



**PREMIER
INVESTMENTS
LIMITED**

A.C.N. 006 727 966

MODERN SLAVERY STATEMENT

Reporting period: 12 months to 31st July 2021

Chief Executive Officer's Letter



27th January 2022

Premier Investments Limited (**Premier**) believes in the integrity of its supply chain and is fully committed to ensure that no supplier engages in unethical practices.

Premier recognises the importance of assessing and addressing modern slavery risks, and in doing so, increasing awareness throughout its supply chain. This is Premier's second modern slavery statement issued under the Australian Modern Slavery Act, and my first as Chief Executive Officer. I am pleased to present this statement, which sets out Premier's work program in the financial year to 31 July 2021 (the **reporting period**).

The importance of our governance practices to prevent modern slavery is demonstrated by the unprecedented events of the last two years caused by the COVID-19 pandemic. The effect of Government lockdowns, border closures and other measures designed to combat the pandemic has resulted in extreme economic disruption, which has had an extraordinary impact on the retail sector.

Unfortunately, that disruption creates pressures in the global supply chain from which no organisation is immune. Considered management and continuous oversight is necessary so as to effectively identify and address risks of modern slavery and unethical practices. All people have the right to work and live in freedom from slavery and other exploitation.

In the reporting period, Premier has launched a number of new initiatives, and existing practices have been strengthened. These initiatives include capacity building in our Support Offices in Melbourne and Bangladesh to ensure our Sourcing team is able to implement best-practice compliance activities, the enhancement of our social compliance factory audit program, the launch of 'worker voice' surveys and the implementation of new production audits to verify an absence of unauthorised subcontracting.

Further, shortly after the reporting period ended, we engaged Elevate Limited (**ELEVATE**) - a global leader in supply chain and sustainability practices. The partnership with ELEVATE will drive an increasing level of effectiveness of our ethical sourcing audit and compliance programs. Our partnership with ELEVATE will greatly enhance the effectiveness of our sourcing program, and we look forward to reporting more on this initiative in future statements.

Premier recognises that its supply chain evolves. As a result, our governance practices in relation to modern slavery are adaptable to meet new challenges and changing conditions. Premier is dedicated to continuous improvement and active engagement with all stakeholders, including our team members, suppliers, government and non-government bodies.

I welcome the publication of this Statement, and look forward to reporting again in 12 months on further initiatives to combat the scourge of modern slavery.

Richard Murray
Chief Executive Officer
Premier Investments Limited

An Update on Premier's Ethical Sourcing Work Program

TIMING	OBJECTIVE	ACTION
2020	Review and Refine Current Practices	<ul style="list-style-type: none"> Create supplier & country risk assessment framework; develop enhanced production monitoring tools and assess raw material procurement strategies Substantially increase direct sourcing of finished goods to better manage risk Update internal team ethical sourcing training Update supplier onboarding policies, procedures and supply terms
2021	Enhance, Monitor and Enforce	<ul style="list-style-type: none"> Completed upgrade of the Just Group Ethical Sourcing Program and risk assessment tools - including a comprehensive compliance program, external program partner selection completed Product suppliers completed the signing of a declaration committing to the absence of modern slavery practices in the supply chain, backed up by a suite of new supply terms and Code of Conduct Mapping and re-confirming Tier 1 factories (ie, finished goods manufacturers), including updating processes to validate manufacturing locations, purchase order by purchase order Rolled out labour rights training to Tier 1 suppliers Continued advocacy partnerships with multi-stakeholder initiatives and NGOs such as Baptist World Aid Launched both real time and retrospective monitoring of production to reduce the risk of subcontracting Just Jeans joined the Better Cotton Initiative (now Better Cotton) to reduce modern slavery risk in the Tier 3 supply chain (ie, raw material producers such as cotton farms) Consolidate and expand the Ethical Sourcing and Compliance Team in Melbourne, in addition to a senior compliance role in the Bangladesh office
2022	Review, Evolve and Assure	<ul style="list-style-type: none"> Begin migrating strategic merchandise factories to ERSA audit standard Set targets, review performance and further enhance modern slavery program, including increasing transparency of Tier 2 suppliers (ie, fabric mills and trim suppliers) Broaden engagement with Australian based importers, and incorporate Tier 2 suppliers into Premier's Ethical Sourcing Program Increase our % of Better Cotton and consider further expansion of the program or similar programs Leverage more direct means of engaging with workers through anonymous worker surveys and Help line Continue engaging with non-merchandise suppliers through Modern Slavery Self-Assessment Questionnaires, to better understand their practices Engage third party ELEVATE to update the terms of the Ethical Sourcing Code of Conduct to align with best practice
2023 +	Deepen Engagement	<ul style="list-style-type: none"> Monitor evolving human rights risks and adapt Ethical Sourcing Program where required Assess and strengthen grievance mechanisms in priority suppliers as identified by risk segmentation to empower worker voice Analyse and develop capacity building projects for suppliers based on key gaps identified

Premier Has a Zero Tolerance to Modern Slavery

Premier Investments Limited (**Premier**) is pleased to present this Modern Slavery Statement, outlining the steps Premier took in the 12 months to 31 July 2021 (**reporting period**) to ensure it, and each of its subsidiaries, assessed and addressed modern slavery risks across its entire supply chain.

