

# Camilla

AUSTRALIA PTY LIMITED

## MODERN SLAVERY STATEMENT FY23

REPORTING PERIOD:  
FOR THE YEAR ENDING 30 JUNE 2023





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# INTRODUCTION - THE REPORTING ENTITY

This is the modern slavery statement lodged by Camilla Australia Pty Limited (ABN 67 135 300 382 / CAN 135 300 382), in accordance with the requirements of the Modern Slavery Act 2018 (Cth).

Camilla Australia Pty Limited (CAMILLA) is an Australian based, global luxury fashion brand. We remain committed to addressing modern slavery throughout our operations and supply chains.

## APPROVAL AND REVIEW OF THIS MODERN SLAVERY STATEMENT

This Modern Slavery Statement was approved by the Board of Camilla Australia Pty Limited in their capacity as the principal governing body of Camilla Australia Pty Limited on 5 December, 2023.

Pursuant to the requirements of the Modern Slavery Act 2018 (Cth), the contents of this Statement have been reviewed and confirmed as accurate by a duly authorised person.

This statement is signed by David Nolan, Director and Philip Corne, Director, on 5 December, 2023.



David Nolan  
Director  
5 December, 2023



Philip Corne  
Director  
5 December, 2023

## A MESSAGE FROM OUR CEO

I am pleased with our continued vigilance against the abhorrent practice of Modern Slavery shown during the reporting period. This statement clearly formalizes the progress made and illustrates our team's commitment to further ongoing improvement. Visibility and transparency continue to improve, and the audit structure of our tier 1 supply chain is now very comprehensive.

Notably, as travel bans lifted, the CAMILLA ESG, design, and production teams were able to personally travel and develop closer relationships and first-hand knowledge of the partner teams at our primary manufacturing and printing facilities. Their deeper understanding, as well as the more formal interviews which were conducted, will assist as we continue our investigation into our key partners living wage position.

Internally, training programmes have now been completed for all existing team members, and new team members are being onboarded in relation to our stance against Modern Slavery.

Our priorities for the forthcoming period include continued mapping of the Tier 2 supply base with a real focus on traceability, and a detailed follow up on any corrective action plans. We remain determined to exclude all elements of Modern Slavery from the CAMILLA supply chain.



Jane McNally  
CEO, Camilla Australia Pty Ltd





## OUR VALUES



### ADVENTUROUS SPIRIT

Embracing the freedom to innovate, being playful, creating beauty from the unexpected and challenging the status quo.



### WITH LOVE

Inspiring people with our passion, leadership, positivity, care and integrity.



### ONE TRIBE

We are united, honest & loyal. We respect and empower others while embracing our diversity.



### WARRIOR ANGELS

We are courageous, resilient, accountable, and disciplined in our determination to colour the world.

## HIGHLIGHT FOR FY23

The good news is, we improved our visibility across our supply chain during this reporting period. Whilst the work around our continued long-term practice of onsite supplier auditing has continued to be comprehensive, we also elevated our worker engagement with our longstanding supplier, our key partner in India (referred to throughout this statement as the ‘key partner’).

It was clear to us that our focus needed to continue with this high risk/high spend supplier, and it was important to gain a deeper understanding of the workforce in achieving the most valuable impact. This direct and tailored engagement with the workers developed a strong connection and appreciation of the people; the workforce and the artisans who produce the product. We achieved greater awareness with a deeper transparency, beyond the social audit parameters. This work was a new endeavour, one we look forward to finding a place within our regular supplier engagement in the future.

# OUR STRUCTURE, OPERATIONS & SUPPLY CHAIN

CAMILLA sells products, on both a retail and wholesale basis, to customers worldwide, using original prints. The core category of our business is women's clothing, with a range of categories for all genders and ages, with some non-clothing categories.

Our main operating entity and holding company is Camilla Australia Pty Ltd. This entity owns one international subsidiary, Camilla Corporation, which operates our retail stores in the United States and is registered in the state of Delaware. In accordance with the Act's requirements, appropriate consultation occurred with this US subsidiary in the preparation of this statement.

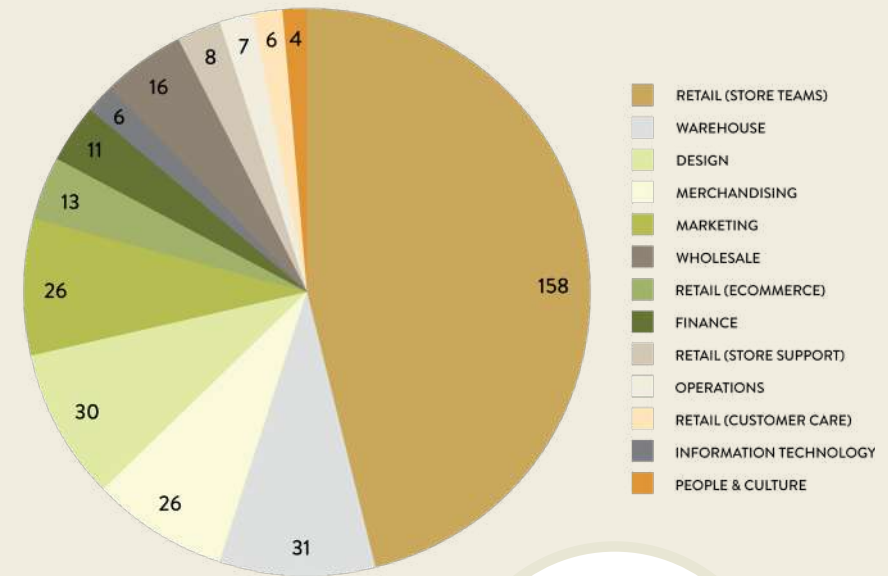
CAMILLA's head office is in Sydney, Australia. In the US, we have a Sales Showroom in Manhattan, New York City.

