

Ethical Sourcing and Human Rights Policy

NewGen Apparel Pty Ltd

Incorporating Marie Brereton Designs Australia Pty Ltd

Policy owner	Senior Management
Approved by	David O’Keeffe, Director
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1. Purpose

NewGen Apparel Pty Ltd, incorporating Marie Brereton Designs Australia Pty Ltd, is committed to conducting business responsibly and sourcing garments, textiles, merchandise and related products in a manner that respects workers, human rights, workplace safety, the environment and ethical business practices.

NewGen sources products and materials locally and internationally. We recognise that global garment and merchandise supply chains can involve risks arising from labour conditions, recruitment practices, subcontracting, workplace safety, environmental impacts and limited visibility beyond immediate suppliers.

This Policy establishes:

- the ethical sourcing and human-rights standards that apply to NewGen;
- the minimum requirements NewGen expects its manufacturers, suppliers, contractors and relevant business partners to meet;
- NewGen’s approach to supplier selection, review and continuing due diligence;
- how concerns and non-compliance are addressed; and
- the responsibilities for implementing and reviewing this Policy.

The requirements in this Policy are minimum standards. NewGen may apply additional requirements where appropriate because of the country, product, manufacturing process, customer requirement or risk involved.

2. Scope

This Policy applies to:

- NewGen’s directors, employees and representatives;
- manufacturers producing garments, textiles, merchandise, packaging or other products for NewGen;
- suppliers of finished goods, materials, components and services;
- contractors and labour providers involved in relevant production or supply activities; and

- approved subcontractors used in connection with NewGen orders.

NewGen expects its direct suppliers to communicate equivalent requirements to relevant parties within their own supply chains and to take reasonable steps to identify and address material ethical sourcing risks connected with the products supplied to NewGen.

Nothing in this Policy reduces a supplier's obligation to comply with applicable laws, regulations, permits, employment agreements or legally binding industry standards.

Where this Policy provides workers with greater protection than applicable local law, NewGen expects the higher standard to be applied to the extent legally permitted.

3. Standards informing this Policy

NewGen's approach is informed by generally recognised principles concerning responsible business conduct, labour rights and human rights, including:

- the International Labour Organization's Declaration on Fundamental Principles and Rights at Work;
- relevant International Labour Organization conventions and standards;
- the United Nations Guiding Principles on Business and Human Rights;
- the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct;
- the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector; and
- the principles and objectives of Australia's Modern Slavery Act 2018.

Reference to these frameworks does not represent a claim that NewGen has been externally certified against them. They inform the standards and due-diligence approach established by this Policy.

4. NewGen's commitments

NewGen aims to:

1. establish clear labour, human-rights, safety, environmental and business-integrity expectations for its suppliers;
2. consider ethical sourcing risks when selecting and reviewing manufacturers and suppliers;
3. maintain direct relationships and practical visibility across relevant parts of its supply chain;
4. consider factory audits, certifications, direct visits and other available evidence when assessing suppliers;
5. investigate credible concerns and require corrective action where standards are not met;
6. encourage transparent supplier relationships in which problems are disclosed and addressed rather than concealed;
7. avoid purchasing practices that knowingly contribute to unlawful working hours, unsafe production or unauthorised subcontracting;
8. protect people who raise concerns in good faith from retaliation; and
9. review and progressively improve NewGen's ethical sourcing controls.

Ethical sourcing is an ongoing process. An audit, certification, supplier declaration or factory visit provides information at a point in time but does not remove the need for continuing oversight.

Part A — Labour and Human-Rights Requirements

5. Legal compliance

Manufacturers and suppliers must comply with all applicable laws and regulations in the countries and locations in which they operate, including requirements relating to:

- employment and industrial relations;
- wages, benefits and working hours;
- workplace health and safety;
- environmental protection;
- immigration and rights to work;
- anti-bribery and corruption;
- privacy and recordkeeping;
- import, export and customs;
- product safety and labelling; and
- building, fire and operational permits.

Suppliers must maintain the licences, registrations, permits and approvals required to conduct their operations lawfully.

6. Modern slavery and forced labour

Modern slavery, human trafficking, slavery, servitude, forced labour, bonded labour, debt bondage and involuntary prison labour are prohibited.

