



FOREVER NEW

MODERN SLAVERY STATEMENT

INTRODUCTION

This is our first modern slavery statement, which applies to the reporting period 1 July 2019 – 30 June 2020. It describes the risks of modern slavery identified in our operations and supply chain and the steps taken during this reporting period to minimize the likelihood of those risks occurring. This statement also broadly outlines our future commitments towards addressing modern slavery.

This statement is submitted by:

Forever New Clothing UK Limited Company Number 12060160

(referred to throughout this statement as '**Forever New**').

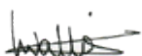
This statement has been prepared in accordance with section 54 of the Modern Slavery Act 2015 (UK) (the '**UK Act**').

Forever New opposes the violation of human rights, including modern slavery in all its forms. 'Modern slavery' includes exploitative situations of coercion, threats and deception used to exploit victims and undermine freedom, practices such as human trafficking, slavery, servitude, forced or compulsory labour, forced marriage, debt bondage, the worst forms of child labour and deceptive recruiting.

We recognise that globally, the apparel industry carries inherent risks of modern slavery across all tiers of the supply chain.

Forever New is committed to respecting the rights of all those involved with our business operations and supply chain by ensuring we are effectively identifying, mitigating and remediating risks of modern slavery. We acknowledge that to do so requires robust due diligence processes, stakeholder collaboration and a commitment to continuous improvement.

This statement was approved by the director of Forever New Clothing UK Limited on 30 March 2021.



Ian Wallis
Director

Forever New Clothing UK Limited

30 March 2021

Forever New is committed to respecting the rights of all those involved with our business operations and supply chain by ensuring we are effectively identifying, mitigating and remediating risks of modern slavery.

OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

OUR STRUCTURE

The Board of ADT Group Holdings Pty Ltd is responsible for the overall governance, management and strategic direction of Forever New in accordance with all duties and obligations imposed by law. This includes oversight of Forever New’s Code of Conduct and other policies. ADT Group Holdings Pty Ltd is the parent company of both Forever New Clothing Pty Ltd and Forever New Clothing UK Limited, which are the operating entities in Australia and the UK respectively.

The Board has delegated some of its responsibilities to the Audit and Risk Committee, including oversight of the Forever New’s risk management and compliance framework.

The Executive Leadership Team of Forever New is responsible for the implementation and delivery of Forever New’s strategy, risk management and compliance framework. Each member of the Executive Leadership Team reports to the Chief Executive Officer of Forever New. Within the business, the General Manager of Production and Quality oversees the management of Forever New’s ethical trade initiatives, including compliance with modern slavery.

OUR OPERATIONS

Forever New commenced in 2006 and its headquarters are in Melbourne, Australia.

Forever New’s business comprises the sale of women’s apparel and related accessories under its brands, ‘Forever New’, ‘Forever New Curve’ and ‘Ever New’. The brands ‘Forever New’ and ‘Forever New Curve’ are used in most countries, with products sold under the ‘Ever New’ brand in USA, Canada and the Philippines.

Forever New is a multichannel retailer directly selling its products via the following channels:

- free-standing retail stores located in Australia, New Zealand, Singapore, Canada, India, South Africa and Namibia (approximately 203 stores)

- concessions (‘store-in-stores’) located in department stores throughout Australia, Singapore, Canada, India, South Africa, the United Kingdom, European Union and the Middle East (approximately 195 stores)
- online through our own websites and third party websites
- as a franchisor in the Philippines and Indonesia (approximately 18 stores); and
- wholesale.

Our subsidiary companies in New Zealand, Singapore, Canada, South Africa, United Kingdom and India operate our business in those countries. Forever New also operates regional offices in Cape Town (South Africa) and Gurgaon (India).

Globally, we directly employ over 1,800 people with a small number of staff employed on a contract basis. In Australia, where our head office and majority of stores are located, we directly employ approximately 1,000 people.

Our operations consist of design, retail, corporate, customer service and warehouse functions. Forever New’s in-house design team designs product ranges which are manufactured by third parties overseas.

Our head office comprises support functions including finance, marketing, IT, buying, design, quality assurance, store development, operations, supply chain and logistics, legal, human resources and planning.