CAMILLA engages contractors, primarily for short-term roles across our business operations. In FY23 Camilla used a total of 45 contractors: Administration (4), Finance (2), Marketing (11), IT (1), Design (9), Textiles (3), Ecommerce (2), Garment tech (3) and Retail (7).

All contractors receive a Contractor Policy Handbook that details the CAMILLA Code of Conduct, the nature of their engagement, the duration of their contract, the fees and services mutually agreed by CAMILLA and the contractor and other legalities around confidentiality, intellectual property, and privacy.

We also used casual contractors in our Warehouse (3). These contractors enter into an agreement directly through a recruitment agency with clear commitments to ensure employees are paid per the Modern Award, receive all entitlements, rights and working conditions per Fair Work Australia. These contractors are also assigned the CAMILLA Contractor Policy Handbook.

FY23 - AU & USA TOTAL EMPLOYEES (342)



Our brand is stocked in **55** countries, **400** wholesale doors & **264** stockists

We employ **342** people across AUS & USA (full-time, part-time and casual)

We operated **23** Camilla Boutiques (21 in AUS & 2 in USA), **5** websites & **49** online shipping destinations



OUR BRANDS

Camilla

HOTEL FRANKS  
BY Camilla

milla  
BY Camilla

VILLA  
Camilla  
XXC



Womenswear & Swimwear



Menswear



Childrenswear, Babywear & Swimwear



Homewares, Hard & Soft

## OUR PRODUCT LINES



Womenswear



Menswear



Kids & Babywear



Swimwear



Gifting



Footwear



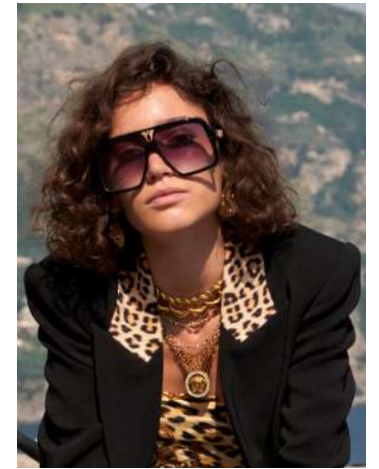
Bags & Soft Accessories



Tableware & Napery



Bed & Bath



Sunglasses

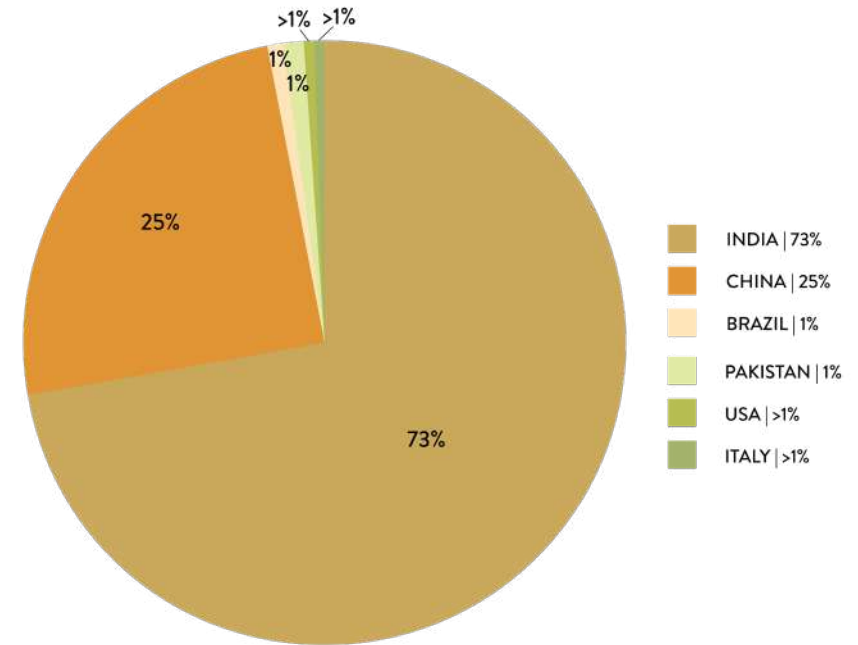


## SUPPLY CHAIN




During the reporting period, CAMILLA engaged a total of **24** tier 1 suppliers who manufactured our products.

- ✦ **73%** of our products were manufactured in India
- ✦ **25%** in China
- ✦ **1%** in Brazil and in Pakistan
- ✦ USA and Italy, all with **less than 1%** at cost value

FY23 - COUNTRY OF ORIGIN BY COST VALUE



Our primary supply chain comprises, in general terms, the following tiered characteristics:

TIER	FY22 PROGRESS	FY23 PROGRESS
 <p><b>Tier 1:</b> Finished goods manufacturers, print and artisan producers. Primary manufacturers: finished product / final assembly factories including cut, sew, and assembly. Includes input subcontractors: printing, layering, embellishers, embroiders.</p>	100% mapped	100% mapped
 <p><b>Tier 2:</b> Fabric mills, tanneries, trim suppliers. Input processors and suppliers: including fabric mill, leather tannery, trim producer, embellishment manufacturer, laundry, dye house.</p>	Visibility into <b>12</b> fabric and tannery facilities, <b>3</b> major trim producers, and <b>5</b> major finishing suppliers (including packaging).	Visibility into <b>23</b> fabric, yarn and tannery facilities, <b>3</b> major trim producers, <b>6</b> major finishing suppliers (including packaging) and <b>5</b> of our major digital print mills.
 <p><b>Tier 3:</b> Raw material processors and suppliers. This include cotton, silk, wool farm, spinning and ginning mills</p>		Progress to be made

