

PRINCESS POLLY

**MODERN SLAVERY AND TRANSPARENCY
IN SUPPLY CHAINS STATEMENT**



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1.0 INTRODUCTION

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

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

Our Modern Slavery statement explores the measures we take to identify, mitigate and remedy the risks of modern slavery in our operations and supply chain. We have focused on our efforts in the 2022 calendar year (our mandatory reporting criteria in Australia), and some activities from 2023 where relevant to California. Transparency is key to our accountability and at the heart of everything we do. We are committed to identifying and addressing Modern Slavery risks within our business.

Our close relationships with suppliers helps us assess and improve our practices and protect those that work with us. We have aligned ourselves with suppliers and partnerships with respected organizations that embody our values and embrace our commitment to respect human rights in the countries and communities in which we operate.

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

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

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

Princess Polly Online Pty Ltd - ABN 43 169 210 520

Princess Polly USA, Inc. - EIN 83-2450052

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

This statement was approved by the Board of Princess Polly Online Pty Ltd on 21 June 2023.



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Board Director and Co-CEO Princess Polly Online Pty Ltd



1.1 OUR APPROACH

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

1 **IDENTIFYING AND ASSESSING**

Understanding the risk of modern slavery

2 **ADDRESSING**

Undertaking due diligence to mitigate risks

3 **AWARENESS**

Engaging everyone on the journey

4 **ACCOUNTABILITY**

Determining the effectiveness of our actions

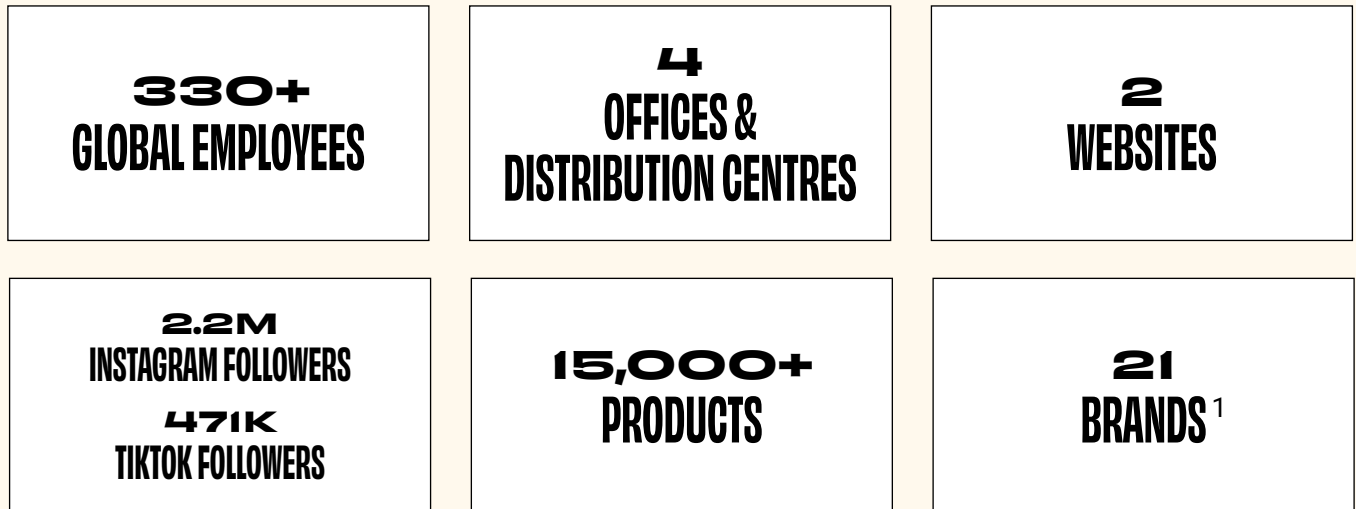
KEY ACHIEVEMENTS IN 2022:

- 100% of Tier 2 factories were traced and maintained
- 100% of Tier 1 factories were traced
- 53% of our Tier 1 factories were visited, in China and India.
- The workers at 18 factories were provided access to a Princess Polly grievance helpline
- 85% of factory managers completed our core training program
- Our Commitment to a Living Wage Policy was developed
- We progressed our Gender Equality roadmap, by rolling out a pilot training with HERProject
- Expanded to a eight-person dedicated Ethical Sourcing team

2.0 OUR BUSINESS AND OPERATIONS

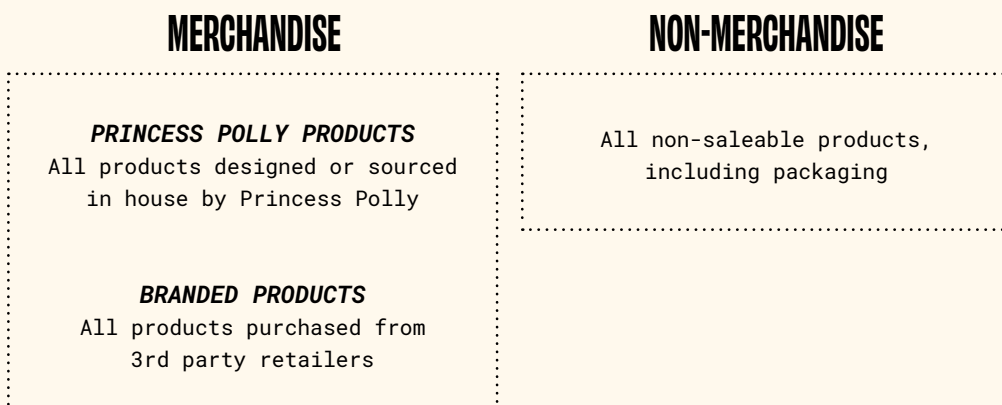
Princess Polly (Princess Polly Online Pty Ltd and Princess Polly inc USA) is a fashion retailer on a mission to make on-trend fashion sustainable and accessible. Born on the Gold Coast, Australia in 2010, the Princess Polly team has grown to over 260 people in Australia and 75 team members in the USA. In 2022, our team worked across four sites; an office and distribution center on the Gold Coast, Australia, plus an office and distribution center in Los Angeles, USA. Princess Polly is wholly owned by a.k.a. Brands, based in San Francisco, USA.

Responsibility for human rights, including modern slavery, ultimately sits with the CEOs and the Chief Merchandise Officer. Within the Merchandise team, Social Responsibility is a eight-person dedicated team, reporting to the Global Supply Chain Director. The Social Responsibility strategy has total commitment from Princess Polly's co-CEOs and the a.k.a. Board.



