

PREMIER INVESTMENTS LIMITED

Our Commitment to Ethical Sourcing

Premier commits to the highest standards of ethical conduct and responsible product sourcing practices.

We support this commitment by our models for sourcing products, the principles that back-up those models, together with our policies and assurance program.

MODERN SLAVERY

Premier has zero tolerance to modern slavery in all its forms, including forced labour, child labour, slavery, people trafficking, deceptive labour recruitment practices, forced marriage and debt bondage. Premier fully supports the introduction of modern slavery legislation in various jurisdictions in which we operate, and will fully comply with the legislative timelines in all relevant markets.

OUR SOURCING MODELS, PRINCIPLES & POLICIES

We share our customers' full engagement in understanding where products come from, how products are made and the way that people who manufacture those products are treated.

With this in mind, we use the following sourcing models:

- direct sourcing from factories with whom we work in close partnership
- through Li & Fung, the world's largest sourcing company for major retailers and brands around the world

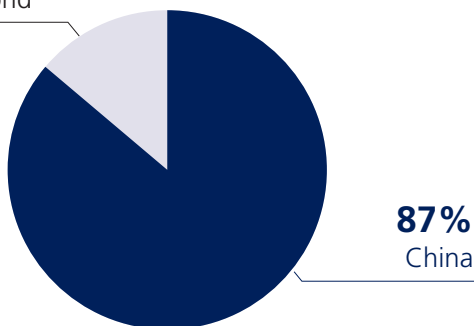
In addition, we work with known established and trusted Australian importers.

We currently source products in the following countries: China, Australia, Bangladesh, India, Indonesia, Pakistan, Sri Lanka, Turkey, and Vietnam.

SOURCE COUNTRIES (THE JUST GROUP, UNITS)

13%

Rest of the world



Our Ethical Sourcing and Supply Code (Code) supports our commitment to sourcing merchandise that is produced according to these principles, regardless of origin.

All suppliers must sign our supply terms and conditions, of which the Code is part, prior to any orders being placed. We will not do business with a supplier who does not comply with the Code.

In each case our model is supported by the following strict sourcing principles:

1. We comply with all laws in the countries we source from and operate
2. We have zero tolerance for modern slavery in all its forms
3. We insist on workers' legal rights – including worker empowerment and free association
4. We have zero tolerance for bribery and corruption
5. We have zero tolerance for animal cruelty

Among other things, we note that our supply terms and the Code:

- requires compliance with all laws (and/or requires our suppliers to meet higher standards)
- insists on the free association of workers, including the right to collectively bargain and be represented
- requires labour to be voluntary, without workers being required to lodge deposits (eg. identity documents; for recruitment fees etc.)
- prohibits forced labour (including child labour)
- insists on worker rights such as the right to work in safe, hygienic premises where working hours are not excessive
- requires the payment of the minimum national legal standards or local benchmark standards (whichever is higher), and, in relation to full time workers, sufficient to meet basic needs and to provide discretionary income
- prohibits unauthorised sub-contracting – meaning that we have a fully transparent relationship with our suppliers
- prohibits discrimination on the basis of personal attributes as well as union membership or political affiliations

ASSURANCES WHICH SUPPORT OUR SOURCING PRINCIPLES

Background checks

We conduct thorough and ongoing compliance activities of all suppliers directly and through Li & Fung and qualified audit firms.

Factory inspections

Senior management personally inspect all factories that manufacture for us. We continue factory visits throughout our relationship with our suppliers to ensure our principles are strictly adhered to.

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Our Commitment to Ethical Sourcing

continued

BANGLADESH SOURCING

Background

Bangladesh's economic and social development relies on the expansion and strength of the garment sector, including through investment by international retailers. The garment industry comprises around 80% of all Bangladesh export earnings, is a significant contributor to GDP, and employs over 4 million workers, most of whom are women. Premier currently sources a portion of its Just Jeans, Dotti and Jay Jays branded products in Bangladesh and we highlight our program in this country in the interest of full transparency.

MEMBERSHIP OF THE ACCORD ON FIRE AND BUILDING SAFETY IN BANGLADESH

We are a member of the Accord on Fire and Building Safety in Bangladesh (the Accord).

Prior to joining the Accord, we were (since 2013) a signatory to the Alliance for Bangladesh Worker Safety (the Alliance). The Alliance program was a five-year commitment which ended in June 2018.

The Accord, and the Alliance before it, share common priorities including a relentless focus on workers generally, as well as building integrity and safety – all supported by financial commitments and good governance.

Together with our international peers in Bangladesh, we have invested in worker safety, improved conditions and transparent reporting in a results-oriented, measurable and verifiable way.

All initiatives of the Accord are publicly available at <http://bangladeshaccord.org/>

OUR ACTIVITIES IN BANGLADESH

Our operational processes have included the establishment of our own office in Bangladesh, which we opened in March 2014. Our investment in on the ground infrastructure in Bangladesh, including employing staff at our sourcing office directly, supports our audit and compliance activities in that market with particular focus on social compliance and safety which includes:

1. Senior management personally inspect ALL factories that manufacture for us prior to commencing business. We continue factory visits throughout our relationship with our suppliers to ensure our principles are strictly adhered to. Our Code includes the ability for us to make unannounced visits in Bangladesh for the purposes of our audit and compliance activities.

2. Prior to placing orders with any factory, we also engage independent, internationally recognised assessment and audit firms to verify compliance with all local laws and safety conditions, in relation to labour and safety issues (including fire and building integrity).
3. During manufacturing, our globally independent audit firm Intertek inspects all orders.
4. In addition, we will not conduct business with factories that do not comply with the requirements of the Accord. All factories have been disclosed to the Accord for assessment under its operational processes.

ETHICAL RAW MATERIAL PROCUREMENT

Our sourcing commitment is supported by the following initiatives relating to fibre procurement:

- **Rabbit angora**
We confirm that we will not source products containing rabbit angora until we can be completely confident that the ethical standards of rabbit angora farming are assured and independently audited.
- **Cotton**
We will not source cotton harvested in Uzbekistan. We will maintain this position until the government of Uzbekistan ends the practice of forced child and adult labour in its cotton sector. To this end, we signed the Pledge against Child and Adult Forced Labour in Uzbek Cotton.
- **Azo Dyes**
We have voluntarily adopted the EU standard whereby we prohibit the manufacture and sale of goods which contain prohibited levels of the specific aromatic amines originating from a small number of azo dyes.
- **Sandblasted denim**
The harmful practice of 'sandblasting' denim with silica based powders has been discontinued in our business since 2011.