Modern Slavery Statement

1 January 2025 - 31 December 2025

1. INTRODUCTION

Quay is committed to contributing to the elimination of modern slavery and reducing the risk of its presence within our supply chain. Our core values drive us to ensure that everyone involved in our business and supply chain is treated with fairness, integrity, and dignity.

We have progressed our modern slavery risk management and continue to proactively identify and address modern slavery risks within our supply chain. Our dedication remains unwavering as we pursue continuous improvement, advancing our strategies and reinforcing our commitment to human rights and ethical practices throughout all our operations. As we expand our supply chain capabilities to other countries, we remain committed to upholding the standards outlined in this statement.

This modern slavery statement (**Statement**) has been prepared by Quay for the reporting period 1 January 2025 - 31 December 2025 in accordance with the requirements of the *Modern Slavery Act 2018* (Cth) (**Act**).

Signed by

Katherine Cousins

Katherine Cousins
Chief Executive Officer

2. OUR STRUCTURE

Quayeyeware Pty Ltd (ACN 118 078 274) (**Quay**) is an Australian private company and has the following wholly owned subsidiaries:

- Quay Eyeware, Inc., which is incorporated in the States of Delaware and California in the United States of America; and
- Quay Eyeware Limited, which is incorporated in England and Wales.

Quay and its subsidiaries employ approximately 300 employees with the majority of them based in the United States of America and the balance located in Australia.

This statement is made on behalf of Quay and its subsidiaries. In this document, unless otherwise apparent from context, references to 'Quay', ‘we’ or ‘us’ are to Quay's corporate group collectively.

3. BUSINESS AND OPERATIONS

Quay is an eyewear and fashion accessories business. Sales of sunglasses account for the majority of Quay’s revenue. The remaining revenue is derived from the sale of optical frames and accessories, including eyewear cases and organisers.

Our products are sold through online, wholesale and retail channels, including via:

- 24 company owned retail stores in the USA;
- digital channels, including our websites and online multi-brand marketplaces; and
- wholesale customers, such as distributors and third-party retailers.

Quay’s head office is located in San Francisco, with its registered corporate office in Sydney. Quay has operations in:

- Australia, where we utilise a third-party logistics provider to facilitate the distribution of our products to Australian customers;
- United States of America, where our leadership team is based and we undertake management decisions, product design and marketing, operate retail stores and sell products to our North American and UK/European customers; and
- China, where our team undertakes local procurement activities.

Quay's supply chain is predominantly managed out of the USA by its Product, Procurement, Compliance and Supply Chain teams who undertake appropriate supplier due diligence and risk assessments.

4. SUPPLY CHAINS

Quay's suppliers comprise less than ten Tier 1 suppliers and include:

- manufacturers of sunglasses, optical frames and lenses, and accessories based in China, Vietnam, Cambodia and Thailand;
- wholesale suppliers of finished products based in the USA, Canada, United Kingdom, European Union, South America, Asia and Australia; and
- professional service providers predominantly based in USA, Germany and Australia.

5. RISKS OF MODERN SLAVERY

No specific instances of modern slavery were identified in our operations, supply chains or any entities that the reporting entity owns or controls over the reporting period. Notwithstanding this, Quay acknowledges that the risks of modern slavery may be heightened in some of our supply chains and operations. These heightened risks are a result of various factors including the geographical location of some manufacturers and the nature of the sector Quay operates within. Some key risks identified by Quay are outlined below.

Quay's operational footprint means its manufacturers may be located in jurisdictions where the risk of modern slavery is higher. The manufacture of eyewear in jurisdictions such as China and Vietnam is susceptible to lower paid labour, short lead times and pressures to ensure productivity, therefore exposing our industry to labour risks, including modern slavery.

Quay recognises that the manufacture of eyewear generally also carries risks. Production may involve reliance on low skill and migrant workers, and manufacturers may engage second level suppliers or obtain source materials in or from countries where modern slavery is more prevalent. Quay recognises that it has limited visibility over secondary levels of our chain of suppliers and the source materials used in our group's products. Manufacturers engaging second level suppliers increase the risk of low skill and migrant workers being engaged in the production of Quay's eyewear and source materials.

To help address these risks, we have developed and continue to engage with our manufacturers using a robust procurement process with auditing procedures and regular compliance programs. We continually monitor and audit our supplier relationships and sourcing arrangements to reduce the risk of modern slavery and identify potential instances within our supply chain.

6. MITIGATION OF MODERN SLAVERY RISKS

6.1 *Summary*

Quay understands that a commitment to mitigating modern slavery risks involves dedicating time and resources on an ongoing basis.

Quay implements systems to:

- regularly map our supplier relationships and undertake risk assessments via due diligence questionnaires, risk mapping exercises and direct engagement with our suppliers;
- monitor potential risk areas in our supply chains through independent audits, which includes physical site visits (where appropriate) and review of supply agreements;
- provide a framework for reporting potential or actual incidents of modern slavery in our operations and supply chains; and
- provide appropriate remediation avenues where actual incidents of modern slavery occur.