As explained in Premier's previous modern slavery statement, 'modern slavery' is a term used to describe certain offences and other prohibited conduct, including forced labour, child labour, slavery, people trafficking, deceptive labour recruitment practices, forced marriage and debt bondage.

Premier has an important role in helping to reduce the incidence of modern slavery, and has zero tolerance to modern slavery in all forms, including forced labour, child labour and non-compliance with worker legal rights. In addition to Premier's long-standing Ethical Sourcing Supplier Code of Conduct, Premier has, in its annual report, reported publicly on its Ethical Sourcing activities in its supply chain since 2014. This latest Modern Slavery Statement sets out the additional steps over the last 12 months that Premier has undertaken to identify and address modern slavery risks in our supply chain.

The statement has been prepared in accordance with sections 14 and 16 of the Modern Slavery Act 2018 (Cth) and the UK's Modern Slavery Act 2015.

This Modern Slavery Statement jointly covers all reporting entities in the Premier Group.

The Impact of COVID-19

Throughout the global pandemic, Premier's absolute priority has been the safety and wellbeing of our teams, our customers, and the broader community in each of the regions in which we operate. During the reporting period, the ongoing impacts and evolving nature of the COVID-19 pandemic created an extremely challenging operating environment for Premier and its portfolio of retail brands in Australia, New Zealand, Asia and Europe.

The pandemic continued to place operational pressure on our distribution centres, and our valued team members working in those centres. We have throughout the pandemic implemented strict 'COVID-safe' health and safety practices to ensure our teams are safe.

The pandemic's continuing impact throughout the reporting period included disruption to Premier's modern slavery work program, including:

- moderate interruptions to the audit program as a result of border closures;
- 'lockdown' measures affecting the supply chain and our retail operations more broadly; and
- management and production teams were unable to personally inspect factories (outside of Bangladesh) due to border closures. This was mitigated by 'virtual' factory tours and Premier's audit program.

In Bangladesh, our on the ground team were able to continue their normal in person inspections of factories and all aspects of our Ethical Sourcing Program largely as normal.

Company Structure, Operations & Supply Chains



Premier is a public company listed on the Australian Securities Exchange (ASX:PMV) with its head office located in Melbourne, Australia.

Premier has a particular focus on retailing, importing and distributing, and owns and operates a selection of retail, consumer products and wholesale businesses.

Premier, through its 100% ownership of Just Group Limited (**Just Group**), operates a number of specialty retail brands in Australia, New Zealand, Asia and Europe.

Premier's portfolio of well-recognised retail brands comprises:

peteralexander

Peter Alexander is a lifestyle brand offering luxurious designer sleepwear, loungewear, homewear, footwear and gifts for women, men and kids.



Available online and in 140 stores across Australia and New Zealand.



Just Jeans offers on trend denim and casual wear for women, men and kids.

Available online and in 240 stores across Australia and New Zealand.



smiggle

Smiggle is the destination for school and leisure essentials. From backpacks to pencil cases, Smiggle is the original creator of all things colourful, fun and unique.



Available online and in 313 stores globally across Australia, New Zealand, Singapore, Malaysia, Ireland and the United Kingdom.

portmans

Portmans is the fashion destination for 25-30 year old women taking on the world. For up-to-the-minute looks that are fast, fresh and ever-evolving.

Available online and across 95 stores in Australia and New Zealand.



dotti

Dotti embraces all the latest fashion trends and styles for 16-24 year old women. Offering a range of styles that include casual, denim, special occasion and accessories.



Available online and in 107 stores across Australia and New Zealand.



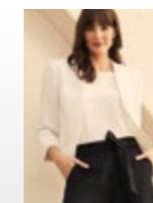
Jay Jays is inspired by youth culture, street wear, fashion trends, and a care free lifestyle. On trend styles include denim, print tees and tanks, shorts, jackets, exclusive licensed product and accessories.

Available online and in 202 stores across Australia and New Zealand.



JACQUI•E

Jacqui E offers smart workwear and versatile casuals to the perfect piece for that special occasion. With an emphasis on flattering styles, quality fabrics and exceptional tailoring.



Available online and in 95 stores across Australia and New Zealand.

Company Structure, Operations & Supply Chains

1970

Just Jeans was founded in 1970. Premier acquired the Just Group group of companies in 2008.



Our Support Office is located in **Melbourne**, Australia.

Premier also has offices in **Auckland, London** and **Singapore** supporting our international retail operations.

Over **1,190** stores worldwide.

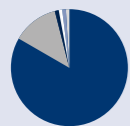


During the reporting period, Premier's 7 brands traded from more than 1,190 stores across 6 countries, as well as online through a number of proprietary and third party websites.



Together, Premier and the Just Group employed over **10,000+** people during the reporting period.

During the reporting period, our team members were located in Australia, New Zealand, the United Kingdom, the Republic of Ireland, Singapore, Malaysia and Bangladesh.