2.1 SUPPLY CHAIN

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

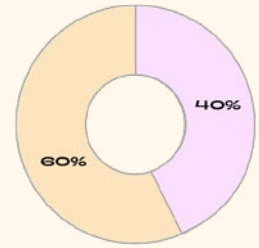
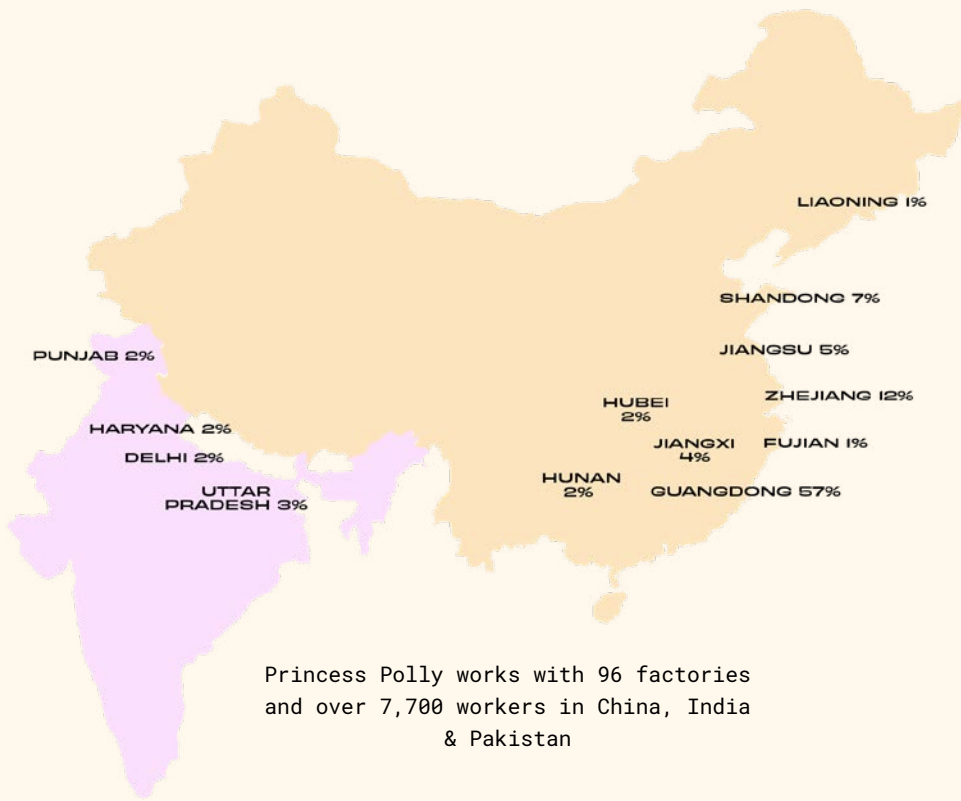


2.1.1 MERCHANDISE

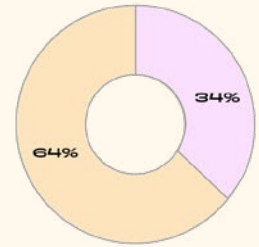
PRINCESS POLLY PRODUCTS

Customers worldwide can purchase Princess Polly products, namely apparel, footwear and accessories, from our websites. Our products are primarily designed on the Gold Coast or in Sydney and entirely manufactured by our partner factories in China, Pakistan and India. Whilst we do not own or operate any of our factories, we pride ourselves on creating long-lasting, strong relationships with our suppliers.

¹ In 2022, Princess Polly placed orders with the following 3rd party brands: Abrand, Berness, Billini, Fame Accessories, Forecast Agency, Guppyfriend, Hollywood Fashion Secrets, JGR & STN, Lemonade Shoes, Lioness, Lipstik, Motel, Nakedvice, New Balance, Peta & Jain, ROC, Rolla's, Slick Hair Company, Ragged Priest, Therapy and Universal Music



40% OF FACTORY WORKERS ARE FEMALE.



36% OF FEMALE WORKERS ARE IN SKILLED OR TECHNICAL ROLES.

Princess Polly works with 96 factories and over 7,700 workers in China, India & Pakistan

At the end of 2022, we sourced from 96 Tier 1 factories, based in China, India and Pakistan. We also traced 100% of our Tier 2 production to 63 factories located in China and India. We do not outsource to other manufacturers where we can't be sure our ethical standards are upheld. We also have a strict 'no order subcontracting' policy for our suppliers, meaning they can't send our orders to different factories that we don't have visibility of.

TIER 1
 Manufacture of finished products
 EXAMPLE OF OUTPUT: A dress or t-shirt

100% TRACED
 100% AUDITED

TIER 2
 All non-functional processes
 EXAMPLE OF OUTPUT: Dyed, printed or embroidered panel

100% TRACED
 8% RISK ASSESSED

TIER 3
 Production of inputs
 EXAMPLE OF OUTPUT: Cotton yarn and fabric

15% OF PRIMARY INPUTS TRACED
 16% OF PRIMARY INPUTS RISK ASSESSED

TIER 4 AND 5
 Production and processing of raw materials
 EXAMPLE OF OUTPUT: Cotton fibers

OUR AMBITION IS TO TRACE TIER 4 & 5 AS FAR AS WE CAN BY 2025

BRANDED PRODUCTS

In 2022, we worked with 21 3rd party brand suppliers. Our direct relationship lies with the 3rd party brands themselves rather than their factories or suppliers.

2.1.2 NON-MERCHANDISE

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

3.0 RISKS OF MODERN SLAVERY

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

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

- Location risks ●
- Sector risks ■
- Business relationship and our level of direct control ▲

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

INHERENT SUPPLY CHAIN RISK ASSESSMENT					
LOCATION		SECTOR		BUSINESS RELATIONSHIP	
SITE SPECIFIC RISK ASSESSMENT					
GENERAL SCORING			MODERN SLAVERY RISK INDICATORS		
GENDER AND EQUALITY	TRANSPARENCY SCORE	WAGES	HARSH TREATMENT		
WORKER SENTIMENT	SEDEX RISK SCORES	VULNERABLE WORKERS	CHILD LABOUR		
AUDIT SCORE	SITE VISIT FINDINGS	FREEDOM OF ASSOCIATION	FORCED/ BONDED LABOUR		
		H&S	WORKING HOURS		

In addition, Princess Polly also adopted the continuum of involvement framework by the UN Guiding Principles on Business and Human Rights (UNGPs). We have considered our human rights risks by applying this framework across our operations and supply chain to understand how we could be causing, contributing to, or being directly linked to modern slavery risks.

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

For example, a company could cause human rights violations by subjecting workers to exploitation through debt bondage such as withholding wages.

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

2 - Including the United States Department of Labor International Labour Organization (ILO), Business for Social Responsibility (BSR), Human Rights Watch (HRW)

For example, a company asks suppliers to reduce the cost of a garment with strict timeframes forcing the suppliers to exploit workers to fulfill the requests.