Merchandise is distributed to our store networks and online orders received via our websites are fulfilled via Forever New’s warehouses located in Australia and India. Forever New uses third party logistics and warehouse service providers in New Zealand, Canada, Middle East, USA, South Africa, Singapore and the United Kingdom.

In the United Kingdom and EU, our operations comprise approximately 37 retail concession stores within department stores; with a further 5 employees in operational and support roles.



OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

OUR SUPPLY CHAIN

Merchandise suppliers (goods for resale)

Our product design team is based in our Melbourne head office with products manufactured by factories primarily based in five countries.

Our main sourcing country is China which accounts for over 80% of our products. We have held relationships with some of our suppliers, the majority of whom we trade with directly, for over 13 years. Our remaining sourcing countries are Vietnam, Bangladesh, Turkey, India and Sri Lanka.

Our sourcing model is predominantly direct with few agents used across our 125 suppliers who produce apparel, accessories and footwear.

Non-merchandise suppliers (goods and services not for resale)

Globally, we source non-merchandise goods and services from approximately 1,000 suppliers covering 30 diverse industry categories such as marketing, packaging, freight and logistics, professional services, shopfitting; warehousing, cleaning, IT and customer support.



ADDRESSING THE IMPACTS OF COVID-19

COVID-19 has had and continues to have profound impacts on the global fashion supply chain. We recognise many of its effects are overwhelmingly felt by garment workers and acknowledge their heightened vulnerability during the pandemic.

COVID-19 SUPPLY CHAIN IMPACTS AND SUPPORT

During the peak of the crisis and beyond, we worked hard to reduce the impact on our supply partners by honouring our commitments and prioritising the safety of garment workers. Direct communications with our suppliers continued throughout the reporting period.

The steps we have taken include:

- committing to taking completed orders as well as all orders in production, paying in full at originally agreed prices
- orders which were not yet in production were re-phased according to market demand and supplier capacity rather than cancelled
- honouring purchase orders by the redistribution of seasonal product to other regions where our merchandise is sold
- committing to raw materials purchased for re-phased orders to assist with supplier liabilities
- commencing re-ordering when it was safe to do so.

The health and safety of workers was a key priority for us. Suppliers maintained the provision of Personal Protective Equipment (PPE), conducted temperature checking, implemented social distancing and hygiene measures and provided regular occupational health and safety training.

Their efforts were further supported through our distribution of training resources, protocols and webinars available in multiple languages.

The closures of factories, travel restrictions and border closures affected our ability to conduct physical audits and factory visits by our in-house compliance teams, however virtual audits were conducted in India where it was possible to do so. Training activities also ceased whilst factories were closed.

COVID-19 OPERATIONS IMPACT AND SUPPORT

Across the business, our global operations were impacted by office, store and warehouse closures.

Staff were supported throughout the duration of the pandemic via safety protocols for those working on and off site which included:

- advanced leave provisions
- flexible working arrangements
- the implementation of COVID-19 safety protocols such as the provision of free PPE, frequent sanitisation measures, temperature checks on commencement of work and use of QR codes for contact tracing purposes
- reorganisation of shifts to reduce number of employees on site at any given time and attendance caps; and
- regular communications including government guidance, resources and updates.

Back-to-work COVID-19 plans have been implemented as staff attendance has incrementally resumed on sites.

For staff in India, a region which presented heightened risks for exposure to the pandemic, additional measures to those above include flexible work arrangements offered to personnel in high-risk categories such as those with existing health conditions and young mothers as well as the establishment of an emergency fund to provide financial assistance for employees impacted by the virus. Testing costs have been covered for all employees.

The roll out of some activities in our Strategic Plan (referred to later in this statement) such as staff training were paused due to staff furloughs/stand downs.

IDENTIFYING RISKS OF MODERN SLAVERY

We recognise that globally, the apparel industry carries inherent and complex risks of modern slavery throughout all tiers of the supply chain. Operational functions of the retail industry carry their own varied and distinct risks and require additional consideration and assessment of risk.

Using indices including the ITUC Global Rights Index, and the Global Slavery Index, combined with resources from the ILO, we have commenced development of a risk register in order to:

- understand and determine our salient risks across all regions by country, sector and commodity
- identify vulnerable worker groups
- prioritise our risk mitigation and due diligence efforts; and
- frame our remediation strategy.