We have direct relationships with 186 suppliers, who either own or who partner with 270 approved factories for Just Group's production.

We also partner with and have fostered strong relationships with a range of national brands through the Just Group business, that account for less than 10% of our total spend.



Premier owns a warehouse in Melbourne from which products are distributed to Just Group retail stores around Australia, and to customers transacting with the Just Group through its online stores.



Over **3,900** TEU (20ft equivalent) containers shipped.



59,007,633 units received in FY21.



The Just Group also operates an additional warehouse in **Auckland** to service its New Zealand business and websites.

In the reporting period, the Smiggle brand utilised third party logistics providers in **Singapore** to service its Asian stores and online business and in the **United Kingdom** to service its European stores and online businesses.



Because it owns multiple brands and has international operations, Premier owns and controls a number of subsidiary entities.

For a complete list of subsidiaries, please refer to Premier's Annual Report published on [Premier's website](#).

Premier's supply chain includes:



The **sourcing of finished goods** from global and local suppliers.

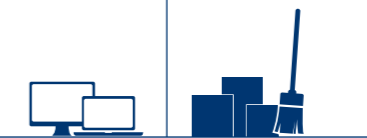
For example, Premier sources finished apparel and accessories from its suppliers for our apparel brands (Dotti, Just Jeans, Jacqui E, Peter Alexander, Portmans and Jay Jays) and stationery, backpacks and other school supplies for our Smiggle brand.



The **transportation** of these finished goods to Premier's warehouses and retail stores.

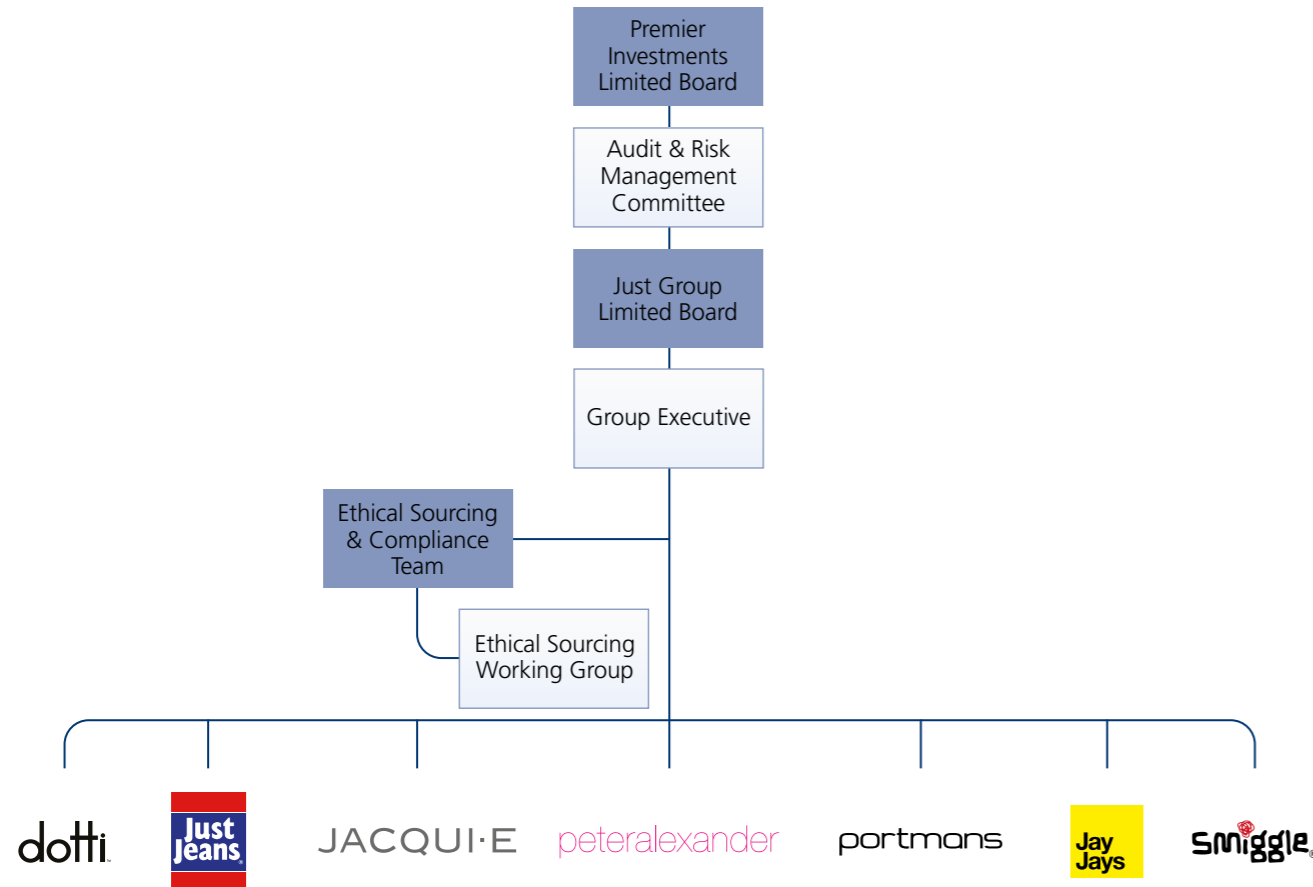


THE **JUST** GROUP



The **procurement** of non-merchandise services to support Premier's supply chain - for example, IT services and other non-merchandise related supplies and goods not-for-resale such as packaging and consumables.