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

For example, a company sources goods from a supplier that bought raw materials that were extracted using forced labor in order to make the product.

Our assessment of this framework has demonstrated, concerning the identified risk areas, Princess Polly could be directly linked to modern slavery risks rather than having caused or contributed to them. Our complex Ethical Sourcing Program, robust policies and training, equip our business and operations to conduct relationships in a way that does not compromise or have adverse impacts on human rights.

RISK SCORE	SUPPLY CHAIN RELATIONSHIPS	DETAILS OF RISKS	PRINCESS POLLY'S POTENTIAL RELATIONSHIP TO RISK
High	Tier 1 Manufacturing	<p>Our Tier 1 sites remain our most high risk supply chain stage, due to the high risk locations and sectors, as well as our high leverage.</p> <p>The risks and further assessments associated with this stage are detailed in section 3.1.</p>	Directly linked
High	Tiers 2+	<p>As we move further down the supply chain, our visibility and leverage reduces, however the country and sector risks remain high. In 2022, Princess Polly initiated a direct relationship with a fabric mill, considered Tier 3 in our usual Tier definitions. However, where we have a direct relationship we undertake the same site-specific risk assessment as our Tier 1 manufacturing sites.</p> <p>Section 4 below outlines how we improved our risk assessment processes for Tiers 2 and 3 in 2022. Tracing Tier 3 has its difficulties, felt by industry partners and manufacturers alike, as inputs are generally traded with no records of their origins. We have begun to trace the main inputs (fabrics, plastics and metals) of our Lower Impact products, by utilizing the production pathways recorded through material certifications. Transaction Certificates provide verification of the trail, to the site where the main inputs were milled or manufactured. We also undertake qualitative assessment of our key inputs created through raw materials, production and processing, outlined in Input Risks in section 3.1</p>	Directly linked

RISK SCORE	SUPPLY CHAIN RELATIONSHIPS	DETAILS OF RISKS	PRINCESS POLLY'S POTENTIAL RELATIONSHIP TO RISK
	Transport and Logistics	<p>This includes global custom clearance and freight forwarding services. In 2022, we consolidated over 99% of our upstream logistics to be performed by Toll Group who complete their own due diligence and reporting for Modern Slavery. 97% of our downstream transport consists of local couriers in low risk countries.</p> <p>We acknowledge the use of additional service providers in higher risk countries for a portion of our upstream and downstream transport, and therefore, this stage remains at a medium risk level.</p> <p>Risks include human trafficking, forced labor, high working hours, weak collective bargaining and low wages.</p>	Directly linked
	Indent Brands	<p>We understand that the same location and sector risks exist within our brand partners' supply chains. However, as our direct and immediate control lies with our unbranded suppliers only, Princess Polly prioritizes our risk assessment and due diligence to those suppliers.</p>	Directly linked
	Service Providers/ Contractors	<p>Princess Polly uses contracted workers at our US Distribution Centre. Other professional service providers include models, IT and cleaners at our Australia and US sites.</p> <p>Risks include, high working hours and no or ineffective unions, high business fees, temporary work, H&S, failure to earn minimum wage and overtime and no social protection contributions.</p>	Directly linked
Low	Princess Polly Employees	<p>Our staff consist of those directly employed in our offices and distribution centers in Australia and the USA.</p> <p>The modern slavery risks are low as these are skilled and specialized roles where we have direct control. Our staff play a critical role in our work against Modern Slavery, enhanced through awareness training, detailed in section 5.1</p>	Directly linked

3.1 PRINCESS POLLY BRANDED MERCHANDISE ○ □ ▲

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

INDUSTRY AND SECTOR RISK

The 2018 Global Slavery Index identified Apparel and Clothing Accessories at high risk of being produced by Modern Slavery. Short production deadlines, rapid style changes and poor payment terms in the apparel industry can result in excessive overtime, low salaries, working without breaks, and unpaid overtime. Managers and supervisors working under pressure can pass this onto workers in the form of harsh treatment and abuse. Additional revisions or mistakes in orders and failure to monitor the factory's capacity, may lead to unauthorized subcontracting or homeworking, as well as child labor. As most workers in the apparel industry are women, sexual harassment and violence against women and gender discrimination are the most prevalent issues to be reported.

COUNTRY RISKS

In 2022, our own branded products were manufactured in China, India and Pakistan. These countries have identified modern slavery risks and highly vulnerable populations, with 2.8 victims for every thousand people in China, 6.1 for India and 17 for Pakistan.

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

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

The Global Slavery Index (GSI) ranks Pakistan as 6th out of 167 countries in terms of modern slavery. The country faces a significant risk of bonded labor, particularly in industries such as cotton and jewelry. Pakistan's Peshgi system sees employers provide work with a loan in advance, where laborers then pay this back over time through work. Unequal distribution of wealth and complex legal frameworks are key drivers of this forced labor.

SITE SPECIFIC RISKS

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

- Internal transparency surveys and traceability requests
- Verified Third Party Social Audits
- Sedex SAQ responses
- ELEVATE Worker Sentiment Surveys
- Internal Site Visits
- Third party Inline Inspections

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

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

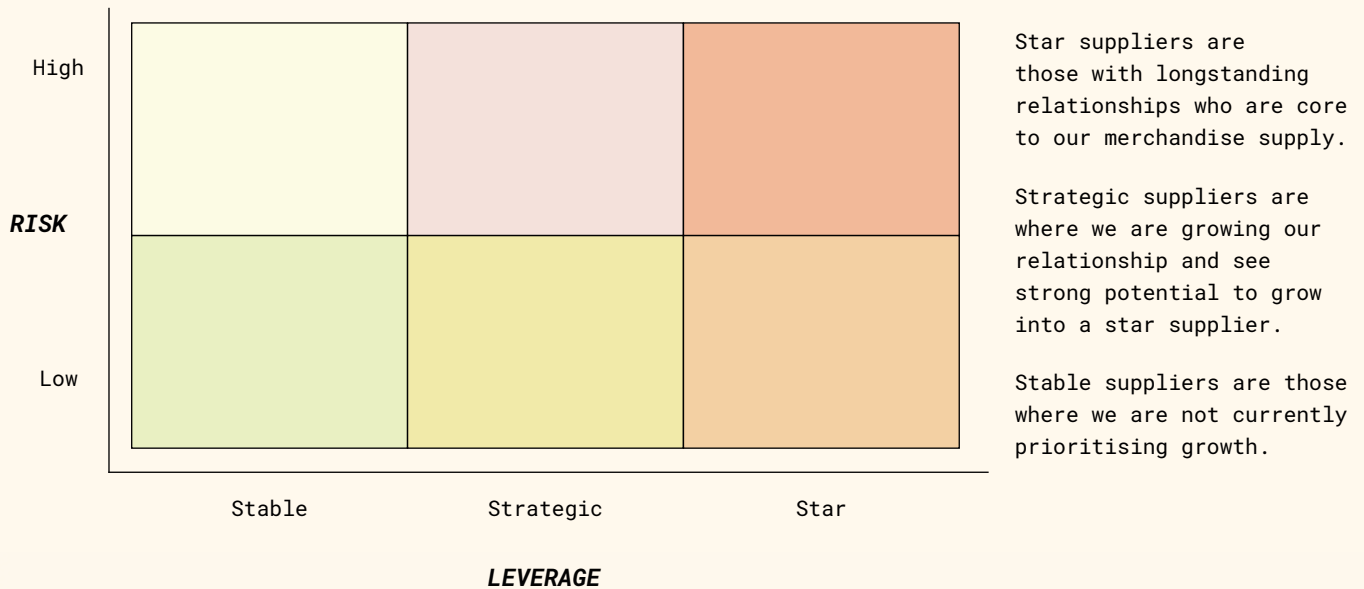
Our most commonly identified high risks were related to emergency health and safety procedures/equipment, documentation and record keeping. Princess Polly remains committed to addressing these through our remediation program.

