

# ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

## POLICY AIM

**This policy aims to outline the responsibilities and compliance at the Cotton On Group to Anti-Slavery and Human Trafficking laws and regulations. We have a zero tolerance to modern slavery and human trafficking supported by our 14 Rules to Trade.**

## APPLICABLE REGIONS/BRANDS

Global - this policy applies to all persons working for us or on our behalf in any capacity, including team members at all levels, directors, officers, agency workers, seconded workers, volunteers and interns.

## POLICY

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

## ZERO TOLERANCE

We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships. We are also committed to implementing and enforcing effective systems and controls to ensure modern slavery does not take place anywhere in our business or in our supply chain.

## TRANSPARENCY AND DISCLOSURE

We are committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains that are consistent with our disclosure obligations under global modern slavery legislation.

## CONTRACTORS, SUPPLIERS AND BUSINESS PARTNERS

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers hold their own suppliers to the same high standards.

## EQUAL OPPORTUNITY

We are proud to employ people of all ages and consider that age diversity is beneficial to our business. We are committed to not discriminating against team members because of age and adhere to the principles set out in our Ethical Framework and 14 Rules to Trade.

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## **RESPONSIBILITIES**

### **THE BOARD**

Our Board of Directors have an overall responsibility for ensuring that this policy complies with the groups legal and ethical obligations.

### **GENERAL MANAGERS AND EXECUTIVES**

Our General Managers and Executives have a day to day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems, policies and procedures to ensure they are effective in preventing or remediating the risk of modern slavery. They are also responsible for investigating or reporting allegations of modern slavery in our business and supply chain.

### **MANAGEMENT**

Our management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training regarding its implementation and the issue of modern slavery.

### **TEAM**

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the General Manager of Risk & Sustainability.

## **COMPLIANCE WITH THE POLICY**

All our team members must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all of our team member. All team members are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Our team members must notify their line manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future. Our team members are also encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chain of any supplier tier at the earliest possible stage.

If our team members believe or suspect a breach of this policy has occurred or that it may occur they must notify their line manager or report it in accordance with our Whistleblowing Policy as soon as possible. Note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in our supply chain. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If a team member believes that they have suffered any such treatment, they should inform our Risk and Compliance department immediately. If the matter is not remedied, team members should contact the Confidential/ Whistle-blower Hotline.

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## **COMMUNICATION AND AWARENESS OF THE POLICY**

Training on this policy and the risk to the Cotton On Group from modern slavery in its supply chains forms part of the induction process for relevant team members who work for the group and regular training will be provided as necessary.

We have a zero tolerance approach to modern slavery and this must be communicated to all suppliers, contractors and business partners at the outset of the business relationship and reinforced thereafter.

## **BREACHES OF THE POLICY**

Any team member or supplier who breaches this policy will face disciplinary action up to and including dismissal. We may terminate our relationship with other individuals and organizations working on our behalf if they breach this policy or any of our 14 Rules to Trade.

This document is considered a broad, overarching policy that incorporates or overlaps our other policies, guidelines and SOPs.

The document operates in conjunction with the legal and regulatory requirements of the state, Province, Country and Region in which we operate. At all times, we expect compliance with this document, and we may reasonably withdraw, update or replace it from time to time. However, this document does not form part of your employment agreement and is not intended to be contractually binding

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