## TIER 1

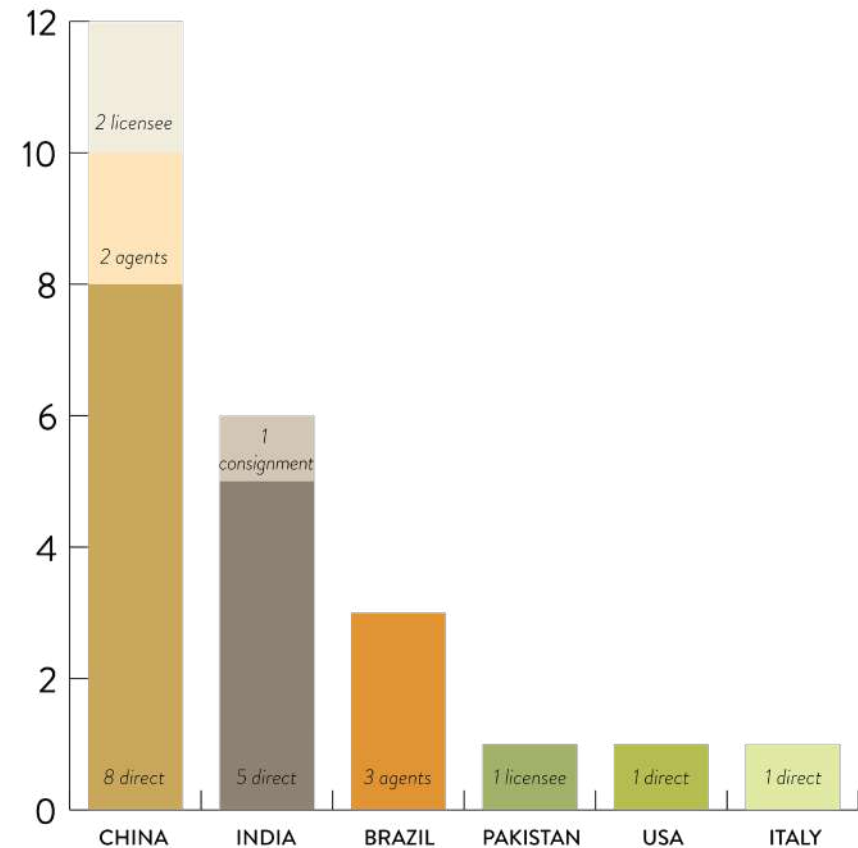
During the reporting period, the **24** individual tier 1 manufacturing facilities included **15** direct factory suppliers, **5** agent partnerships, **3** license agreements and **1** sale or return agreement.<sup>1</sup>

**65%** of these suppliers are direct relationships and make up nearly **97%** of the intake at cost. All communication and transactions are conducted directly with the factory teams. Direct engagement with the supplier through transparent communication develops trust, supporting both parties' operations. The partnership includes site visits and on-site third-party auditing with direct discussion of corrective action plans. These connections are very important as the open dialogue encourages any suspected risks of modern slavery to be less hidden in the complex supply chains.

Our partnership with agents demands the same relationship conditions. When generally agents could be at arm's length, in our case we have the same on-boarding and level of operational visibility.

In FY23 we exited three tier 1 suppliers. For one of these suppliers, based in Brazil, the lack of third-party social audit compliance was the primary reason for exiting the relationship. This was after many attempts to encourage a globally available compliance program, to no avail. The other supplier we ceased to work with in FY23, was an Indian accessory supplier, where volume of business was small and mutual opportunity and success were limited. For the Australian fragrance agent we exited we had not identified on-going opportunities.

FY23 - LOCATION OF FACILITIES BY COUNTRY



<sup>1</sup>Direct factory supplier: The relationship is directly with the manufacturing source. All communication and transactions are conducted directly with the factory teams.

Agent Partnership: The agent works as a mediator between CAMILLA and the manufacturers. They provide a service as a 'middle-man' to the supply chain.

License agreement: The Licensee enters into the agreement with CAMILLA for design assistance, production, packaging, dispatch and marketing assistance as specified, approved and agreed. The licensed product is sold via a wholesale agreement with department stores in addition to being sold in our channels.

Sale or Return Agreement: The agreement is with the brand to design and make product and CAMILLA agrees to stock in our stores on a sale or return basis.





## TIER 1 CONTINUED

CAMILLA continues the long-established relationship and commitment with a supplier based in Gurugram, India. This key partner owns three of our main tier 1 manufacturing facilities and one printing factory. During the reporting period, remaining consistent with the previous year, **71%** of CAMILLA's total garment and accessory production by value, was produced by these core entities.

Our key partner manages our main warehouse logistics operation in India, employing nine staff. This warehouse does an annual Sedex social audit, to date no major or critical non-compliances have been found. Our production and logistics teams engage directly with the warehouse staff through daily communication.

Many of the other manufacturing partners also have longstanding relationships. After our key partner, our top five suppliers average a six year relationship.