Accountability and Governance



Premier has a dedicated Ethical Sourcing team which sits in the central Group Sourcing division that has members based in Melbourne and Dhaka that work directly with all Tier 1 apparel suppliers to deliver and ensure that they are compliant with our program.

Our Ethical Sourcing team sits independently of our brands. Therefore critical decisions around compliance are, from a governance perspective, completely separate from the everyday commercial decisions made by our buying teams (such as pricing and order placement). Our brands are unable to on-board new suppliers without the approval of the Ethical Sourcing team.

There are a number of ways that our due diligence and actions are monitored and governed, including:

- sponsorship of the Ethical Sourcing program at an Executive level;
- regular updates to the audit and risk committee;
- Premier Investment's Annual Report; and
- internal Ethical Sourcing Working Group.

The Just Group Ethical Sourcing Program has been developed with multiple internal stakeholders and signed off by the Premier Board. This program is reviewed by the audit and risk committee each year to ensure that the program is effectively managing the human rights risks identified in our supply chain.

Risks of Modern Slavery in Premier's Operations & Supply Chains

This section describes the risks of modern slavery practices in the operations and supply chains of Premier and other reporting entities within the Premier Group, as well as within the entities that Premier owns or controls.

PREMIER'S OWN OPERATIONS

Premier considers the risks of modern slavery practices within Premier's own operations relatively low, as over 90% of Premier's workforce are subject to collective agreements, with the balance employed on individually negotiated employment agreements.

Premier recognises the right of workers to collectively bargain and be represented.

Premier's own operations include its company-employed team members in stores in Australia, New Zealand, the United Kingdom, the Republic of Ireland, Singapore and Malaysia and own-distribution centres in Australia and New Zealand, and at Premier's support offices in Melbourne, Auckland, London, Singapore and Bangladesh.

THIRD-PARTY LABOUR AND LOGISTICS SUPPLIERS

In certain circumstances, such as peak trading periods, Premier will engage third-party labour suppliers to support increased labour requirements at its distribution centres.

In addition, Premier engages third party logistics suppliers in the United Kingdom and Singapore to manage the warehousing and distribution of goods in Europe and Asia. Because there is no direct employment relationship between Premier and workers employed with labour hire companies and third party logistics operators, this creates additional modern slavery risk.

PREMIER'S SUPPLY CHAINS

THIRD-PARTY PRODUCT SUPPLIERS

Premier does not own, operate or control any of the factories from which it sources finished goods. There is, therefore, a risk of modern slavery practices in those factories. We have a responsibility to have a comprehensive compliance strategy to mitigate risk.

By sourcing from third parties, company operations may cause or contribute to modern slavery risks in the following ways:

- the potential for forced labour within third-party manufacturers, or in a country that has a high prevalence of labour rights violations;
- delivery timeframes might cause manufacturer workers to be required to work excessive overtime or encourage poor labour hire practices;
- in breach of the express terms of Premier's supply agreements, suppliers might subcontract orders to unauthorised third parties with unverified labour rights standards that might engage in modern slavery practices;

- raw materials for production (for example, cotton) might be sourced from farms that engage in poor labour practices; and
- the impact of COVID-19 on international supply chains may lead to disruption or create other circumstances which increase the risk of suppliers adopting, encouraging or allowing modern slavery practices.

Further, some countries from which Premier sources products or other services might have higher risks of modern slavery, including due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors like poverty.

Full details of Premier's monitoring and actions to ensure compliance are set out in the 'Actions Taken to Assess and Address Modern Slavery Risks' section below.

Industry Supply Chain Risks and Premier Actions

For illustrative purposes, we have set out an example of the key steps for producing a pair of denim jeans below:

POTENTIAL INDUSTRY RISKS:

Governments or private bodies may use coercive or exploitative labour practices whilst often employing vulnerable migrant labour or ethnic minorities.