RISKS IN OUR OPERATIONS

In Australia, New Zealand, Canada, EU and Singapore, we have determined the risk of modern slavery in our retail and head office operations to be low.

A preliminary assessment has identified our warehouses and franchise operations as necessitating further due diligence to understand any potential risks of vulnerable worker groups including temporary and migrant workers. This will commence in 2021.

Concession staff based throughout department stores in the United Kingdom are usually hired directly and are employed on Forever New contracts. The use of recruitment agencies is minimal.

RISKS IN OUR SUPPLY CHAIN

Merchandise suppliers

Across our merchandise supply chain, our preliminary assessment has identified the following potential modern slavery risks as our most salient:

- forced labour
- bonded labour
- the worst forms of child labour; and
- deceptive recruitment practices.

We also recognise the following risk factors in the apparel sector as indicators of the potential for modern slavery to occur:

- unauthorised subcontracting
- excessive overtime
- the use of migrant, low skilled workers
- lack of freedom of association
- temporary labour contracts; and
- lack of access to effective grievance mechanisms

We acknowledge the following categories of workers as the most vulnerable in the garment sector:

- female workers
- migrant labour
- subcontracted labour
- agency and temporary/contract labour; and
- young/child workers.

Non-merchandise suppliers

We source non-merchandise goods and services from approximately 1,000 suppliers covering 30 industry categories. Given their broad nature and locations, risks in this area of our supply chain are unique and varied. In the 2021 reporting period, we will commence detailed risk mapping by sector, region and spend to identify specific risks and prioritise areas of due diligence.

We recognise that industries which make use of short term contract, migrant labour and labour hire agencies such as cleaning, third party warehousing, freight and logistics pose greater risks and as such will be a focus of our efforts.

ACTIONS TAKEN TO ADDRESS MODERN SLAVERY RISKS

Our cross functional approach to mitigate and remediate risks of modern slavery in our supply chain and operations is supported through policy frameworks, resourcing, supplier engagement and industry partnerships.

GOVERNANCE

The Board, together with the Audit and Risk Committee share responsibility for oversight of Forever New's risk management and compliance framework with the Executive Leadership team responsible for its implementation and delivery.

A cross functional and regional modern slavery working group, established in 2021, will be tasked with developing a standardised operational and supply chain due diligence approach across Forever New.

OPERATIONS

Our policy framework establishes the standards by which we operate as well as outlining responsibilities and expectations regarding workplace behaviour, compliance with relevant laws and regulations, bribery and corruption, harassment and conflicts of interest.

Across the regions, our suite of policies and employee handbooks contain the following policies:

- code of conduct
- equal employment policy
- diversity, equality and inclusion policy; and
- prevention of sexual harassment policy.

Whilst a preliminary risk assessment of our operations highlights workers hired via our franchisees and third party labour contracts as a priority due to the lower visibility of these arrangements, further assessment is scheduled to determine the specific nature and degree of potential risks relevant to each function and region.

Existing governance in our international regions includes independent grievance mechanisms and risk committees. Our work going forward is to gain further understanding of their effectiveness and explore how they are responding to the nature of risks specific to their region.

The Forever New Whistleblowing Policy and anonymous helpline is available to ensure staff and others to whom the policy applies are provided access to an effective grievance channel. We will raise awareness of the Whistleblowing Policy throughout our regional operations.

In respect to our concession arrangements in the United Kingdom and European Union, we will continue to work with department stores to address modern slavery risks as required by our contracts with them.

MERCHANDISE SUPPLY CHAIN

During the reporting period, we established a Responsible Sourcing strategy to reflect our responsibility to uphold the rights of workers in our supply chain, our commitment to minimising our environmental footprint and drive positive change for our stakeholders.

Containing six pillars underpinned by time bound strategic objectives, the roadmap includes supplier capacity building and worker access to remedy, responsible fibre sourcing, governance, stakeholder partnerships, transparency and governance.

