

ACEIT SPORTSWEAR PTY LTD MODERN SLAVERY POLICY Dated 13/05/2019

Organisational Structure and Supply Chains

Aceit is an Australian owned and operated business employing local staff from all sections of the community. The production facility based in regional Wollongong NSW includes a dedicated team of designers, production, administration, and customer service personnel. Aceit actively practice social compliance as an ongoing commitment to the community through local employment, flexible work roles, training programs and an individual approach to staff management. This statement sets out Aceit Sportswear Pty Ltd 's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

Aceit Sportswear Pty Ltd and its supply partners, recognises that it has a responsibility under the Modern Slavery Act 2018 to take a robust approach to slavery and human trafficking and we are absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking.

Relevant Policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

HR Policy - We have zero tolerance of any threat of physical or sexual violence, harassment or intimidation against employees and their family, or close associates. Our policies are clearly defined and communicated to all employees. All our employees are treated fairly and equally, and are paid at least the national minimum wage. Our employees won't be forced to work in excess of the number of hours permitted in law, and normal working hours won't exceed 38 hours per week average unless the employee agrees.

Purchasing Policy - The organisation is committed to conducting purchasing activities in a fair, objective and transparent manner that satisfies the requirements of accountability and internal controls including but not limited to Aceit Sportswear Pty Ltd. 'Quality Management', 'Environmental', 'Ethical Code of practice', 'Anti-Bribery' and 'Modern slavery and Human Trafficking' policies which fulfil legal and financial obligations and effectively manages commercial risk. Emphasis is placed on selecting suppliers and service providers that demonstrate recognisable environmental, sustainable, business integrity along with Corporate Social Responsible (CSR) standards including but not limited to compliance with laws and regulations, respect for human rights, labour working conditions, equal opportunities, health and safety accreditation, maintenance and promotion of information security, fair trade and acceptable corporate ethics.

Recruitment Policy - The organisation uses only specified, reputable employment agencies to source agency workers and always verifies the practices of any new agency it is using before accepting workers from that agency.

Whistleblowing Policy - We encourage all of our employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, Aceit Sportswear Pty Ltd. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation.

Our values – Aceit Sportswear Pty Ltd values of Knowledge, Integrity and Action makes clear to our employees the actions and behaviour expected of them when representing Aceit Sportswear Pty Ltd. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.

Due Diligence

We undertake due diligence when considering taking on new suppliers, and review our existing suppliers on a periodic basis. Our due diligence and reviews include:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking
- Evaluating the modern slavery and human trafficking risks of each new supplier
- Conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Awareness-Raising Programme

As well as training employees, the organisation has raised awareness of modern slavery issues by circulating information to employees.

The information explained to relevant employees:

- The basic principles of the Modern Slavery Act 2018;
- How employers can identify and prevent slavery and human trafficking;
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- What external help is available, for example through the Modern Slavery Helpline
- Raised awareness of employees of Modern Slavery
- As well as training relevant employees, we have raised the awareness of modern slavery issues by circulating information to all employees. The information has outlined the basic principles of the Modern Slavery Act 2018 as well as what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and what external help is available, for example through the Modern Slavery Helpline.
- Embedded Modern Slavery due diligence into the supplier set up process
- The due diligence process is undertaken for each new supplier being set up as part of the 'new supplier' set up process. We have also undertaken checks across our existing supplier base and will update these checks every 3 years. The due diligence checks include:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- Evaluating the modern slavery and human trafficking risks of each new supplier.
- Conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified, to include but not limited to:
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

If when following this due diligence process we cannot deem suppliers as low risk, we proceed to establish further detail such as product, manufacturing location and relevant corporate policies (Modern Slavery and Human Trafficking, code of ethics, structure, governance and control, etc.) for further consideration. If the risk remains, findings are then presented to the legislative and regulatory group and CFO for a formal action plan to be agreed.

In addition, we are investigating the development of a reporting capability to the supplier database which will allow us to filter suppliers flagged as high risk, and undertake annual checks in a more efficient manner. Since the introduction of our policy we have not identified any high-risk Modern Slavery concerns.

Committed to the World

Aceit is committed as a socially responsible employer to achieving the highest labour practices and working condition standards. We are devoted to maintaining an open dialogue with non-governmental organizations (NGOs), members of the labour movement, and other interested parties. Our compliance program is designed to ensure that, at a minimum, all our facilities and supply partners comply with local and international laws, we adhere to the code of conduct, principals and standards of the Fair Labour Association ([FLA](#)).

We adhere to the 10 principles of the Fair Labour Association (FLA) and The 10 Principles of Fair Labor and Responsible Sourcing (and/or Responsible Production) and agree to uphold the FLA Workplace Code of Conduct in their supply chain.

FLA Code of Conduct Summary

Employment Relationship

Nondiscrimination

Harassment or Abuse

Forced Labor

Child Labor

Freedom of Association and Collective Bargaining

Health, Safety and Environment

Hours of Work

Compensation

Aceit also follows the 12 principals of the World Responsible Accredited Production (WRAP). Aceit also encourages all external suppliers to follow these principals and adhere to the codes.