rural has a profound impact on social insurance. Urban factories must pay higher premiums, while rural factories are only entitled to retirement and medical benefit coverage. This disparity has become more apparent as many factories have moved inland. Despite now operating in rural provinces, employers and employees are still required to pay the urban premium for social insurance. This has led to a significant number of them opting out of enrollment.
3. In the apparel industry, corrective action for non-compliance is not standardized. Social insurance violations typically do not lead to supplier termination, which reduces the perceived importance of improvement.⁷

In response to these barriers, in 2024 we aim to improve and evolve our approach to social insurance, focusing on the needs of our workers and what realistically benefits them. Through the Preferred Factory Program, we have developed multiple activities that promote further awareness and education about insurance while also ensuring all workers are at least receiving occupational injury insurance to safeguard their compensation if they are injured at work or become sick due to their work.

⁶ BSR Research Summary: Social Insurance in China

⁷ BSR Research Summary: Social Insurance in China

6.0 AWARENESS

Raising awareness within our teams and supply chains, and engaging our customers on our journey, are all key to our Modern Slavery response.

6.1 TRAINING

THE PRINCESS POLLY TEAM

Every year, we involve and educate our global Merchandise Team, including Buying, Design, Supply Chain and Planning, our Marketing Team, Distribution Center and key senior leaders on supply chain issues and challenges. We believe that everyone plays a crucial role in spotting potential human rights abuses in our supply chain.

In 2023, we hosted an internally-led training session alongside a guest speaker and launched a digital training program through ELEVATE'S/LRQA EiQ Learn platform. Princess Polly has carefully chosen five interactive e-learning modules, and assigns them to each team as appropriate. In 2023, 41 team members and 20 managers completed this. Princess Polly's Social Responsibility team also regularly attends webinars/seminars and engages in training modules to further develop their knowledge and apply their learnings to the business.

PARTICIPATING IN AUSTRALIAN DISCUSSIONS

*Australian Government's 2023 Modern Slavery Conference:
Taking Action Together*

UNGC Modern Slavery Community of Practice (COP)

UNGC Human Rights Accelerator

OUR SUPPLY CHAIN

Similarly, we understand the importance of training our suppliers and factories. Our training program has been continuously developed, with core and non-compliance training modules assigned to suppliers and factory managers. At the end of 2023, we had assigned core learning modules on Forced Labor Prevention and Corrective Action Plans to 100% of suppliers and Tier 1 factory managers. We implemented non-compliance training relevant to findings from social audits and site visits to increase capacity and mitigate risk. At the end of 2023, we had assigned 56 unique factories non-compliance training, with 86% of the total modules completed. In 2024, we will continue to evaluate and develop this program, emphasizing non-compliance training to close relevant findings.

SPOTLIGHT: CODE OF CONDUCT

Princess Polly believes it is vital that the values within our Code of Conduct are embodied in day-to-day life beyond audits and site visits. To achieve this, we partnered with ELEVATE/LRQA to create a custom video module of our Code of Conduct on their EiQ Learn platform. Offered in English and Mandarin, the

interactive tool which has been embedded into our onboarding process covers four areas: Respect, Safety, Sustainability, and Integrity.

HERPROJECT

Princess Polly teamed up with HERproject to deliver the HERhealth program designed to educate women and share access to services they may need to maintain their health. This was implemented across 25 factories, with 400 female workers educated through the program which concluded in 2023.

Insights

- ★ 85% of female respondents said they had high confidence speaking to a manager about an issue at work. This was a 6% improvement from the baseline.
- ★ 98% of women respondents “agree” or “strongly agree” that they have a positive opinion of themselves. This was an 8% improvement from the baseline.
- ★ 73% (on average) of respondents were able to identify methods of modern family planning. This was a 37% improvement from the baseline.

“After the completion of the project, we initiated a collaboration with the local women’s union and family planning office. This strategic partnership has significantly bolstered our confidence in effectively retaining our newly recruited staff members.” - Anonymous Factory Manager

6.2 PUBLIC DISCLOSURE

We believe the whole fashion industry needs to do better, so in 2020 Princess Polly created our Social Responsibility Strategy, to play a big part in the movement for lasting change in our industry to put people, the planet and community first.

