



MODERN SLAVERY STATEMENT

2024

52 weeks ended 27 July 2024.



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Joint Letter from Premier's Chairman & the Interim CEO (Retail) & Just Group CFO



Solomon Lew
Chairman

John Bryce
Interim CEO (Retail)
and Just Group CFO

We remain committed to continuing to build comprehensive measures to strengthen our actions on ethical sourcing and human rights. We are proud to share our most recent progress in our FY24 modern slavery statement.

The causes of modern slavery are complex. Adverse global economic conditions only accelerate this risk. In light of this, over the past year we focussed on further enhancing our Ethical Sourcing Program & our partnerships.

Our statement focuses on several key themes, including:

- how we integrate modern slavery risk management across our business, including increased awareness through regular training programs for our teams and supplier partners
- the importance of our strong partnerships with our suppliers and other key stakeholders in combating modern slavery, and
- increasing our transparency about the challenges, the lessons we have learnt and the measurable actions we have taken

Our enhanced due diligence processes include rigorous supplier assessments and ongoing monitoring, to ensure suppliers follow our policies. By fostering a culture of accountability, we aim to enhance transparency, responsibility, and ultimately lead to more effective prevention and eradication efforts.

We are confident that these steps will significantly advance our efforts in combating modern slavery.

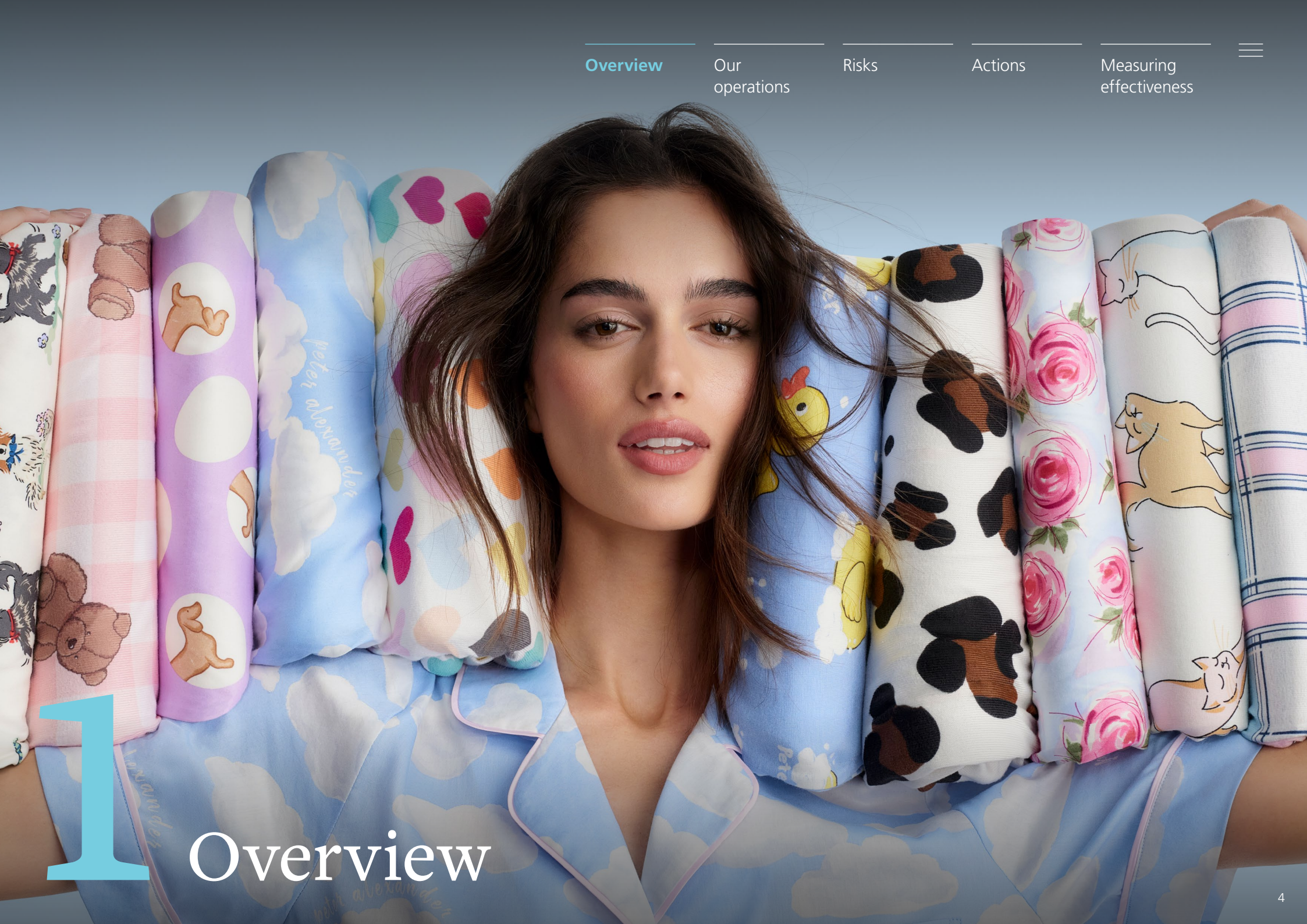
We are committed to always improving our ongoing program work plan. In addition, we continue to iterate as we learn from our experiences and external feedback to enhance our modern slavery response.

Solomon Lew
Chairman &
Non Executive Director

John Bryce
Interim CEO (Retail)
& Just Group CFO

17 January 2025

*FY24 for Premier is the 52 week period ending 27 July 2024, being the reporting period for the purposes of this modern slavery statement.



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Overview



About Premier Investments Limited

Company type	Public company limited by shares, incorporated in Australia
Public trading of company shares	Premier's shares are traded publicly on the Australian Securities Exchange (ASX:PMV)
Registered office	Level 7, 417 St Kilda Road, Melbourne VIC 3004 Australia
Company website	premierinvestments.com.au
Principal activities	Premier operates a number of specialty brands through its 100% ownership of Just Group Limited (Just Group).
Just Group brands	Smiggle, Peter Alexander, Just Jeans, Portmans, Dotti, Jacqui E, Jay Jays
Location of retail operations	Smiggle: Australia, New Zealand, Singapore, Malaysia, the United Kingdom, the Republic of Ireland and online Peter Alexander, Just Jeans, Portmans, Dotti, Jacqui E, Jay Jays: Australia, New Zealand and online
Premier's Reporting Entities	<p>Entities report under the Modern Slavery Act if they are an Australian entity with a minimum annual consolidated revenue of \$100 million. For FY24, Premier has chosen to report in relation to its entire operations on behalf of each of the following Australian entities in its group:</p> <ul style="list-style-type: none"> • Premier Investments Limited • Just Group Limited • Peter Alexander Sleepwear Pty Ltd • Smiggle Pty Ltd • Just Jeans Pty Ltd • Jay Jays Trademark Pty Ltd • Portmans Pty Ltd • Dotti Pty Ltd • Jacqui E Pty Ltd

Acknowledgment of Country



This Modern Slavery Statement was written on the lands of the Bunurong and Wurundjeri Woi-wurrung peoples. We recognise the continuing connection to the land, waters and communities of the Traditional Custodians of Country throughout Australia.

Mandatory reporting criteria: checklist

Criteria under the Modern Slavery Act	Where to read more
Identify the reporting entity	5
Describe the reporting entity's structure, operations and supply chains	5, 9-11
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities owned or controlled by the reporting entity	13-15 19-21
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls to assess and address those risks, including due diligence and remediation processes	17-35
Describe how the effectiveness of such actions are assessed by the reporting entity	37-38
Describe the process of consultation with any entities that the reporting entity owns or controls	5
Provide any other information that the reporting entity considers relevant	3,6-7,11

Premier Investments Limited Board Approval

The contents of this statement was approved by the board of Premier on 17 January 2025. The Premier board is in a position to influence or control each of its subsidiaries and the reporting entities within the Premier group covered by this statement. The boards of Just Group's operating entities listed on this page 5 have been consulted in relation to the preparation of this statement.

This statement is issued by Premier jointly on behalf of all reporting entities in the Premier Group. Solomon Lew, a Director of Premier Investments Limited, has signed this statement.

Solomon Lew
Chairman &
Non Executive Director

17 January 2025

FY24 Achievements & FY25 Forward Plans

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Our core Ethical Sourcing Program activities include social compliance audits, corrective action and remediation, worker voice projects, production verification audits and risk assessment tools. The following outlines our additional work program achievements that were completed in the reporting period and our forward plans.

Risk assessment 	Audit, due diligence & worker rights 	Worker Voice 
<p><i>Assessing and analysing modern slavery risk in the supply chains in which we operate</i></p>	<p><i>Assessing the working conditions and transparency of suppliers with which we produce products. Embedding our living wage project in our value chain</i></p>	<p><i>Hearing directly from workers and providing grievance mechanisms which align with the UNGP's</i></p>
FY24 Achievements		
<ul style="list-style-type: none"> • Added nominated tier 2 fabric sites to the Sentinel risk monitoring tool • Increased in-person factory visits by our sourcing, Ethical Sourcing and production teams • Completed industry benchmarking exercise of non-merchandise supplier due diligence to further understand best practice 	<ul style="list-style-type: none"> • Deployed 119 ERSA factory audits • Monitored risk of unauthorised subcontracting through 20 Production Verification Audits • Ensured wage increases in sourcing markets were accounted for in open cost breakdowns with suppliers • Assessed working conditions of six nominated fabric mills • Further incorporation of importers into our Ethical Sourcing Program to capture 73% of all spend • Commenced wage gap analysis pilot in nominated Bangladesh factories, and scoped sites in India 	<ul style="list-style-type: none"> • Rolled out Amader Kotha helpline to all tier 1 sites in Bangladesh • Participated in RSC 'Comprehensive Complaint Mechanism' pilot • Worker voice mechanisms effective, with 138 grievances received and addressed • Deployed worker sentiment surveys at 10 factories
FY25 Forward Plans		
<ul style="list-style-type: none"> • Expand scope of Sentinel to capture further nominated tier 2 sites including trims and accessory suppliers • Further expand audit and assessment activity of additional nominated tier 2 sites • Reassess suppliers and factories based on risk and segmentation exercise • Continue to assess new supply chain traceability solutions that are available in the market 	<ul style="list-style-type: none"> • Complete and analyse wage gap project with nominated factories in Bangladesh • Increase open cost breakdowns on core volume lines to ensure we account for official wage increases in all sourcing markets • Create costing database of bill of materials and cost inputs across all markets to enhance the effectiveness of negotiations • Systemise open costing data for optimisation • Update sourcing reporting to assist with open cost and measuring supplier performance 	<ul style="list-style-type: none"> • Continue to build awareness with workers about the Amader Kotha helpline for sites in Bangladesh • Continue to scope suitable grievance mechanisms in India • Utilise insights from grievance mechanisms for capacity building projects

FY24 Achievements & FY25 Forward Plans

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Core Ethical Sourcing Program activities include social compliance audits, corrective action and remediation, worker voice projects, production verification audits and risk assessment tools. The following outlines our additional work program achievements that were completed in the reporting period and our forward plans.

Remediation & corrective actions



Providing access to remediation and ensuring findings are closed by suppliers through addressing the root cause of issues

Industry engagement & training



Engaging in collaboration with our peers and capacity building with our stakeholders

Policies & contractual governance



Setting standards that are in alignment with internationally recognised human rights benchmarks

FY24 Achievements

- Enhanced analytical capability in our Ethical Sourcing team to lead data improvement
- Reduced non-transparent findings in audits through improved supplier education and engagement
- Closed or implemented remediation plans for all zero tolerance and critical findings
- Achieved 99% remediation rate of worker grievances received through helplines

- Became a financial signatory to the EIS pilot program
- Delivered working hour management training, covering root causes of excessive overtime
- 86% completion rate of supplier CAP service training modules
- Respectful workplace behaviour training delivered to 11,851 Premier team members globally
- 1,930 Premier team members completed OH&S training
- Delivered Ethical Sourcing & Modern Slavery awareness training to 79% of product team members
- Delivered RPP training to 82% of product team members
- Delivered anti bribery training to over 100 supplier facing team members

- Scoping completed on a Cotton Position Statement project which aims to communicate the risks associated with cotton sourcing and preferred sources of cotton with suppliers and stakeholders and understand industry best practice in this area
- Onboarded a range of factories across China, Bangladesh, Indonesia, India and Vietnam, in line with our supplier onboarding process, to ensure compliance to the Ethical Sourcing Program

FY25 Forward Plans

- Improve CAP reporting, remediation and supplier assessment through new analytical resource within the Ethical Sourcing team
- Analyse the pilot results of the updated EiQ CAP management platform
- Formalise existing Modern Slavery Incident Remediation Policy to be both inward and outward facing and to operationalise the remediation process and build awareness with internal team and suppliers

- Host an industry round table on the topic of the EIS Pilot
- Develop and train nominated factories in China working hour and wage record transparency
- Develop Ethical Sourcing and Modern Slavery awareness e-learning module for product team members
- Continue RPP product team member training
- Complete anti-bribery and corruption training rollout e-learning modules to internal team members

- Select 3rd party to complete Cotton Position Statement for operationalisation
- Scope and draft Premier internal Buyer Code of Conduct
- Create a buyer scorecard for suppliers to assess our buying practices
- Review and analyse Supplier Codes of Conduct of key strategic GNFR suppliers



2

Our operations



Our business includes our seven retail brands supported by our leading sourcing and operational capabilities and our 10,000+ valued team members.