Child Labour risks are taken very seriously at Princess Polly and we have many checks in place to monitor this risk. If any of these indicators are suspected, they are investigated thoroughly with the highest priority.

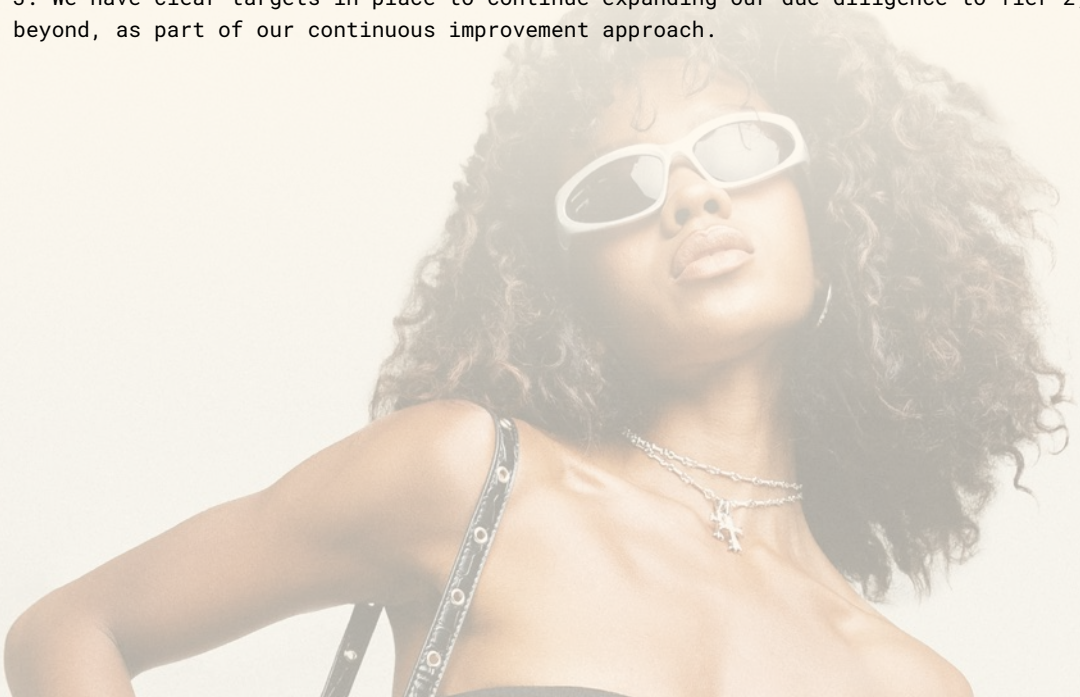
Although no audits found wages below the legal minimum, Princess Polly understands the risk posed by the wage gap. Through our site visits, we complete a wage comparison based on the factory’s most recent minimum wage increase.

We acknowledge that while our risk assessment tools are varied and thorough, they may not uncover all existing risks or violations at our supply chain sites. They reflect only a snapshot in time and full transparency is never guaranteed. As a result, we continue to build out our response and awareness measures (see sections 5 and 6 below).

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



We acknowledge the modern slavery risks associated with less visible tiers of our supply chain. In 2022, Princess Polly expanded our Transparency Surveys and Site Visits to Tiers 2 and 3. We have clear targets in place to continue expanding our due diligence to Tier 2, 3 and beyond, as part of our continuous improvement approach.



INPUT RISKS

While our comprehensive site-specific risk assessment currently considers our Tier 1 sites and Tiers 2 and 3 with direct relationships only, we acknowledge that further along our supply chain, where we have less visibility, the risk of modern slavery increases. All inputs sourced for our manufacturing have their own complex supply chains. Princess Polly aims to keep informed about the risks of our main inputs; in 2022, our six primary materials were polyester, recycled polyester, cotton, viscose, recycled nylon and nylon.

According to the Global Slavery Index, cotton is the highest ranking product at risk of modern slavery, with the US Department listing 16 countries with potential forced or child labor, including China, India and Pakistan. Conversely, the synthetic materials we use and viscose have very low risk of modern slavery. The process of manufacturing synthetic materials requires qualified technicians and is a highly capitalized industry.

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

When it comes to accessories, which make up approximately 10% of our product range, World Vision notes forced and child labor is prevalent in many stages of the jewelry supply chain, including mining, with an estimated 1 million children working in the mining industry globally. In 2022, the most commonly used metals in our accessories were recycled zinc and recycled steel, which according to Sedex's commodity risk tool, have no evidence of forced or child labor violations in China, India or Pakistan, nor does fashion accessories in general. Princess Polly aims to strengthen our risk assessment by conducting more specific analysis on the raw materials and Tier 4 processes used in our products and the associated human rights violations that occur in their supply chains.

VULNERABLE WORKERS

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

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

Migrant workers - The extreme wealth disparities across regions in both China and India drive a large migration of workers to different regions. In China, migrant workers account for 67% of the urban workforce, while India sees an annual migrant flow of nine million and Pakistan's annual migrant population is over 3.2 million. Migrant workers can be exposed to vulnerability and forced labor as they have limited access to legal protection, benefits and services compared to local workers.

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

5 - Global Slavery Index

6- https://www.un.org/sites/un2.un.org/files/2019/12/wmr_2020.pdf

7 - ILO <https://www.ilo.org/islamabad/areasofwork/child-labour/lang--en/index.htm>

Contract and Agency Workers - Workers hired indirectly through recruitment agencies are at greater risk of deceptive recruitment and bribery. These workers are more vulnerable to forced overtime and underpayment of wages. Homeworkers who work outside the formal system are also more vulnerable to exploitation. Princess Polly currently has no home working arrangements as outlined in our Code of Conduct. We maintain open communication and conduct intermittent checks on high risk processes with suppliers, such as crochet. In a case where homeworking is found, we review it against the ETI guidelines and ILO recommendations. We then work with the supplier to either bring the production back into the audited factory, with on ground support from our Social Responsibility representative in China, or exit this production category with the supplier.