All work must be undertaken voluntarily. Workers must:

- be free to accept or reject employment;
- be free to leave the workplace after completing their ordinary shift, subject only to lawful and reasonable workplace arrangements;
- be free to terminate their employment after giving legally required or reasonable notice;
- not be threatened, punished, intimidated or financially coerced into continuing employment;
- not be required to lodge unreasonable deposits or security payments; and
- not be subjected to restrictions on movement that are unrelated to legitimate workplace safety or security requirements.

Suppliers must not retain, destroy, conceal or deny workers access to passports, identity documents, work permits, bank cards or other personal documents.

Where documents must temporarily be held to complete a lawful administrative process, they must be returned promptly and remain accessible to the worker.

7. Responsible recruitment and migrant workers

Workers and jobseekers must not be charged, directly or indirectly, any recruitment fees or related costs. Legitimate fees charged by recruitment agencies or labour providers must be borne by the employer and must not be passed on to workers.

Suppliers and any labour agents they use must provide workers with accurate information about:

- the identity of the employer;
- the type and location of work;
- wages and benefits;
- working hours;
- accommodation arrangements, where applicable;
- lawful deductions;
- the duration of employment; and
- any conditions for ending employment.

This information must be provided before employment begins and in a language the worker can reasonably understand.

Suppliers must only employ workers who have a legal right to work. Verification of that right must be conducted lawfully, respectfully and without discriminatory treatment.

Migrant, temporary, contract and agency workers must receive the same fundamental protections as directly employed workers performing comparable work.

Labour agents must be appropriately licensed where licensing is required. Suppliers remain responsible for labour conditions and recruitment practices connected with workers supplied by an agent.

8. Child labour and young workers

Child labour is prohibited.

No person may be employed below:

- the applicable legal minimum age for employment;
- the age for completing compulsory education; or
- the minimum age established by applicable International Labour Organization standards, whichever provides the greatest protection.

Suppliers must use reliable age-verification processes and retain appropriate records, subject to applicable privacy requirements.

Workers who are legally permitted to work but are under 18 years of age must not:

- perform hazardous work;
- work in conditions likely to harm their health, safety or development;
- undertake unlawful night work or excessive overtime; or
- perform work that interferes with their education.

If child labour is identified, the supplier must immediately protect the child from further harm and work with NewGen on a responsible remediation plan. A child must not simply be dismissed where doing so could expose them to greater hardship or exploitation.

9. Freedom of association and collective bargaining

Suppliers must respect workers' lawful rights to:

- form or join trade unions or other worker organisations;
- choose their own representatives;
- communicate with management;
- bargain collectively; and
- engage in lawful and peaceful worker activities.

Workers and their representatives must not be subjected to discrimination, intimidation, harassment, retaliation or dismissal because they exercise these rights.

Where freedom of association or collective bargaining is restricted by law, suppliers must not obstruct lawful alternative means through which workers can communicate collectively with management and raise workplace concerns.

10. Equal opportunity, dignity and respect

Workers must be treated fairly, equitably and with dignity and respect.

Discrimination in recruitment, employment, training, promotion, remuneration, benefits, discipline, termination or retirement is prohibited where based on characteristics protected by applicable law, including:

- race, colour, ethnicity or national origin;
- sex, gender, gender identity or sexual orientation;
- age;
- religion or belief;
- disability;
- pregnancy, maternity or marital status;
- family or caring responsibilities;
- union membership;
- political opinion where legally protected; or
- any other legally protected status.

Employment decisions must be based on lawful and legitimate job requirements.

Pregnancy testing, virginity testing or other inappropriate medical testing must not be used to determine employment or continued employment.

11. Harassment, abuse and disciplinary practices

Suppliers must provide workplaces free from:

- physical abuse or punishment;

- sexual harassment or abuse;
- verbal abuse;
- bullying;
- threats;
- coercion;
- intimidation; and
- degrading or inhumane treatment.

Disciplinary rules must be lawful, reasonable, documented and communicated to workers.

Workers must be given an opportunity to respond to allegations and, where applicable, access representation or an appeal process.

Wage deductions or financial penalties must not be used as a disciplinary measure unless expressly lawful, reasonable and agreed in circumstances that do not involve coercion.

12. Employment terms and records

Before beginning work, workers must receive clear and understandable information about their employment conditions, including:

- their employer;
- position and duties;
- wages and method of payment;
- ordinary working hours;
- overtime arrangements;
- benefits;
- lawful deductions;
- leave entitlements; and
- termination conditions.