Portfolio of 7 Iconic Brands



peteralexander



portmans

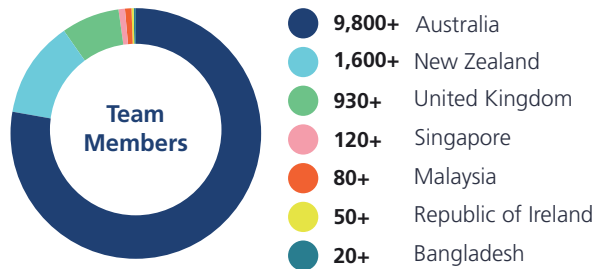
dotti

JACQUIE



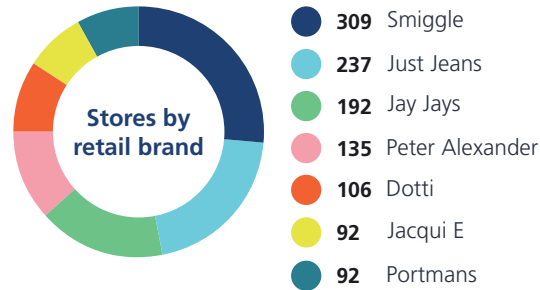
Team members

We scale up to 12,500+ team members globally at peak trading



Store & online network

1,100+ total stores globally, and online



Support offices

Leveraging Centralised Support Functions

During the reporting period, we operated in five office locations in Australia, New Zealand, Bangladesh*, Singapore & the United Kingdom.

The Australian support offices houses key operational functions - Sourcing, Finance, Property Leasing & Store Development, eCommerce, Marketing, Information Technology, and People & Culture.

Distribution centres

Operated by Premier in Australia and New Zealand, and partnering with third party logistics partners in Singapore and the United Kingdom servicing all owned retail operations & wholesale customers.

We ship tens of millions of units of product annually from our valued suppliers to our six retail markets, wholesale and online channels.

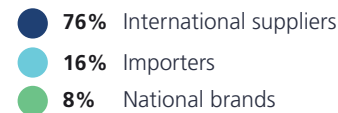
Sourcing

Our merchandise offering

Our seven brands work with international suppliers with factories located in China, Bangladesh, Pakistan, Vietnam, India, Indonesia and Taiwan to manufacture apparel, accessories and general merchandise for resale.



We also work with a number of importers and buy products from a range of national brands.



Goods and services not for re-sale (GNFR)

We partner with key GNFR providers to support our core operations, including:

- Freight and logistics
- Labour hire
- Financial services, such as banking and insurance services
- Information technology
- Property services
- Creative services, such as advertising and marketing
- Store support goods and services, such as shopping bags, team member apparel and cleaning services

*In June 2024 we closed our Bangladesh sourcing office to work directly with our suppliers, while continuing to retain merchandising, quality and compliance capabilities on the ground through a third party. By doing this, we have aligned the region with our direct sourcing strategy in all other markets.



About our own operations

We consider the risk of modern slavery in our operations to be low because we have direct employer-employee relationships with our team members and follow local employment laws, including validating rights to work in the country of employment in every case. Where we engage third parties to supply labour services (such as in our distribution centres), we engage with those third parties directly through contracts which require adherence to local legal requirements.

We take further precautions by having strong policies, providing team member training, offering accessible grievance mechanisms, and ongoing monitoring.

Despite this, recent emerging workplace risks have become more evident. Incidents in the reporting period, such as the tragic events that occurred at shopping centres in Bondi and Marion in Australia highlight the importance of ensuring a safe environment for our team, suppliers and customers. Our team members have a right to be safe at work. We extend our condolences to the affected families of such events.

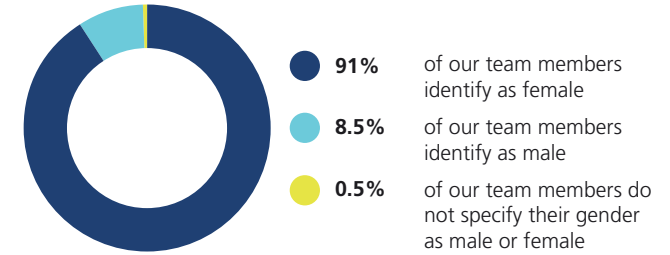
Pleasingly, our response and emergency processes were all actioned by our teams safely and swiftly and escalation alerted to manage the situation and minimise any impact.

Nonetheless, we have reviewed our emergency procedures to support our teams, who follow safety measures through our various frameworks, including the Code of Conduct, 'Just Play It Safe and 'Safety Eyes'.



About our 10,000+ team members

The majority of our team members are employed on a permanent basis, with the balance consisting of fixed term contract or casual team members (the latter in particular with a focus on scaling up our store network to support peak retail trade between October and January each year).



Our robust framework clearly defines the expectations and rights of our team members and available grievance mechanisms, as set out below in Table 1.

TABLE 1

Employment terms	Written and signed agreements that clearly articulate individual team member obligations and rights in the scope of their role including pay and conditions, reviews, grievance mechanisms and requiring supporting verification of information (i.e. age, proof that they are eligible to operate machinery). In addition, we recognise the importance of freedom of association and acknowledge team members have the right to collectively negotiate.
Policies and Code of Conduct	Clearly articulated expectations for team members and contractor behaviour. Our Code of Conduct references all parts of our framework including compliance and grievance mechanisms. Our annual compliance training is delivered in each market to reinforce expectations and incorporate updated applicable legislative changes.
Working rights	Compliance with all local laws ensuring team members' legal working rights.
Training	Just Group has a number of resources that are shared through the onboarding process and also delivered through regular training and education programs to assist teams and promote compliance. Areas covered in our training include respectful workplace behaviour, including positive duty, health and well-being, team safety, ethical sourcing and anti-bribery and corruption. <ul style="list-style-type: none"> • Across FY24 Respectful Workplace behaviour training was delivered to 11,851 team members globally • 1,930 team members attended Health & Safety training (H&S Induction, Health & Safety Leadership and Mental Health online modules)
Listening & grievance mechanisms	Just Group's internal People Support helpline for team members is our primary grievance channel for our own team, ensuring grievances are handled confidentially and impartially. The helpline received over 1,500 calls in the reporting period. We have remediation procedures in place to address and close out grievances as they are reported. In addition, our Employee Assistance program provides confidential counselling and support for team members facing challenging life situations.
Audit & verification	We conduct a monthly audit of applicable team members to ensure team members are paid in full compliance with and verified against the Just Group Retail Agreement.

Governance & accountability framework

Our approach

Critical governance and oversight is provided top-down by the Premier Board. Our Governance and Accountability framework ensures a clear understanding of reporting lines and responsibilities as outlined in Table 2.

This framework ensures decisions around factory selection and compliance are completely independent of everyday commercial decisions made by our product teams. This means product teams, in their day-to-day dealings with suppliers, cannot work outside of the framework and principles of our Ethical Sourcing Program. Product teams in turn receive regular training and are supported by our Ethical Sourcing Team.

Our Ethical Sourcing framework is aligned to the following internationally recognised human rights charters and principles:

- The United Nations' Universal Declaration of Human Rights;
- The International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work, and Core Conventions;
- United Nations Guiding Principles on Business and Human Rights (UNGPs).

We are committed to addressing new and emerging risks within our supply chain and operations and adapt our program where required.

Due diligence

Modern Slavery risks are inherently higher in operations we do not own or control. Our Ethical Sourcing Program encompasses both our direct and indirect operations.

Our approach is segmented and based on inherent risk, with a primary focus on those areas where we can make the most impact. This does not mean that we disregard risk in other areas (as further set out in this statement). A detailed analysis of the scope of our program in relation to direct suppliers, where our impact is most significant, is set out in Table 5 on page 18.

TABLE 2

Governance Program oversight	Premier Board	Guidance and approval of the Ethical Sourcing strategy, including our Modern Slavery Statement.
	Premier Audit & Risk Committee	Oversight of the work program, due diligence and risk management practices. This includes the Ethical Sourcing Program, including our Modern Slavery Statement.
	Just Group Board	Monitoring agreed work program, reporting and progress of commitments made in Ethical Sourcing work plans.
Accountability Program delivery	CEO & Executive Team	Progressing the agreed work program, reporting and risk management.
	Ethical Sourcing Working Group	Overseeing collaborative development and implementation of the Ethical Sourcing strategy.
	Brands & Operational Support Functions	Consulting on approach, and accountable for operationalising agreed frameworks.
Program Development & Analysis Program insights	Ethical Sourcing & Sustainability Team	Leading and bringing together insights from our program – including utilising data analysis to refine and improve our program. As an example of our commitment, this year we employed a full time Analytics Manager to lead improvement in supplier assessment and remediation reporting.



3

Risks

Risks of modern slavery in Premier's operations and supply chains

Approach

We continue to actively monitor the risk of modern slavery occurring in our operations and supply chains through a holistic program which seeks full transparency in relation to human rights and working conditions. We do this through a combination of actions including utilising risk assessment tools, implementation of an audit program, corrective action plan monitoring and the use of worker voice tools that are embedded in our Ethical Sourcing Program framework outlined in Section 4.

We support and endorse the UNGPs on Business and Human Rights, which are also supported widely by our industry peers and Government. The Protect, Respect and Remedy framework outlines guiding principles for States' and businesses' obligation to uphold human rights and fundamental freedoms, and to remedy breaches when found.

Supply chains are complex and can at times be fluid. Regardless of this, businesses' actions can be linked to instances of modern slavery and therefore there is a responsibility to use leverage to remedy these violations. This impact can be explained through the 'cause', 'contribute', 'directly linked' continuum, outlined in Table 3. As our program evolves we are actively analysing how we can strategically and practically target our efforts using this continuum.

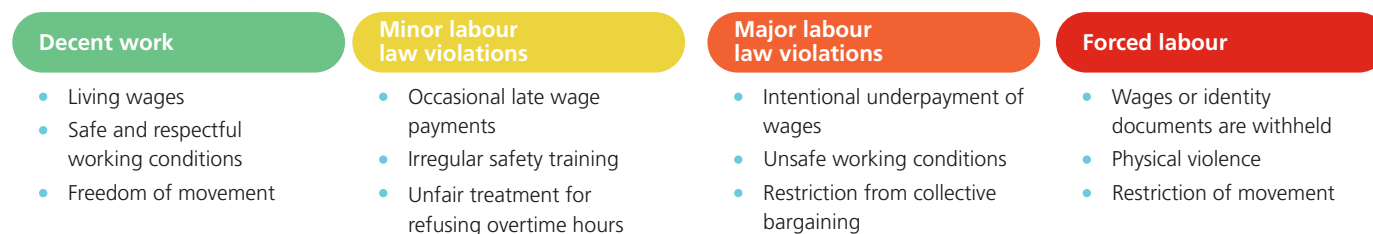
We align with the theory that Decent Work can only be achieved if a proactive approach is taken, to ensure minor issues do not worsen into major issues which can result in Modern Slavery. The ILO's continuum of exploitation in Table 4 highlights that the mitigation of risks improves working conditions. This is what our Ethical Sourcing Program seeks to achieve with our suppliers in order to reduce risks worsening.

TABLE 3

	Risks which may <u>cause</u> modern slavery practices	Risks which may <u>contribute</u> to modern slavery practices	Risks which may be <u>directly linked</u> to modern slavery practices
Description	Operational risks that may directly result in modern slavery occurring.	Operational risks and/or actions in supply chains that may contribute to modern slavery. This includes acts or omissions that may facilitate or incentivise modern slavery.	Operational risks, products or services that may be connected to modern slavery through third parties with whom one transacts.
Remediation	An adverse impact is caused in relation to human rights, with an expectation that impact should cease, be prevented, and remediated.	Through contributing to a human rights breach, it is expected to cease, prevent and remedy the impact(s) to the extent of the contribution. It is also expected to exercise leverage over the supplier to mitigate any remaining impact.	There is a direct link to the human rights breach and therefore leverage should be used or sought to mitigate the adverse impact.
Example	As a retailer that scales up to 12,500 team members in our peak season, it is our responsibility that all workers have a legal right to work and have signed an employment contract. If we did not have these due diligence controls, workers could be exploited in areas such as not being paid minimum wage, unfair working hours, leave entitlements, and termination procedures.	Late changes to specifications, unfair delivery dates and negotiating on the labour cost component are all acknowledged risks which could contribute to workers rights being breached.	There is complexity to the multiple tiers in our supply chain as well as the goods and services we procure not for resale (GNFR). With this comes exposure to a number of modern slavery risks. A reason for the heightened risk is that gaining visibility of further tiers in the supply chain and with our GNFR suppliers can be challenging. Using leverage with strategic suppliers is a key piece of this work.