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

3.2 BRANDED MERCHANDISE ○ ◻ △

We acknowledge that similar risks exist within our brand partners' supply chains. We worked with 21 third-party brands in 2022, and are continuing to consolidate this. In 2023, Princess Polly will begin exploring a risk assessment that can be applied to our third-party brands to ensure they align with Princess Polly's due diligence. Currently, our direct and immediate control lies with our unbranded suppliers, this is where Princess Polly prioritized our risk assessment and due diligence.

3.3 COVID-19

Princess Polly recognises that the COVID-19 pandemic directly and disproportionately increased the risk of modern slavery in the global fashion supply chain, and heightened the vulnerability of many garment workers. Beyond the health risks to factory workers, factory closures and workforce reductions lead to high overtime to recover from production delays. The inconsistency of orders also meant many suffered from underpayment of wages. Moreover, mass unemployment, high debt and little government safety net creates opportunities for modern slavery.

A key risk associated with the COVID-19 pandemic is a loss of transparency and visibility into the supply chain. ELEVATE EIQ data found that wage and working hour related audit findings increased significantly from 2019.

In 2022, the effects of COVID-19 continued to permeate in China as a response to the country's zero-COVID policy, a mandate that aimed to keep cases of infection at or near zero. As a result, Princess Polly restructured our requirements in order to ease any additional pressures to factories and their workers, while maintaining consistent communication to ensure the health and safety of our workers were protected. Princess Polly continues to take steps to understand how these risks might present in our supply chain, adapting our way of working when needed to protect everyone involved.

4.0 ASSESSING

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

4.1 ONBOARDING

In 2022, we maintained a stringent onboarding process ensuring any new potential suppliers meet our requirements upfront, enabling us to identify human rights risks early on, while maintaining the integrity of our Ethical Sourcing program.

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

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

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

- An updated Transparency Survey with the new factory details.
- A valid Ethical Audit Report.
- Join and link to Princess Polly on Sedex.
- Received an Audit Scorecard and grade for the factory.
- Agreement to complete SAQ within 60 days.

STANDARDS AND POLICIES

Our approach to social responsibility is underpinned by our standards and policies. As a part of our growth, we regularly review and update our standards & policies to ensure they best reflect our values and nuances within our Ethical Sourcing program. In 2022, we re-defined our Ethical Sourcing Strategy into five strategic focuses that inform the activities within our program. These strategic focuses are:

- Modern Slavery
- Gender Equality
- Responsible Purchasing
- Living Wage
- Respect

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

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

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

1.	OUR HUMAN RIGHTS POLICY	Applies to the team, our supply chain, and our customers.
2.	OUR CODE OF CONDUCT	These documents apply to our suppliers – including our factories and others in our supply chain – and outline our standards and expectations for the treatment of workers.
3.	OUR ETHICAL SOURCING GUIDELINES	
4.	OUR CHILD & FORCED LABOUR POLICY	
5.	OUR ROUTING MANUAL	These documents outline our standards and expectations for how our products are made, including the treatment of animals and use of animal products.
6.	OUR ANIMAL WELFARE POLICY	
7.	OUR GENDER EQUALITY POLICY	This document guides our team to create better experiences for women in our supply chain.
8.	OUR RESPONSIBLE PURCHASING POLICY	This document establishes a standard for how we interact with all our suppliers
9.	OUR COMMITMENT TO A LIVING WAGE	This document outlines our commitment to a living wage including our next steps to drive change.

Since 2020, Princess Polly has clearly set and defined our expectations for our Ethical Sourcing program through our Ethical Sourcing Guidelines.

THIS INCLUDES OUR REQUIREMENTS ON:

- Visibility
- Auditing
- Remediation
- Response to COVID-19
- Training
- Subcontracting
- Traceability
- Site visits
- Warning system
- Feedback and engagement

ALL AUDITS MUST INCLUDE THE FOLLOWING:

- Labor Standards
- Health and Safety
- Management Systems
- Entitlement to Work
- Subcontracting & Homeworking
- Environmental Assessment

Our Ethical Sourcing Guidelines also introduce our suppliers to our auditing partner, ELEVATE. ELEVATE not only audits our factories, but offers professional tools and training to all our team, suppliers and factories for assessing and addressing modern slavery risks. ELEVATE is an industry leader in sustainability and supply chain risk identification and has extensive geographical reach to over 110 countries.

4.2 MONITORING

OUR AUDIT PROGRAM

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

Princess Polly developed a reduced onboarding process for specialty factories who complete limited, specialized production that no other factory can provide based on technical capabilities. These factories still require a valid social audit, however a wider scope of auditing firms and methodologies are accepted. In 2022, we also expanded this to include existing suppliers that are in the process of being exited. This is to allow for a gradual and responsible phasing out of production.

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

HELD A VALID AUDIT DURING REPORTING PERIOD IN AUSTRALIA				
TIER 1 FACTORIES	Announced	Semi-Announced	Unannounced	Total
		24%	71%	5%

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

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

The factory, the supplier and Princess Polly receive a copy of the audit report. We explore the root cause and potential risk for every finding in the report, applying one of four gradings based on the severity and immediacy of any threat to factory workers, the local community or the environment; minor, major, critical or highly critical. In 2021, we undertook a review of all Sedex Issue Titles against our Code of Conduct and realigned certain gradings to more accurately represent our internal values.

The table above explains how each non-compliance is viewed collectively to apply a grade to the factory from Gold, Silver, Bronze, or Red. Some examples of non-compliances from our audit reports (during the reporting period in Australia) included overtime of up to 72 hours, a lack of social insurance and a lack of needle guards on sewing machines.

COVID-19 AUDITING PROCEDURE

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

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

WORKER VOICE

In collaboration with ELEVATE, Princess Polly distributes anonymous worker sentiment surveys to our factories in China & India. The survey includes 20 questions that are designed to provide detailed analysis and visibility of the working conditions at a factory. As of 2021, Princess Polly includes and pays for worker sentiment surveys with every audit booked with ELEVATE. This ensures that Princess Polly can proactively identify issues impacting workers beyond the scope of an ethical audit. In 2022, 57% of Tier 1 factories had received a worker sentiment survey capturing the voices of 2,602 workers. In 2022, we extended our worker sentiment surveys to our Tier 2 factories, surveying 17.5% of our Tier 2 factories capturing the voices of 278 workers.