Suppliers must maintain accurate, complete and verifiable employment records.

False records, double books, concealed working hours and coaching workers to provide misleading information are prohibited.

Temporary contracts, labour-hire arrangements, apprenticeships, homeworking or other forms of engagement must not be used to avoid legal obligations to workers.

13. Wages, benefits and deductions

Workers must be paid at least:

- the applicable legal minimum wage;
- wages required by a binding industrial instrument; or
- the prevailing industry standard where it provides greater protection, whichever is higher.

Suppliers must provide all legally required overtime premiums, allowances, paid leave, social insurance, retirement contributions, workers' compensation, health benefits and other employment entitlements.

Wages must be paid accurately, regularly and directly to workers in lawful currency or through another lawful and accessible payment method.

Workers must receive clear wage statements explaining ordinary hours, overtime, rates, benefits and deductions.

Deductions must be lawful, clearly explained, related to a legitimate purpose, not reduce pay below the lawful minimum, and not be imposed to bind a worker to employment.

NewGen supports progressive improvement towards wages that are sufficient to meet workers' basic needs and provide some discretionary income. This objective does not replace the mandatory requirement to pay all wages and benefits required by law.

14. Working hours and rest

Working hours must comply with applicable laws and relevant industry standards.

Suppliers must ensure that:

- ordinary and overtime hours are accurately recorded;
- overtime is voluntary, except in lawful and genuinely exceptional circumstances;
- workers receive legally required breaks;
- workers receive at least one day off in each seven-day period, except where a lawful and appropriately managed exception applies;
- overtime is not used as a routine substitute for adequate workforce planning;
- workers are paid the legally required overtime premium; and
- total working hours do not exceed 60 hours per week except in lawful, temporary and genuinely exceptional circumstances.

Suppliers must investigate and address persistent excessive overtime, including its underlying causes.

Part B — Workplace Health and Safety

15. Safe and healthy workplaces

Workers are entitled to a safe, hygienic and healthy working environment.

Suppliers must identify, assess and control workplace health and safety risks and comply with applicable occupational health and safety laws.

Each manufacturing facility must appoint a suitably senior person with responsibility for workplace health and safety.

Suppliers must provide, without charge to workers:

- appropriate personal protective equipment;
- safe machinery and equipment;
- machine guards and safety devices;
- training relevant to workplace hazards;
- appropriate first-aid arrangements; and

- emergency equipment and procedures.

Workers must be able to report unsafe conditions and remove themselves from imminent and serious danger without punishment or retaliation.

16. Buildings, fire safety and emergency preparedness

Production facilities, warehouses, offices and worker accommodation must be structurally safe and used consistently with applicable approvals.

Suppliers must maintain:

- sufficient, accessible and clearly marked emergency exits;
- unlocked exit routes during occupancy;
- functioning fire alarms and firefighting equipment;
- evacuation plans and assembly points;
- emergency lighting where required;
- regular drills;
- trained emergency personnel; and
- documented inspections and maintenance.

Emergency exits, stairways and access to firefighting equipment must not be blocked.

17. Workplace conditions and amenities

Workplaces must provide:

- adequate lighting;
- appropriate ventilation and temperature control;
- safe electrical systems;
- clean and accessible toilets;
- potable drinking water;
- hygienic eating and food-storage facilities;
- appropriate sanitation;
- safe storage and handling of chemicals; and
- suitable workstations.

Exposure to hazardous chemicals, airborne contaminants, excessive noise, heat, unsafe machinery or other workplace hazards must be controlled.

18. Worker accommodation

Where accommodation is provided or arranged by a supplier, it must:

- be safe, clean and secure;
- be separate from production and hazardous storage areas;
- comply with applicable building and fire-safety laws;
- have adequate emergency exits and alarms;
- provide drinking water and sanitation;
- provide reasonable personal space and privacy; and

- not be used to restrict workers' freedom of movement.

Part C — Environmental Responsibility

19. Environmental compliance

Suppliers must comply with applicable environmental laws, regulations, permits and reporting requirements.

This includes requirements concerning air emissions, wastewater, waste disposal, hazardous substances, chemical storage and use, land and water contamination, resource consumption, biodiversity where relevant, and environmental incidents.