CAMILLA accessory ranges include bags, shoes, belts, scarves and jewelry; in FY23 we on-boarded three new accessory suppliers. In Italy, a new relationship with a factory producing luxury scarves. In China, two new manufacturers; one, an accessory factory producing small accessories and the other a licensee agreement with an eyewear supplier. They now form part of our primary supply chain manufacturing in the US, Brazil, India and Pakistan. It is Pakistan that CAMILLA has a relatively limited collection of bed linen, which is sourced under a license agreement and manufactured with cotton sourced locally. This represents a very small (< 1%) part of our overall business at cost. We have a limited production of towels from China. They source the cotton from Switzerland from one of the largest cotton dealers in the world.

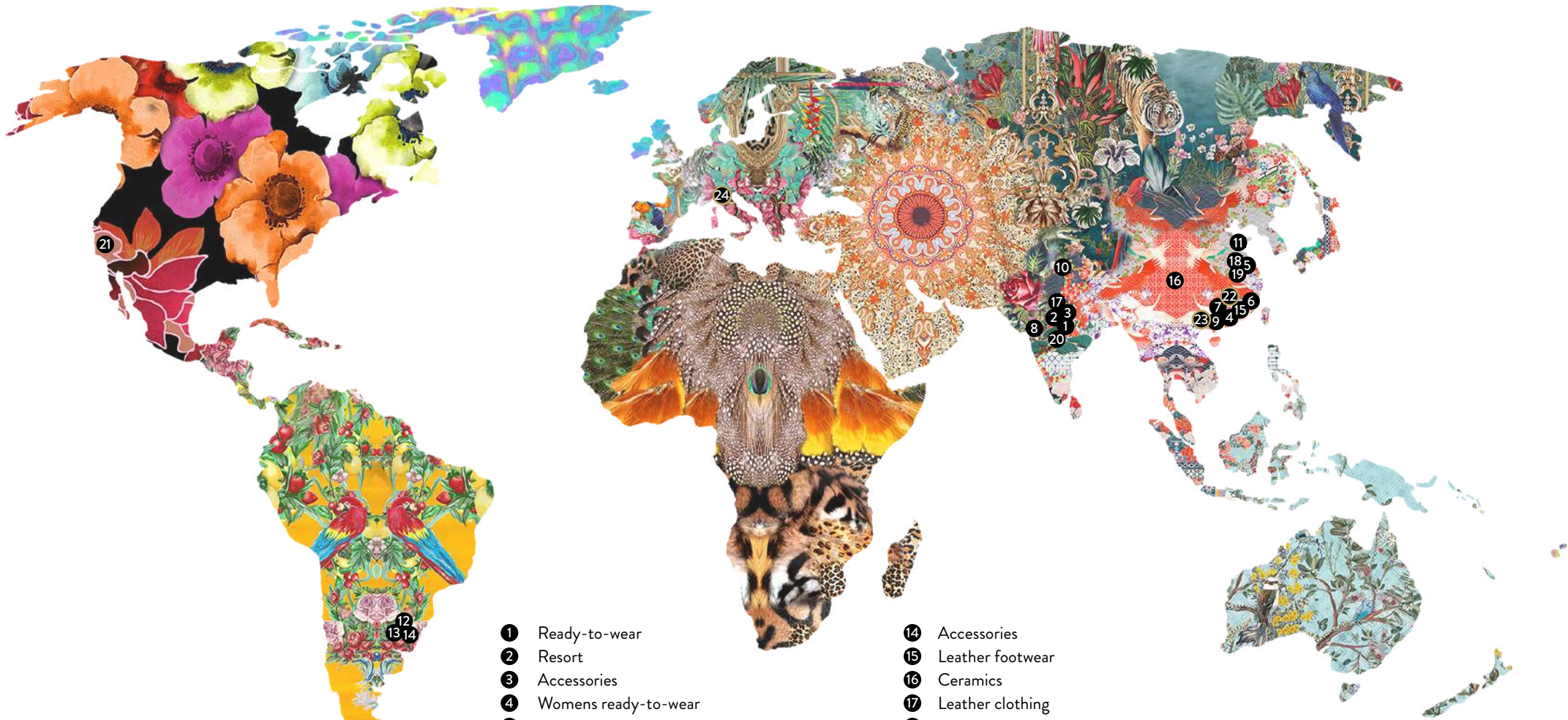
## TIER 1 CERTIFICATION SUMMARY

Of the Tier 1 facilities, **92%** (22 out of 24 factories) provided current global social audits, which address working conditions including health and safety and other key modern slavery risk indicators. The social audits are actioned by certified third party auditors, Sedex and BSCI Amfori, WRAP, Bureau Veritas and in Brazil, ABVTEX.

SUPPLIER	COUNTRY OF ORIGIN	CERTIFICATIONS & ACCREDITATIONS
Key partner	India	SEDEX (4 Pillar)
Womens ready-to-wear supplier	China	SEDEX (2 Pillar)
Womens swim supplier	China	BSCI amfori, SEDEX (4 Pillar)
Swim, active, body supplier	China	SEDEX (4 Pillar), WRAP
Knitwear, clothing, accessories supplier	India	SEDEX (4 Pillar)
Kidswear, womens resort supplier	China	SEDEX (4 Pillar)
Leather clothing supplier	India	SEDEX (4 Pillar)
Accessories supplier	China	SEDEX (2 Pillar)
Bedding, towels supplier	Pakistan & China	BSCI amfori, SEDEX (4 Pillar)
Accessories supplier	China	SEDEX (4 Pillar)
Accessories supplier	China	BSCI amfori, SEDEX (4 Pillar)
Accessories supplier	Brazil	ABVTEX, SEDEX (4 Pillar)
Ceramics supplier	China	SEDEX (4 Pillar)
Magnets supplier	USA	N/A
Sunglasses supplier	China	SEDEX (4 Pillar)
Accessories supplier	China	SEDEX (2 Pillar)
Accessories supplier	Italy	BUREAU VERITAS
Jewellery supplier	India	N/A