The Continuum of exploitation

TABLE 4



Exposure to modern slavery risk

Modern Slavery exists due to exploitative practices, inequality and poor labour conditions which are allowed to worsen. The degree of risk and the prevalence of this issue in each country can vary depending on a number of factors including anti-slavery legislation, the type of industry as well as societal risk factors. No business is immune from Modern Slavery risk. As table 3 previously outlined, business activities can cause, contribute to or are directly linked to Modern Slavery, however the countries in which we operate and from which we source all have their own geographical or inherent risk.

Risk Assessment Tools

To assess risks in our supply chains, our Ethical Sourcing team uses various tools, as outlined in diagram 1. The main tools are LRQA's EiQ platform and Sentinel technology, which analyse data from 25,000 audits conducted annually, together with global risk. These tools help us rate risks by region and product. We also gather risk data through our wider Ethical Sourcing Program including audits, worker grievance mechanisms, industry memberships and factory visits, which help identify new or existing risks.

Our key risk identification tools

DIAGRAM 1



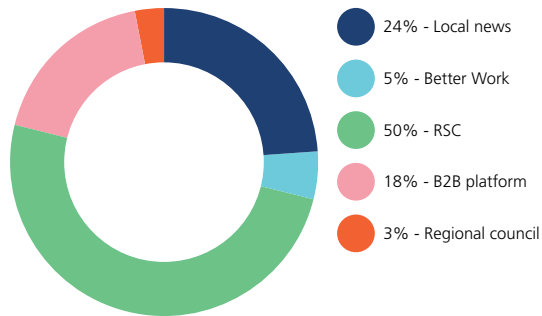
Sentinel findings

Sentinel is a risk tool that analyses data online across international databases, news outlets and regulatory bodies.

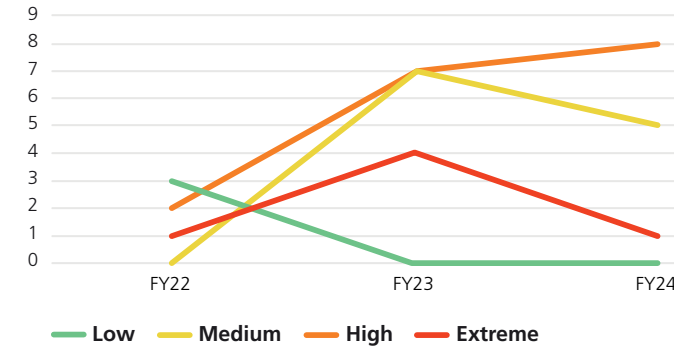
The wide range of sources include but are not limited to: global sanctions lists, regional and local news sources, third party public compliance databases, and human rights press sites. In the reporting period we look to increase our understanding of our tier 2 supply chain risk, we added nine nominated tier 2 fabric suppliers to Sentinel which already holds our tier 1 database. No adverse human rights incidents were found for the new sites added.

Of the 14 incidents found in the reporting period, we were aware of five through the RSC complaint mechanism and investigated the outstanding issues.

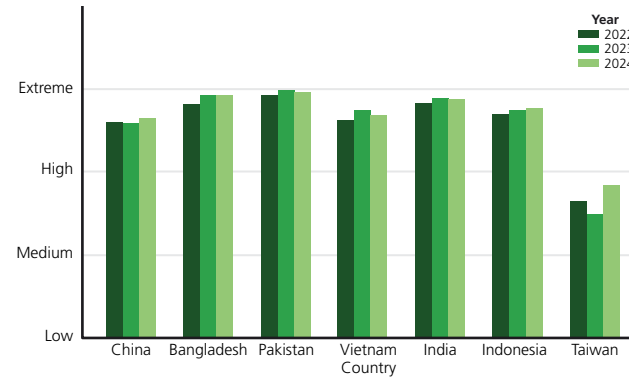
Sentinel media source summary CHART 1



Sentinel incidents year on year CHART 2



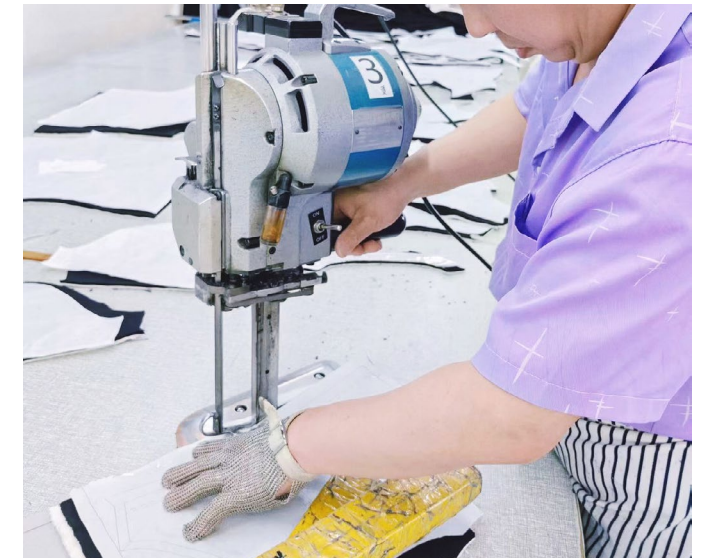
Supply chain - Country risk score CHART 3



Supply chain Modern Slavery risk

Over the last three years as we have monitored risk through the tools we use there has not been a large shift in overall risk scores in each country from which we source, however, each country's risk score has worsened over the last three years as shown in Chart 3. Whilst each country has different drivers to these results, there is a combination of both increased data on factory profile risk coupled with supply chains putting increased pressure on workers which ultimately leads to a higher risk of labour violations.

Through our assessment of risk using our tools and our due diligence, we have identified a number of key drivers that contribute to the heightened level of risk in the supply chain we operate in being the following identified in Diagram 1 on page 14. These drivers are caused by a number of factors including economic, political and societal malaise in relation to improving labour rights. These results only highlight the importance of having robust due diligence controls in place and ensuring transparency in supply chains.



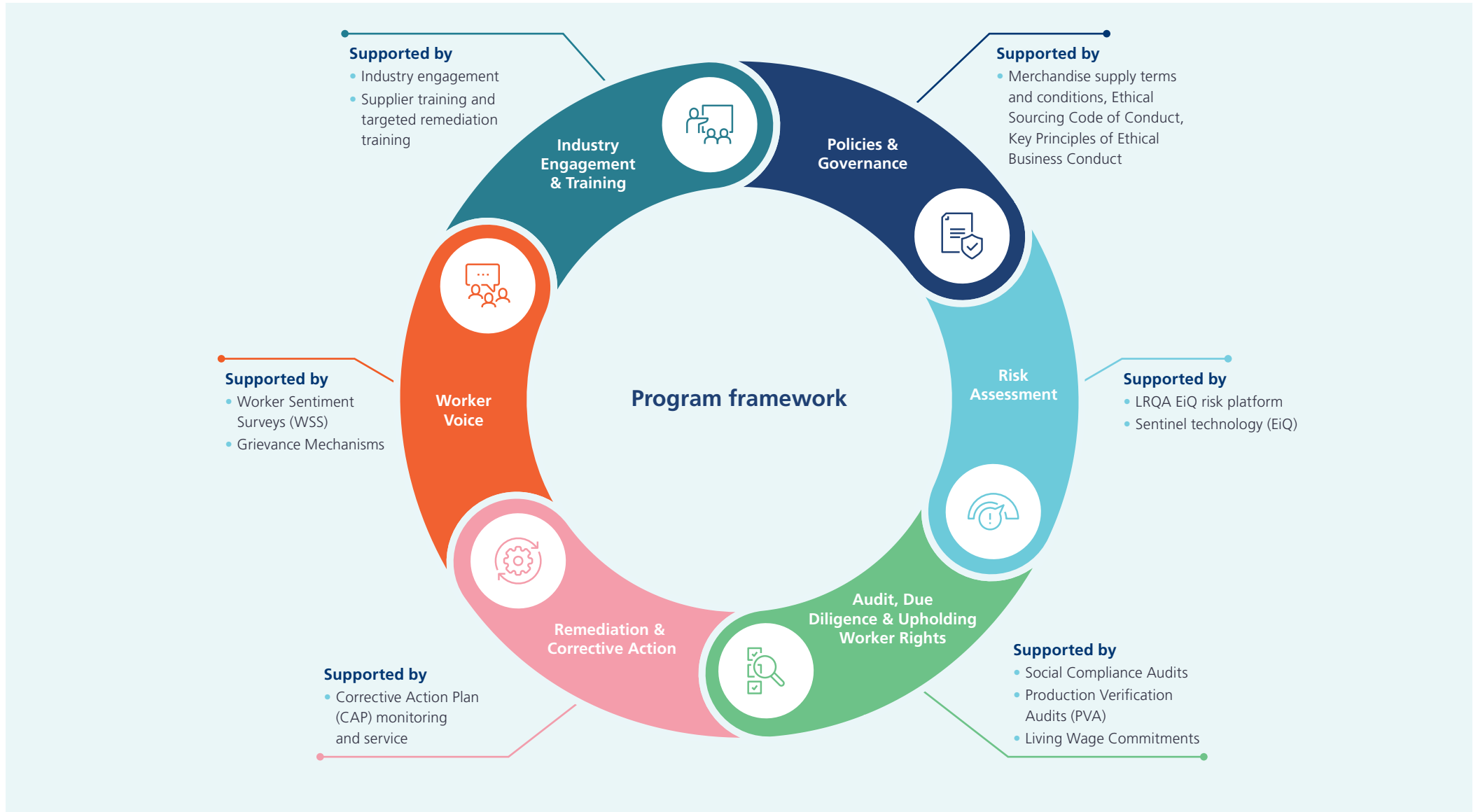
A woman with blonde hair pulled back, wearing a beige blazer over a white top and a patterned shoulder bag. She is looking off to the side with a slight smile. The background is a soft, light brown gradient with a large, faint circular shape behind her.

4 Actions

Program framework: from engagement to action



Our Ethical Sourcing framework is built on core pillars, each with programs that drive positive action. The program's circular approach focuses on measuring effectiveness, reassessing our approach, and continuous improvement. This helps the program evolve to address human rights risk, meet stakeholder expectations, and adapt to changing laws.



Program framework in detail

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A detailed analysis of our program framework in relation to our direct suppliers is set out in Table 5 below. This includes the segmentation of suppliers based on risk, ongoing monitoring and due diligence as well as a number of remediation programs. In the pages that follow we set out more detail on the actions we have taken to assess & address modern slavery risks.

Engagement point	Supported by	Overview/Nature of engagement	TABLE 5
 Risk assessment	LRQA EiQ risk platform	EiQ draws on proprietary audit data and publicly available risk indices to then assign a level of risk to regions across the world. This score can then be used to guide sourcing strategy and our approach to the region.	
	Sentinel technology (EiQ)	Sentinel monitors the web for key supply chain Environmental Social Governance (ESG) risks and media controversies related to suppliers and vendors, including human rights, environment, bankruptcy, layoffs, wages, working hours and health and safety. It scans in over 100 languages and uses machine learning to filter and categorise results. This helps detect reputational risks in near real-time and to action supply chain incidents.	
 Audit, due diligence & worker rights	Social Compliance Audits	All primary factories are audited by LRQA to the Responsible Sourcing Assessment Standard (ERSA). ERSA is a globally recognised audit standard that has a heightened focus on human rights and transparency. The ERSA audit covers the following areas: transparency & business integrity, labour, health & safety, environment and management systems.	
	Production Verification Audits (PVA)	Secondary factories which account for less than 0.9% of purchases are initially assessed according to a mutual recognition audit. As business with such factories grows, they may be promoted to primary status which would then require an ERSA audit (see page 22). Our PVA program identifies unauthorised subcontracting in any location in which we source. In addition to PVAs, our team members in-country also conduct product inspections which serve the dual purpose of monitoring for unauthorised subcontracting and maintaining product quality.	
	Living Wage Commitments	Our Living Wage commitments employ a multi-pronged approach (see page 29) with the aim being to close the gap between a minimum or legal wage and a living wage which is actually linked to the true cost of living in each country or region.	
 Remediation & corrective action	Corrective Action Plan (CAP) monitoring and service	Our Ethical Sourcing team manage the remediation of zero tolerance and critical issues directly with suppliers, and with the support of LRQA oversee the CAP service for less severe issues to ensure they are remediated in a timely manner. Mutual recognition CAPS are monitored primarily for any zero tolerance or critical issues.	
 Worker Voice	Worker Sentiment Surveys (WSS)	WSS are anonymous and are designed to create a safe channel for workers to communicate externally in both a free and honest manner regarding factory conditions. These are deployed to nominated factories where required.	
	Grievance Mechanisms	The worker helpline (Amader Kotha) is a grievance channel for workers to report issues which have been rolled out to Bangladesh suppliers as further detailed on page 31. Workers can also access the RSC's OHS grievance mechanism which is run through the International Accord.	
 Industry engagement & training	Industry engagement	Collaborating with industry peers and organisations to gain insights and improve worker conditions.	
	Supplier training and targeted remediation training	Supplier e-learning modules support upskilling of suppliers in relation to human rights issues in the supply chain. Targeted training is aimed at ensuring suppliers have sufficient remediation plans in place to capture any issues that arise from our audit activities and Modern Slavery awareness training.	
 Policies & contractual governance	Merchandise supply terms and conditions, Ethical Sourcing Code of Conduct, Key Principles of Ethical Business Conduct	Our package of contractual terms and conditions, supported by our policies, are one part of our external governance framework. <ul style="list-style-type: none"> • Sign Terms & Conditions and Just Group Supplier Ethical Code of Conduct • Acknowledge Key Principles of Ethical Business Conduct However we recognise that policies must be supplemented and supported by other mechanisms as set out above.	



