

Environmental Sustainability Policy

NewGen Apparel Pty Ltd incorporating Marie Brereton Designs Australia Pty Ltd

Policy owner	Directors and Senior Executive Team
Approved by	David O’Keeffe, Director
Effective date	15 July 2025
Review date	15 July 2027
Version	3.0

1. Purpose

NewGen Apparel Pty Ltd incorporating Marie Brereton Designs Australia Pty Ltd ("NewGen") is committed to reducing the environmental impacts associated with its operations, products, packaging and supply chain.

This policy establishes NewGen’s approach to environmental responsibility, including responsible sourcing, product and range design, stock management, packaging, transport, energy use, waste reduction and continual improvement.

NewGen’s approach is practical and customer-focused. We identify opportunities, explain the operational, commercial and environmental trade-offs, and work collaboratively with customers and suppliers to implement improvements that suit the program. Final customer decisions remain subject to their operational, branding, workforce, service and budget requirements.

2. Scope

This policy applies to:

- all NewGen directors, senior executives and employees;
- NewGen’s office, warehouse and operational activities;
- product development, sourcing, purchasing and supplier management;
- customer uniform-program design, stockholding, packaging, storage, freight and distribution;
- waste generated through NewGen’s operations; and
- suppliers and contractors where NewGen can reasonably influence environmental outcomes.

3. Policy principles

NewGen integrates environmental responsibility into normal business decisions. Our priorities are to:

- avoid unnecessary materials, stock, packaging, handling and freight;
- select garments and materials that are suitable for their intended use and expected service life;
- help customers build practical uniform ranges without unnecessary duplication;
- use forecasting and stock visibility to reduce shortages, excess stock and obsolescence;
- reuse suitable packaging before recycling or disposal;
- work with customers to introduce packaging and material improvements that remain operationally practical;
- prefer efficient freight and shipment planning where customer timelines permit;
- comply with applicable environmental obligations;
- make environmental claims only where they are accurate and supportable; and
- monitor performance and pursue continual improvement.

4. Environmental governance and risk

The Directors and Senior Executive Team oversee this policy and are responsible for ensuring that material environmental risks and improvement opportunities are considered in NewGen's operations and decision-making.

NewGen will identify and manage environmental risks associated with matters including:

- waste handling and disposal;
- energy consumption;
- packaging materials;
- electrical and electronic waste;
- damaged, surplus or obsolete garments;
- supplier manufacturing practices;
- textile chemicals, dyes, finishes and treatments;
- freight and transport;
- unsupported or misleading environmental claims; and
- changes in legal, regulatory, customer or tender requirements.

Environmental incidents, material concerns and identified non-compliance must be reported to a Director or member of the Senior Executive Team. Appropriate corrective action will be implemented and recorded where required.

5. Customer uniform-program design

Environmental performance begins with the design of the uniform program itself.

NewGen works with customers to develop ranges that are practical, fit for purpose and manageable. Where a proposed range contains multiple garments serving substantially the same purpose, NewGen will explain the likely effects on stockholding, ordering complexity, minimum production quantities, cost and obsolete-stock risk, and may recommend a simpler approach.

The final range is agreed with the customer and reflects their operational, branding, workforce, service and budget requirements. NewGen does not impose product, packaging or range decisions on customers.

When reviewing or developing a uniform range, NewGen may consider:

- the roles and working environments the range must support;
- whether garments duplicate an existing function;
- garment durability, laundering, colour and shape retention;
- fit, comfort, safety and inclusive sizing;
- minimum order quantities and replenishment requirements;
- stockholding and supplier lead times;
- packaging and distribution requirements;
- availability of certified organic, recycled or other preferred materials; and
- the expected service life and whole-of-program value.

6. Stock forecasting and replenishment

NewGen uses a sophisticated stock forecasting and visibility system to support managed uniform programs.

The system combines historical ordering patterns, customer demand, relevant industry ordering behaviour and supplier replenishment lead times to identify future requirements, stock exposure and replenishment needs earlier.

This supports:

- more accurate purchasing and production decisions;
- earlier replenishment action;
- clearer visibility of stock risk;
- fewer avoidable shortages and emergency orders;
- reduced exposure to unnecessary surplus stock; and

- better management of range changes and customer growth.

For managed programs, NewGen can provide customer-specific reporting on ordering, stockholding and replenishment. Relevant environmental measures may be incorporated into program reviews where the necessary data is available and agreed with the customer.

7. Materials and product development

NewGen works collaboratively with customers to identify material options that meet their operational requirements while supporting more responsible choices where suitable.