6.2 *Due diligence*

Prior to engaging with any potential supplier, Quay's Procurement team conducts an initial screening of that potential supplier to identify any risks of exposure to modern slavery. Following engagement, Quay conducts appropriate ongoing risk assessments to maintain the currency of those assessments with our suppliers throughout the term of their engagement with Quay.

We use the results of our risk mapping and risk assessment exercises to guide the actions we take to mitigate these risks as outlined in this section.

6.3 *Supplier adherence*

As part of our anti-slavery initiatives, we ensure all those in our supply chain comply with our ethics by not only communicating our performance expectations and ethics to our suppliers but undertaking the following:

- engaging with our suppliers on a regular basis to monitor performance and potential for modern slavery issues; and

- where practicable, including a contractual obligation on our suppliers to commit to an anti-slavery policy.

6.4 *Training*

To ensure a high level of understanding of the risks of modern slavery in our supply chain and our business, we provide training to our staff on modern slavery awareness and how to address any perceived modern slavery risks within our business. Our Code of Conduct policy includes training of our employees on modern slavery awareness.

6.5 *Reporting policy and response plan*

Quay continues to maintain measures for mandatory reporting and responses as outlined in our Anti-Slavery Policy.

In terms of the governance structure of reporting, all employees, contractors and personnel have a responsibility to identify and report modern slavery risks to the relevant representatives from Quay's Human Resources and Procurement teams. Where a potential incident is brought to the attention of our representatives, they will consider the modern slavery risk in the first instance and assess whether it should be escalated to the Chief Compliance Officer.

The Chief Compliance Officer is responsible for further investigation of potential, or actual, incidents of modern slavery within Quay's operations and supply chains and for determining whether referral is required to the board of directors. To the extent that matters can be resolved by the Chief Compliance Officer, the Chief Compliance Officer will put in place actions to address the risks. Ultimately, the board of directors will act where the Chief Compliance Officer cannot or does not.

Quay received no modern slavery related reporting during the reporting period.

6.6 *Remediation*

Following confirmation of an incident or risk of modern slavery, systematic and immediate action is required to be taken. If our investigative processes determine an issue of non-compliance with our policies by one of our suppliers, we will endeavour to have the supplier identify and correct those issues. If it is apparent that an individual has suffered harm as a result of such issue, we will seek to ensure that they are addressed by leveraging our supplier relationship.

In the event of a breach of our Anti-Slavery Policy, we may subject the supplier to review and potentially terminate our relationship with the supplier.

Where any Quay personnel breach the Anti-Slavery Policy, they will be subject to disciplinary action.

If Quay has contributed to a risk, we will re-assess our internal measures to better mitigate any potential risks in the future and remedy any actual impact as appropriate.

7. EFFECTIVENESS

Quay has continued to develop and invest in ensuring modern slavery risks are adequately assessed and addressed within our operations and supply chains. To review our effectiveness in assessing and addressing modern slavery risks within our operations and supply chains, we record and review our progress towards the objectives and milestones we set. During the reporting period, Quay completed the following in line with the objectives of our last modern slavery statement:

- we audited our suppliers through either our internal team to identify and address any modern slavery risks in our supply chain;

- we used an engagement channel for regular feedback on the effectiveness of our modern slavery mitigation strategies leading to regular consultation between our Human Resources, Procurement and Finance teams;

- where practicable and appropriate, we conducted physical site visits to our third-party logistic warehouses;

- we raised awareness of modern slavery risks through knowledge sharing with our team and regularly updating our Code of Conduct training to incorporate education on modern slavery;
- we implemented our Anti-Slavery Policy;
- we tracked the responsiveness of our suppliers to our requirements and their awareness of modern slavery risk in their supply chain;
- we partnered with an external auditor to undertake independent reviews of suppliers; and
- we maintained a framework for reporting of modern slavery risks and will record any cases and how they are handled if they arise.

Quay will continue to monitor the effectiveness of the processes and procedures we use to address modern slavery risks in our operations and supply chain.

8. CONSULTATION

Quay actively engaged and consulted with each of its subsidiaries in preparing this statement. This included liaising with the boards of directors and senior leadership team of the Quay corporate group, disseminating modern slavery resources and information to Quay personnel and suppliers, engaging with our external auditors and advisers and taking on board feedback from these stakeholders to ensure we strengthen our practices to minimise modern slavery risk.

9. APPROVAL

This Statement is made by Quay for the year ending 31 December 2025.

This Statement has been reviewed and approved by the board of directors of Quay on behalf of itself and its subsidiaries, for the purposes of Section 16(2)(a) of the Act. Entities owned or controlled by Quay have been consulted and approved this statement.

Signed by

Myles McCormick
Director
Quayeyeware Pty Ltd

Date: 18 June 2026