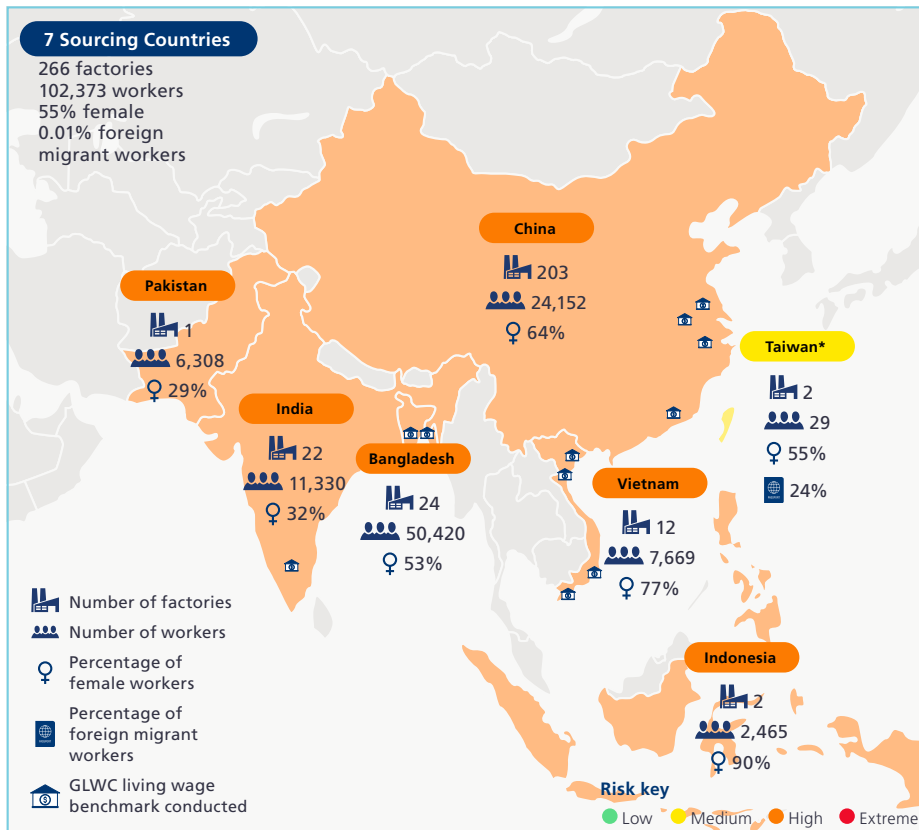
Traceability of our supply chain

Through the EiQ system, we actively monitor the inherent human rights risk rating for each tier in our value chain, which in relation to tier 1 increased from high to extreme in the last 12 months. Tier 2 and 3 remained at extreme risk. Table 6 illustrates our interpretation of tiers in the supply chain and our mapping and tracing efforts, with our goal to achieve mapping of all tiers in our supply chain.

Production tier	Inherent risk rating	Mapping & traceability – international suppliers	Mapping & traceability – importers
Tier 1 – Final stage production	EXTREME	Complete – 100% mapped*	Work in progress – 73% mapped*
Tier 2 – Fabric, trims and componentry	EXTREME	Work in progress - 146 sites mapped	Work in progress - 1 site mapped
Tier 3 – Raw materials (eg. cotton)	EXTREME	Mapping has not begun	Mapping has not begun

TABLE 6

*mapping percentage based on total annual supplier spend



Tier 1 – Final stage production

Our monitoring of human rights risk reinforces the importance of taking action to reduce human rights violations at all stages of the supply chain.

We have fully mapped our international final stage production (tier 1) supply chain. We have also made further progress to identify 73% of our importers’ factory partners. The map and data points on Table 7 illustrate the following:

- The location of our tier 1 supply chain including the number of factories from which we source, the percentage of female and foreign migrant workers. We note that although Premier does not own the factories from which it sources product, and our share of supplier’s production capacity therefore varies over time, we ensure that every location operates in accordance with our program regardless of the size of business;
- Cities and factories where a Global Living Wage Coalition (GLWC) living wage benchmark exists. These benchmarks have been determined based on research that has been conducted in different cities to understand the cost of living in a particular location.

This analysis shows that only 20% of the factories we work with are located in a city where a living wage benchmark has been defined. Whilst these benchmarks support the work we have started to understand the gap between minimum wage and living wage in selected factories in which we operate, we also recognise there is further work to do to understand different benchmarks globally. Capturing and analysing this type of data is crucial to ensure we are implementing an effective program, as the payment of living wages is directly linked to the working conditions in our supply chain. More information on our living wage commitments can be found on page 29.

Data collected from factories through 3rd party audits as of 27th July 2024.

*Premier has suspended sourcing out of Taiwan as at the date of this report. See page 23 for more information.




Traceability of our supply chain

Tier 1 – Final stage production

As noted on page 19, cities and factories where a Global Living Wage Coalition (GLWC) living wage benchmark exists are set out below in Table 7.

TABLE 7

Living wage benchmarks Global Living Wage Coalition (GLWC) 			
Country	City	# of factories	Living wage benchmark (p/m USD)
China	Hangzhou	6	\$702
	Shenzhen	5	\$519
	Suzhou	3	\$634
	Shanghai	2	\$713
Bangladesh	Dhaka City	4	\$235
	Satellite cities & districts surrounding Dhaka	19	\$194
India	Tiruppur	1	\$225
	Region 1	4	\$366
Vietnam	Region 2	5	\$335
	Region 3	2	\$326
	Region 4	1	\$262
Total sites where a Living Wage Benchmark exists		52	

Read more information about the GLWC benchmarks [here](#).

Tier 2 – Fabric, components and trims

Our brands source fabrics and trims from tier 2 factories, some of which are nominated suppliers, but the majority of which do not have a direct relationship with Premier, as the tier 1 supplier owns the contractual relationship. However, our tier 2 factory partners are held to the same standards as outlined in our Code of Conduct.

Traceability and transparency are critical to Premier being able to effectively assess and mitigate modern slavery risks. In order to gain further visibility of our supply chain, we completed a pilot audit program to identify a number of nominated tier 2 sites fabric mills. Part of this work aimed to understand the maturity of these sites in terms of social compliance activity in regards to upholding labour rights and legal working requirements. Please see the case study for further information.

Our previous efforts to map the tier 2 supply chain of our tier 1 factories (ie. tier 2 suppliers that are not nominated) were useful, and enabled us to gather important data on our apparel factories' declared tier 2 suppliers. However, as orders are contracted between Premier and our tier 1 partners only and no contract exists with tier 2 suppliers, effective mapping of tier 2 will require a more sophisticated and technical approach. In the next reporting period we will assess traceability solutions that address this challenge.

Case study: Due diligence in nominated tier 2 sites

During the reporting period we took a further step in our supply chain traceability efforts by engaging with a number of nominated fabric mills which are considered tier 2 sites to Premier. These nominated fabric mills have been partners of Premier for a number of years, and work closely with our product teams and tier 1 sites to deliver quality fabric.

We identified nine sites across China, Bangladesh and Pakistan that work with five of our tier 1 sites to source fabric. Five of these sites were able to provide a mutual recognition social compliance audit, in which we were able to verify their compliance to our Code of Conduct. Additionally, we commissioned an LRQA ERSA audit at one of the nominated sites located in Pakistan. Pleasingly, the factory aligned on our key principle of full transparency during the audit, sharing all requested records with the auditing team. Through the assessment, no zero tolerance or critical non-compliances were identified. The LRQA CAP service will assist the factory in remediating the non-compliances that were found in the assessment in the next reporting period.

Learning and next steps

This exercise allowed us to gain insight into the compliance standards of selected tier 2 nominated fabric mills. In FY25, we will work with the remaining three nominated mills identified in China to understand their social and ethical compliance standards, and identify where further due diligence is required. In the next reporting period we will also workshop how tier 2 nominated sites will be further incorporated into the Ethical Sourcing Program, to ensure we are managing the ongoing risk at this tier effectively.

Tier 3 – Raw materials

The raw materials in our supply chain include any unprocessed material or commodity used to produce finished goods, like cotton (for clothing), PET (for drink bottles) and polyester (for clothing and backpacks). Since these processes are further down the supply chain, the inherent human rights risk is extreme. Mapping this part of the supply chain is complex.

To help, we are working with the certification bodies and experts to improve labour rights in this sector. As supply chain traceability tools are still developing, we continue to scope and analyse the most suitable tools to collect data for this tier.

Increased demand globally for responsibly sourced materials has led to an uptake of certifications which have a focus on human rights and environmental requirements. Examples of this being Better Cotton, Lenzing, Birla Cellulose and Australian Cotton. Our Better Cotton membership began in early 2021 and all apparel brands now have a range of products sourced as Better Cotton.

Our commitment to expand the program will ensure that a growing percentage of Premier’s cotton procurement will be driving demand for and use of responsibly sourced cotton. Premier sourced 1,718 metric tonnes of its cotton through the Better Cotton program in FY24.

In 2024, Better Cotton introduced the requirement for brands to undertake an independent assessment in regards to measuring their cotton consumption and Better Cotton sourcing.

The objective of the independent assessment is to ensure consistency and reliability of results and any marketing claims being made. Premier completed its independent assessment in the reporting period by engaging Control Union, a global auditing body providing a range of quality services including testing, inspection and certification.

In addition, Peter Alexander continues to range a small number of products using organic cotton and dyes made in accordance with the Global Organic Textile Standard (GOTS). The aim of GOTS is to ensure organic status – from harvesting of the raw materials, through to environmentally and socially responsible manufacturing. In the reporting period, 20% and 5% of the baby and junior ranges respectively were sourced to the GOTS standard.

Finally, as a group we do not condone the sourcing of cotton harvested from any region where state sanctioned forced labour regimes or practices exist. We are a signatory to the Cotton Pledge which prohibits sourcing of cotton from Turkmenistan and Uzbekistan. To ensure a comprehensive, risk based approach to this important topic the scoping of a ‘Cotton position statement’ has begun, which when complete, will provide clarity and structure to the way we source one of our largest natural fibres by volume.





Audit, due diligence & worker rights

Approach to audit requirements

Partnering with LRQA to implement our audit program has given us a greater understanding of transparency levels within our primary factory partners operations, whilst also verifying that our sites adhere to our Supplier Ethical Code of Conduct. Premier's audit program targets all tier 1 factories that produce for our brands. These factories are divided into two categories, allowing us to focus on improving working conditions more effectively with those where we have established or stronger relationships.

- Primary factories ≈ 99.1% of our annual purchases with suppliers (includes suppliers that we spend >US\$100K)
- Secondary factories ≈ 0.9% of our annual purchases with suppliers (includes suppliers that we spend <US\$100K)

Social compliance audit findings

LRQA's ERSA standard remains our preferred audit type due to the heightened focus on transparency, business integrity and assessment of vulnerable worker groups, with key primary factories undergoing the assessment within the reporting period.

The ERSA audit covers five key pillars:



LRQA conducted audits at 119 factories throughout the reporting period. Non-compliances are categorised into five severity ratings. The below table outlines the most common non-compliance that were found in LRQA audits for each severity rating during the reporting period.

Severity Rating	Most common non-compliance
Minor	Monthly overtime exceeded the legal limit, but not considered excessive
Moderate	Chemicals were not stored in secondary containers, to avoid leakage
Major	In more than one instance, needle guards were not equipped to sewing machines
Critical	Factory concealed records, therefore wages and working hours could not be verified
Zero Tolerance	Factory representative attempted to bribe auditor

Throughout FY24 we continued to assess the compliance status of our secondary factory partners through the review of mutual recognition audits. Commissioned by another brand or by the factory themselves, mutual recognition audits allow us to assess compliance against our Supplier Ethical Code of Conduct. Throughout the reporting period our Ethical Sourcing team reviewed a range of audits including SMETA 2 pillar, SMETA 4 pillar, BSCI, WRAP, Better Work and ICTI conducted by APSCA accredited auditing firms.

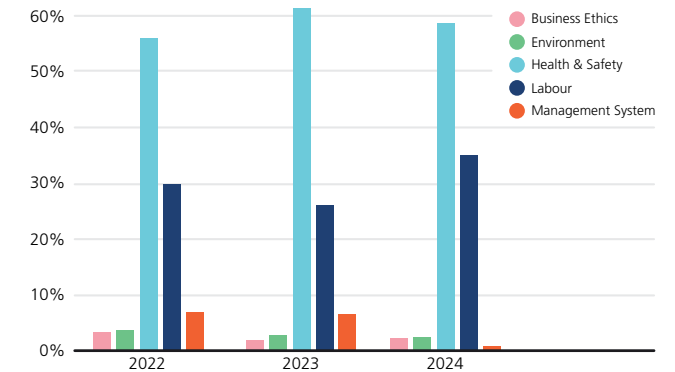
We have analysed the total LRQA audit findings over the past three years, which has shown that there has been an overall decrease of total non-compliances identified each year.