Available options may include:

- organic cotton;
- recycled polyester;
- OEKO-TEX certified materials; and
- other verified materials with relevant environmental attributes.

NewGen can organise these options through its supplier network and provide relevant certification or supporting product information where available.

Material selection is considered alongside garment performance, durability, comfort, laundering, availability, minimum quantities, cost and customer requirements. Environmental attributes will not be considered in isolation from product suitability and expected service life.

NewGen will not describe a product as sustainable, environmentally friendly, recycled, organic, biodegradable, compostable or otherwise environmentally preferable unless the claim can be appropriately supported and accurately scoped to the relevant material, component or product.

8. Responsible sourcing and supplier expectations

Environmental expectations form part of NewGen's broader Responsible Sourcing Policy.

Suppliers are expected to:

- comply with applicable environmental laws in the countries where they operate;
- manage waste, wastewater, chemicals and emissions responsibly;
- provide accurate information about product composition and environmental attributes;
- provide relevant certifications, test reports or supporting evidence when requested; and
- cooperate with reasonable environmental reviews or corrective actions.

Depending on the product and level of risk, NewGen may review:

- OEKO-TEX certification;
- organic cotton certification or supporting documentation;
- recycled polyester content certification;
- fibre composition and material information;
- chemical controls, textile treatments and relevant testing;
- manufacturing and wastewater controls; and
- other relevant environmental or product certifications.

Environmental considerations will progressively form part of supplier approval and review processes. Where issues are identified, NewGen may request clarification, further evidence, corrective action or an alternative product or supplier.

9. Energy use

NewGen's warehouse and office are supported by onsite solar generation and battery storage.

Based on initial operating data during winter, including overcast conditions, the system has supplied more than 75% of the premises' electricity requirements.

Since installation, average winter electricity drawn from the grid has reduced from approximately 28 kWh per day to approximately 4.8 kWh per day.

Because the system was recently installed and full-year data is not yet available, NewGen will continue monitoring solar generation, battery performance, grid consumption and seasonal results before making annualised claims.

Appliances, lighting and equipment are switched off when they are not required. NewGen will periodically review energy data and investigate practical opportunities to improve efficiency.

10. Packaging

NewGen's packaging approach follows a practical hierarchy: avoid unnecessary packaging, reduce what is required, reuse suitable materials, recycle where possible, and dispose only where reuse or recycling is not reasonably available.

Current packaging practices include:

- using recycled cardboard cartons;
- reusing clean, strong cartons for outbound orders wherever they remain fit for purpose;
- sending cartons that are unsuitable for reuse to cardboard recycling;
- using regular tape and shipping labels;
- not using pallet wrap as part of normal outbound packing; and
- consolidating orders to the same location where practical.

NewGen is working collaboratively with customers to transition individual garment packaging from conventional poly bags to glassine bags where the alternative suits the customer's storage, handling, distribution and garment-protection requirements. The majority of customer programs have already transitioned.

NewGen will periodically review packaging materials and practices, including opportunities to reduce packaging, improve recycled content, avoid unnecessary plastic and verify disposal or recovery claims.

11. Freight and distribution

NewGen recognises that freight and distribution contribute to the environmental impact of a uniform program.

NewGen will:

- prefer sea freight over air freight where customer timing and supply requirements allow;
- consolidate orders going to the same location where practical;
- avoid unnecessary split shipments where operationally reasonable;
- consider transport mode and replenishment planning when scheduling imports and deliveries; and
- review available freight and shipping information to identify practical improvement opportunities.

NewGen does not currently undertake comprehensive freight-emissions accounting. As data and systems permit, NewGen will investigate practical methods of reviewing freight impacts, including shipment consolidation, shipment frequency and the proportion of goods transported by air and sea.

12. Waste, reuse and recycling

NewGen separates operational waste into recyclable and non-recyclable streams and seeks to avoid unnecessary waste before relying on recycling or disposal.

Current arrangements include:

- general recyclable materials collected through council recycling services;
- cardboard directed to appropriate recycling facilities where reuse is not possible;
- electronic waste taken to appropriate e-waste transfer stations; and
- non-recyclable materials placed in the appropriate waste stream.

Where suitable unbranded surplus, sample or discontinued garments are no longer required, NewGen may seek reuse or charitable donation opportunities rather than treating disposal as the first option.

Customer-branded stock requires careful management because logos and identifying marks may prevent unrestricted reuse or donation. NewGen's primary approach is to reduce this risk through forecasting, stock visibility and disciplined range management. Where residual branded stock remains, NewGen will consider practical and authorised recovery, de-branding, reuse or disposal options appropriate to the circumstances.