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

OVERALL FACTORY GRADINGS				
	A STRONG PERFORMANCE	B SATISFACTORY PERFORMANCE	C NEEDS IMPROVEMENT	D NEEDS SIGNIFICANT IMPROVEMENT
TIER 1	44%	51%	5%	0%
TIER 2	18%	64%	18%	0%

TRACEABILITY

Mapping our supply chain is the first step to knowing who made our clothes, and assists us in ensuring every person who contributes to creating Princess Polly products is respected, protected and healthy. Our efforts to trace beyond Tiers 1, 2, 3, and 4 facilitate our understanding of potential modern slavery risks along the supply chain. Our focus is on identifying Tier 2 and 3 facilities, as well as verifying the capabilities of each site to ensure no order subcontracting is occurring without our knowledge. While the importance is on our suppliers to truthfully share all production processes with us, we continually assess the factories of all suppliers on an order-by-order basis.

To maintain and accurately map our Tiers for each product we refined our internal programs and software. In 2022, Princess Polly developed a robust Mapping Sheet to track every PO that is raised and what factory it belongs to, generating an automatic response to 'confirm' the factories capabilities for every PO. The system also flags any product that requires investigation to approve a product or factory capability. In unison, we upgraded our product software to list each factory involved in a product that our Merchandise can fill out when creating a product. In addition, our tracing project is comprised of four main steps:

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

To further verify tracing data given by suppliers, we introduced inline inspections. Princess Polly worked with an accredited third-party to customise these inspections, which are typically used for quality control, to include production verification. This way, we can verify that our products are being made in the factory we are told they are being made in by inspecting them while in production.

CASE STUDY: MAPPING THE CAPABILITIES OF OUR TIER 1 FACTORIES

Through routine inline inspections, we discovered one of our Tier 1 factories was sending our final products to an offsite packing room that was not disclosed to or approved by Princess Polly. In response, we immediately took the appropriate measures and paused orders with this supplier until we had visibility of all sites involved with the final production of our products. Over a three-month remediation plan, we worked closely with the supplier and factory to do the following:

5. Met with the supplier to discuss the findings and remediation plan.
6. Gained visibility of all sites involved in our final production through ongoing communication and a site visit from our China-based representative.
7. Verified, approved and onboarded the new facility within the three month timeframe.
8. Resumed orders, while increasing future inline inspections, monitoring capacity and providing further support to the supplier.

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

CERTIFICATION OF MATERIALS

In addition, Princess Polly actively traces the sites that produce our main sustainable inputs, and ensures each material is correctly certified or tested. We only accept and source sustainable materials from certified factories that can provide valid scope & transaction certificates.

SITE VISITS

In 2022, Princess Polly developed a bespoke site visit program into our Ethical Sourcing framework for Tier 1, 2 and 3 sites. The visits include a document review and on-site observation according to SMETA and ELEVATE ERSA standards, a confidential ELEVATE worker sentiment survey, gathering additional wage data, assisting with training modules, confirming factory capabilities, and providing any additional support with existing CAPs. The purpose of these visits is dependent on the site's place within our supply chain and their progress with our framework.

The purpose of these visits is dependent on the site's place within our supply chain and their progress

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

These visits are primarily conducted by our China-based representative, but can be deployed by other internal trained team members when necessary.

In the first 12 months of the program, we conducted 86 visits, 75% Tier 1, 10% Tier 2 and 14% Tier 3. We have also worked with 30% of these sites on further remediation of opportunities found during the visit that weren't found in initial audits.

5.0 ADDRESSING

5.1 ENGAGING

REMEDIATION

After each audit, Princess Polly prepares an Audit Scorecard to support the factory to clearly understand:

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

Factories that have completed SMETA audits with ELEVATE are invited to participate in building a Corrective Action Plan, and provide the right evidence within our timeframes. Our suppliers and factory managers are also engaged in non-compliance training related to issues found in their audit. Our Princess Polly Social Responsibility team and ELEVATE provide guidance through regular emails, WeChat, calls and virtual meetings.

Since February 2022, Princess Polly has had a full-time Social Responsibility representative in China to support our Ethical Sourcing program, conduct site visits, facilitate training programs and offer one-on-one support for our suppliers and factories.

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

Control Audits

Another way we engage in remediation is through control auditing. Princess Polly has developed a framework to assess the reliability and materiality of any historical audit that was not initiated by us through ELEVATE. Factors include:

- The auditing methodology and advanced factory notice
- The auditing firm and use of an Association of Professional Social Compliance Auditors (APSCA) certified auditor
- The depth and regularity of non-compliance findings
- The completions of desktop review
- A Sedex membership and a supplier self assessment questionnaire
- The number of vulnerable workers and the type of grievance mechanism
- The wage payment method, standard worker wages and recorded overtime

For any audit failing to meet our threshold, Princess Polly worked with these suppliers to arrange and fund a new audit with ELEVATE.

SITE VISIT CORRECTIVE ACTIONS

After a site visit is conducted, observations and opportunities for improvement are recorded and an internal corrective action plan is created with the factory. This allows for remediation of additional findings between audit windows and offers more hands-on support for progressing in our program.

WARNING SYSTEM

In order to provide consistent and fair communication with our Suppliers while also upholding our Ethical Sourcing Requirement, we developed a warning system. The purpose of the system is to provide warning that our relationship with a supplier may need to end if they are unable to comply with our requirements. After a minimum of 1 month of consistent requests and no progress, they are provided the first warning and are set a remediation period of at least 2 months to rectify their breach of our program. Princess Polly will continually offer support and guidance throughout the remediation period. If failure to comply after the given timeframe, Princess Polly will notify all relevant parties involved that the relationship has ceased until further notice. For Princess Polly to have an ethical and efficacious supply chain it is

5.1 ENGAGING

GRIEVANCE PROCEDURES

Princess Polly firmly believes that our factories should have access to robust and effective grievance channels that aid in identifying and addressing any potential impact on our workers. All the factories we work with have a grievance procedure; in order of commonality, hotlines, suggestion boxes, anonymous email channels and direct communication. In 2022, 94% anonymously surveyed were willing to speak up for a suggestion or a complaint, and the same percentage were confident it would be treated seriously. Our collective results also demonstrated that our workers prefer going directly to management to raise a grievance, followed by using suggestion boxes.

In 2022, we piloted a Speak Up Helpline in partnership with ELEVATE to offer an anonymous worker grievance channel. 18 factories were chosen for the pilot program as they were identified to have ineffective grievance procedures in place. The helpline can be accessed via a QR code found on posters throughout the factory as well as business cards handed out to workers during on-site visits. Our Social Responsibility representative in China handles the cases and provides full support to workers and information on workers' rights in the workplace. Any reports received are managed within the appropriate

RESPECT AND EMPOWERMENT PROGRAM PILOT

Respect and empowerment are critical elements of our Human Rights Policy. In 2021 we piloted an in-factory train-the-trainer program in three factories, to build knowledge to effectively and collaboratively encourage a respectful workplace with an emphasis on anti-discrimination, women empowerment, refining policies and managing effective grievance channels. This pilot program concluded in 2022, and through the collection of feedback we are continuing to finetune this offering to improve its value.