As shown in chart 4 and 5, during FY24 health and safety non-compliances remained to be the most common finding within factories followed by issues related to labour rights. Whilst there was a slight year on year increase of zero tolerance

and critical findings, pleasingly we have seen a year on year decrease of major non-compliances overall and an increase in minor non-compliances. This demonstrates that there is beginning to be a shift in some of the severity ratings of issues found in audits. When considered against the ILO's continuum of exploitation graphic outlined on page 13, this is an indicator that our Ethical Sourcing Program activities are having an impact on conditions improving in factories, whilst also reducing our supply chain risk.

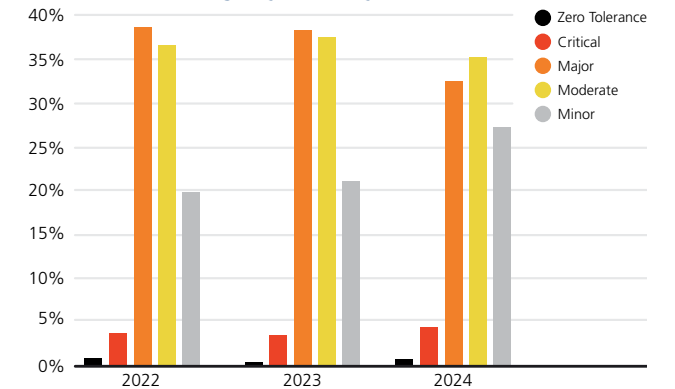
Total audit findings by pillar

CHART 4



Total audit findings by severity

CHART 5



*Chart X and X include findings from LRQA audits only.

Zero tolerance and critical audit findings

Both zero tolerance and critical non-compliances found across LRQA and mutual recognition audits are closely monitored by the Ethical Sourcing team to ensure the severity of these issues are understood by suppliers and factories and remediated appropriately. In FY24, a total of 4 zero tolerance and 23 critical issues were identified through the audit program. These findings are summarised in chart 6 and table 8 and show that the most common zero tolerance issue identified was attempted bribery, whilst inconsistent transparency was the most common critical non-compliance found, being 44% of total critical issues found in the reporting period. Detailed information on the transparency status of all LRQA audits can be found on page 24.

Two issues in two factories in Taiwan were identified in FY24 that had not been found in previous reporting periods, being the retention of worker identity documents, and workers paying recruitment fees in those facilities. The affected workers were foreign migrant workers, a vulnerable group at higher risk of exploitation. Premier recognises the human rights risk of workers not having access to their identity documents, which is identified as an indicator of forced labour by the ILO and recognised as such in our Code of Conduct. Premier also follows the fair recruitment principles stipulated by the ILO as outlined in clause 2 of the Code of Conduct, which includes the prohibition of charging workers any form of recruitment fees in order to secure employment. Following these incidents, Premier has suspended sourcing out of Taiwan completely and will maintain that position until such time as inherent risks are better understood and managed. More details on how these issues were addressed are available on page 27, and we will provide further updates in the next reporting period.

FY24 Critical Findings

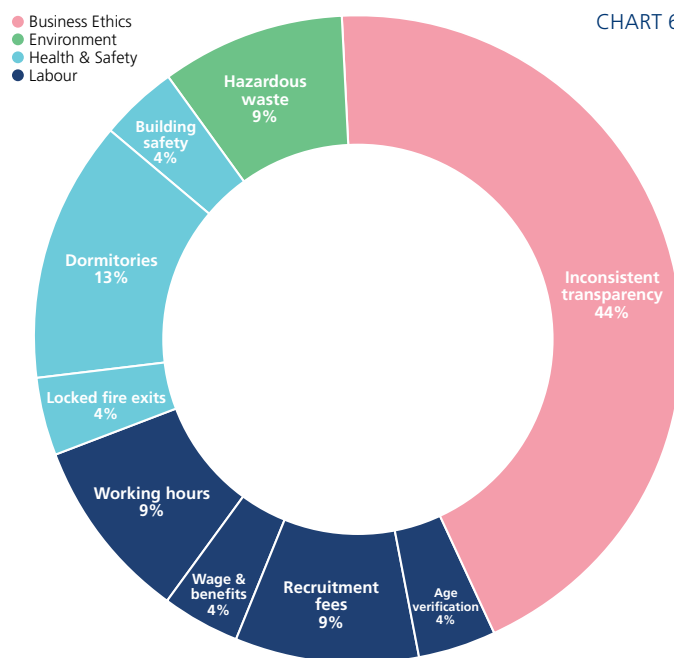


CHART 6

FY24 Zero Tolerance Findings

TABLE 8

Pillar	Findings	Number of total ZT findings
Business Ethics	Attempted bribery	2
	Unauthorised subcontracting	1
Labour	Retention of worker identity documents	1





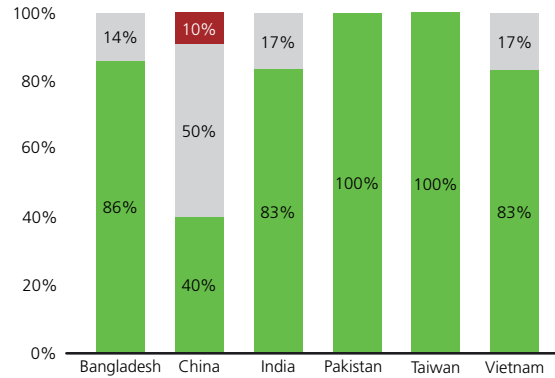
Transparency in ERSA audits

Transparency remains a key part of our Ethical Sourcing Program, helping us understand the real conditions of the factories that make our products. We emphasise transparency in all interactions with suppliers and factories, but particularly those audited by LRQA where transparency of records are assessed and verified to an audit standard. LRQA assessments, particularly the ERSA standard, ensure the integrity of shared records, unlike most other audit standards, which don't assess transparency of records.

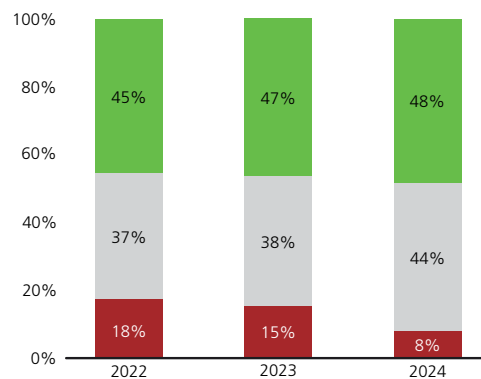
As shown in **chart 8**, during the reporting period 48% of LRQA audits were transparent, covering factories across Bangladesh, China, India, Pakistan, Taiwan and Vietnam. However, 8% of factories in China were found to have concealed records relating to working hours and wages. Whilst overall inconsistent audit findings have decreased, inconclusive audit results increased to 44% this year, up from 38% in FY23. Pleasingly, all audits conducted in Pakistan and Taiwan during the reporting period were transparent, whilst the majority of audits in regions including Vietnam and India were also fully transparent with sharing records.

When audits conducted in China are excluded from FY24 data, the overall transparency rating increases to 87%, with the remaining 13% being inconclusive. This clearly demonstrates that further capacity building is required with our Chinese suppliers and factories on transparency and business ethics. In FY25, we will focus on helping our partners in China understand the importance of full transparency for continuous improvement.

FY24 Factory transparency rating by country CHART 7



Factory transparency rating year on year CHART 8



TRANSPARENT

Site was transparent in sharing all wages and working hours records

INCONCLUSIVE

Auditor observed incomplete data or wages and working hour records that prevent conclusive audit results being reached

INCONSISTENT

Evidence was found showing the site had concealed or falsified wages and working hour records



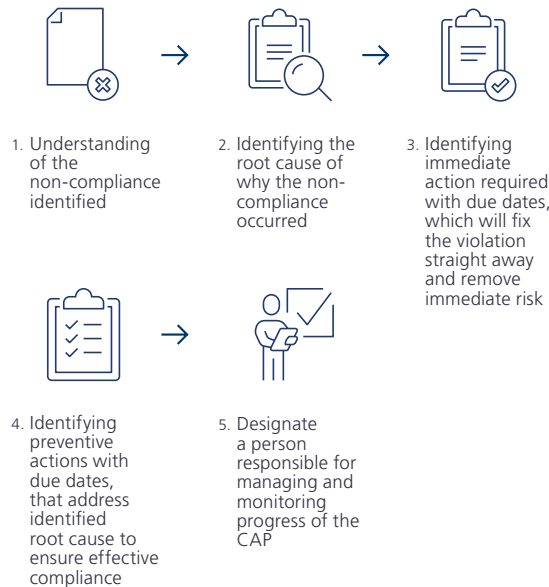


Remediation & corrective action



Remediation of audit findings through LRQA CAP service

Premier is committed to working with supplier and factory partners to improve conditions in the factories that manufacture our product. Throughout the reporting period, we continued to monitor audit findings closely and ensure that effective corrective action plans (CAP) were implemented within factories. There are a number of key elements to consider when implementing a CAP with all steps being crucial to ensure effective action is taken to remediate non-compliances. These steps are outlined below:

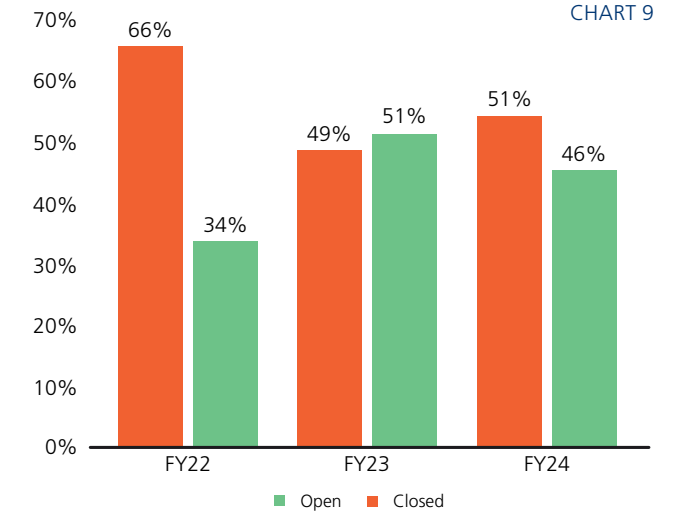


We continued to deploy the LRQA CAP service for factories that underwent an audit by LRQA, which gives factories an opportunity to implement an effective CAP ensuring a root cause is identified so issues are remediated in a way where they won't repeat in the future. LRQA worked closely with our factory partners to support them through this process and close out the non-compliances that are possible to be remediated

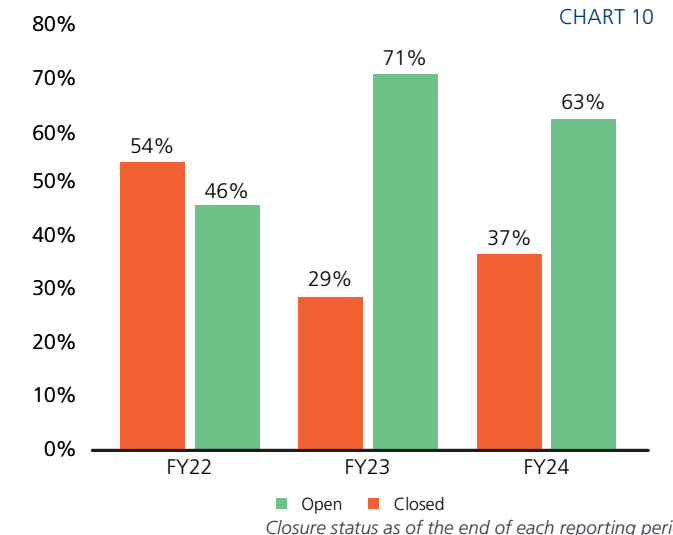
via a desktop review. This service is comprehensive and ensures that less severe issues are remediated before they turn into bigger human rights risks. The zero tolerance and critical issues identified in the reporting period were remediated outside of the CAP service, which is detailed on page 25.

In FY24, 46% of non-compliances were closed via desktop review through the CAP service. This closure percentage was down 5% compared to FY23. The findings that remain open comprised largely those related to working hours and social insurance, which cannot be closed via desktop review in the CAP service. These non-compliances remained open with commitment to continuous improvement. These issues were of either major, moderate or minor severity and remain open because the corrective actions are generally more in depth and require longer time frames to complete. The CAPs for these findings are still closely monitored and will be verified during the next annual audit cycle. When excluding these less severe and more complex findings related to working hours and social insurance (shown in chart 10), over 60% of non-compliances were remediated and closed in the reporting period. We recognise there is work to do to improve the total number of issues closed within the CAP service. As the industry's inherent human rights risk has increased globally, it is crucial that we prioritise the improvement of remediation of issues found in our supply chain. Through closer monitoring and reporting of the CAP service, as well as a rollout of an improved LRQA EiQ CAP management portal, improving these results will be a focus for the next reporting period.

