

FY25

Modern Slavery Statement



This statement outlines dusk's approach to addressing Modern Slavery during the financial year 2025.

DUSK GROUP LIMITED (ACN 603 018 131)

dusk



Contents

Introduction	page 3
Our Structure, Operations and Supply Chain	page 4
About Us	page 4
Our Structure	page 5
Our Operations and Supply Chain	page 6
Identified Risks	page 7
Inherent Risks	page 7
Operational Risks	page 8
Supply Chain Risks	page 11
Our Actions	page 12
Business Commitment	page 12
Continued Risk Assessment	page 14
Supplier Governance and Auditing	page 14
Supplier Consolidation	page 16
Future Commitments	page 17
Assessing Effectiveness	page 17
Consultation	page 19
Continued Commitment	page 19

dusk Modern Slavery Statement FY25

DUSK GROUP LIMITED (ACN 603 018 131) (“dusk”)

This Modern Slavery Statement is made in accordance with the Modern Slavery Act 2018 (Cth) for the financial year ending 30 June 2025. It outlines our approach to identifying, managing, and mitigating modern slavery risks across its operations and supply chain, with a strong focus on social monitoring, compliance, and continuous improvement.

Introduction

dusk reaffirms its commitment to ethical business conduct and the elimination of modern slavery in all its forms. We maintain a zero-tolerance approach to exploitation, including forced labour, human trafficking, servitude, and deceptive recruitment practices, across our operations and supply chains.

This Modern Slavery Statement outlines the business strategic approach to identifying, preventing, and mitigating modern slavery risks. It reflects our commitment to transparency, continuous improvement, and alignment with internationally recognised standards, including ethical sourcing assessments, supplier due diligence, and certification frameworks. Through this statement, we highlight how our systems, policies, and partnerships support the protection of human rights and uphold the integrity of our supply chain globally.

Our Structure, Operations and Supply Chain

About Us

Dusk Group Limited is an Australian company listed on the Australian Securities Exchange (ASX: DSK) and headquartered in Sydney. The group structure includes:

- Dusk Group Limited (ACN 603 018 131) – ASX listed entity
- Dusk Australasia Pty Ltd (ACN 090 850 383) – trading entity
- Dusk Wholesale & Imports Pty Ltd (ACN 106 413 361) – dormant
- Dusk Europe Pty Ltd (ACN 097 448 407) – dormant

As at the end of the reporting period, dusk operated as a leading omni-channel specialty retailer in the home fragrance sector. Our retail footprint included 145 stores across Australia and 3 stores in New Zealand, complemented by two online channels that serve both domestic and international customers.

Our vertically integrated business model encompasses design-led product development, customer-focused sourcing, and retail operations, providing end-to-end control over quality, innovation, and ethical standards. Every product is developed to dusk’s specifications, ensuring a consistent brand experience and alignment with sustainability and compliance commitments.

We embed a rights-respecting culture through clear policies, mandatory training, and accessible grievance mechanisms. All team members complete training on our respect culture, which incorporates the following key policies:

- Anti-Bribery and Corruption Policy: Zero tolerance for bribery and corruption
- Diversity and Gender Equality Policy: Promotes inclusion across gender, ethnicity, disability, age, and more
- Speak Up Policy: Encourages reporting of misconduct, protects disclosers, and reinforces a safe, ethical workplace

Further information about our business and options, including its corporate governance is available at <https://investors.dusk.com.au>

Our Structure

dusk’s ethical and compliance responsibilities are embedded within its governance framework, ensuring oversight, accountability, and continuous improvement across operations and the supply chain.

Key governance bodies include:

• Board of Directors (the Board)

Oversees the strategic direction of human rights and ethical sourcing, approves the Modern Slavery Statement, and ensures alignment with the business values.

• Audit & Risk Committee

Monitors risk management and internal controls, oversees systems for identifying and managing ethical sourcing and modern slavery risks, and governs whistleblower processes.