## PRIMARY SUPPLIERS MAP



- |   |                                  |   |                                  |
|---|----------------------------------|---|----------------------------------|
| ① | Ready-to-wear                    | ⑭ | Accessories                      |
| ② | Resort                           | ⑮ | Leather footwear                 |
| ③ | Accessories                      | ⑯ | Ceramics                         |
| ④ | Womens ready-to-wear             | ⑰ | Leather clothing                 |
| ⑤ | Swim, Active, Body               | ⑱ | Gifting                          |
| ⑥ | Kidswear, womens resort          | ⑲ | Gifting                          |
| ⑦ | Womens swim                      | ⑳ | Jewellery                        |
| ⑧ | Knitwear, clothing & accessories | ㉑ | Magnets                          |
| ⑨ | Accessories                      | ㉒ | Eyewear ( <i>new</i> )           |
| ⑩ | Bedding                          | ㉓ | Small accessories ( <i>new</i> ) |
| ⑪ | Towels                           | ㉔ | Luxury scarves ( <i>new</i> )    |
| ⑫ | Leather accessories              |   |                                  |
| ⑬ | Leather accessories              |   |                                  |

## TIER 2

The main fabric input for CAMILLA's product lines is silk. In FY23 **65%** of product units were made with 100% silk. Most of this silk procurement is through our key partner and sourced from a mill located in the Shandong Province, China. This mill has sourced raw material from the same farms they have been in business relationships with for between 20 and 30 years. As our key partner purchases on our behalf our visibility is therefore maintained through their annual Sedex audits. Whilst we have access to their full audit results (including all non-compliances), we do not have a full understanding of the corrective actions in place beyond the audit framework. We aim to build a stronger connection to the mill, most likely this will be through our key partner, with the aim to increase our channel of communication, in particular with the compliance team.

Our major printer (CAMILLA exclusive) is owned by our key partner. The same audit structure applies with Sedex. This print house operates with leading digital print machinery and has LEED certification, for recognised global energy and environmental design. Based on units, our second largest printing mill also has a social audit program with Sedex. The other printers within our top five suppliers are all mapped, although we have not yet seen evidence of social compliance programs. These will be investigated in the next reporting period, with the high risk/high spend rationale.

With extensive CAMILLA product categories manufactured, the materials are sourced throughout the world; China, India, Brazil, Italy, Korea, Turkey, South Africa, Switzerland, Pakistan and the United States. This includes woven and knitted fabrics, leather, feathers, footwear, bag components and packaging materials.

Most of our trims and hardware accessories are produced at one facility in Shenzhen, China. We design directly with this supplier and have had a relationship for circa six years. They have amfori BSCI social compliance. For hand-crafted trims and hardware for small volume orders we occasionally source from local markets in China and India. We are underway with investigating these sources. The challenges at play continue to be due to the artisanal style of work, the small quantities and the lack of infrastructure in the apparel and textile regions they source from.

We ask that our leather tanneries all have the Leather Working Group (LWG) certification. This includes our Brazilian tanneries, that are managed through a single agent. We are working closely with this agent in Brazil to further understand the operations, they have the long-standing relationship with this select group of partners. The tannery for accessories in China and our apparel tannery in India also both have Gold LWG standard certification.

The CAMILLA paper packaging is produced in two plants, one in Australia (Adelaide) and one in China (Heshan). Both facilities are owned and operated by Australian-based entities with published Modern Slavery Statements. Our plastic packaging, made by a leading sustainable packaging company, has amfori BSCI and strong governance practices.

Labelling, including swing tags, is produced in two sites in Guangdong, China through a global packaging and labelling business with their own Modern Slavery mandatory obligations and Human Rights Policy.

Other operational supply chains for our goods and services for head office, retail, distribution, and warehousing, remain the same procurement operations as FY22.



## CASE STUDY: SUPPLIER ENGAGEMENT WITH OUR KEY PARTNER

*The Modern Slavery Index 2023, from the WalkFree Foundation, states that from India there are USD\$23.6 Billion worth of at-risk products imported, and the products at risk include garments and textiles.<sup>2</sup> With our supply base concentrated in India, CAMILLA understands the importance of effectively identifying, addressing and assessing modern slavery risks.*

Our key partner in India employs workers to execute the meticulous print placement for which our products are known. Hand cutting of silk garments is a highly involved process and requires precision to ensure perfect placement. In addition, a team of specialist artisans create bespoke embroidery and crystal designs that are all attached by hand.

This partner started its business with one factory and 20 workers. It now employs approximately 1300 people on a full-time basis, who work across 3 factories, a print mill and head office premises. A mix of men and women are in management positions. More than 30% of our key partner's entire workforce has been employed for 5 years, and in many cases, much longer. There is still an original group who were present when Camilla Franks started the brand, in the early days as she found her way through the Indian creative and manufacturing process.

During this reporting period, for the first time we underwent worker engagement surveys and interviews. A sample of 300 people across various departments of Printing, Washing, Graphics, Cutting, Stitching, Embroidery and Crystal Artists were surveyed or interviewed. The intention was to understand where the workforce was from, which evolved into further research into the states of Uttar Pradesh and Bihar, both notably poor regions on India. Identifying the background and training of the workers and where they learnt their skills was also a key purpose. The questions included what their day entailed and what they valued about their work.

