NEWGEN APPAREL

Quality and Product Compliance Policy

Document code	QPC-POL-001	**Version**	3.0
Policy owner	Directors and Senior Executive Team	**Review cycle**	Every two years

1. Purpose

NewGen Apparel Pty Ltd incorporating Marie Brereton Designs Australia Pty Ltd (NewGen) is committed to supplying products that meet approved customer requirements, are fit for their intended purpose and comply with applicable legal, regulatory, technical and labelling requirements.

2. Scope

This policy applies to product development, custom and catalogue garments, workwear, uniforms, branded merchandise, customer specifications, local and overseas suppliers, testing, inspections, incoming goods, complaints, corrective action, product withdrawal and recall.

3. Commitments

- Approve specifications and pre-production samples before bulk production.
- Identify applicable product, labelling, safety and technical requirements before production.
- Obtain relevant laboratory reports, certificates or declarations where required.
- Apply additional controls to higher-risk products, new factories and material changes.
- Maintain traceability for overseas-manufactured products through production date and purchase order references.
- Inspect incoming goods and prevent known non-conforming products from release.
- Record complaints, investigate defects and require effective supplier corrective action.
- Use supplier performance and repeat defects in supplier reviews.
- Suspend or terminate suppliers for serious or repeated quality, compliance, traceability or falsification failures.
- Withdraw or recall a product where a confirmed or reasonably suspected safety or compliance risk requires it.

4. Product requirements and risk classification

NewGen determines applicable requirements according to product type, intended use, wearer, work environment, customer specification and risk. Relevant requirements may include fibre content, care and country-of-origin labelling; high-visibility, protective workwear, flammability and antistatic requirements; restricted substances; ultraviolet protection; and customer-specific technical requirements.

Products are classified as standard, elevated or high risk. New factories, safety-related products, new constructions, technical claims and products with a history of defects receive increased review, testing or inspection.

5. Specifications, samples and change control

Specifications may include fabric, colour, measurements, grading, construction, workmanship, trims, branding, labels, packaging and testing requirements. NewGen reviews the initial sample and, once accepted, submits it to the customer for approval where required. Approved samples and specifications are retained for the life of the product or customer program.

Suppliers must not change the factory, fabric, fibre composition, construction, trim, treatment, branding, labelling or packaging without written NewGen approval. Material changes are assessed for customer approval and repeat testing before production continues.

6. Testing and compliance evidence

Testing requirements are set before bulk production. Evidence may include OEKO-TEX certification, AS or AS/NZS reports, UPF reports and fabric testing for colourfastness, shrinkage, washing performance, tear strength, flammability, antistatic performance or restricted substances, as applicable.

Testing is undertaken by appropriately qualified laboratories and, where reasonably available and relevant, laboratories accredited to ISO/IEC 17025 for the applicable test method. NewGen verifies that evidence applies to the correct product, material, construction and production source.

7. Factory and incoming inspections

Third-party inspections may be used for new factories and higher-risk production. Inspection criteria are based on the approved sample, specification, compliance matrix and order requirements.

Incoming checks include quantity, visible defects and a risk-based random sample for detailed review. Sample size and inspection depth consider order quantity, product risk, supplier performance, product complexity and previous defects. A full inspection may be required where failures are identified.

8. Non-conforming product and CAPA

Known non-conforming goods are identified, isolated and prevented from release. Failed goods may be rejected, replaced, reworked, re-labelled, retested or otherwise corrected. Safety, legal or mandatory compliance failures cannot be accepted through commercial approval.

Material failures require documented corrective and preventive action covering containment, root cause, correction, responsible person, due date, verification and closure.

9. Complaints and remedies

Complaints and defects are recorded by customer and product in NewGen's quality-control database. NewGen acknowledges the issue, investigates traceability and affected stock, obtains supplier comment and laboratory testing where necessary, and records the resolution. Remedies may include repair, rework, replacement, credit, refund, withdrawal or another agreed action.

10. Traceability and records

Overseas-manufactured products are assigned production date and purchase order traceability through product labelling, packaging or associated records as appropriate to the product. Specifications, approvals, test reports, inspection records, complaints and CAPA evidence are retained for the life of the product or customer program and for at least seven years after final supply, unless a longer period is required by law, contract or product risk.

11. Product safety, withdrawal and recall

A potential safety issue is escalated immediately. NewGen may stop supply, isolate stock, trace affected products, obtain technical assessment, notify customers and regulators, and conduct a withdrawal or recall. The Directors and Senior Executive Team appoint a Recall Coordinator and deputy for each event. Where a voluntary consumer product recall is commenced, NewGen will notify the ACCC within the legally required timeframe.

12. Supplier performance

Suppliers are reviewed using quality, defect frequency, compliance evidence, delivery, traceability, communication and corrective-action performance. Serious or repeated failures may result in increased inspection, order holds, suspension or termination.

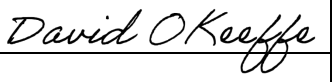
13. Monitoring and review

- Quality KPIs are reviewed at least annually.
- A documented internal quality review is completed annually.
- A mock recall is completed at least every two years.
- Relevant staff receive role-specific quality and compliance training.
- This policy is reviewed at least every two years or earlier following a serious issue, legal change or new high-risk product category.

14. Quality objectives

Measure	Initial objective	Review frequency
Incoming inspections completed where required	100%	Monthly
Material complaints acknowledged	Within 1 business day	Monthly
Corrective actions assigned	Within 2 business days of confirmed failure	Monthly
CAPA closed or formally extended	Within agreed due date	Monthly
Required compliance evidence obtained before bulk production	100%	Per order/product
Mock recall traceability test	At least every 2 years	Biennial
Repeat material supplier defects	Downward trend	Quarterly

15. Approval

Approved by	Effective date	Next review date	Signature
D O'Keeffe	15 July 2025	15 July 2027	

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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
1.x-2.x	Prior to July 2025	Earlier internal quality-assurance, sample-approval, inspection, product-compliance and corrective-action policies, procedures and operating controls.	Senior Management
3.0	15 July 2025	Comprehensive consolidation and public reissue, incorporating established quality, testing, inspection, traceability, complaint and corrective-action controls.	David O'Keeffe, Director

STATUS OF EARLIER MATERIAL

Earlier internal versions and related operating procedures were superseded by this consolidated public issue. The current version does not represent the commencement of NewGen's quality and product-compliance controls.