RESOURCING

We commenced the role of Social Responsibility Manager based in our Head Office during the reporting period. This role is in addition to our in-country compliance teams located in our major sourcing countries in China, India, Bangladesh and Vietnam.

Engaged to uphold our ethical sourcing standards, our in-country representatives work with us to manage our supplier on boarding, audit programmes and site visits, as well as corrective action management to drive continuous improvement.

SUPPLIER VISIBILITY

Visibility of our supply chain is vital to both mitigating modern slavery risks and managing their impacts should they be detected.

Forever New works in a partnership approach with our finished goods suppliers, some of which we have worked with for as long as 13 years. We have visibility of our Tier One factory base and over 50% of Tier Two suppliers (fabric mills and trim (inputs) suppliers).

Our Top Three sourcing countries for finished goods are China, Vietnam and Bangladesh.

Further mapping of Tier Two suppliers will continue so we can gain greater understanding of the profile of our production base.

ACTIONS TAKEN TO ADDRESS MODERN SLAVERY RISKS

SUPPLIER ENGAGEMENT

Social audit programme

Finished goods suppliers are required to comply with our ethical sourcing on-boarding process which includes compliance with our policy suite (see below), audit and corrective action remediation programme. Suppliers are required to complete a pre-audit questionnaire and undergo either an annual internal audit conducted by our in-country compliance teams or provide a third party audit conducted in the past 12 months.

Our in-country compliance teams conduct physical site visits of facilities in China, Sri Lanka, Vietnam, Bangladesh and India before they can be approved for production during which conditions are reviewed against the standards in our Supplier Code of Conduct. Audits must cover our Supplier Code of Conduct which is based on the ETI Base Code, all relevant laws and include criteria such as working hours, wages, freedom of association, subcontracting, freely chosen employment and health and safety.

Suppliers found to have zero tolerance findings will not be on-boarded into our order platform until these issues are confirmed as remedied.

To ensure continuous improvement of workplace conditions and drive progress on issues identified in audits, suppliers are required to engage in time bound corrective action remediation plans which are overseen and managed by our in-country compliance managers. Findings are graded according to their severity with resolution time-frames ranging from immediate to 90 days accordingly.

During the reporting period, we conducted 70 audits (internal and third party), on an unannounced and semi announced basis. A total of 60 compliance site visits including non-compliance verification visits also took place. Whilst this number is usually higher, the impacts of COVID-19 meant that fewer new suppliers were on-boarded and physical visits limited due to travel limitations and safety restrictions.

Whilst physical audits in some regions were hampered temporarily by the pandemic, audit assessments did continue during the reporting period including virtually. Remediation time-lines were extended where necessary whilst the safety of workers was prioritised and or factories were closed.

Policy and contractual provisions – Supply Chain

Our Supplier policy suite to which all suppliers must comply includes our Supplier Code of Conduct, which is based on the ETI Base Code and addresses forced labour risks including child labour and debt bondage. The Supplier Code of Conduct coupled with our ethical sourcing policy suite governs the minimum requirements of our trading relationships. To assist with compliance and understanding, our Supplier Code of Conduct has been translated into Mandarin for China based factories.

Our policy suite includes:

- supplier code of conduct
- young worker and child labour policy
- forced labour policy; and
- ban on cotton harvested from Uzbekistan.

Additionally, our Purchase Order Terms and Conditions requires compliance with our Code and policy suite. In 2021, this will be further strengthened to reference Modern Slavery risks more specifically including compliance with relevant legislation. In parallel, as with our non-merchandise suppliers, our merchandise supply chain will be engaged by the inclusion of Modern Slavery clauses into agreements.

Similarly, whilst planned for the reporting period but delayed due to COVID-19, in 2021, a more robust Supplier Code of Conduct with its application broadened to include non-merchandise suppliers of goods and services will be rolled out.



ACTIONS TAKEN TO ADDRESS MODERN SLAVERY RISKS

Responsible Fibre Sourcing Strategy

We recognise that modern slavery risks exist beyond Tier One into further tiers of the supply chain.

We have visibility of a portion of our Tier Two fabric mills and whilst mapping of this Tier continues, further due diligence of our most strategic suppliers will allow us to identify whether these facilities have undergone social assessments and audits.