Engaging with the supply chain workers developed a stronger understanding of the people and the artisans that form the DNA of the CAMILLA brand. It developed a new level of understanding of the personalities behind the scenes, and allowed for the workers to speak openly about their time with the factory. This work was a valuable engagement tool for the CAMILLA team and became a tool internally to understand the workforce of this long-standing partnership.

Such engagement directly with the team produced a level of confidence that third party auditing are not able to provide. It further reinforces the ability for open dialogue on several issues, including the importance of modern slavery mitigation.

<sup>2</sup> Walkfree Global Slavery Index 2023



## ✕ IDENTIFYING AND ASSESSING MODERN SLAVERY RISK

The industry's complex supply chains mean that overall sustainability issues are inherently complicated. To assist in identifying areas to focus our attention we use the support of the SEDEX Risk Assessment Matrix. This tool specifically uses our suppliers, (those who form part of the SEDEX system, in FY23 this was 62% of our supply chain) to create a risk assessment by combining the inherent country and sector risk. It identifies the supplier's risk and allows us to prioritise audits, risk management and improvement.

Those suppliers with the highest inherent risk (country and sector risk) are the suppliers based in India; our key partner's three factories and our knitwear supplier (at cost value < 2%).

The three suppliers with the highest site risk (specific to site) were in China; one producing our women's ready-to-wear (8%), our ceramics factory (< 1%) and the other is the silk mill our key partner purchases from (~ 70%).

The risk assessment is primarily a tool to help identify areas where there could be possible risk of modern slavery. We use the assessment to direct our concentration on those that are evaluated high risk. To address the risk, our primary method is using social audit findings. The audits during this reporting period identified a range of non-compliances in the category of health, safety and hygiene, and in China, excessive overtime. When the audits show critical or major findings, we work closely with the factory directly or the agent to address the issue and remain close throughout the corrective plan process.



## ASSESSMENT FOCUS TO DATE

To strengthen our approach and to further manage the risk of modern slavery, focus was directed specifically into these areas:

- ✦ Establishing strong modern slavery risk management and supplier expectations as CAMILLA seeks to diversify its supply base
- ✦ Ensuring a robust approach is in place prior to lodgement
- ✦ Aligning to the leading practice guidelines of WalkFree

From this we used the following three focus areas for this period to benchmark of our progress and effectiveness...

## IMPROVED OVERALL SUPPLY CHAIN VISIBILITY

- ✦ We continued mapping tier 1 and 2 suppliers, our targeted assessment approach driven by major suppliers (by total value), location of operations with the highest recognised industry risk factors and the pre-existing relationship with suppliers, and extended track record of operational transparency. The existence of globally recognised social audits of the primary supply chain increased from **84%** to **92%** for this reporting period. The two suppliers who were not able to meet this requirement are less than **1%** of our total business, at unit and cost value:
  - ✦ Our jewelry maker (under a sale or return agreement for a manufacturer located in India) was due to complete an independent 3rd party social audit during this reporting period. We had planned to present any audit outcomes in this statement. However, they have decided that most appropriate to their sector is becoming a member of the Responsible Jewelry Council and are currently certifying. In FY23 they remain **<1%** of our business at cost.
  - ✦ Our magnet manufacturer is in the USA. A sole owner who produces herself, suggesting the risk of modern slavery to be very low and operationally does not require a third-party to audit.

The three new suppliers we selected to on-board during FY22 and manufactured in FY23, have all had a full supplier assessment.

- ✦ Through sourcing with an agent or producer directly, CAMILLA nominates the supplier for most of our fabrics and trims. However, on occasions we also rely on our supply chain to source, this is where visibility has continued to be challenging. We have progressed with our tier 2 mapping, but progress is gradual. Particularly in India, the supply chain is complex, it is a framework built on small volumes and artisanal techniques in an industry with a lack of infrastructure. In China we have found the challenge still lies in many factories inherent beliefs around not easily sharing intellectual property. The main progress made in tier 2 mapping has been with our fabric and yarn suppliers. This result was only possible through repeated attempts with the fabric and yarn agents to disclose their mill names and locations and trusting our intention.

## MORE FULLY DEVELOP AND IMPLEMENT INTERNAL GOVERNANCE PRACTICES EXPRESSLY RELATING TO MODERN SLAVERY

- ✦ To build competency internally, training programs have been increased in FY23:
  - ✦ Our first Modern Slavery training was held, available to all in the business. A module on Modern Slavery has been added to our employee on-boarding and learning platform. Modern slavery continues as a running topic on the CSR committee agenda.
  - ✦ Our Responsible Purchasing training continued, covering the responsibilities across forecasting, costs and cost negotiation, payment and terms and responsible exiting. Training was held for planning, buying and production departments.
  - ✦ For the first time, ESG training was held, including in-person sessions and an ESG on-boarding module for all employees sits on our employee learning platform.
- ✦ As international travel became appropriate again, we re-established on-ground visits to tier 1 factories. Our key partner has had multiple visits from CAMILLA employees during the reporting period and we visited two of our Chinese suppliers. These site visits were made by our design and graphics teams, production manager, an executive member and our ESG manager.
- ✦ CAMILLA's whistle-blower policy was updated during this period and re-circulated to tier 1 supply chain. We used this to encourage suppliers to raise concerns regarding suspected unethical, illegal, or fraudulent conduct that may relate to potential areas of modern slavery risk. We also encouraged suppliers to share their internal grievance mechanisms to further ensure a meaningful framework is in place. No grievances related to modern slavery were made apparent during the reporting period.