In early 2021, our sustainability sub-page was published, announcing our long term commitments, timebound targets and details of our work to date. We are devoted to making continual progress towards these commitments, ensuring transparency, and updating our website when necessary to reflect our most recent progress. Disclosures are also made through our public Annual Impact Reports.



7.0 ACCOUNTABILITY

Princess Polly is proud of the actions we have taken to date to understand and respond to the risks of modern slavery in our supply chain. We employ several strategies to ensure that our measures are effective and are focused on reviewing and expanding our modern slavery work.

MONITORING KEY PERFORMANCE INDICATORS

Our KPIs measure our performance across all areas of our modern slavery approach.

Process and Area	Activity	Measurement
Risks of Modern Slavery: Risk assessment	<ul style="list-style-type: none"> ★ Industry, sector, country, location and site specific risk factors ★ Continuum of Involvement framework ★ Input and material risk factors ★ Vulnerable workforce 	<ul style="list-style-type: none"> ★ % of supply chain tiers mapped and assessed for risk ★ % of procurement from high, medium and low risk suppliers and regions
Assessing: Onboarding	<ul style="list-style-type: none"> ★ Policy development and review ★ Sedex memberships ★ Transparency surveys ★ Supplier Assessment Questionnaires 	<ul style="list-style-type: none"> ★ % of suppliers signing Code of Conduct, holding active factory Sedex memberships and confirming and signing factory details on the Transparency Survey ★ Number of visible factories at each Tier ★ % of Supplier Assessment Questionnaires completed and date of completion
Assessing: Monitoring	<ul style="list-style-type: none"> ★ Third-party audits and Princess Polly team member site visits ★ Worker Surveys ★ Inline Inspections ★ Warning System 	<ul style="list-style-type: none"> ★ Number of site visits conducted at each tier ★ % of factories with a valid audit, site visit and site score ★ Number of purchase orders with inline inspections conducted for each supplier ★ Number of warnings provided before reparations are complete
Addressing: Engaging & Responding	<ul style="list-style-type: none"> ★ Corrective Action Plans ★ Supplier and factory visits ★ Grievance mechanism effectiveness surveys ★ Consistent communication and review of factory data 	<ul style="list-style-type: none"> ★ % of audit and site visit non-compliances remediated within the allocated time frame ★ Effectiveness of Grievance mechanism ★ Number of factories with democratically elected worker representatives
Awareness: Training	<ul style="list-style-type: none"> ★ Team member training ★ Supplier training ★ Factory Manager training (Tier 1, 2 and 3) 	<ul style="list-style-type: none"> ★ Number of team members, suppliers and factory managers engaged in training ★ % of courses completed by enrolled factory managers and suppliers

<p>Awareness: Governance and Communication</p>	<ul style="list-style-type: none"> ★ Fortnightly Ethical Sourcing report ★ Weekly Supplier Management meeting ★ Quarterly Executive summary and annual board update ★ Public Annual Impact Report 	<ul style="list-style-type: none"> ★ Number of team members with KPIs related to Social Responsibility, and specifically Ethical Sourcing ★ Number of sustainability targets related to Ethical Sourcing published and met
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SUPPLIER ENGAGEMENT

Princess Polly prides itself on creating a holistic and personable approach to engaging with our suppliers. Our genuine friendships and deep, long-term relationships help us understand our suppliers' issues, build trust, improve our transparency, and cultivate a collaborative approach to ethical sourcing.

