

Circle to Zero Pty Ltd



Modern Slavery Statement

2023



Introduction

Circle to Zero Pty Ltd is committed to ensuring that we conduct our business operations in a socially responsible manner that respects and promotes human rights. This Modern Slavery Statement sets out our commitment to preventing modern slavery in our operations and supply chain.

Our commitment

We acknowledge that modern slavery is a global issue and is a violation of basic human rights. As a company, we are committed to preventing and eliminating any form of modern slavery in our business operations and supply chain. We are committed to complying with the Modern Slavery Act 2018 of Australia and to integrating the principles of Article 4 of the UN Declaration of Human Rights into our operations.

Message from our leaders

At Circle to Zero, we believe that every person deserves to be treated with dignity and respect. That's why we are committed to preventing modern slavery in our business operations and supply chain. We will not tolerate any form of modern slavery, and we will work tirelessly to ensure that our business practices align with our values.

We recognise that Circle to Zero is still at the very beginning of its journey towards preventing modern slavery in our operations and supply chain. We acknowledge that this is a complex issue that requires ongoing effort and commitment. As such, we welcome any expertise, knowledge, and experience from our stakeholders, including our employees, suppliers, customers, and organisations. We believe that by working together, we can learn from each other and make progress towards our shared vision of zero waste, zero inequality, and zero injustice.



ZERO WASTE

ZERO INEQUALITY

ZERO INJUSTICE

Our Policies

1 Ethical Sourcing Policy

Circle to Zero Pty Ltd is committed to ensuring that our products and services are ethically sourced. We expect our suppliers and partners to adhere to the same high standards of social and environmental responsibility that we do. We have implemented the following practices in our sourcing process:

- Conducting due diligence on our suppliers to ensure that they comply with applicable laws and regulations, and are committed to upholding human rights.
- Requiring suppliers to sign our Supplier Code of Conduct, which outlines our expectations regarding human rights, labor standards, environmental protection, and anti-corruption.
- Periodically auditing and monitoring our suppliers to ensure ongoing compliance with our ethical sourcing standards.

2 Human Rights Policy

Circle to Zero Pty Ltd is committed to upholding and promoting human rights in all aspects of our business. We respect the rights of our employees, customers, suppliers, and the communities in which we operate. We have implemented the following measures to ensure the protection of human rights:

- Implementing fair labor practices, including fair wages, working hours, and safe working conditions.
- Providing equal opportunities for all employees and prohibiting any form of discrimination or harassment.
- Engaging with stakeholders to address human rights concerns and working collaboratively to find solutions.

Our Policies

3 Anti-slavery and Human Trafficking Policy

Circle to Zero Pty Ltd is committed to combatting modern slavery and human trafficking in our operations and supply chain. We have implemented the following measures to prevent these practices:

- Adopting a zero-tolerance approach to modern slavery and human trafficking in our operations and supply chain.
- Training employees to recognize and report potential instances of modern slavery or human trafficking.
- Establishing a grievance mechanism for employees and other stakeholders to report any suspected instances of modern slavery or human trafficking.

4 Whistleblower Policy:

Circle to Zero Pty Ltd is committed to fostering a culture of transparency and accountability. We encourage employees and other stakeholders to report any concerns, including those related to modern slavery or human trafficking, without fear of retaliation. Our whistleblower policy includes the following provisions:

- Establishing a confidential reporting channel for employees and stakeholders to report concerns.
- Providing protection for whistleblowers, including maintaining their anonymity and protecting them from retaliation.
- Investigating all reports thoroughly and taking appropriate action to address any identified issues.

Our Due Dilligence

We conduct due diligence on our suppliers and business partners to ensure that they comply with the Modern Slavery Act 2018 of Australia and share our commitment to human rights. Our due diligence includes:

1 Assessing Suppliers

Assessing our suppliers' compliance with the Modern Slavery Act 2018 of Australia. All suppliers are required to provide their modern slavery statement and compliance policy.

2 Site Visits

Conducting site visits to our suppliers to assess their labor practices and ensure that they comply with our policies.

3 Contractual Obligation on Compliance

Implementing contracts that include provisions that require our suppliers to comply with the Modern Slavery Act 2018 of Australia and our policies.

4 Audits

where risk is material, monitoring our suppliers' compliance with our policies through regular audits.

Measuring Progress

These KPI measures, key activity projects, and expected data and outcomes will help Circle to Zero Pty Ltd monitor progress towards achieving performance goals and ensure compliance with the Modern Slavery Act 2018, as well as promoting ethical business practices and protecting human rights. Regular reviews and updates to these measures and projects will be essential to maintaining continuous improvement and adapting to any changes in the business environment or regulatory landscape.