Suppliers must promptly notify relevant authorities of reportable environmental incidents and take appropriate action to contain, investigate and remedy the impact.

20. Environmental management

Suppliers must take reasonable steps to identify and reduce the environmental impacts of their operations.

Relevant measures may include:

- reducing waste at its source;
- reusing and recycling materials where practicable;
- safely handling and disposing of hazardous waste;
- controlling pollution to air, water and land;
- improving energy efficiency;
- reducing unnecessary greenhouse-gas emissions;
- conserving water and other natural resources;
- preventing environmental contamination;
- reducing unnecessary packaging;
- using recycled or lower-impact packaging where appropriate; and
- maintaining emergency-response procedures for environmental incidents.

Environmental claims made to NewGen must be accurate, capable of substantiation and not misleading.

21. Chemicals and restricted substances

Chemicals used in manufacturing, dyeing, printing, finishing, cleaning or packaging must be lawfully sourced, appropriately labelled, safely stored and handled, used by trained workers, accompanied by required safety information and disposed of responsibly.

Suppliers must comply with applicable product-safety and restricted-substance requirements, including any customer-specific requirements communicated by NewGen.

Part D — Ethical Business Conduct

22. Bribery and corruption

NewGen prohibits bribery, corruption, extortion, embezzlement, secret commissions, kickbacks and other improper payments.

Suppliers must not offer, promise, give, request or accept anything of value for the purpose of improperly influencing a business or government decision.

Gifts, hospitality and business courtesies must be lawful, reasonable and proportionate, infrequent, transparently provided, not made in cash or cash equivalents, and incapable of reasonably being interpreted as an inducement or reward for improper conduct.

23. Conflicts of interest

Suppliers must avoid actual, potential or perceived conflicts between personal interests and their obligations to NewGen.

Any conflict that could affect, or reasonably appear to affect, impartial business judgment must be disclosed promptly to NewGen.

24. Accurate records and transparency

Information provided to NewGen concerning production, labour conditions, factory identity, audits, certifications, materials, environmental attributes and legal compliance must be accurate and complete.

Suppliers must not falsify documents, conceal relevant production sites, misrepresent audit results, coach workers to mislead auditors or NewGen representatives, obstruct legitimate inspections or retaliate against a person who provides truthful information.

25. Unauthorised subcontracting

Production must not be transferred to an undisclosed or unapproved manufacturing site where NewGen has selected, reviewed or approved a particular facility.

Suppliers must disclose relevant subcontractors when requested and obtain NewGen's approval before materially changing an approved production location.

Suppliers remain responsible for ensuring that approved subcontractors meet the standards in this Policy.

Homeworking must not be used to conceal production, avoid working-hour requirements or remove workers from legal protection.

26. Confidentiality, privacy and intellectual property

Suppliers must protect confidential business information, personal information, customer information, product designs, trademarks, patterns, specifications and other intellectual property.

Information must only be collected, used, retained and disclosed for lawful and authorised purposes.

Part E — NewGen's Due-Diligence Approach

27. Supplier selection and approval

NewGen considers ethical sourcing as part of the selection and continuing review of relevant manufacturers and suppliers.

Depending on the supplier, location, product and assessed risk, NewGen may consider:

- the nature and location of manufacturing;
- the supplier's experience and reputation;
- direct discussions with management;
- NewGen's history and relationship with the supplier;
- factory visits by NewGen representatives;
- available social, ethical, quality or environmental audits;
- recognised certifications;
- licences and regulatory records;
- production capability and workforce arrangements;
- health and safety conditions;
- previous non-conformances and corrective action;
- the use of labour agents or subcontractors; and
- the supplier's willingness to provide transparent information.

NewGen will not rely solely on price when evaluating whether a supplier is appropriate.

28. Risk-based due diligence

The level of review may vary according to risk.

Relevant considerations may include country and regional risk, sector and product risk, labour intensity, use of migrant or vulnerable workers, recruitment arrangements, chemical or safety risks, subcontracting, production-site visibility, previous audit findings, significant ownership or location changes, credible allegations and customer-specific requirements.

Higher-risk circumstances may require additional enquiries, evidence, visits, audits or management approval.

29. Factory audits, certifications and visits

NewGen uses a combination of available factory audits or certifications, direct factory visits and established supplier relationships to support supplier assessment and oversight.