Open & closed non-compliances year on year



Open & closed non-compliances year on year (excluding working hours & social insurance)



Case study: Piloting updated EiQ CAP Management Platform

We are committed to reviewing ways of working to ensure our approach to managing factory CAPs are effective. In FY24 we commenced a pilot with LRQA which looked at the functionality of an improved EiQ CAP management platform. With results of this project to be analysed in full in the next reporting period, initial results are promising with factories finding the interface of the platform easier to navigate, and closing out a higher number of non-compliances in full. Addressing and closing non-compliances through the CAP service remains a priority and with the enhancements to the EiQ CAP platform we expect to see further improvement over the next 12 months.

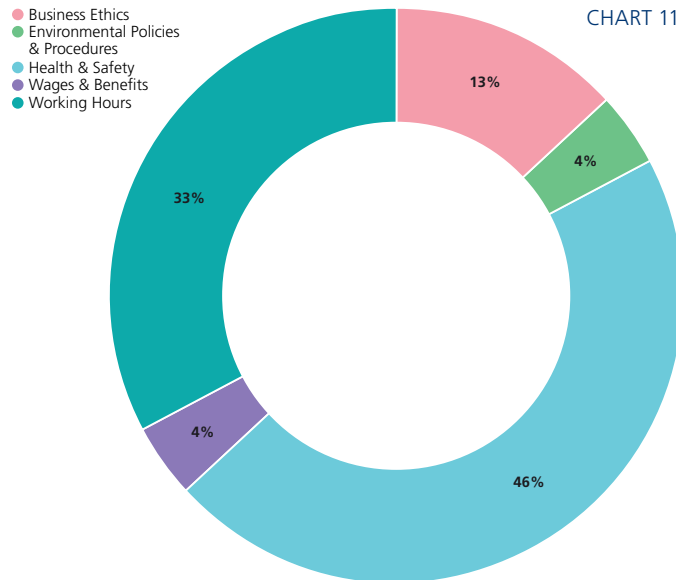
Learnings & next steps

Collaborating with LRQA to pilot their updated EiQ CAP management platform highlighted the importance of regularly measuring the effectiveness of existing tools that are in place in the Ethical Sourcing Program. The full results of this pilot will be analysed in FY25, followed by a wider rollout of the updated platform to more of our factory partners.

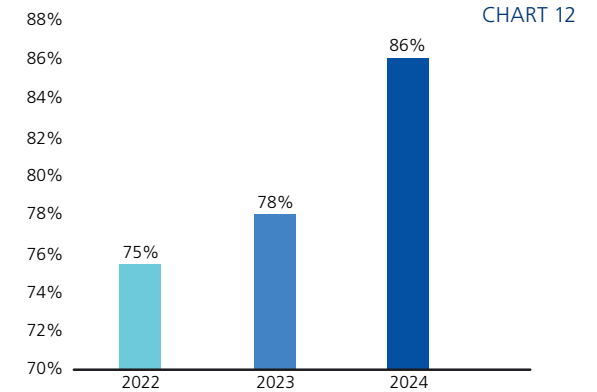
Supplier e-learning training modules

Sites that participated in the LRQA CAP service were also assigned three e-learning modules for completion, to support them through the process of creating an effective CAP specifically for the audit findings identified at their site. As shown in chart 12, pleasingly 86% of sites that took part in the CAP service completed all three modules that were assigned to them, which is an increase year on year compared to 78% of sites in FY23. Chart 11 outlines that the module on health and safety remains to be the most common training topic completed by factories, as findings related to health and safety are the highest pillar of overall findings, as detailed on page 22.

Total e-learning modules completed by category FY24



% of sites who completed all assigned e-learning modules year on year



Remediation of zero tolerance and critical findings

Outside of the CAP service, the Ethical Sourcing team closely monitored the remediation status of the zero tolerance and critical findings identified in the reporting period. Given the severity of these issues, suppliers were engaged regularly to ensure appropriate corrective action was being taken to reduce risk and to improve the factory conditions for workers.

The percentage of incidents closed or in remediation is set out in Table 9, along with further information relating to remediation plans.



Remediation plans of open zero tolerance and critical findings

TABLE 9

Severity	Pillar	Sub pillar	Remediation plan
Zero Tolerance 100% in remediation	Business Ethics	Attempted bribery	Sites have received a first and final warning letter and they are currently undergoing external business ethics and anti-bribery training.
		Unauthorised subcontracting	Site has received a first and final warning letter and has agreed to comply with terms and conditions related to unauthorised subcontracting clauses.
Critical 39% closed 61% in remediation	Labour	Retention of worker identity documents	Worker ID's were requested to be returned immediately, with evidence sent through by management. Personal lockers were also requested to be provided immediately. Issue remains open pending third party verification. See also page 23.
	Business Ethics	Inconsistent transparency	Sites must provide explanation for concealing records; Just Group Ethical Sourcing team conduct call to reiterate transparency expectations and site must commit to re-audit at their cost and be fully transparent with all wage and working hour records.
	Labour	Recruitment fees	Fee investigation conducted. Remediation in progress. See also page 23.
	Labour	Wages & benefits	Site is committed to ensuring controls are in place for wage payments to be in line with at least local law. Must complete re-audit at their cost to verify closure.
		Working hours	Sites to complete root cause (ie root analysis) and overtime action plan. Must commit to providing monthly updates on overtime and progress to reduce working hours.
	Health & Safety	Building safety	Site must commit to updating relevant regulatory approvals immediately and provide a time frame for closure as soon as possible.
		Dormitories	Any dormitory must be made separate from any production and or storage of goods. Site to undergo re-audit at own cost to verify the closure of the issue.

Monitoring for unauthorised subcontracting

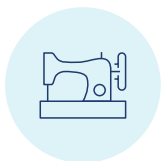
Premier is committed to addressing the risk of unauthorised subcontracting in the final stage of our product supply chain. In order to manage this risk, we have comprehensive monitoring in place within our tier 1 supply chain, whilst also ensuring transparent and robust relationships are upheld with our suppliers.

Production Verification Audits (PVA's)

We continued to carry out PVAs with LRQA during the reporting period to ensure that our products were manufactured in factories that meet the standards of our Ethical Sourcing Program. In each PVA, a sample set of Premier purchase order data is reviewed at a selected factory where our supplier has previously confirmed selected orders have been produced. LRQA audits the factory records to verify that the processes listed below were completed at the approved factory.



Cutting



Sewing



Pressing



Finishing



Packing



Warehousing

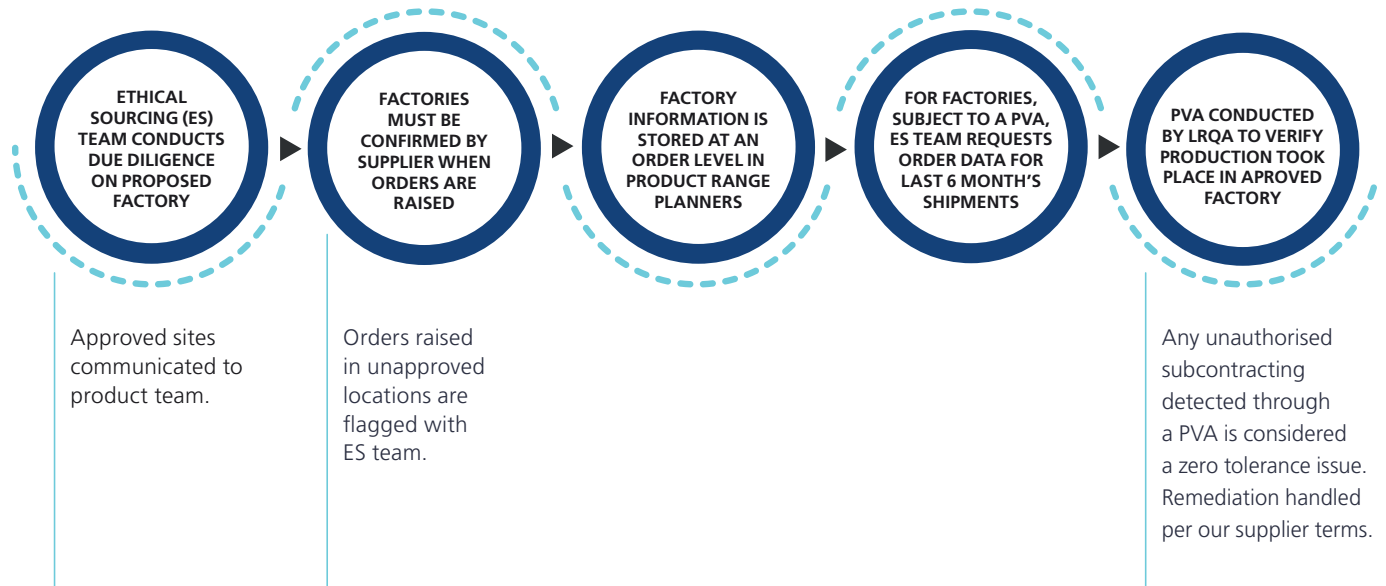
To ensure the success of the PVA program, the tracking of approved factories at a purchase order level is embedded in our product team's day to day process, per the process outlined in diagram 2.

Our supplier terms and conditions mandate that all suppliers are in scope for a PVA to be conducted at the tier 1 factories they use to make goods for Premier. In FY24, 20 PVAs were conducted at factories in China, Pakistan and Vietnam. All records were verified, and no cases of unauthorised subcontracting were found.

Production inspections by our teams in-country

In addition to our work with LRQA, we also continued to conduct further production inspections. Our compliance, quality and merchandise team members located in Bangladesh and China visit factories on a regular basis to ensure planned production is being conducted in the relevant approved Tier 1 factories. Our team in Bangladesh were able to verify over 80% of orders through in-line inspections. Through these production inspections, no unauthorised subcontracting was identified.

DIAGRAM 2





Living Wage

Since Premier published its first [Living Wage Position Statement](#) which also included a roadmap of commitments and activities, a significant effort has been made to support this initiative. Further detail on our progress can be seen below in Table 10.

Areas of Focus	Commitments (FY22/23)	Progress (FY24)	Future Plans (FY25)
Responsible purchasing practices training (RPP)	<ul style="list-style-type: none"> • Refresher training with additional tools scheduled 	<ul style="list-style-type: none"> • Updated RPP training delivered to 82% of product team members • Completed anti-bribery training with over 100 supplier-facing team members • Raw material and cost input update to continue at least once a quarter 	<ul style="list-style-type: none"> • Review best practice Industry Buyer Codes of Conduct • Draft a Just Group internal Buyer Code of Conduct • Create a Buyer scorecard for suppliers to assess our buying practices
Open costing and ring fencing of labour cost	<ul style="list-style-type: none"> • Complete rollout and consistency of approach across the six apparel brands (Just Jeans, Jay Jays, Portmans, Dotti, Jacqui E and Peter Alexander) 	<ul style="list-style-type: none"> • The usage of open costs is at approximately 70% across all six apparel brands • Improved internal governance, compliance and management of open costing across buying teams 	<ul style="list-style-type: none"> • Create a costing database of bill of materials and cost inputs across all markets and categories to enhance the effectiveness of negotiations • Scope and systemise open costing data for optimisation
Modern Slavery training	<ul style="list-style-type: none"> • Updated comprehensive supplier training and workshop was delivered in FY23 	<ul style="list-style-type: none"> • Ethical Sourcing and Modern Slavery Awareness training continued, training 79% of product team members 	<ul style="list-style-type: none"> • Develop training for China based factories with a focus on transparency as well as wage and working hour insights and learnings
Wage gap analysis	<ul style="list-style-type: none"> • Increased transparency and accuracy of worker wage information through new LRQA audit program and worker sentiment surveys • Finalise the scope of a wage gap analysis by end of FY23 for implementation in FY24 	<ul style="list-style-type: none"> • Rollout of upgraded ERSA audit standard from version 2.0 to 3.0 with a focus on vulnerable workers and working hours which should increase insights on wages • Living wage methodology confirmed • A wage gap analysis pilot commenced in Bangladesh 	<ul style="list-style-type: none"> • Complete and analyse wage gap project with nominated factories in Bangladesh
Amplify worker voice	<ul style="list-style-type: none"> • Roll out of grievance mechanism helpline to all factories by end FY23 • Continue scoping market specific grievance mechanism options across Asia 	<ul style="list-style-type: none"> • Rollout of Amader Kotha in Bangladesh completed • Review a full 12 months of reporting on issues relating to wages • Scoping project started in India 	<ul style="list-style-type: none"> • Continue scoping and finalise approach to grievance mechanisms in India • Top up Amader Kotha training for selected sites in Bangladesh
Industry engagement	<ul style="list-style-type: none"> • Engage with industry multi-stakeholder living wage initiatives to learn and gain better insights into best practice in this area 	<ul style="list-style-type: none"> • Completed joint Oxfam/Monash Bangladesh Living wage survey pilot and committed to participate in the final survey • Financial signatory to the ILO Pilot Employment Injury Scheme (EIS) in Bangladesh with the objective of establishing a comprehensive social insurance system that protects workers against multiple work-related life risks 	<ul style="list-style-type: none"> • Host an industry round table on the topic of the ILO Pilot Employment Injury Scheme (EIS) in Bangladesh

TABLE 10



Due diligence on suppliers of goods and services not for resale

Premier acknowledges that our risk related to modern slavery goes beyond the supply chains of our products. We work with a range of GNFR suppliers that play key roles in the operations of our business. In the reporting period, we conducted a benchmarking research exercise to understand the common strategies and approaches to managing modern slavery risk in GNFR supply chains. These included:

1. Supplier engagement and collaboration

There was a real emphasis on the importance of building trusted partnerships with GNFR suppliers as well as fostering open communication and promoting transparency.