Detailed operational disposal instructions may be maintained separately in NewGen's Waste and Recycling Procedure and updated when collection arrangements or recycling requirements change.

13. Environmental claims and customer communication

All environmental and sustainability claims made by NewGen must be:

- truthful and accurate;
- supported by appropriate evidence;
- expressed in clear and specific terms;
- appropriately qualified;
- limited to the relevant product, material, process, site or activity; and
- reviewed before being included in tender submissions, marketing materials, product descriptions or customer communications.

NewGen will avoid broad or absolute statements such as "fully sustainable", "zero impact", "carbon neutral" or "all packaging recyclable" unless sufficient evidence exists and the scope of the claim is clear.

Supplier certificates and statements will be checked for relevance and scope before being relied upon in customer-facing material.

14. Customer collaboration and improvement planning

At the commencement or review of a managed program, NewGen may work with the customer to identify practical environmental improvements across:

- garment and material selection;
- range structure and duplication;
- stockholding and replenishment;
- packaging;
- delivery consolidation;
- sea-versus-air freight planning; and
- customer-specific reporting.

Recommended actions will be discussed with the customer and implemented only where agreed. NewGen recognises that customers retain responsibility for their final range, service, operational and budget decisions.

15. Responsibilities

Directors and Senior Executive Team

- approve and oversee this policy;
- ensure material environmental risks are considered;
- assign appropriate responsibilities;
- review significant environmental incidents or concerns;
- approve environmental objectives and improvement actions; and
- ensure environmental representations made by NewGen are supportable.

Employees

- comply with this policy and related procedures;
- use waste and recycling systems correctly;
- avoid unnecessary resource and packaging use;
- report environmental concerns or incidents;

- follow approved product and supplier processes; and
- support practical environmental improvements within their roles.

16. Monitoring and continual improvement

NewGen will maintain a practical approach to environmental improvement appropriate to the nature and scale of its operations.

Areas that may be monitored or periodically reviewed include:

- electricity consumption, solar generation and battery performance;
- packaging materials and customer transitions;
- carton reuse and recycling;
- waste streams;
- stockholding, months of cover, slow-moving stock and obsolete-stock risk;
- supplier environmental information and certifications;
- use of organic, recycled or certified materials;
- air and sea freight use;
- shipment consolidation; and
- progress against agreed customer or business improvement actions.

Current improvement priorities include:

- continuing the transition from poly bags to glassine bags with customer agreement;
- reviewing packaging materials periodically;
- continuing the reuse of suitable cardboard cartons;
- maintaining and improving stock forecasting and visibility;
- incorporating environmental considerations into supplier reviews;
- continuing to prefer sea freight where practical;
- monitoring solar, battery and grid performance;
- investigating practical freight-impact reporting; and
- investigating improved recovery options for residual branded garments.

17. Training and awareness

Relevant employees will be informed of this policy and any supporting procedures that apply to their work. Environmental responsibilities may be included in employee induction, warehouse and operational instructions, supplier onboarding and review, purchasing, product development, tender preparation and marketing approval processes.

18. Related policies and procedures

This policy should be read in conjunction with NewGen's:

- Responsible Sourcing Policy;
- Ethical Sourcing Policy;
- Modern Slavery framework or statement;
- Occupational Health and Safety policies and procedures;
- Waste and Recycling Procedure;
- workplace procedures and manuals; and
- supplier approval and review processes.

19. Review

This policy will be reviewed at least once every two years, or earlier where:

- legislation or regulatory requirements change;
- NewGen's operations materially change;

- new environmental risks are identified;
- significant environmental incidents occur;
- customer or tender requirements materially change; or
- improved environmental practices become reasonably available.

Environmental Sustainability Policy

DOCUMENT HISTORY

This table records the known development of the policy and the point at which the current consolidated public issue took effect. Current version: 3.0. Effective date: 15 July 2025.

Version	Date	Description	Approved by
Earlier versions	Prior to July 2025	Environmental practices and policy requirements developed through NewGen's sourcing, packaging, stock, freight, waste-management and operational procedures.	Senior Management
3.0	15 July 2025	Comprehensive policy update and consolidation, including current environmental governance, product and range design, stock, packaging, freight, energy and waste controls.	David O'Keeffe, Director

STATUS OF EARLIER MATERIAL

Earlier environmental policies, procedures and operating practices were superseded by this consolidated issue. Version 3.0 records the current public policy, not the beginning of NewGen's environmental practices.