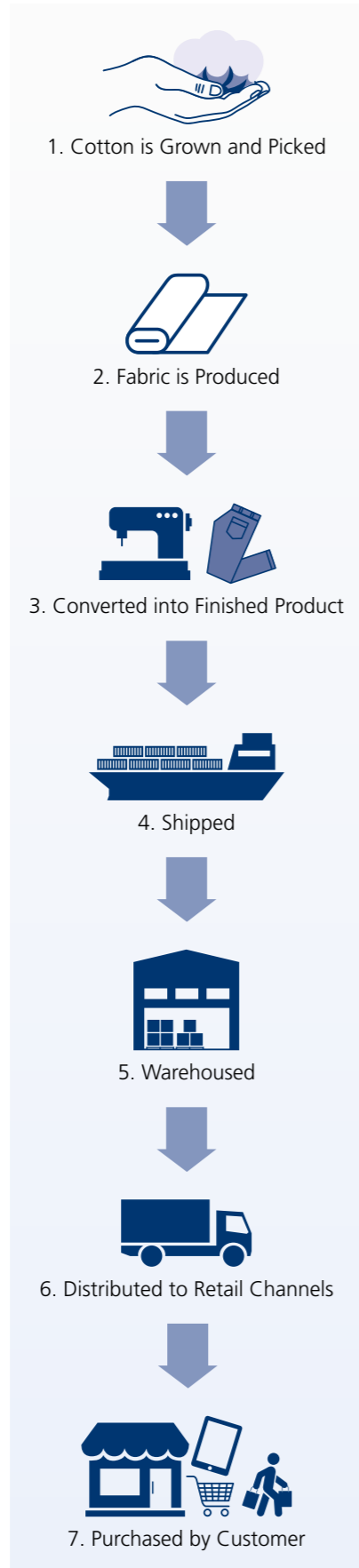
The various stages of production at fabric mills may be characterised by forced labour and a lack of freedom of association and collective bargaining.

Workers who are employed by finished goods factories may be subject to excessive working hours, in order to meet factory management KPIs and customer expectations.

The transportation and logistics (T&L) industry is not immune to human rights violations as workers may be contracted casually with T&L customers not having full oversight of T&L operations or supply chains.

3rd party labour hire, a casualisation of the workforce and migrant workers who may be more vulnerable can lead to exploitation in warehouses.

As noted above, the T&L industry is not immune to potential human rights violations, with T&L customers not having full oversight of T&L supply chains.



OUR ACTIONS TO MITIGATE RISKS:

The uptake of more sustainable sources of cotton by the Just Group, such as Better Cotton and GOTS, in addition to signing the Cotton Pledge against forced labour are steps that work towards improving labour practices.

Nominating fabric mills, building direct relationships and tracing the supply chain to gain greater visibility are our key actions in understanding worker conditions.

All Tier 1 finished goods factories are audited. From the end of FY21 our new and expanded compliance program in partnership with ELEVATE provides increased insight into labour rights breaches and remediation of issues found.

In international supply chain agreements with T&L companies, we require T&L suppliers to complete due diligence of their supply chain to mitigate the risks of modern slavery in their operations.

Employment contracts are in place with all Just Group team members in line with all relevant awards and legal requirements. All migrant workers have regular VEVO checks and 3rd party labour hire companies have been required to complete modern slavery questionnaires in FY22.

We require all T&L supply companies to complete due diligence assessments to mitigate modern slavery practices in their operations and supply chains.

Actions Taken to Assess and Address Modern Slavery Risks in Premier's Supply Chains

During the reporting period, Premier and its subsidiaries have invested in a number of initiatives to assess and address the modern slavery risks identified in its supply chain.

POLICIES & PROCEDURES



Premier recognises that policies are only one part of our work in respecting, assessing and addressing human rights in our supply chain. Policies alone cannot sufficiently mitigate the modern slavery risks and vulnerabilities workers face in the countries we operate in.

Premier has a range of internal policies and procedures which work to support existing international human rights standards and local laws in the jurisdictions in which we operate. The Ethical Sourcing Code of Conduct (COC) has been written using the key human rights principles from International Labour Organization (ILO) core standards and the Ethical Trading Initiative (ETI) base code. The COC is reviewed annually to ensure Premier is proactively addressing human rights issues or legislative changes that need to be updated in our policies.

We are committed to continuously reviewing and improving all business policies to strengthen our business practices in human rights due diligence.

SUPPLY CHAIN DUE DILIGENCE & VERIFICATION



i. Risk Analysis

Premier's risk-based analysis of all product supply chain activities includes ranking modern slavery risk according to a number of factors such as supplier country of origin, supply chain channel (eg. direct relationship vs agency relationship) and supply chain tier ie. finished products (Tier 1), fabrics and trims (Tier 2) and raw materials procurement (Tier 3).

Based on that risk assessment, suppliers have been classified according to a risk ranking, which in turn triggers detailed requirements for both supplier on-boarding prior to any order placement, and ongoing monitoring once suppliers are accepted for order placement.

Since the reporting period ended, we have engaged ELEVATE in a strategic partnership to further upgrade Premier's compliance programs. Our partnership with ELEVATE includes a significantly more robust risk mapping of our current and future manufacturing locations, through ELEVATE's EIQ and Sentinel systems. EIQ draws on ELEVATE proprietary audit data together with publicly available risk indices to segment risk in our supply chain. Sentinel is a web-based analytics developed by ELEVATE to give immediate real-time alerts on factory compliance, human rights, ethics and health and safety issues. These tools will greatly enhance the effectiveness of our program and ensure resources are focused on higher risk sites. We look forward to reporting more on this development in our work program in our next modern slavery statement.