Policy Area	KPI Measure	Key Activity Projects	Expected Data and Outcomes
Ethical Sourcing Policy	Percentage of suppliers adhering to our Supplier Code of Conduct	Supplier engagement and training programs	100% since day 1: Increased compliance with ethical sourcing standards, reduced risk of modern slavery in the supply chain
	Number of supplier audits conducted annually	Regular supplier audits	100% by June 2024: Enhanced supplier performance, transparency, and continuous improvement in human rights and environmental practices
Human Rights Policy	Employee satisfaction and engagement rates	Employee engagement surveys, training programs, and workshops	>90%: Improved employee morale, retention, and productivity; a more inclusive and diverse workplace
	Number of human rights incidents reported	Human rights impact assessments	Zero at all time: Reduced human rights violations in the workplace and the communities in which we operate

Measuring Progress

Policy Area	KPI Measure	Key Activity Projects	Expected Data and Outcomes
Anti-slavery and Human Trafficking Policy	Number of employees trained on modern slavery and human trafficking	Modern slavery and human trafficking awareness training	100% from Day 1: Increased awareness and ability to identify and report potential instances of modern slavery or human trafficking
	Number of reported incidents of modern slavery and human trafficking	Incident monitoring and reporting system	Zero at all time: Timely identification and resolution of modern slavery and human trafficking incidents
Whistleblower Policy	Number of whistleblowing reports submitted	Whistleblower awareness campaigns and training	Any report to be addressed at Board level within 21 working days: Improved transparency, accountability, and early detection of potential issues
	Number of resolved whistleblowing cases	Whistleblowing case management system	100% Resolved within 3 months from report being addressed: Timely and effective resolution of reported concerns, contributing to continuous improvement in company policies and practices

We are only at the start of our journey



Policies

- Ethical Sourcing
- Human Rights Protection
- Anti-slavery and Anti-human trafficking
- Whistleblower Protection



Due Diligence

- Assessing Suppliers
- Site Visits
- Contractual Obligation on Compliance
- Audit



Performance Measure

- KPI Measure
- Key Activity Projects
- Expected Date and Outcomes

We recognise that Circle to Zero is still at the very beginning of its journey towards preventing modern slavery in our operations and supply chain. We acknowledge that this is a complex issue that requires ongoing effort and commitment. As such, we welcome any expertise, knowledge, and experience from our stakeholders, including our employees, suppliers, customers, and organisations. We believe that by working together, we can learn from each other and make progress towards our shared vision of **Zero waste, Zero Inequality, and Zero Injustice.**

Integrating with UN Sustainability Goals

Circle to Zero Pty Ltd, trading as aciae, acknowledges that modern slavery is a global issue and a violation of basic human rights. As a company, we are committed to preventing and eliminating any form of modern slavery in our business operations and supply chain. We are devoted to complying with the Modern Slavery Act 2018 of Australia and integrating the principles of Article 4 of the UN Declaration of Human Rights into our operations. In line with this commitment, the business and brands actively seek to contribute to the achievement of the United Nations' Sustainable Development Goals (SDGs) 1, 8, 10, and 16, as outlined below:



aciae strives to eradicate poverty by creating fair employment opportunities and promoting equitable economic growth throughout our supply chain. We support local communities by providing stable income opportunities, adhering to fair labor practices, and ensuring safe and inclusive working environments for all our employees and partners.



aciae fosters sustainable economic growth by prioritising decent work conditions, fair wages, and equal opportunities for all workers. We actively collaborate with suppliers who share our commitment to ethical labor practices, and we continuously monitor and assess our supply chain to ensure compliance with international labor standards.



As part of our commitment to reducing inequalities, aciae champions diversity and inclusion in our workforce and throughout our supply chain. We uphold the principles of non-discrimination, gender equality, and equal opportunity, actively working to empower marginalized and underrepresented groups within our business operations.



aciae is committed to fostering a culture of transparency, accountability, and respect for the rule of law. We collaborate with our suppliers and stakeholders to promote ethical business practices, combat corruption, and ensure human rights are respected and protected. By actively engaging in dialogue with governmental and non-governmental organisations, we aim to strengthen institutions that safeguard human rights and uphold justice.

Through our unwavering commitment to these SDGs, aciae endeavors to create a positive impact not only on the environment but also on the lives of individuals across our value chain. By integrating human rights considerations into our business model, we strive to drive meaningful change in the fashion industry and contribute to a more equitable and just world. Furthermore, we pledge to incorporate human rights commitments and progress into our ongoing sustainability reporting, ensuring transparency and accountability in our efforts to uphold the dignity and rights of all stakeholders involved.

Acknowledgement


We would like to extend our heartfelt gratitude to everyone who has contributed to the development and publication of our Modern Slavery Statement. Your dedication and expertise have been invaluable in shaping our understanding of the complex issues surrounding modern slavery and human rights. Your contributions have played a crucial role in helping us establish robust policies and practices to combat modern slavery in our business operations and supply chain.

We would also like to acknowledge the tireless efforts of our employees, partners, and stakeholders who have been committed to upholding ethical practices and human rights standards throughout our organization. Your unwavering support has been essential in driving meaningful change and fostering a culture of responsibility and integrity within our company.

As we continue to strive for a world free from modern slavery and human rights abuses, we remain deeply grateful for your collective knowledge, experience, and commitment to this crucial cause. Together, we can make a lasting impact and pave the way for a more just and equitable future.

Contact Us

Circle to Zero Pty Ltd

 aciae.com.au

 hello@aciae.com.au