• Remuneration Committee

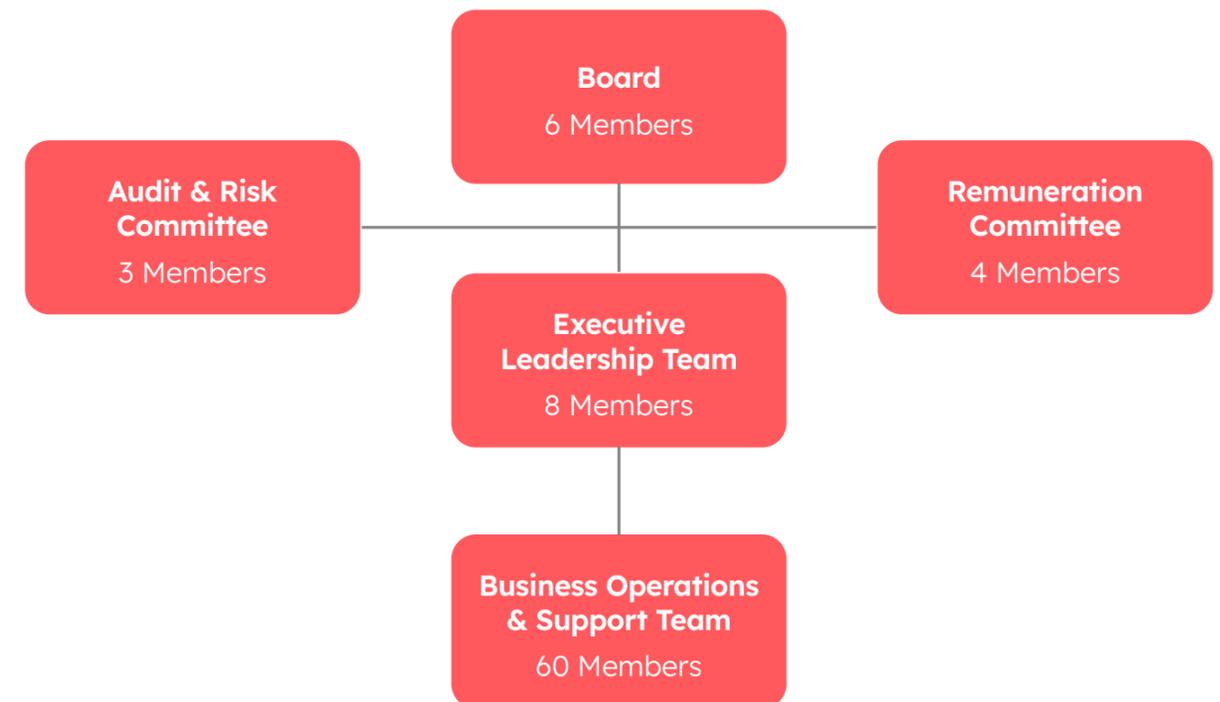
Oversees remuneration frameworks that promote ethical behaviour and fair labour practices, ensuring alignment with the business values.

• Executive Leadership Team

Implements approved strategies and policies, integrates ethical sourcing into operational decisions, and manages procurement and supplier relationships in line with dusk’s Ethical Sourcing Policy.