2. Compliance and due diligence

Due diligence measures, including risk assessments, audits and supplier evaluations, are utilised to ensure that GNFR suppliers adhere to ethical requirements.

3. Risk Management and mitigation

Efforts to address risks extend beyond internal operations with a focus on high-risk sectors, geographic regions and vulnerable workers.

4. Transparency and accountability

Demonstrating transparency by disclosing information related to supply chain practices, sustainability goals and modern slavery statements.

5. Training, systems and KPIs

The delivering of Modern Slavery awareness training whilst setting up internal systems to track and manage GNFR Suppliers, embed KPIs within procurement teams to ensure compliance to ethical requirements.

Through our benchmarking exercise we learnt that the GNFR area is both complex and not as well advanced in the areas of due diligence and human rights monitoring. Improvement will require not only a commitment to responsible purchasing practices but also industry collaboration.

As a first step we plan to engage with our strategic GNFR suppliers to review their existing Supplier Codes of Conduct to understand the degree of alignment with our Supplier Ethical Code of Conduct in the next reporting period.





Worker voice



Genuine engagement in understanding the worker experience in the factories we operate in is critical to assessing whether we are contributing to safe working environments and workplaces that are free from harassment and discrimination. In the reporting period, we continued our worker voice program to identify which factories we need to be engaged with more closely, to remediate issues identified through our Ethical Sourcing Program and to proactively mitigate risks in the future and aligning to one of the UNGP's core pillars, access to remedy.

Worker grievance mechanisms

Ensuring workers have a voice and are listened to is a core pillar in our program framework. We are committed to providing trusted, anonymous and external grievance mechanisms to workers in our supply chain in order for them to speak safely and freely, outside of traditional routes such as suggestion boxes.

Amader Kotha

Amader Kotha was chosen for our factories in Bangladesh as it is trusted, well known in Bangladesh and transparently remediates grievances raised. It reaches over 1.5 million workers in the RMG industry and fields over 2,800 calls a month. In the reporting period, Amader Kotha received 125 calls from 21 sites that work with the Just Group. Additionally, there were 231 test or inquiry calls that were received in this period. Of the 'substantive issues' reported in the past 12 months 99.68% of issues had been remediated. One low risk health and safety issue remained open, but was in remediation and is planned to be closed in the next reporting period. To read about the rollout of this mechanism in the reporting period, refer to the case study on page 32.

RSC Complaints mechanism

The RSC has a system for handling complaints about occupational, health and safety (OHS) issues. In the reporting period, we were one of 100 brands chosen to join a pilot program that expanded the system to include non-health and safety complaints. In 2023, the RSC received over 2,300

Hours of operation
6am-10pm

Operational days
Sunday-Thursday

Bengali speaking operators

+880 17777 54398
WhatsApp
info@amaderkothahelpline.net

Callers can leave a voicemail after hours and their call will be returned

complaints across RSC member factories in Bangladesh. These included issues such as freedom of association, forced labour, discrimination and wages. After the pilot ends next year the RSC will gather feedback from brands and suppliers to evaluate its effectiveness.

Summary of grievances reported in FY24

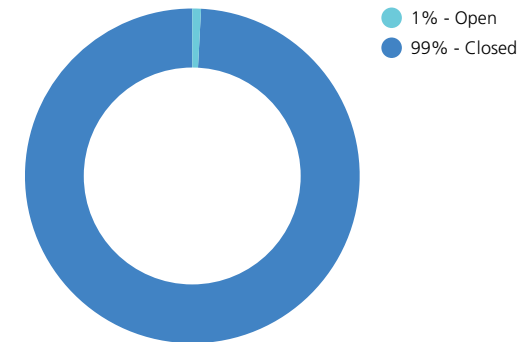
During the reporting period, we received 138 grievance calls and 231 test or inquiry calls. The charts below show the types of issues reported and how many were resolved. These helplines are available to all workers in Bangladesh, who make up about 50% of our tier 1 supply chain. A range of issues were reported, with 2% involving physical abuse or harassment. These serious complaints are treated as a top priority, investigated, and resolved. They are also escalated to our Ethical Sourcing team, who work directly with factory partners to ensure the issue is fully addressed to the worker's satisfaction.

Anonymous worker sentiment surveys

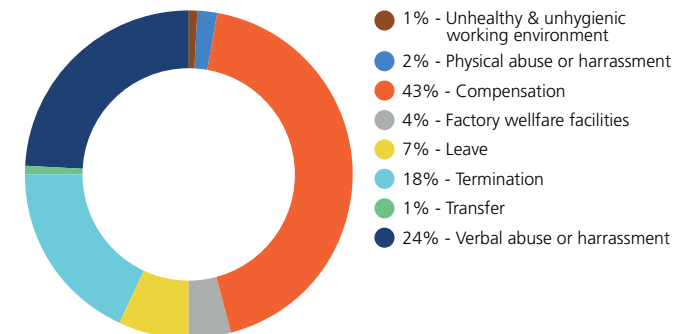
Over the last three years, we conducted 100 anonymous Worker Sentiment Surveys (WSS) across all sourcing regions as part of our worker voice program, including 10 this year. Most were done alongside audits, while several were completed standalone

where required. The surveys covered areas like grievance mechanism, wages & working hours, workplace wellbeing, environment, health & safety and productivity. Analysing the last three years of data, results were overwhelmingly positive. These responses did not match the data we saw from audits and grievances reported by workers in this reporting period. As a result, we will shift our focus to external helpline systems, which we found to be more effective for addressing grievances and ensuring transparency. We have started exploring 3rd-party grievance systems in India and will decide on the best option next year.

Remediation rate - worker grievances CHART 13



Worker grievances by issue category CHART 14



Case study: Amader Kotha rollout

In the previous reporting period we began the rollout of an external helpline for workers in factories located in Bangladesh. ‘Amader Kotha’ meaning ‘Our Voice’ in Bengali has been in operation by a Dhaka based NGO, Phulki for the last 11 years. Operators have been trained to receive calls from factory workers and are able to support queries or grievances, and triage matters depending on the severity. This grievance mechanism was selected due to meeting the UNGP’s on effective grievance mechanisms.

In FY24 we engaged with our Bangladeshi suppliers to implement Amader Kotha training in remaining sites. We commissioned a webinar in Bengali for all management at suppliers and factories to understand how Amader Kotha operates, how workers use the third party helpline, the remediation process and situations where the Just Group may become involved due to serious issues.

We rolled out training to workers through a ‘Train the Trainer’ (ToT) model. Our local team member scheduled factory visits to train a sample of workers, and factory representatives were selected to complete worker training. These sessions were structured with our team member explaining the importance of the helpline to the workers, explaining the benefits of an external mechanism including that it is toll free, operates 12 hours a day, a local team receives the calls and that one can choose to remain anonymous.

Workers then watched an educational video in Bengali about the helpline with some case studies to understand when to use this mechanism. We funded the printing of all posters (pictured) to be placed around the factory in high traffic locations as well as in worker bathrooms.

Our Ethical Sourcing and Sustainability Manager visited Dhaka to oversee the rollout in selected sites. This investment provided insights into worker and management sentiment towards the mechanism. During this trip, we met with the Phulki team at their office to see the helpline in operation and to discuss the progress of the rollout with our factories. Through our worker training almost 4,000 workers were trained in person. To date, over 3,100 workers have been trained by factory management and we are conducting follow up visits to assess the effectiveness of this rollout and any sites which may need additional support.

Learnings & next steps

Engagement with management on this project needed time and resources so each supplier could fully understand what was expected of them. In some cases where there was pushback, one on one meetings were conducted to work through any concerns or challenges. Ensuring that a grievance line and materials are culturally appropriate are key in rolling out an effective mechanism that meet the UNGP’s on Business and Human Rights.

Finally, in person visits and training will be scheduled where it is seen there is low call volume at sites.





Industry engagement & training

Overview

Our operations

Risks

Actions

Measuring effectiveness



Premier works with and values collaboration with the following organisations, to uphold human rights, ethics and provide greater transparency in supply chains.

Due diligence initiatives

About the initiative

Our involvement



LRQA (formerly ELEVATE) is a leading global assurance partner providing compliance, supply chain and ESG specialist services globally. Our work with LRQA has driven an increasing level of transparency along with effectiveness of our ethical sourcing audit and compliance programs – through data, analysis and review.

2021 – commenced our strategic partnership



Sedex's platform ensures data-driven insights and tools are available to our teams to ensure continuous improvement in environmental, social and governance outcomes

2022 – Just Group became a Sedex member



APSCA is a professional standards body for social compliance audits. We will only accept third party social compliance audit reports from APSCA member firms.

2022 – Just Group became a supporter brand

Worker voice initiatives

About the initiative

Our involvement



Amader Kotha is a locally run helpline based in Dhaka, by civil society organisation Phulki in partnership with LRQA and Clear Voice.

2023 – Just Group commenced implemented helpline

Industry initiatives

About the initiative

Our involvement



Better Cotton trains farmers to use water efficiently, care for soil health and natural habitats, reduce use of the most harmful chemicals and respect workers' rights and wellbeing. Better Cotton is sourced via a chain of custody model called mass balance. This means that Better Cotton is not physically traceable to end products, however, Better Cotton Farmers benefit from the demand for Better Cotton in equivalent volumes to those we 'source'.

2021 – Just Jeans joins as a member of Better Cotton

2022 – Our membership of Better Cotton expands to all apparel brands



The International Accord is an independent, legally binding agreement between brands and trade unions committed to a safe ready made garment industry in Bangladesh. We continue to work with the Accord and the RMG Sustainability Council (RSC).

2013 to 2018 – Alliance member

2018 to 2021 – Accord member

2021 to present – International Accord member



In cases of work-related injuries, the EIS Pilot in Bangladesh provides compensation payments for the permanently disabled and the dependents of deceased workers, financed by voluntary contributions from international brands.

2024 – Just Group became a signatory of the pilot and has committed to the annual voluntary financial payment

Academic & NGO initiatives

About the initiative

Our involvement



We were one of two Australian brands that participated in Living Wage pilot research project conducted by Monash University and commissioned by Oxfam.

2024 – selection and participation in project pilot

Advocacy

We support policy and broader industry initiatives which look to improve human rights in the supply chains in which we operate. We welcome active engagement and collaboration with our peers in our work to improve working conditions in factories. Our engagement continued with other organisations and NGOs in a collaborative manner including Baptist World Aid, Oxfam and Action Aid.

Training

Supplier Conferences in September 2023 & July 2024

We met in person at our head office twice in the reporting period with our strategic suppliers accounting for over 50% of purchases for the five brands that participated. Suppliers were given an update in relation to our Ethical Sourcing Program and a number of key initiatives. One on one meetings were held with any suppliers that required additional support.

Supplier Working Hour Management Training

Premier recognises that excessive overtime is a systemic issue within supply chains and is considered an indicator of forced labour. To mitigate this risk and to support our supplier and factory partners in managing working hours effectively, in collaboration with LRQA we deployed working hour management training in the reporting period. Covering the majority of supplier and factory partners in our tier 1 supply chain, this training was delivered to those partners in China and Bangladesh in local language.

The training included three main elements:

1. Administration: how to maintain accurate working hour records, reviewing how working hours are managed and identifying whose responsibility it is to manage;
2. Lean production: how to identify processes that will enhance productivity, which in turn can directly reduce working hours;

3. Quiz for participants: to measure that suppliers and factory partners understood the training content and how to implement the learnings into their operations.

Over the two webinars that were held, a combined 154 people across 110 different companies were in attendance. A total of 66% of attendees scored 80% or more in the post training quiz, which shows that a large portion of people understood how they can apply the practices of how to best manage working hours within factories. We recognise that there may still be a knowledge gap with some suppliers on understanding this topic. This will be analysed in FY25 to determine how we can further support those partners who require additional support on managing working hours effectively.

Ethical Sourcing and Modern Slavery Awareness Training

In FY24 we continued to deliver Ethical Sourcing and Modern Slavery awareness training with 79% of product team members completing it. These team members are the focus because they regularly interact with suppliers. The updated training covered topics such as ethical sourcing, modern slavery, global prevalence, legislation, risks in our supply chain, and real-life case studies. A survey showed that 100% of participants improved their understanding of modern slavery, with all rating their knowledge as a four or five out of five after the training. Before the training, 82% could identify forced labour indicators; this increased to 92% afterward. These results show the training's effectiveness, and feedback from participants will shape future programs. In FY25, we plan to introduce an e-learning module for new product team members during their induction.

Anti-bribery and Corruption Training

During the reporting period, we continued anti-bribery and corruption training for relevant team members. This training helps everyone in our organisation understand and follow

policies to prevent unethical practices. In the reporting period, 106 team members received in-person training on real-life case studies. Additionally, an e-learning module was developed and will be rolled out more widely next year.

EIS Pilot

In March 2024 we became a signatory to the Employment Injury Scheme Pilot in Bangladesh, along with 36 international peers including one other Australian member. We supported the rollout and ongoing implementation through brand/factory orientation and training in Bengali. We acknowledge the absence of a government-funded scheme creates a risk for the RMG workforce, and look forward to gaining greater insights through our membership and support.