## DESIGN LIVING WAGE AUDIT METHODOLOGY

- ✦ CAMILLA committed to undertaking a living wage audit for the workforce of our primary supply chain. Our planned action was to undertake analysis to understand our supply chain living wage position.
- ✦ During the reporting period we engaged with other brands to discover the most effective way to investigate the living wage in apparel manufacturing. We have since employed QIMA, a quality control and supply chain audit specialist to provide an audit program for our key partners facilities. The audit was not completed in the reporting period and we will outline the findings in our next statement.





## ✕ ADDRESSING MODERN SLAVERY RISK

The global textiles and fashion industry are typically informal and in certain locations also unregulated. We continue to prioritise due diligence with our key partner in India, due to their dominance within our supply chain, their location, and the fact that it is an industry sector with typically low visibility.

We were not made aware of any actual or suspected incidences of modern slavery in our supply chains or operations during this reporting period.

To uphold our modern slavery position and maintain the structure we need to ensure our visibility of the supplier, they are required to:

- ✦ Undergo social audits conducted by independent, authorised third-party auditors
- ✦ Major suppliers to submit annual audits, all others to have current audits every two years
- ✦ Encouraged to use the SMETA methodology and in line with the Ethical Trading Initiative (ETI) base code
- ✦ Ideally the audits conducted on an unannounced or semi-announced basis
- ✦ A Correct Action Plan Report (CAPR) must also be supplied along with the audit results. All non-compliances must be verified within the agreed timescale
- ✦ Review and sign our Code of Conduct and Supplier Agreement

## CAMILLA POLICIES AND GOVERNANCE

SUPPLIER CODE OF CONDUCT	SUPPLIER AGREEMENT	SUPPLIER GRIEVANCE MECHANISM
<p>All our suppliers are required to abide by our Supplier Code of Conduct. Suppliers are, in turn, responsible for ensuring compliance with our Supplier Code of Conduct is passed along their own supply chains. This includes their subcontractors, and their own suppliers (including raw materials sources).</p> <p>Our Code of Conduct is based on the Ethical Trading Initiative (ETI) Base Code, Conventions of the International Labour Organisation (ILO) including the Declaration on Fundamental Principles and Rights at Work, as well as internationally recognised good labour practices.</p> <p>It prescribes the following requirements:</p> <ul style="list-style-type: none"> <li>✦ Employment is freely chosen</li> <li>✦ No forced, bonded or involuntary prison labour</li> <li>✦ Working conditions are safe and hygienic</li> <li>✦ Child labour is not used</li> <li>✦ Living wages are paid</li> <li>✦ Working hours are not excessive</li> <li>✦ No discrimination</li> <li>✦ Regular employment is provided</li> <li>✦ No harsh treatment</li> </ul> <p>Our Supplier Code of Conduct conveys our zero-tolerance position towards any form of forced, bonded, trafficked or unlawful prison labour. Suppliers are required to have a written policy to reflect this and communicate it effectively.</p>	<p>The legal contract between CAMILLA and our suppliers to establish the terms for the purchase and delivery of the CAMILLA products. All tier 1 suppliers are required to sign.</p>	<p>The CAMILLA Whistleblower Policy has been communicated to all our primary supply chain. During the reporting period we were not made aware of any actual or suspected incidences. We have encouraged all suppliers to make the policy accessible to all workers, with a focus on conveying it as a means by which anyone can contact CAMILLA confidentially to communicate any concern. The policy has been translated into local languages and positioned in prominent, communal locations amongst the workplaces.</p> <p><i>Our key partner also has its own governance procedures relating to Policy and Handling Mechanism. This documentation is produced in both English and Hindi. The key partner's Grievance Handling Committee includes representatives from each factory. These representatives meet quarterly with the HR team. Complaint and suggestion boxes are placed prominently at every facility.</i></p>





## SUPPLIER ONBOARDING

New suppliers are carefully considered. During our on-boarding process, prospective new factories are briefed on CAMILLA policies and standards prior to commencing product sampling, taking care to ensure they are also aligned to the CAMILLA values. This includes our zero-tolerance position in relation to all forms of modern slavery practices. Both the supplier and their facilities are assessed for suitability for the CAMILLA production, sourcing, quality and responsible business practices (including worker protection and welfare).

## EMPLOYEE EXPECTATIONS

The CAMILLA team are expected to adhere to our organisational values and ethical principles. CAMILLA has a process in place to support all new staff, aided by a suite of policies. This is available on the Go1 platform in Australia and ADP in the USA.

These policies align with our commitment to ensuring legal compliance and promoting an ethical culture by observing the highest standards of fair dealing, honesty, and integrity in our business activities.

CAMILLA also has a suite of internal policies that are designed to address employee wellbeing and protection, whistleblowing (for any suspected misconduct or related concern), and responsible sourcing. During FY23 a 'CAMILLA Handbook' was created to hold these and the additional policies.

CAMILLA team members are trained in relation to the content of our internal policies when they commence employment, as well as when these governance materials are periodically updated.

## GOVERNANCE

The CAMILLA Board has ultimate responsibility for our response to modern slavery risks, including ensuring that an appropriate framework is developed, and continuously improved, for risk management practices and long-term strategies. All Board Reports include a section on Modern Slavery progress.