• Business Operations & Support Team

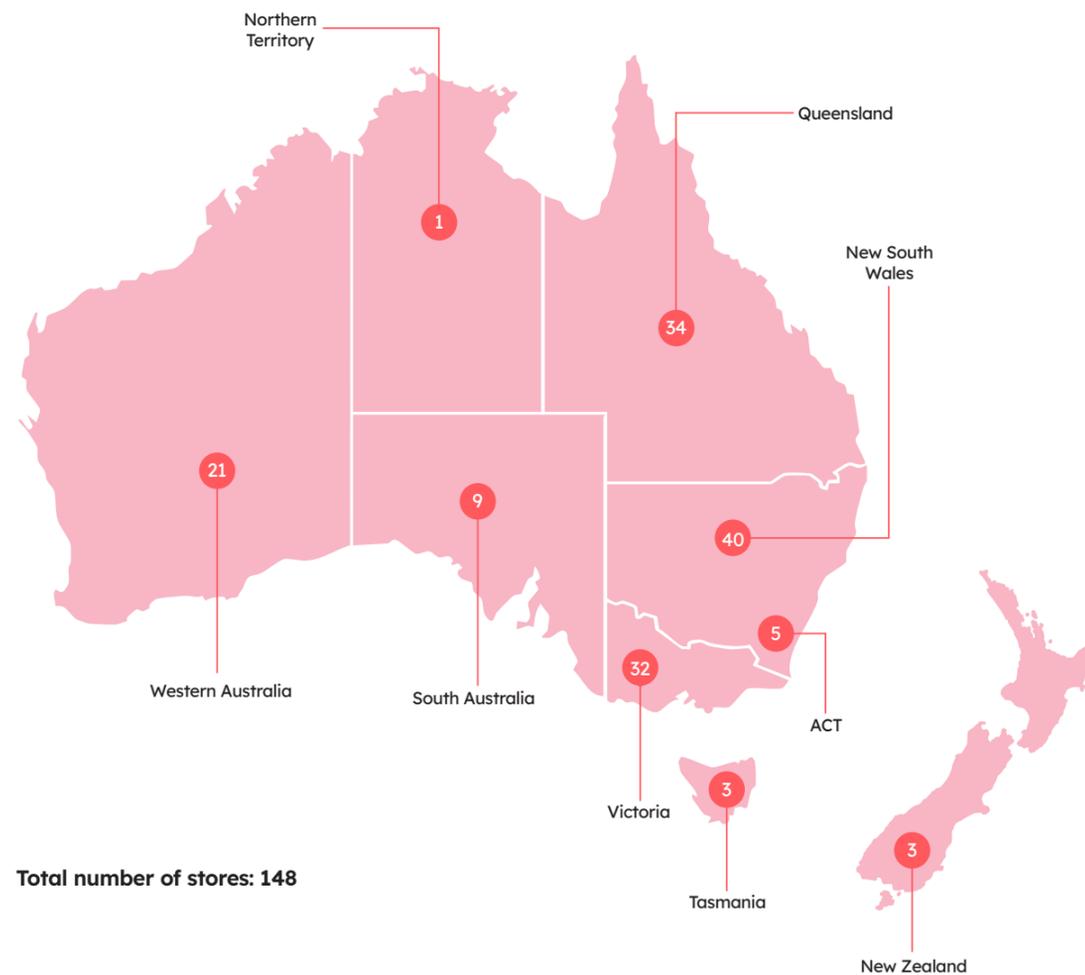
Manages supplier engagement, operational compliance, and continuous improvement initiatives to monitor and mitigate modern slavery risks.



Our Operations and Supply Chain

dusk operates in partnership with manufacturing suppliers locally and offshore, non-merchandising service providers, third-party logistics forwarders, warehouse and distributors. Our business structure is supported by over 1,000 dedicated team members whose expertise drives our growth and commitment to our business values which includes:

- We collaborate to achieve our common goal
- We keep moving forward
- We don't take ourselves too seriously; we are serious about what we do
- We do what we say
- We create meaningful experiences



Identified Risks

dusk has identified specific modern slavery risk factors within its operations and supply chains. These risk factors may contribute to increased vulnerability to exploitation and reduced access to fair treatment and representation. Recognising these risks allows the business to strengthen its due diligence processes, improve supplier oversight, and uphold ethical business practices. Our approach includes regular monitoring, supplier engagement, and responsive controls to ensure early detection and effective remediation.

Inherent Risks

dusk acknowledges that certain modern slavery risks are systemic and cannot be entirely eliminated due to the complexity of global supply chains. These inherent risks include:

- Limited visibility over indirect suppliers
- Reliance on outsourced service providers
- Sourcing from regions with elevated human rights concerns

To address these challenges, we maintain ongoing risk assessments and implement adaptive strategies to mitigate potential harm. This includes continuous supplier engagement and site visits, enhanced transparency measures, and a commitment to ethical sourcing standards across all tiers of our supply network.



Operational Risks

dusk is committed to respecting human rights and addressing any adverse impacts that may be caused by, contributed to, or directly linked to our operations and those of our business partners. We require all employees and our direct and indirect business partners throughout our supply chain to uphold human rights in line with our Supplier Code of Conduct, Anti-Bribery and Corruption Policy, Diversity and Gender Equality Policy, and applicable legal requirements. All business activities must comply with this commitment.

Identified Risk Factors

Certain activities within our operations and those of our service providers present potential vulnerabilities to modern slavery, including:

- Third-Party Labour Hire: Contractors for cleaning, maintenance, seasonal retail staffing, and logistics may reduce visibility over employment conditions and increase risk of exploitation.
- Vulnerable Worker Groups: Casual or temporary workers may face barriers to fair treatment, representation, and grievance mechanisms.
- Indirect Service Providers: Outsourced services such as IT support, financial services, and facilities management often involve subcontracting chains with limited oversight.
- High-Turnover Roles: Positions requiring manual or low-skilled work, particularly in store operations, may attract vulnerable workers and create conditions for underpayment, excessive hours, and health and safety risks.
- Cultural Norms and Attitudes: Inconsistent awareness of labour rights and cultural acceptance of informal work practices can perpetuate exploitative conditions.
- Legal and Regulatory Compliance: Gaps in monitoring compliance with workplace laws, award wages, and labour hire licensing can increase risk exposure, especially where enforcement mechanisms are weak.