6.0 AWARENESS

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

6.1 TRAINING

THE PRINCESS POLLY TEAM

Every year, we involve and educate our global Merchandise Team, including Buying, Designing, Production, Logistics and Planning, on supply chain issues and challenges. In 2022, we expanded our compulsory training program to our marketing and distribution center team leaders. As we evolve as a business we aim to empower and equip all team members to proactively and consistently apply responsible practices. Our Merchandise Team, in particular, plays a crucial role in spotting potential human rights abuses in our supply chain.

In 2022, we hosted internally-led training sessions and launched a digital training program through ELEVATE'S EiQ Learn platform. ELEVATE'S EiQ Learn offers supply chain sustainability training and is an effective platform to support our internal teams to understand what best practice in the industry should look like. Princess Polly has carefully chosen five modules, and depending on each department's prevalence in our supply chain, our team members are assigned anywhere between 2-5 modules that aid in being able to identify, mitigate, or remediate risks in our supply chain and operations.

Collectively, 115 hours of training was completed. Each module results in a scored assessment of knowledge gained and each module must achieve 100% to be completed successfully.

Princess Polly's Social Responsibility team also regularly attends webinars/seminars and engages in training modules to further develop their knowledge and apply their learnings to the business.

OUR SUPPLY CHAIN

Similarly, we understand the importance of providing training to our suppliers and factories. Our training program has been continuously developed throughout 2022, with core and non-compliance training modules assigned to both suppliers and factory managers. At the end of 2022, we had assigned core learning modules on Forced Labor Prevention and Corrective Action Plans to 73 unique suppliers and 86 unique factories. We implemented non-compliance training relevant to findings from social audits to increase capacity and mitigate risk. At the end of 2022, we had assigned 58 unique factories non-compliance training with 60% of total modules completed. In 2023, we will continue to evaluate and develop this program, with a strong emphasis on using non-compliance training to close relevant findings from their audits.

HERPROJECT

Princess Polly teamed up with HERproject, which is an initiative run by Business for Social Responsibility (BSR) that develops tailor-made workplace education programs that empower women in supply chains. In 2022, we launched a locally tailored HERHealth program with 25 factories to educate women with information and access to services they need to maintain their health. In addition to education, the 10-month program aims to improve self-esteem, confidence and strengthen workplace policies to support worker well-being further.

Due to the program running on a monthly basis, we recognise this can have an effect on the production. In response, Princess Polly has offered and will continue to provide compensation to the worker representatives for the time to attend the training sessions and will also cover the peer-to-peer training sessions in the factories for time taken from production.

As COVID restrictions continued to pervade in China, our 10-month program extended due to missing a few months in order to comply with local regulations and to ensure the safety of our worker representatives. To date, our feedback on the program has had a positive influence within our factories. Princess Polly will continue to monitor the success and feedback of the HERHealth program.

“...Training is meaningful and useful. We are very grateful for training opportunity provided by our customer”

Worker representative from our Guangdong factory

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

In early 2021, our sustainability web-hub was published, announcing our long term commitments, timebound targets and details of our work to date. We are devoted to making continual progress towards these commitments and ensuring transparency. Our modern slavery statement is another way we invite our customers to engage with us on our ethical sourcing journey and stay accountable.

In 2022, we completed our first UN Global Compact Communication on Progress, outlining our progress within our Program towards the Ten Principles and the Sustainable Development Goals.

7.0 ACCOUNTABILITY

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

MONITORING KEY PERFORMANCE INDICATORS

We have developed KPIs during 2022 to thoroughly and regularly measure our performance across all areas of our modern slavery approach while sharing these results across the business.

PROCESS AND AREA	ACTIVITY	MEASUREMENT
Risks of Modern Slavery: Risk assessment	<ul style="list-style-type: none"> • Industry and sector risk factors • Country and location risk factors • Continuum of Involvement framework • Site Specific risk factors • Input and material risk factors • Vulnerable workforce 	<ul style="list-style-type: none"> • % of supply chain tiers mapped and assessed for risk • % of procurement from high, medium and low risk suppliers and regions • Number of risk factors analyzed, including country, supply chain tier, people and inputs
Addressing: Onboarding	<ul style="list-style-type: none"> • Policy development and review • Sedex memberships • Transparency surveys • Supplier Assessment Questionnaires 	<ul style="list-style-type: none"> • % of suppliers signing Code of Conduct • Number of visible factories at each Tier • % of suppliers and factories with Sedex memberships • % of suppliers confirming and signing factory details on the Transparency Survey • % of Supplier Assessment Questionnaires completed and date of completion

Assessing: Monitoring	<ul style="list-style-type: none"> • Third-party audits • Quality assessment of audits • Worker Surveys • Inline Inspections • Warning System • Site Visits 	<ul style="list-style-type: none"> • % of factories with a valid audit and audit gradings • Number of low quality audits repeated and outcome • % of factories graded A-D through Worker Surveys • Number of purchase orders with inline inspections conducted for each supplier • Number of warnings provided before reparations or exiting • Number of site visits conducted at each tier
Addressing: Engaging & Responding	<ul style="list-style-type: none"> • Corrective Action Plans • Supplier and factory visits • Grievance mechanism effectiveness surveys • Consistent communication and review of factory data 	<ul style="list-style-type: none"> • % of audit non-compliances remediated within the allocated time frame • Number of supplier and factory visits • Effectiveness of Grievance mechanism • Number of factories with democratically elected worker representatives
Addressing: Engaging & Responding	<ul style="list-style-type: none"> • Corrective Action Plans • Supplier and factory visits • Grievance mechanism effectiveness surveys • Consistent communication and review of factory data 	<ul style="list-style-type: none"> • % of audit non-compliances remediated within the allocated time frame • Number of supplier and factory visits • Effectiveness of Grievance mechanism • Number of factories with democratically elected worker representatives
Awareness: Governance and Communication	<ul style="list-style-type: none"> • Fortnightly Ethical Sourcing report and monthly Ethical Sourcing merch team review • Quarterly Executive summary and annual board update • Annual Sustainability Recap Report 	<ul style="list-style-type: none"> • Number of team members with KPIs related to Ethical Sourcing • Number of sustainability targets related to Ethical Sourcing published and met

SUPPLIER ENGAGEMENT

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

We currently assess our effectiveness through:

- **Our supplier responsiveness:** How they respond to our ethical sourcing requirements and any questions or resistance received. We create pathways and timeframes to best suit the individual supplier and their circumstance.
- **Our monitoring:** We regularly engage in open discussions on the findings and root causes of potential risks with our suppliers to communicate effectively back to their Tier 1 factories. We offer support to develop clear corrective action plans and update them on their progress.
- **Supplier Feedback:** Princess Polly has a live anonymous feedback survey that remains open all year round to suppliers and factory managers in English and Mandarin. In all our communication, we always ask suppliers to inform us and provide feedback on our procedures to improve our approach and enhance their experience.
- **Our training:** In 2022, we enabled suppliers and factory managers to share feedback on the training opportunities we provide. As a result, the general consensus found our training opportunities to be highly effective and created a greater understanding of relevant topics. We also listened to feedback where we could improve and adopt alternative approaches to better suit our suppliers and factory managers
- **Our visits:** Some of our long-lasting suppliers live in Australia, and our Australian team members often visit when necessary to discuss our Ethical Sourcing program. Similarly, our China-based team member visits our factories and suppliers in China weekly to support our requests. He will also assist in calling our China-based suppliers to offer guidance with our Ethical Sourcing program. Our visits and communications form a personable relationship where we can listen to feedback and collaborate on solutions that uphold our standards while supporting our suppliers and their factories to their needs.

REVIEW OF OUR MODERN SLAVERY PROCESSES

We are proud of our achievements to date, and are dedicated to empowering the employees of the factories we work with and protecting vulnerable people within our supply chain. We also recognise that there is always room to enhance existing practices and expand our processes further.

We are committed to performing quarterly reviews of all policies, programs and governance, including external consultation with industry groups and our supply chain.

PROGRESS ON ACTIVITIES PLANNED FOR 2022	ACTIVITIES PLANNED FOR 2023
ASSESSING	
<ul style="list-style-type: none"> • 94% of factories completing production for Princess Polly were Sedex members and 88% of factory managers had completed a Self Assessment Questionnaire • 100% of the capabilities of our Tier 1 supply chain were mapped • 100% of our Tier 2 supply chain was traced • A new comprehensive risk assessment process and indicator list was rolled out • Expanded our comprehensive site-specific risk assessment process to include high risk non-merchandise branded goods, and Tier 2 and Tier 3 sites. • Employed a Social Responsibility representative in China who has visited 86 tier 1, 2 and 3 sites to date to conduct risk assessments and provide in-person support for our Ethical Sourcing requests 	<ul style="list-style-type: none"> • Expand risk assessment to comprehensively review low and medium risk value chain stages, including distribution and contractors • Finalise membership of all Tier 1 factories to Sedex and support factories to complete their Self Assessment Questionnaires • Trace 100% of our Tier 2 supply chain • Extend our mapping of Tier 3 inputs, and tracing of Tier 3 main input production sites • Verify our capability assumptions • Rollout improved risk assessment and supplier gradings
ADDRESSING	
<ul style="list-style-type: none"> • Published Our Commitment to a Living Wage • Launched ELEVATE's EiQ training platform to suppliers, enrolling factories in specific training to assist in addressing non-compliant practices and incorporated this into our Scorecards. • Improved our issue closure rate by 24% from last year, with 60% of non-compliances closed. • 57% of Tier 1 sites have completed Worker Sentiment Surveys, including questions to assess the effectiveness of existing grievance mechanisms • Our Ethical Sourcing Guidelines were updated and communicated to all Suppliers. • Launched our Speak Up Helpline in 18 factories. • Provided 1:1 training with suppliers to assist in addressing the root cause of issues raised during auditing. 	<ul style="list-style-type: none"> • Create a roadmap to address barriers to worker social insurance in our China-based factories • Ideally, we will customize our Worker Sentiment Survey to focus on our most salient issues and strategic focuses in 2023, although this might not occur until 2024. • Continue to evolve and provide suppliers individual guidance to close issues found in audits. • Improve the effectiveness and uptake of our Speak Up Helpline • Continue 1:1 support and training with suppliers to assist in addressing the root cause of issues. • Gain visibility of our T3 sites responsible for Lower Impact product inputs

AWARENESS

- Advanced our Vendor Portal to support suppliers through onboarding and compliance
- Expanded our compulsory modern slavery training to other relevant departments in our operations.
- Published our 2022 Sustainability Recap for customers, including an overview of our Ethical Sourcing projects
- Our Australian team members visited our suppliers located in Sydney.
- Our full-time China-based representative facilitated factory visits all throughout 2022 educating and assisting our factories on our Ethical Sourcing program
- Launched our first training for female workers, facilitated through HERProject.
- Rollout a Social Responsibility onboarding pack to all new team members of the business.
- Roll out a preferred factory system where suppliers are awarded for positive behavior
- Publish a 2023 Sustainability Recap for customers, including an overview of our Ethical Sourcing projects and targets, specifying new targets for 2024.
- Continue to keep suppliers and factory managers updated on our team, our ethical sourcing requirements, best practice examples and industry news through a bi-annual newsletter
- Expand our Social Responsibility team to include an Engagement Resource in China, to improve supplier and factory manager engagement in our programs and gather input on existing and new practices

ACCOUNTABILITY

- Actively participated in industry and peer working groups on modern slavery
- Participated in Baptist World Aid's Ethical Fashion Report, and ranked in the top 40% of brands
- Actively participate in industry and peer working groups on modern slavery, including the Sedex SAQ working group
- If possible, collaborate with other companies owned by a.k.a. Brands

EXTERNAL BENCHMARKING

We are dedicated to communicating transparently with our customers and industry about our progress toward our social responsibility targets and commitments. Princess Polly actively participates in the Baptist World Aid Ethical Fashion Report and provides complete transparency of our Ethical Sourcing program. Baptist World Aid uses this disclosure to benchmark Princess Polly against the industry, and guide us on areas we can continue to improve in. In 2022 Princess Polly ranked in the top 40% of brands assessed. We believe engaging with external parties provides greater transparency to our customers.

The feedback from benchmarks like these provides us with an overview of our strengths and opportunities, while holding us accountable for our business and operations to ensure we are doing our best to put people, the planet and the community first.



8.0 INDUSTRY COLLABORATION AND CONSULTATION

We acknowledge the importance of a collective approach and believe in aligning with partners to understand and address human rights risks, including those related to modern slavery. Our network includes the United Nations Global Compact, Sedex, the Mekong Club and ELEVATE.

Wez Bryant has approved this statement on behalf of the reporting entity, Princess Polly Online Pty Ltd and Princess Polly USA, Inc. Princess Polly has prepared the required statement to be compliant with the Australia Modern Slavery Act (Cth) and California Transparency in Supply Chains Act. The statement was prepared in consultation with suppliers, industry organizations, third party consultants and NGOs.