Our sourcing strategy will continue to explore further due diligence measures to mitigate risks in this area of our supply chain.

GRIEVANCE MECHANISMS AND ACCESS TO REMEDY

Worker Voice

We recognise that whilst factory audits provide a useful tool in identifying potential indicators of modern slavery from which to drive further engagement, they cannot provide a full understanding of working conditions.

All audits and site visits assess the presence of complaints mechanisms however we appreciate providing a range of channels for workers to raise concerns is vital in ensuring they have effective and legitimate access to remedies which they feel comfortable and confident in using.

Our factories in Bangladesh, as members of the RMG Sustainability Council (RSC) have a health and safety complaints mechanism in place where workers are able to raise safety concerns in a confidential manner.

After a review of a previous worker helpline partnership held in some of our most strategic factories, in 2021 we will explore reinstating this function coupled with targeted training to address prevailing issues identified with the assistance of factory management consultation.

Whistleblowing Policy

The Forever New Whistleblowing Policy provides an independent confidential hotline for reportable conduct to staff, contractors and suppliers and is available on the Forever New intranet and website.

INTERNAL CAPACITY BUILDING

Responsible Sourcing and Purchasing

We acknowledge the impact purchasing behaviour can have on working conditions as well as supplier relationships and standards.

During the reporting period, a Responsible Sourcing and Purchasing Policy and accompanying guidelines were developed and issued to the buying and sourcing functions. The guidelines define roles and responsibilities at the development, costing, order placement and payment stages of the buying process.

All relevant departments in the purchasing cycle are required to consider the following factors in their supplier relationships and negotiations:

- factory capacity and capability are factored into forecasts and orders
- forecasts are as accurate as possible
- lead times are adequate and agreed milestones adhered to
- price negotiations and payment terms are fair and balanced
- commercial terms and provisions allow for compliance with local and international laws and our Supplier Code of Conduct
- purchase orders and payments are made on time
- technical details are accurate, complete and provided on time
- orders with strategic suppliers are as consistent as possible; and
- responsible exit guidelines are followed.

ACTIONS TAKEN TO ADDRESS MODERN SLAVERY RISKS

Training

In-person training with our buying and sourcing functions included scenario setting and case studies to demonstrate the multiple stages of a transaction where the opportunity to influence positive purchasing behaviour presents itself.

The policy and how to implement its guidance has been included in an annual training calendar and induction of new team members in the sourcing and purchasing departments.

Modern Slavery training for our employees was halted due to office and store closures during COVID-19. This will re-commence in the next reporting period.

Stakeholder Engagement and Partnerships

Tackling the risks of forced labour is a combined effort and we acknowledge the partnership and collaboration required across the sector to work towards its eradication.

Participation in industry benchmarking reports, as well as training sessions and webinars provided by the NGO sector designed to foster a common understanding of the risks and expectations of our stakeholders, has contributed to our efforts to manage vulnerabilities in our supply chain effectively. Likewise, increasing expectations from our wholesale and concession partners has also helped us to identify where to prioritise efforts to ensure our approach is consistent with industry standards.

During the reporting period, we also maintained the following strategic partnerships:

Non-merchandise supply chain

Understanding the diverse nature of risks across our non-merchandise supply chain and developing a risk mitigation strategy is a key priority as we also look to develop a standardised approach to procurement across all regions.

Building on our initial risk assessment identifying high risk supplier categories, we will further map risks based on prevailing indicators specific to each region.

An analysis of spend data, existing contractual levers and relationship duration will help to inform leverage and prioritise engagement.

In 2021, we will commence the development of a supplier questionnaire to be issued to high risk priority suppliers along with the inclusion of Modern Slavery provisions in contracts. Our updated Supplier Code of Conduct which has been extended to non-merchandise suppliers will also roll out.