Supply Chain Risks

dusk's supply chain operates with partners in three countries only. When reviewing supply chain risks, we apply a risk-based and leverage-informed approach. A structured risk matrix is used to assess supplier location, order volume, and country-specific risk indicators as suggested by the Global Slavery Index rankings (GSI). This process enables us to prioritise high-risk segments where it has the greatest influence, such as strategic or long-term suppliers. Where leverage is lower, enhanced due diligence measures including documentation reviews, supplier self-assessments, and site visits are applied.

China

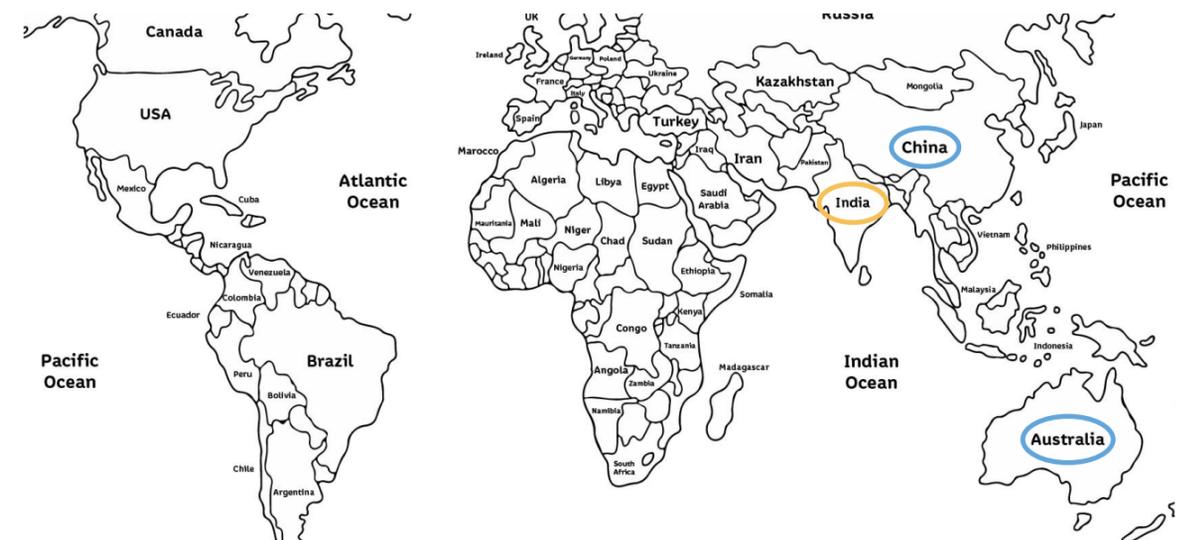
Approximately 86% of our products were sourced from China during FY25, a country rated low to medium risk on the recent GSI. dusk's overall risk rating for China is assessed as medium, reflecting a high level of order leverage, which provides the company with some influence over supplier practices.

India

India accounts for only 0.5% of our total sourcing and is assessed as a medium to high-risk country on the GSI due to its large informal labour sector, weak enforcement of labour laws, and systemic governance challenges. However, based on the internal risk matrix, India is classified as low risk due to stringent supplier selection process and the minimal order volume, which significantly limits the company's exposure and associated supply chain risk.

Australia

In contrast, Australia, representing approximately 13% of our sourcing, which is considered low risk by the GSI. This is due to strong regulatory frameworks such as the Fair Work Act 2009 and Modern Slavery Act 2018.



Risk Matrix

Origin	Global Slavery Index	Order Leverage	Risk
China	Low-Medium	86%	Low
India	Medium-High	0.5%	Med
Australia	Low	13%	Low

Our Actions

dusk has identified specific modern slavery risk factors within its operations and supply chains. These risk factors may contribute to increased vulnerability to exploitation and reduced access to fair treatment and representation. Recognising these risks allows the business to strengthen its due diligence processes, improve supplier oversight, and uphold ethical business practices. Our approach includes regular monitoring, supplier engagement, and responsive controls to ensure early detection and effective remediation.