Policies & contractual governance

Policies

Contractual governance: supplier onboarding

Premier has a non-negotiable supplier and factory onboarding process, to ensure all tier 1 and selected tier 2 factories are captured in the Ethical Sourcing Program.

The onboarding process includes:

- 1. Social compliance audit review:** review by the Ethical Sourcing team of a valid factory social compliance audit conducted by a member firm of the Association of Professional Social Compliance Auditors (APSCA) that has been conducted within the past 12 months. An ERSA is required for all factories for any supplier that exceeds US\$100k in spend by the Just Group annually.
- 2. Sentinel:** complete search of supplier and factory being onboarded via the LRQA Sentinel system.
- 3. Approval:** approval by the Ethical Sourcing team is required in writing before the accounts registration team can create a supplier number in the system.
- 4. Policies and contractual governance:**
 - Review and acknowledgement of the Just Group’s Key Principles of Ethical Business Conduct;
 - Sign Supplier Ethical Code of Conduct;
 - Sign Terms and Conditions.

During the reporting period we onboarded 52 factories across our seven brands, located in China, Bangladesh, Indonesia, India and Vietnam. All new suppliers were supported through the onboarding process to ensure compliance to the Ethical Sourcing Program. Furthermore, we offboarded 69 sites in the reporting period for product and performance related sourcing reasons (rather than any ethical sourcing and compliance issues).

Our core policies and those we are working on finalising in the next reporting period are set out below.

	In place	In progress	Purpose
Supply chain policies	Supplier Ethical Code of Conduct	Cotton Position Statement	A position statement on the usage of cotton in our product ranges, including how we work with industry partners to improve working conditions for those in the cotton supply chain.
	Key Principles of Ethical Business Conduct		
	Cotton Pledge		
Operational policies	Safety and quality assurance manuals	Forced Labour Remediation Policy	A revised policy on how the Just Group responds to incidents of forced labour, including clear accountabilities for roles in the business and possible remediation outcomes and objectives.
	Operations Procedures Manual		
Team Member policies	Team Member Code of Conduct	Buyer Code of Conduct	Principles and accountability metrics for our buying team to follow when working with suppliers. Key aspects include: <ul style="list-style-type: none"> • Commitment that purchasing prices include wages as itemised costs • Fair terms of payment and responsible purchasing practices • Commitment to measurable improvements on planning and forecasting • Clear and accountable responsible exit plan
	Respectful Workplace Behaviour Policy		
	Electronic Equipment & Communication Policy		
	Whistleblower Policy		



5

Measuring effectiveness








Assessing Premier's actions: our effectiveness framework

Our tools and insights have found that this reporting period has presented increased complexity and challenges as they relate to modern slavery issues. Our agile governance framework meets the demands of an evolving supply chain, to improve and enhance supply chain outcomes. We initially measure 'effectiveness' by gaining insights and transparency on the incidence of modern slavery in the supply chain, and then remediating issues accordingly. This requires multiple activities being implemented to provide a range of methods to assess supplier due diligence, and for worker voice to be communicated up the supply chain.

A summary of that framework is set out in Table 11 below, against which we have set out the outcomes in the reporting period. We have also continued with a self assessment scorecard of our actions and projects as to where they are in their level of progress.

TABLE 11

Our framework for measuring effectiveness:

Engagement point	Action	Objective	Reporting period outcomes	Progress against commitments
 Risk assessment	Supplier on-boarding	To identify any modern slavery risks prior to commencing supplier registration process	Gained visibility of nominated fabric mills and uploaded them to the EiQ system to be included in Sentinel scans	
 Audit, due diligence & worker rights	ERSA audits conducted in tier 1 primary factories	To identify key human rights risks and indicators of modern slavery in the supply chain	No evidence found of child or forced labour Retention of worker identity documents and the payment of recruitment fees by workers, as outlined on page 23, was identified - these are indicators of possible forced labour No instance of auditors being refused access to sites No evidence found of workers being prevented from attending interviews Improvement in audit transparency compared to FY23, as reported on page 24 Reduction in major non-compliances and shift to moderate and minor issues compared to FY23, as reported in chart 5 on page 22	
 Remediation & corrective action	Non-compliance remediation	To ensure issues raised in audits that may be indicators of modern slavery are remediated appropriately	Remediation of 63% of non-compliances that could be closed via desktop review through the LRQA CAP service All suppliers with critical and zero tolerance non-compliances found in their audits were either remediated or had remediation plans in place for the FY25 reporting period 86% of sites audited by LRQA completed all three assigned e-learning modules to support CAP implementation	
	Monitoring for unauthorised subcontracting	To monitor and identify any instances of unauthorised subcontracting by factories. Sites not approved by Premier are at higher risk of modern slavery indicators	20 Production Verification Audits undertaken in primary factories One zero tolerance incident of unauthorised subcontracting was found through the social compliance audit program Verification of production of the majority of orders placed in Bangladesh	

Note: The self assessment is against our FY24 commitments, but we recognise at every engagement point and stage of our program there is room for further improvement.

Scorecard key

-  Scoping or planning
-  Work commenced
-  Increased focus
-  Well advanced
-  Complete
-  Sustained



Engagement point	Action	Objective	Reporting period outcomes	Progress against commitments
Worker Voice	Worker grievance mechanism - Amader Kotha (Bangladesh)	To create an avenue for workers to report possible illegal, unethical or improper conduct in factories and any retaliation workers may face following an ERSA audit	125 complaints across 21 sites received through the mechanism Key themes of complaints included compensation and verbal abuse/harrasment 99.68% remediation rate of substantive issues received	
	RSC complaints mechanism (Bangladesh)	To provide a grievance channel for workers to report issues related to fire & building safety in factories participating in the RSC	13 complaints received through Bangladesh RSC complaints mechanism in relation to occupational health & safety 92% remediation rate of issues received	
	Worker surveys	To create avenues for workers' voices to be heard and communicated	Anonymous Worker Sentiment Surveys completed in 10 factories across China and Vietnam	
Industry engagement & training	Premier team member modern slavery training	To continuously educate and create awareness in our own teams of modern slavery risks and improve the quality of that training year on year	Ethical Sourcing and Modern Slavery training completed by 79% of product team members 100% of respondents said their understanding of the concept of Modern Slavery had increased after the training was delivered 92% of respondents could successfully define the indicators of forced labour after the training was delivered	
	Supplier training and capacity building	To continuously educate and create awareness in supplier terms of modern slavery risk and labour violations and to improve the quality of training year on year	Working hour management training was delivered to 110 suppliers and factories across China and Bangladesh Scores of 80% or more by over two-thirds of participants in working hour management quiz after the training was delivered	
Policies & contractual governance	Maintaining policies & procedures	To adapt and update policies and procedures to reflect human rights issues in the supply chain	Successfully onboarded 52 factories in line with our program policies and procedures Successfully began scoping for an external party to support the drafting and implementation of a Cotton Position Statement	

Note: The self assessment is against our FY24 commitments, but we recognise at every engagement point and stage of our program there is room for further improvement.

Scorecard key



Scoping or planning



Work commenced



Increased focus



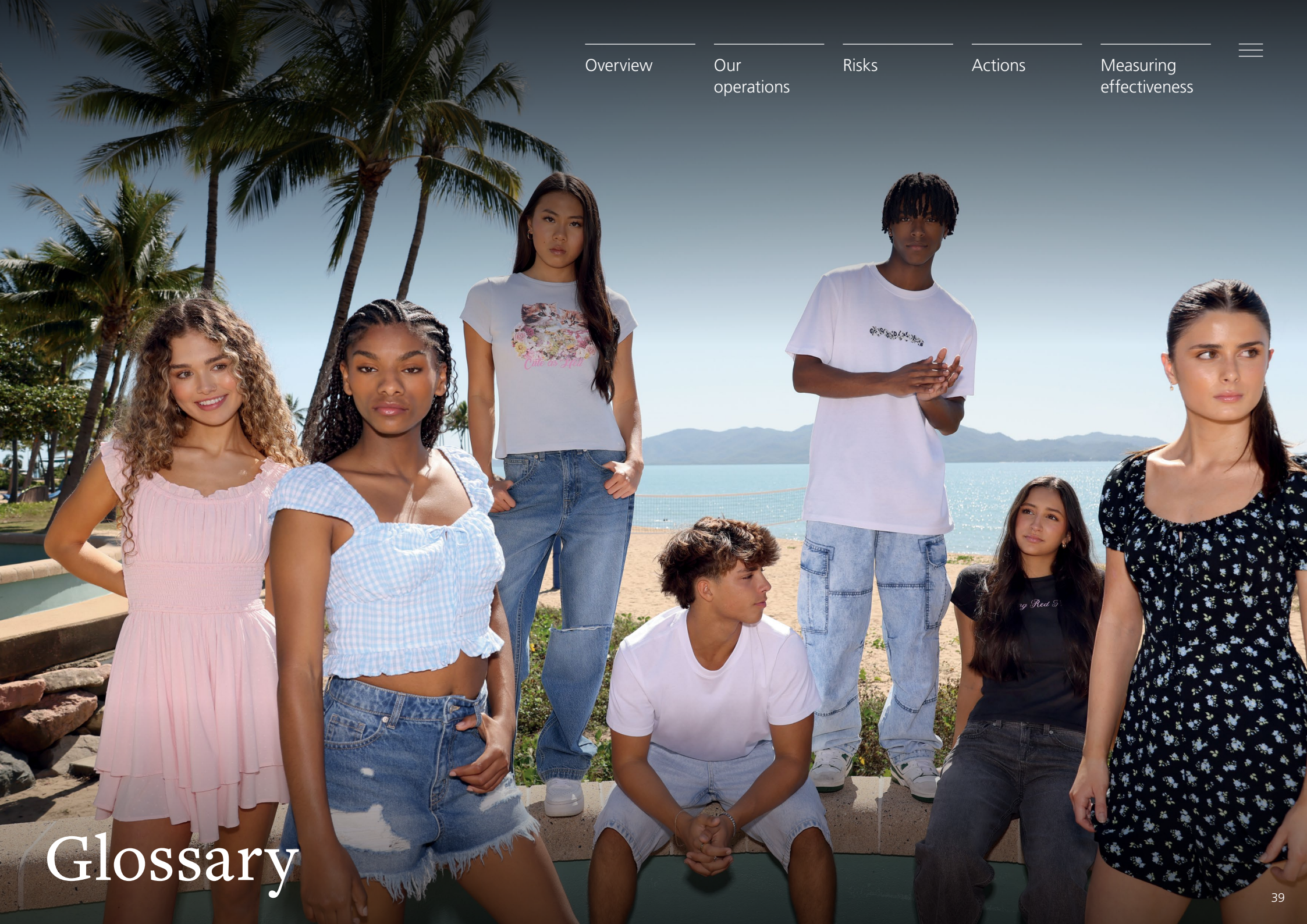
Well advanced



Complete



Sustained



Glossary



Amader Kotha	External helpline for workers in Bangladesh
APSCA	Association of Professional Social Compliance Auditors
BC	Better Cotton
CAP	Corrective Action Plan
Code of Conduct	Just Group's Supplier Ethical Code of Conduct
EIS	Employment Injury Insurance Scheme
EiQ	LRQA ESG due diligence platform
ERSA	Responsible Sourcing Assessment Standard
FY24	the reporting period
GIZ	the German development agency known as Gesellschaft für Internationale Zusammenarbeit, which provides services relating to international development and education
GNFR	Goods and services not for resale
ILO	The International Labour Organization
Importers	Suppliers to the Just Group that import finished goods into Australia, principally on a free-in-store (FIS) basis
International supplier	A manufacturing facility that is in a location (premises) outside of Australia that manufactures product for the Just Group, principally on a free-on-board (FOB) basis
International factory or factory International supplier or supplier	A supplier of product to the Just Group is located outside Australia, principally on a free-on-board (FOB) basis, that may own or act as an agent for one or multiple factories
Just Group	Just Group Limited (a wholly owned subsidiary of Premier)
Just Group brands	Dotti, Jacqui E, Jay Jays, Just Jeans, Peter Alexander, Portmans and Smiggle
LRQA	LRQA Group Limited (formerly ELEVATE)
modern slavery	a comprehensive term used to describe certain offences and other prohibited conduct, including forced labour, child labour, slavery, people trafficking, deceptive labour, recruitment practices, forced marriage and debt bondage
Modern Slavery Act or the Act	Modern Slavery Act 2018 (Cth)
NGO	Non-governmental organisation
Premier	Premier Investments Limited
PVA	Production Verification Audit
raw materials	an unprocessed material or commodity used to produce finished goods. For Premier's products, this includes natural fibres such as cotton (eg. used in apparel), and man-made and synthetic material such as polyethylene terephthalate (PET) (eg. used in water bottles) and polyester (eg. used in apparel and in backpacks and other school supplies)



reporting period 30 July 2023 to 27 July 2024 (being FY24 for Premier)

RMG Ready-made garment

RSC RMG Sustainability Council

UNGP United Nations Guiding Principles on Business and Human Rights

we, our or similar expressions Premier, including Just Group

WSS Worker Sentiment Survey