In addition, an assessment of non-merchandise supplier modern slavery risk was developed and distributed, the results of which are under review. We will also report on this work program in our next modern slavery statement.

ii. Auditing, Approval and Registration

Prior to accepting any order for a Just Group branded product, all suppliers are required to provide an up to date social compliance audit which in essence is a detailed workplace conditions assessment report on the factory, including risks such as labour standards, business ethics, health and safety and environmental practices.

This has been a fundamental tool used by the Just Group brands for many years in both the initial approval of supplier factories and their ongoing monitoring. All audits are conducted by globally recognised firms specialising in social compliance and worker safety and welfare. These audits are conducted by firms such as Intertek, Bureau Veritas and SGS who are all members of the Association of Professional Social Compliance Auditors (APSCA). In all cases, Premier requires suppliers to be audited every 12 months. All factories are reviewed for non-compliance by our General Manager of Sourcing and Compliance before approved to place orders.

As part of our strategic partnership with ELEVATE we have introduced a new and enhanced factory audit program whereby the majority of strategic Tier I factories supplying the Just Group will be audited by ELEVATE to the ERSA standard, a recognised global standard with a focus on labour rights risks.

ERSA audits cover each of the following matters:

- Transparency & Business Integrity
- Management Systems
- Hiring, Disciplinary & Termination
- Child Labour
- Forced Labour and Migrant Workers
- Harassment or Abuse
- Discrimination
- Freedom of Association and Grievance
- Wages and Benefits
- Hours of Work
- Health & Safety
- Environment
- Subcontracting
- Home-work

Where a third party licensor or brand partner requires an alternative audit standard (such as a BSCI or SMETA) ELEVATE will conduct the audit to the required standard. The Just Group will continue to use audits conducted by APSCA audit member firms.

We look forward to reporting more on this development in our work program in our next modern slavery statement.

Actions Taken to Assess and Address Modern Slavery Risks in Premier's Supply Chains

iii. Monitoring beyond compliance audits

Premier understands that policies and social compliance audits alone are insufficient to fully safeguard against labour rights breaches in supply chains. Although our onboarding compliance documents communicate clear expectations in terms of supplier behaviour and due diligence, in addition we have a comprehensive approach to engaging and working with our suppliers to monitor, remediate and continuously upgrade their performance.

One of the key risks that can lead to modern slavery breaches is that of subcontracting, where a supplier may choose, without permission, to move production to a factory that is neither compliant nor approved for production.

In order to ensure that all suppliers continue to only manufacture in both fully audited and Just Group approved factories, Premier engages in a number of ongoing monitoring activities. These include conducting factory visits (in person or virtual) by members of the Just Group buying teams, in-line inspections of final production as well as a production audit program which was launched in the reporting period.

Production Audits

Production audits are conducted by ELEVATE and allow the Just Group to randomly and retrospectively review production records at factories. By doing so we are able to verify that orders have only been made in approved factories. Evidence of subcontracting may result in disqualification or significant penalties depending on the circumstances.

These measures act as a vital tool in helping to ensure only suppliers that have passed our rigorous standards are making our products.

Anonymous Worker Surveys and Help Line

Enhancing our suite of tools outside of the audit program in the reporting period included launching an anonymous worker survey program administered through ELEVATE. Workers are invited to answer a short questionnaire of 15-20 questions on a range of topics ranging from wages and work conditions to health & safety and recruitment practices. Worker responses cannot be attributed to any one individual and as such the probability of collecting genuine feedback increases substantially.

Creating a direct channel to workers where they can safely and anonymously answer questions in relation to working conditions including pay, working hours and management treatment of employees was a major upgrade of our program. This program is in its early stages however we are confident that it will be most effective in helping workers voice issues that may not be easy to raise in an audit setting.

From 1 December 2021 we expanded this as part of our ELEVATE strategic partnership to include a factory Ethicspoint Help Line facility to key strategic suppliers, which will be operated independently of the company. We look forward to reporting more on this development in our work program in our next modern slavery statement.

Direct Sourcing and Supplier Relationships

Over the past five years the group has worked to increase the proportion of direct sourcing and in 2020 ended its relationship with its largest buying agent in China. This enables Premier to work more closely with suppliers and to therefore both manage risks more reliably and efficiently but also collaborate with factories and suppliers to bring about meaningful and lasting change.

Training

During the reporting period, Premier conducted Ethical Sourcing training for its Australian and Bangladesh based buying teams to assist them in identifying and mitigating the risks of modern slavery.

Further, Labour Rights Awareness training was rolled out to the majority of our strategic suppliers and factories in 2021. The training consisted of an update in relation to the Modern Slavery legislation, ILO indicators of Modern Slavery risk, real life examples of modern slavery breaches as well as a recap of our Ethical Sourcing Code of Conduct.

Recognising that purchasing practices can place pressure on and impact working conditions in factories, Just Group introduced a Responsible Purchasing Practices module to our regular buyer training sessions which will be rolled out further in the next year.

All training activities will continue throughout 2022.

MULTI-STAKEHOLDER INITIATIVES & ADVOCACY



i. Bangladesh and the Bangladesh Accord

Premier opened its own Bangladesh office in 2014 where we employ over 22 employees directly, including specialist merchandisers and quality and compliance roles to support sourcing of finished goods for our Just Jeans, Jay Jays and Dotti brands.