Business Commitment

Store & Support Office

dusk invests in building ongoing awareness of modern slavery risks among employees, with a focus on procurement and supply chain teams. These programs are designed to equip staff with the tools to identify, assess, and respond to potential risks in their areas of responsibility.

All team members are provided with a copy of dusk's Code of Conduct during onboarding. The Code integrates the respectful workplace culture and the Speak Up Policy, ensuring a shared understanding of expected behaviours and available reporting channels.

We maintain compliance through:

- Clearly defined employment contracts.
- Ongoing monitoring of working conditions.
- Accessible grievance channels for all team members.
- Biannual employee engagement survey.

Non-Merchandise Supply Chain

We remain committed to upholding the highest standards of ethical conduct and human rights across all aspects of our operations and supply chains. In FY25, the company undertook a targeted review of our non-merchandise supply chain, focusing on service providers supporting corporate functions such as IT, cleaning services, and business process outsourcing.

As part of our internal audit and risk assessment process, management identified that one of the existing offshore service partners based in India was not operating in alignment with dusk's Supplier Code of Conduct and commitments. The findings highlighted gaps in transparency, worker protections, and compliance with ethical labour standards.

In response, we implemented a competitive tender process to identify a new offshore partner that aligns with the business ethical sourcing and governance expectations. Following a rigorous evaluation, an offshore IT and Finance contract service provider has been appointed as our new partner who demonstrates a strong commitment to ethical labour practices and complies with relevant legislation, adherence to dusk's Supplier Code of Conduct, that includes specific clauses on modern slavery compliance, audit rights, and reporting obligations.

In addition, we onboarded a new cleaning services provider in FY25. As part of our due diligence, we reviewed the service provider's internal policies and found them to be strongly aligned with our values and legal obligations. Their policy explicitly prohibits forced labour, child labour, inhumane treatment, wage violations, excessive working hours, unsafe working conditions, discrimination, and restrictions on freedom of association. It also includes provisions for ethical subcontracting and promoting regular employment.

Logistics, Warehouse & Distribution Partners

In collaboration with third-party service providers, dusk prioritises ethical conduct and accountability through routine site visits, compliance checks, and the encouragement of whistleblower disclosures. Identified risks are addressed through immediate remediation, while ongoing engagement fosters transparency and promotes ethical practices across logistics operations.



Continued Risk Assessment

dusk takes a proactive and tailored approach to reviewing potential modern slavery risks within our business. Our focus is on two key pillars as below to prevent harm:

- Addressing Risks: We identify and assess modern slavery compliance triggers across our operation and supply chain. Where concerns are detected, an investigation report is required to the Audit & Risk Committee.
- Maintaining Effective Grievance Mechanisms: We provided safe and confidential reporting channels for workers and stakeholders to raise concerns without fear of retaliation. These include our Speak Up Policy and grievance procedures, which are reviewed regularly for effectiveness. Workers can also raise issues during confidential interviews conducted as part of ethical audits.

Supplier Governance and Auditing

Supplier Code of Conduct

All suppliers continuing must comply with dusk's Supplier Code of Conduct, which prohibits all forms of modern slavery, requires adherence to applicable laws, and mandates that subcontractors uphold the same standards. This Code is embedded in our trading terms and onboarding processes to ensure consistent ethical expectations across the supply chain.

Supplier Disclosure Requirements

From FY25, all suppliers must provide full and accurate disclosure of:

- Factory locations and production sites.
- Use of subcontractors, including any changes to subcontracting arrangements.
- Employment practices, including recruitment methods, working hours, and wage structures.

Factory Audit Requirements

From FY25, we have streamlined our requirements for all suppliers must undergo social audits conducted by accredited bodies and meeting our minimum requirement. Accepted audit frameworks including SMETA (Sedex Members Ethical Trade Audit – minimum 4 pillar audit) and BSCI (Business Social Compliance Initiative – minimum C score), which help verify labour practices and support continuous improvement across our supply chain.