NewGen may review audit or certification documents, seek clarification of findings, request supporting records, visit manufacturing facilities, communicate directly with supplier management, require corrective action, request follow-up evidence or commission further review where considered appropriate.

An audit or certification will be considered according to its issuing or auditing body, scope, methodology, date, facility covered, identified findings and relevance to the products supplied to NewGen.

Possession of an audit report or certification does not automatically establish continuing compliance with this Policy.

30. Responsible purchasing practices

NewGen recognises that purchasing decisions can affect working conditions.

NewGen aims, where reasonably practicable, to provide clear specifications, allow reasonable production lead times, communicate material order changes promptly, avoid knowingly setting requirements that can only be met through unlawful or unsafe practices, consider production capacity, maintain constructive communication and address problems early rather than creating incentives for concealment or unauthorised subcontracting.

Suppliers are expected to notify NewGen promptly if an order, amendment or deadline creates a material risk of excessive hours, unauthorised subcontracting, unsafe work or another breach of this Policy.

Notification of a genuine concern will not, by itself, be treated as supplier failure.

Part F — Monitoring, Corrective Action, Remediation and Escalation

31. Cooperation and access to information

Suppliers must cooperate with reasonable ethical sourcing enquiries by NewGen.

This may include providing access, subject to lawful confidentiality and privacy requirements, to relevant workplace policies, licences and permits, wage and time records, employment records, health and safety records, environmental records, audit and certification reports, corrective-action records, production areas, worker accommodation and relevant personnel.

Records must be authentic, complete and retained for the period required by applicable law or, where no period is prescribed, for a reasonable period appropriate to the record.

32. Classification of non-compliance

32.1 Critical violations

Critical violations may include forced labour or human trafficking, child exploitation, immediate and serious threats to life or safety, physical or sexual abuse, deliberate concealment of a serious violation, unauthorised subcontracting involving serious labour or safety risks, deliberate falsification of material records, serious bribery or corruption, obstruction of a legitimate investigation or retaliation against workers or whistleblowers.

Critical violations may result in immediate escalation, suspension of orders, requirements to protect affected people, independent investigation, responsible disengagement or termination.

32.2 Remediable non-conformances

Where a matter can be corrected without placing workers or others at continuing unacceptable risk, NewGen may require a corrective-action plan.

The plan may specify the issue identified, immediate containment measures, the underlying cause, required actions, responsible persons, supporting evidence, completion dates, follow-up review and measures to prevent recurrence.

33. Corrective-action plans

NewGen's preferred approach is to work with transparent and cooperative suppliers to correct remediable problems within agreed timeframes.

Corrective-action requirements will be proportionate to the seriousness of the issue.

NewGen may require immediate action to protect workers, changes to policies or practices, repayment of unlawfully withheld wages, unlawful deductions, recruitment fees or related costs, health and safety improvements, training, improved recordkeeping, changes to labour-agent arrangements, removal of an unauthorised subcontractor, follow-up documentation, a further factory visit or an independent follow-up audit.

Completion of a corrective-action plan must be supported by evidence acceptable to NewGen.

Failure to complete agreed corrective action may result in increased monitoring, suspension of new orders, reduction of business, responsible disengagement or termination.

34. Remediation

Where NewGen identifies that a person has suffered or is at risk of harm connected with products supplied to NewGen, the response should prioritise the safety and interests of affected people.

Depending on NewGen's connection to the issue and the circumstances, NewGen may require the supplier to stop the harmful practice, require immediate protective measures, support or require repayment of unpaid wages, unlawful deductions, recruitment fees or related costs, require safe reinstatement or alternative arrangements where appropriate, cooperate with customers, qualified specialists, auditors, authorities or other relevant parties, monitor whether agreed remediation has occurred and consider responsible disengagement where the supplier refuses or fails to remedy serious harm.

Remediation does not prevent NewGen from suspending or terminating a supplier relationship where appropriate.

35. Responsible disengagement

NewGen may suspend or terminate its relationship with a supplier where a critical violation occurs, a supplier refuses access to material information, records have been deliberately falsified, the supplier conceals production locations, corrective action is repeatedly delayed or ineffective, the supplier retaliates against workers or reporters, or continued engagement would expose workers, customers or NewGen to unacceptable risk.