Our continued investment in Bangladesh supports our audit and compliance activities in that region — with a particular focus on social compliance and safety.

Our commitment to this region contributes to Bangladesh's economic and social development. In particular, the garment industry comprises around 80% of all of Bangladesh's export earnings, is a significant contributor to GDP and employs over 4 million workers, 80% of whom are women (Understanding the Gender Composition and Experience of Ready Made Garment Workers in Bangladesh, ILO, 2020).

From 2013 to 2021 Premier has worked with both the Accord on Fire and Building Safety in Bangladesh and the Alliance for Bangladesh Worker Safety. Premier has recently joined the International Accord and looks forward to working closely with all parties including the RMG Sustainability Council (RSC) to continue the unprecedented work to improve worker safety in the country.

ii. Advocacy

Premier has worked closely with Baptist World Aid Australia (BWA) on the Ethical Fashion Report since 2016. The report focusses on what steps the fashion industry as a whole, together with individual companies, are taking to address compliance issues such as forced labour, child labour and exploitation generally, as well as other modern slavery practices.

iii. Cotton and Tiers 2 and 3 Supply Chain Transparency

Premier understands that supply chain transparency and managing risk extends beyond Tier 1 factories making our finished product. In spite of the challenges and complexity of doing this the company is taking active steps to develop strategies to improve Tier 2 and Tier 3 supply chain transparency.

The group's brands source materials and trims from a range of Tier 2 suppliers. Some Tier 2 suppliers, such as mills, are nominated, and therefore direct relationships with our company exist. For the Tier 2 suppliers that are not nominated, in 2021 we worked in collaboration with our Tier 1 suppliers to gain greater understanding and visibility of fabric and trim suppliers.

For Tier 3 raw materials suppliers, cotton is the group's largest single natural fibre. During the reporting period, Just Jeans became a signatory to The Better Cotton Initiative (now **Better Cotton**). Better Cotton exists to help farmers produce cotton in a way that is better for themselves, their communities and the environment, with a focus on labour rights.

In addition, Peter Alexander ranges a number of products using organic cotton and dyes certified as 100% organic according to the Global Organic Textile Standard (GOTS). The aim of the GOTS is to ensure organic status – from harvesting of the raw materials, through to environmentally and socially responsible manufacturing.

As the vast majority of brands, due to their purchasing power, are unable to work directly with cotton farmers, partnering with organisations such as Better Cotton and GOTS is the best available strategy to help improve labour rights in this sector. We are committed to strengthening our ties with these two organisations as well as exploring other new programs as they emerge.

How the Effectiveness of the Actions We Have Taken to Address Modern Slavery Risks are Assessed

Premier is committed to ongoing improvement and upholding human rights within our supply chain and across the industry more broadly. We remain open minded to improving the rigour of our program and to adjust it when needed to enhance outcomes.

'Effectiveness' is determined by initially putting measures in place to potentially gain insights into the incidence of high risk Modern Slavery indicators in the supply chain and then, if cases are found, remediating issues accordingly. In order to do so, multiple activities must be in place simultaneously to provide a range of methods of assessing factory due diligence and for workers' voices to be communicated up the supply chain.

Through these actions we hope to ultimately protect vulnerable workers from exploitation, and to decrease the associated human rights risk associated in the supply chains.

During the reporting period, Premier has developed a new framework for implementation, review and reporting purposes for the subsequent (FY22) reporting period and beyond. This will provide internal teams and key stakeholders with valuable insight in order to deliver meaningful improvement year on year.

A summary of that framework is set out below.

OUR PROPOSED FRAMEWORK FOR MEASURING EFFECTIVENESS FROM FY22 ONWARDS

POLICIES AND PROCEDURES

ACTION	OBJECTIVE	MEASURING EFFECTIVENESS
Maintaining policies and procedures	To adapt and update policies and procedures to reflect human rights issues in the supply chain	<ul style="list-style-type: none"> Supplier compliance to current policies and procedures through audit program Method of communication of any new policy or procedure updates to suppliers Identify how policies and procedures have changed in response to modern slavery risks identified through Ethical Sourcing activities
Supplier on-boarding	To determine if there are any modern slavery risks identified prior to commencing the registration process	<ul style="list-style-type: none"> Issues detected in pre-screening process through the use of ELEVATE's EIQ and Sentinel tools to determine whether a supplier should be approved

AUDIT AND DUE DILIGENCE PROGRAM

ACTION	OBJECTIVE	MEASURING EFFECTIVENESS
ERSA audits conducted in Tier 1 supplier factories	To identify key human rights risks and indicators of modern slavery in the supply chain	<ul style="list-style-type: none"> Tracking number of zero-tolerance and critical issues found in audits, for example, the following zero-tolerance audit breaches: <ul style="list-style-type: none"> evidence of child or forced labour auditor refused access to site or offered bribe workers prevented from attending interviews, or identification documents withheld Tracking number of issues by categories found in audits Tracking transparency score from suppliers during audit Consistency of worker sentiment survey results against ERSA results


AUDIT AND DUE DILIGENCE PROGRAM continued...