We currently assess our effectiveness through:

- ★ Our supplier responsiveness: How they respond to our ethical sourcing requirements and any questions or resistance received. We create pathways and timeframes to best suit the individual supplier and their circumstance.
- ★ Our monitoring: We regularly engage in open discussions on the findings and root causes of potential risks with our suppliers to communicate effectively back to their Tier 1 factories.
- ★ Supplier feedback: Princess Polly has a live anonymous feedback survey that remains open all year round to suppliers and factory managers in English and Mandarin. In all our communication, we always ask suppliers to provide feedback on our procedures to improve our approach and enhance their experience.
- ★ Our training: We enable suppliers and factory managers to share feedback on the training opportunities we provide. As a result, the consensus found our training opportunities highly effective and created a greater understanding of relevant topics. We also listened to feedback on where we could improve and adopt alternative approaches to suit our suppliers and factory managers better.
- ★ Our visits: Some of our long-lasting suppliers live in Australia, and our Australian team members often visit when necessary to discuss our Ethical Sourcing program. Similarly, our China-based team members visit our factories and suppliers weekly, and regularly call our China-based suppliers to offer guidance with our Ethical Sourcing program.

REVIEW OF OUR MODERN SLAVERY PROCESSES

We are proud of our achievements to date and also recognize that there is always room to enhance existing practices and expand our processes further. In September 2023, Princess Polly established a monthly cadence with relevant team members to review our planned activities and ensure we meet the expectations set and address any barriers to tasks. To support the monthly meetings, an interactive roadmap was also developed to track our progress and provide visibility of remaining tasks needing extra support. We are committed to performing quarterly reviews of all policies, programs and governance, including external consultation with industry groups and our supply chain.



We have assessed our planned activities for 2023, utilizing the system below, and established a new set of planned activities for 2024:

1. *The activity has been redirected or paused*
2. *The activity is underway*
3. *The planned milestone was reached*
4. *The activity was completed, and has been built into ongoing workflows*

2023		2024
Planned activities	Progress	Planned activities
Assessing		
<p>Expand risk assessment to comprehensively review low and medium risk value chain stages, including distribution and contractors</p> <p><i>In 2023 we focused on assessing our major brand partners and contracted labor in our US Distribution Centre</i></p>		Expand our risk assessment methodology to include additional factors, namely climate risk
<p>Finalize membership of all Tier 1 factories to Sedex and support factories to complete their Self Assessment Questionnaires</p> <p><i>The new Sedex Self Assessment Questionnaire was rolled out and completed by 100% of factory managers</i></p>		Embed findings from the Sedex Self Assessment Questionnaire into our risk assessments
Trace 100% of our Tier 2 supply chain		Expand our risk assessment site visits of tier 2 sites
<p>Extend our mapping of Tier 3 inputs, and tracing of Tier 3 main input production sites</p> <p><i>12% of main inputs were traced to a production site</i></p> <p><i>20 Tier 3 sites were risk assessed during a site visit</i></p>		Extend our mapping of Tier 3 inputs, and tracing of Tier 3 main input production sites
Verify our capability assumptions		Extend our Supply Chain team, to build capability and capacity assessments into the weekly workflow

<p>Rollout improved risk assessment and supplier gradings</p> <p><i>Our site scorecards were improved, incorporating key findings from assessments, including audits, site visits, worker sentiment and self assessment questionnaires and activities</i></p>		<p>Expand site scorecards to develop a supplier level scorecard, incorporating further sites and tiers</p>
Addressing		
<p>Create a roadmap to address barriers to worker social insurance in our China-based factories</p> <p><i>Our roadmap is underway</i></p> <p><i>In 2023, we focused on improving our understanding of barriers</i></p>		<p>Continue our roadmap to address barriers to worker social insurance in our China-based factories</p>
<p>Ideally, we will customize our Worker Sentiment Survey to focus on our most salient issues and strategic focuses in 2023, although this might not occur until 2024</p> <p><i>Adopted the newest version of ELEVATE/LRQA's Worker Sentiment Survey Report</i></p>		<p>Review the Worker Sentiment Survey findings and remediation methods, exploring additional opportunities to address risks</p>
<p>Continue to evolve and provide suppliers individual guidance to close issues found in audits</p> <p><i>Relevant e-learning modules were provided to support greater issue closure</i></p>		<p>Achieve a 100% completion rate for Princess Polly's custom Code of Conduct e-learning module</p>
<p>Improve the effectiveness and uptake of our Speak Up Helpline</p> <p><i>We rolled out additional training to three focus factories</i></p>		<p>Improve the effectiveness and uptake of grievance channels through our Preferred Factory Program</p> <p>Support our Preferred Factories to operate effective worker committees</p>