Our current CSR committee oversees the modern slavery planned actions. The committee reviews the progress of the key actions and targets relating to its modern slavery response. The ESG manager provides updates to the CSR committee and manages day-to-day responsibility of integration across the business of issues related to modern slavery.



## ASSESSING EFFECTIVENESS

Our first statement last year gave us the opportunity to review our key objectives and then formalise our approach. We understand that true progress in addressing modern slavery issues is setting meaningful actions and measuring their effectiveness between reporting periods.

The focus remained on a comprehensive audit structure and having the controls and policies in place to reduce any possible risk of modern slavery in our operations or supply chains. We appreciate improvement is a very important measure and our progress is outlined below along with our identified three focus areas for the next reporting period.

### 1. KEY OBJECTIVE: LIVING WAGE




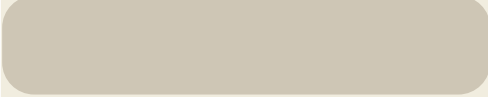

PROGRESS MADE FOR THIS REPORTING PERIOD FY23	PROGRESS
<p>Design an approach to the selection of key suppliers (covering both India and China) and a methodology that ensures the definition of 'living wage' to be applied in the audit is substantively aligned with current best practice.</p>	
<p>Carry out an analysis of our primary supply chain to understand our living wage position.</p>	

### PLANNED ACTIONS FOR NEXT REPORTING PERIOD FY24

- ✦ Continued investigation of the selected key partner to understand the specifics of the living wage analysis and align outcomes to best practice.



## 2. KEY OBJECTIVE: IMPROVED OVERALL SUPPLY CHAIN VISIBILITY



PROGRESS MADE FOR THIS REPORTING PERIOD FY23	PROGRESS
Maintain (and improve) Tier 1 visibility.	
Ensure complete coverage of current social audit results for all Tier 1 factories (92% achieved in FY23).	
Continue mapping of Tier 2 suppliers with primary focus on identified areas of highest potential risk.	
Implement alternative due diligence approaches for Tier 2 suppliers where visibility into factory locations and operations cannot be sufficiently verified via our usual mapping processes. <i>*see footnote</i>	
For all suppliers in Tier 1, ensure social compliance process is supported and encouraged, and proactively monitor corrective action plans. Tier 2, where possible, encourage a social compliance framework.	

### PLANNED ACTIONS FOR NEXT REPORTING PERIOD FY24

- ✦ Maintain and improve Tier 1 visibility ensuring complete coverage of social audit results.
- ✦ Continue mapping of Tier 2 suppliers with primary focus on identified areas of highest potential risk.
- ✦ For our key partner, as areas of visibility have not yet been able to be verified, we will work together to review alternative approaches.
- ✦ Where possible, encourage Tier 2 social compliance with focus on areas of highest potential risk.
- ✦ Consider the advantages and feasibility of building on the supplier engagement program with our key partner. Considerations to be made into the structure, the post-engagement response and its practical outcome in supporting modern slavery due diligence.

*\*Not completed. Understanding the scope of our tier 2 supply chain with our key partner, beyond the nominated suppliers, remains challenging. Whilst attempts were made to gain visibility, success was limited and an alternative approach will be implemented.*

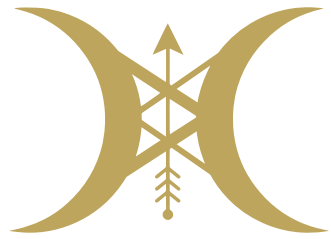
### 3. KEY OBJECTIVE: DEVELOP AND IMPLEMENT INTERNAL GOVERNANCE PRACTICES EXPRESSLY RELATING TO MODERN SLAVERY

PROGRESS MADE FOR THIS REPORTING PERIOD FY23	PROGRESS
Finalise ESG Strategy development that is currently underway, including embedding within CAMILLA’s overall responsible business strategy.	
CSR Committee to track modern slavery response. Regular Board reporting to include progress on modern slavery response.	
Deliver tailored internal training to ensure awareness of modern slavery and potential risks in our business.	
Closely monitor trends in reported supply chain risks in relevant geographic regions and industry categories.	
Prompt and targeted due diligence to be undertaken if specific risk applies to CAMILLA’s primary supply chain.	
Re-establish on-ground site visits to Tier 1 factories (assuming continued easing of applicable COVID-related restrictions).	
Scoping and feasibility assessment to specifically investigate and report on the inclusion (and practical impact) of incorporating express contractual provisions relating to modern slavery in CAMILLA’s standard Supplier Agreement. <i>**see footnote</i>	
Actively promote CAMILLA’s Whistle-blower Policy to encourage suppliers to raise concerns regarding suspected unethical, illegal, or fraudulent conduct that may relate to, or otherwise indicate, potential areas of modern slavery risk.	

#### PLANNED ACTIONS FOR NEXT REPORTING PERIOD FY24

- ✦ Governance of our modern slavery response to continue through our CSR Committee and Board reporting.
- ✦ Training on modern slavery awareness and potential risks in our business and responsible sourcing and buying training.
- ✦ Closely monitor trends in reported supply chain risks in relevant geographic regions and industry categories.
- ✦ Prompt and targeted due diligence to be undertaken if specific risk applies to CAMILLA’s primary supply chain.
- ✦ Investigate the inclusion of specific provisions relating to modern slavery in CAMILLA’s Code of Conduct.
- ✦ Develop a Modern Slavery Policy.
- ✦ On-ground site visits from team members to continue to aid supplier relationships and support transparency.









Camilla