ACTION	OBJECTIVE	MEASURING EFFECTIVENESS
Non-compliance remediation	To ensure issues raised in audits that may be indicators of modern slavery are remediated appropriately	<ul style="list-style-type: none"> Tracking number of issues closed and open. For those issues that are open there is further detail on remediation plan timelines
ELEVATE Production audits	To monitor and verify instances of unauthorised subcontracting by factories. Sites not approved by Just Group are at higher risk of modern slavery practices	<ul style="list-style-type: none"> Percentage of production audits completed in Tier 1 suppliers Instances of unauthorised subcontracting

TRAINING

ACTION	OBJECTIVE	MEASURING EFFECTIVENESS
Just Group employee modern slavery training	To continuously educate and create awareness of modern slavery risks and improve the quality of that training year on year	<ul style="list-style-type: none"> Engage in awareness survey testing with team members to determine understanding and proficiency in modern slavery risks Number of employees trained Hours of training delivered Post-training participant testing on content of training delivered Review of feedback on training content delivered
Supplier modern slavery awareness training	To continuously educate and create awareness of modern slavery risks and improve the quality of that training year on year	<ul style="list-style-type: none"> Number of suppliers trained Hours of training delivered Post-training participant testing on content of training delivered Review of feedback on training content delivered Year on year audit score improvement Improvement in worker sentiment through survey results over time
Supplier capacity building and targeted modern slavery training	To address gaps and issues requiring remediation found through audit program and grievance mechanism tools	<ul style="list-style-type: none"> Supplier scores from post-training assessment Follow up surveys conducted to determine effectiveness of training

How the Effectiveness of the Actions We Have Taken to Address Modern Slavery Risks are Assessed

GRIEVANCE MECHANISMS AND REMEDIATION 		
ACTION	OBJECTIVE	MEASURING EFFECTIVENESS
Worker surveys	To create avenues for workers' voices to be heard and communicated to the Just Group	<ul style="list-style-type: none"> Percentage of surveys conducted in Tier 1 suppliers Tracking number of issues by category found in worker surveys Percentage of improvement of worker satisfaction in follow up surveys Track and report number of issues remediated
ELEVATE/ Ethicspoint Help Line	To create an avenue for workers to report possible illegal, unethical, or improper conduct in factories and any retaliation workers may face following an ELEVATE audit	<ul style="list-style-type: none"> Tracking number of issues by category reported via the Ethicspoint Help Line Track and report number of issues remediated
RSC Worker Help Line (Bangladesh)	To provide a grievance channel for workers and to report issues related to fire and building safety in factories participating in the RSC	<ul style="list-style-type: none"> Tracking number of issues by category reported via the RSC Worker Help Line Track and report number of issues remediated

Our commitment to the continuous improvement of our Ethical Sourcing Program and modern slavery program requires reflection and analysis of our actions to combat modern slavery practices.

Process of Consultation with any Owned or Controlled Entities

The boards of Premier's operating subsidiaries, including the various Just Group operating entities, have been consulted in relation to the preparation of this modern slavery statement. This includes ongoing engagement between the entities operating each of the Just Group brands and briefing board members.

While some of Premier's subsidiaries may not be reporting entities for the purposes of the Modern Slavery Act, Premier has adopted a group-wide approach to identifying and reporting on modern slavery risks. This statement applies to all of Premier's operations and is made jointly on behalf of each of Premier's brands within the Just Group, being Just Jeans Pty Ltd (for the brand Just Jeans), Jay Jays Trademark Pty Ltd (for the brand Jay Jays), Jacqui E Pty Ltd (for the brand Jacqui E), Smiggle Pty Ltd (for the brand Smiggle), Portmans Pty Ltd (for the brand Portmans), Dotti Pty Ltd (for the brand Dotti) and Peter Alexander Sleepwear Pty Ltd (for the brand Peter Alexander).

This statement is issued jointly on behalf of all reporting entities in the Premier Group. The contents of this statement is approved by the Board of Premier, which is in a position to influence or control each of its subsidiaries and the reporting entities within the Premier Group covered by this statement.

Our Commitment

Premier condemns all forms of modern slavery practices. Premier will continue to report, on an annual basis, the steps taken to assess and address modern slavery risks in its entire supply chain and looks forward to sharing those developments in its next statement.



Richard Murray
Chief Executive Officer
Premier Investments Limited
27th January 2022

Appendix - Reporting Criteria References

REPORTING CRITERIA	WHERE TO READ
Identify the reporting entity	Page 1
Describe the reporting entity's structure, operations and supply chains	Pages 4-6
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities owned or controlled by the reporting entity	Pages 8-9
Describe the actions taken to assess and address those risks	Pages 10-12
Describe how the effectiveness of such actions are assessed by the reporting entity	Pages 13-15
Describe the process of consultation with any entities that the reporting entity owns or controls	Page 16
Provide any other information that the reporting entity considers relevant	Pages 2-3; 7



dotti.



JACQUIE

peteralexander

portmans



Smiggle®