Before disengaging, NewGen will consider, where reasonably practicable, whether withdrawal could worsen harm to workers and whether measures are available to reduce that risk.

Part G — Raising Concerns

36. Supplier grievance mechanisms

Suppliers must provide workers with accessible means to raise workplace concerns.

Grievance mechanisms should be understandable and accessible, permit confidential reporting where practicable, be available in languages workers understand, allow concerns to be raised without management interference, be handled promptly and fairly, protect workers from retaliation, maintain appropriate records and communicate outcomes where appropriate.

A grievance process must not prevent a worker from contacting a trade union, regulator, law-enforcement authority, court or other lawful external body.

37. Reporting concerns to NewGen

Workers, suppliers, customers and other stakeholders may raise concerns about conduct connected with NewGen's supply chain by contacting:

Email: info@newgenapparel.com

Attention: Senior Management — Ethical Sourcing

Reports should include as much relevant information as reasonably possible, but anonymous concerns may also be considered.

NewGen will assess concerns containing sufficient information to permit reasonable enquiry and determine an appropriate response. This may include seeking further information, engaging with supplier management, reviewing documents, visiting a facility, requiring corrective action or remediation, obtaining independent assistance, escalating the matter to senior management or notifying relevant authorities where required or appropriate.

38. Non-retaliation

NewGen prohibits retaliation against any person who raises a concern in good faith, participates in an investigation or provides truthful information.

Retaliation by a supplier will be treated as a serious breach of this Policy.

This protection does not extend to knowingly false or malicious allegations.

Part H — Governance and Review

39. Responsibility

NewGen's senior management is responsible for oversight of this Policy and NewGen's ethical sourcing approach.

Senior management responsibilities include approving the Policy, considering significant supplier risks, reviewing serious allegations and critical violations, approving material corrective-action or

disengagement decisions, ensuring relevant records are maintained, supporting appropriate training and communication, and reviewing the continuing suitability of NewGen's controls.

Employees involved in sourcing, supplier relationships, product development, purchasing or tender responses must act consistently with this Policy and escalate material concerns.

40. Training and awareness

NewGen will communicate this Policy to relevant employees and suppliers.

Training or guidance may be provided according to role and risk, including in relation to recognising indicators of modern slavery, responsible supplier selection, interpreting audits and certifications, recording factory information, escalating concerns, corrective-action plans, responsible purchasing practices and accurate tender and customer representations.

41. Records

NewGen will maintain records reasonably required to support its ethical sourcing activities.

These may include supplier and factory details, relevant audit reports and certifications, factory-visit records, supplier correspondence, risk assessments, corrective-action plans, evidence of completed actions, significant complaints or allegations, escalation decisions and policy reviews.

Access to records will be controlled according to confidentiality, privacy and legitimate business requirements.

42. Customer and tender representations

Statements made by NewGen concerning ethical sourcing, factory oversight, certification, auditing, environmental performance or modern-slavery risk management must be accurate and capable of substantiation.

NewGen will distinguish between NewGen's own policies and controls, supplier representations, independent audit findings, third-party certifications, customer-specific requirements and objectives that are still being developed.

NewGen will not describe a product, supplier or supply chain as ethical, sustainable, slavery-free, fully compliant or independently certified unless the specific claim is supported by appropriate evidence.

43. Continuous improvement

NewGen recognises that ethical sourcing risks and expectations change over time.

NewGen will seek to improve its approach by strengthening supply-chain visibility, maintaining direct supplier relationships, reviewing available audits and certifications, learning from factory visits and corrective actions, improving the consistency of supplier records, considering emerging legal and customer requirements, reviewing credible stakeholder concerns and periodically assessing whether its controls are effective.

44. Policy review

This Policy will be reviewed every two years, or earlier following a significant change to NewGen's supply chain, a serious ethical sourcing incident, a material legal or customer requirement change, or where review identifies that the Policy is no longer adequate.

Material amendments must be approved by senior management.

Approval

Approved for and on behalf of NewGen Apparel Pty Ltd

David O'Keeffe

Director

Effective: 1 January 2025

Version history

Version	Date	Description	Approved by
1.0	2014	Original Ethical Sourcing Policy	—
2.0	2016	Policy updated and reissued	—
3.0	1 January 2025	Full Ethical Sourcing and Human Rights Policy rewrite	David O'Keeffe, Director