Audits must assess compliance with:

- Social Management System
- Workers Involvement & Protection
- Freedom of Association & Collective Bargaining
- No Discrimination, Violence or Harassment
- Fair Remuneration
- Decent Working Hours
- Occupational Health & Safety (OHS)
- No Child Labour
- Special Protection for Young Workers
- No Precarious Employment
- No Bonded Labour
- Protection of the Environment
- Ethical Business Behaviour

Corrective Action and Continuous Improvement

Where non-compliances are identified:

- Suppliers must submit a Corrective Action Plan (CAP) within 30 days.
- Follow-up audits may be required to verify remediation.

Our Compliance and Sourcing teams review all audit findings and collaborate with suppliers to remediate any non-conformances. Suppliers who fail to meet minimum standards or refuse corrective action plans are subject to suspension or termination of business relationships.

Transparency and Traceability

Suppliers are expected to maintain transparent operations and cooperate fully with audit and verification processes. Any changes to factory locations or subcontractor use must be reported promptly.



Supplier Consolidation

dusk has continued its sourcing strategy to consolidate the supplier base, strengthening oversight and reducing modern slavery risks. By working with a smaller, more focused group of suppliers, we can:

- Enhance Audit Coverage: Fewer suppliers allow for more frequent and detailed ethical audits.
- Improve Traceability: Simplified supply chains make it easier to track raw materials and labour practices.
- Strengthen Relationships: Closer engagement fosters open dialogue on compliance and ethical standards.
- Increase Accountability: Consolidation reduces complexity and limits exposure to subcontracting risks.
- Enable Targeted Training: Focused supplier groups allow for tailored training on modern slavery awareness and remediation.

This approach ensures that we can allocate resources effectively, maintain transparency, and uphold our commitment to responsible sourcing.

Future Commitments

Factory Worker Voice and Grievance Mechanism

As part of dusk's ongoing commitment to worker welfare and ethical sourcing, we have identified a gap in hotline accessibility at the factory site. In response, we are dedicated to roadmap the factory worker voice and grievance channel specifically for our business. This will ensure factory workers have a reliable channel to raise concerns and reinforce our broader strategy for continuous improvement in grievance handling and remediation.

Remediation Roadmap

dusk is committing to road mapping its remediation process through a structured six-step framework, with a focus on collaborating closely with key stakeholders to ensure the process is effectively implemented and embedded into our business practices.

Steps are as follows:

1. Issue Identification: Concerns are received and logged, then categorised by severity (e.g. minor, moderate, critical).
2. Investigation: A fact-finding process is conducted, which may include supplier engagement, team member interviews, document reviews, or site visits.
3. Corrective Action Planning: A Corrective Action Plan (CAP) is developed with clear responsibilities, timelines, and preventive measures.
4. Implementation & Monitoring: CAP progress is tracked through follow-ups and, where needed, third-party verification or capacity-building support.
5. Closure & Feedback: The case is closed once actions are verified and outcomes are satisfactory; feedback and lessons learned are documented.
6. Reporting & Continuous Improvement: Outcomes are recorded in dusk's risk matrix, with trends and systemic issues reported to senior leadership to inform ongoing improvements.

Assessing Effectiveness

We are continuing to strengthen our approach to modern slavery risk management through structured review and enhancement of our systems, policies, and procedures. We proactively identify, prevent, and mitigate risks of modern slavery across our operations and supply chains.

We assess the effectiveness of our actions through a combination of governance oversight, employee training, supplier engagement, site visits and collaboration with external partners. During FY25, there were no reported cases.





Consultation

This statement was developed through cross-functional consultation and approved by the Board on 24 December 2025, in accordance with the Modern Slavery Act 2018 (Cth). It outlines dusk's approach, actions, and progress in addressing modern slavery risks across operations and supply chains. Responsibility for compliance rests with the CEO and Executive Team, supported by key business functions.

dusk remains committed to continuously reviewing and improving its policies and procedures to mitigate modern slavery risks.

Continued Commitment

At dusk, we are committed to conducting our business with integrity and upholding human rights throughout our operations and supply chains. We acknowledge that modern slavery remains a global issue and take seriously our responsibility to identify and mitigate risks, particularly in regions with elevated vulnerabilities.

In FY25, we strengthened our approach through targeted assessments of suppliers and service providers, enhanced due diligence processes, and the introduction of a structured risk matrix. These initiatives reflect our ongoing commitment to ethical sourcing, transparency, and continuous improvement.

Looking ahead, we will continue to focus on building strong supply chain partnerships and ensuring that our operational practices align with our core business values.

Vlad Yakubson
CEO and Managing Director

dusk

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