PARTNER	PURPOSE	RISK/INDICATOR ADDRESSED
RMG Sustainability Council (RSC) (formerly the Bangladesh Fire and Safety Accord)	Forever New has been a member of the Bangladesh Fire and Safety Accord (now RMG Sustainability Council or 'RSC') since 2013. Our factories in Bangladesh remain members of the RSC.	Safe working conditions
Responsible Sourcing Network	Forever New is signatory to the Company Pledge Against Forced Labor in the Cotton Sector of Uzbekistan. As a signatory to this pledge, we are stating our firm opposition to the use of forced labour in Uzbekistan's cotton production and require all suppliers to comply with this requirement.	Forced labour in the raw materials tier of our product supply chain

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

GOVERNANCE

Our understanding and assessment of the effectiveness of our actions towards managing our risks of modern slavery continues to be evaluated.

To build on the existing risk management measures we currently use as outlined below, the establishment of a robust framework and consolidated regional reporting process, overseen by the Audit and Risk committee, will be established.

The commencement of a cross functional Modern Slavery Working Group with regional representation will assist to strengthen our approach to governance across all regions and give greater insight into understanding how effective our efforts are in driving their intended change.

Our policy framework grew with the development of a Responsible Purchasing Policy and accompanying guidance document. Annual training is in place to determine and test its efficacy.

ETHICAL SOURCING PROGRAMME COMPLIANCE

Of the 70 audits we conducted during the reporting period, we oversaw the closure of 55% of non-compliances raised during those audits within the same period. The most prevalent findings related to working hours, social insurance payments and safety.

During the reporting period, we did not terminate any factory due to non-compliance with our ethical sourcing requirements.

GRIEVANCE MECHANISMS

No claims of reportable conduct were raised through our Whistleblower helpline during the reporting period.

CAPACITY BUILDING

Members of our buying and management team received Modern Slavery and Responsible Purchasing training.

Training of further departments at our Head Office planned for the second half of the reporting period was hampered due to COVID-19 and has been re-scheduled to take place in 2021-2022.

STAKEHOLDER ASSESSMENT

NGO benchmarking forms an important tool from which to assess our actions and understand industry best practice. Throughout the reporting period, we have engaged and taken part in industry reports focused on human rights and worker welfare. We view participation in these assessments as useful opportunities for continuous improvement and impact analysis and continue to welcome constructive feedback from our industry peers and stakeholders.

We remain committed to transparency as we progress our strategic objectives and mitigate risks to those most vulnerable in our supply chain and operations.

CONSULTATION WITH CONTROLLED ENTITIES

Forever New is committed to developing a strong, consistent, group-wide approach to address and minimise the risks of modern slavery in its operations.

To help meet this commitment, ADT Group Holdings Pty Ltd (the parent company of Forever New Clothing UK Ltd) developed this statement in consultation with Forever New Clothing UK Ltd, a reporting entity under the UK Act.

The director of Forever New Clothing UK Ltd reports directly to the CEO of ADT Group Holdings Pty Ltd.

All controlled entities operate within the same sector.

In preparing this statement, input was sought from key management personnel of Forever New Clothing Pty Ltd from central functions including production, finance, operations, human resources, legal and logistics. Initially, focus was on compiling information across these functions which was then analysed by a small working group. From there, modern slavery risks were identified and plans devised to address those risks. This statement is the result of that work.

The Audit and Risk Committee of ADT Group Holdings Pty Ltd reviewed and approved this statement before it was approved by the respective boards of ADT Group Holdings Pty Ltd, Forever New Clothing Pty Ltd and director of Forever New Clothing UK Ltd.



FUTURE PRIORITIES

Looking ahead, our focus will be to prioritise our governance structures through the strengthening of existing systems and processes, whilst investing further effort towards capacity building both internally and with our suppliers.

Due diligence and risk management of our non-merchandise supply chain will be a key focus in the broadening of our overall risk governance.

Our focus for the next reporting period in 2020 – 2021 includes the following items:

GOVERNANCE

- ongoing development of our cross functional modern slavery working group
- commence roll out of modern slavery clause into supplier contracts
- commence roll out of updated supplier policy suite; and
- continue the development of our risk register in order to prioritise due diligence efforts and map against audit findings.

CAPACITY BUILDING

- extend Modern Slavery training to the remainder of Head Office staff and commence training at regional operations.

ACCESS TO REMEDIES

- continue to explore independent grievance mechanisms for strategic suppliers.

TRACEABILITY

- map high risk non-merchandise suppliers; and
- commence due diligence on third party labour hire relationships.

FOREVER NEW

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