<p>Continue 1:1 support and training with suppliers to assist in addressing the root cause of issues</p> <p><i>Our issue closure rate improved by 17% in 2023, with 77% of non-compliances closed</i></p>		<p>Establish a Root Cause visit (a new type of site visit), aimed to support our supply chain to minimize the recurrence of issues</p> <p>Collaborate with our indent brands and US based Distribution Centre Service Provider to improve assessment methods and findings</p>
<p>Gain visibility of our Tier 3 sites responsible for Lower Impact product inputs</p> <p><i>Our focus was on working with the 'middle-man' / trading company to identify the production site</i></p> <p><i>The project to improve visibility was paused in 2023</i></p>		<p>Increase visibility of our Tier 3 sites responsible for Lower Impact product inputs</p> <p>Launch a full-chain-of-custody pilot with three sites</p>
Awareness		
<p>Rollout a Social Responsibility onboarding pack to all new team members of the business</p> <p><i>All new team members globally are invited to attend a monthly session</i></p>		<p>Refresh our Princess Polly Values, to explicitly include Social Responsibility themes, including Responsible Purchasing</p> <p>Expand our annual modern slavery training to further departments, including Team Experience, Finance, and IT</p>
<p>Roll out a preferred factory system where suppliers are awarded for positive behavior</p> <p><i>The Princess Polly Preferred Factory Program supports ethical and environmental developments and rewards engagement</i></p>		<p>Support our key partners through the Preferred Factory Program, to progress their chosen activities</p>
<p>Publish a 2023 Sustainability Recap for customers, including an overview of our Ethical Sourcing projects and targets, specifying new targets for 2024</p>		<p>Publish our annual 2024 Impact Report for customers, including an overview of our Ethical Sourcing projects and targets</p>

Continue to keep suppliers and factory managers updated on our team, our ethical sourcing requirements, best practice examples and industry news through a bi-annual newsletter		Host the first Princess Polly Conference for our Supply Chain partners in China
Expand our Social Responsibility team to include an Engagement Resource in China, to improve supplier and factory manager engagement in our programs and gather input on existing and new practices		Expand the scope of global team members with Social Responsibility goals in their job descriptions
Accountability		
<p>If possible, collaborate with other companies owned by a.k.a. Brands</p> <p><i>A collaboration with a.k.a. Brands and Culture Kings was established in 2023</i></p>		If possible, extend our global group collaboration

EXTERNAL BENCHMARKING

We are dedicated to communicating transparently with our customers and industry about our progress toward our social responsibility targets and commitments. Princess Polly actively participates in the Baptist World Aid Ethical Fashion Report and provides complete transparency of our Ethical Sourcing program. Baptist World Aid uses this disclosure to benchmark Princess Polly against the industry, and guide us on areas we can continue to improve in. The feedback from benchmarks like these provides us with an overview of our strengths and opportunities, while holding us accountable for our business and operations to ensure we are doing our best to put people, the planet and the community first.



8.0 INDUSTRY COLLABORATION AND CONSULTATION

We acknowledge the importance of a collective approach and believe in aligning with partners to understand and address human rights risks, including those related to modern slavery. As the brand furthest along our ethical sourcing journey within the a.k.a. Brands network, we were proud to connect with Culture Kings to collaborate on a group approach. Our extended network includes the United Nations Global Compact, Sedex, Cascale, the Mekong Club and ELEVATE/LRQA.

Wez Bryett has approved this statement on behalf of the reporting entity, Princess Polly Online Pty Ltd and Princess Polly USA, Inc. Princess Polly has prepared the required statement to be compliant with the Australia Modern Slavery Act (Cth) and California Transparency in Supply Chains Act. The statement was prepared in consultation with a.k.a. Brands, our suppliers, our Marketing and Social Responsibility departments.



Wez Bryett
Board Director and Co-CEO Princess Polly Online Pty Ltd

