

MODERN SLAVERY STATEMENT

FOR THE FINANCIAL YEAR TO 31 MARCH 2025





Any use of slave or trafficked labour is abhorrent to MACVAD. We take the issue very seriously, and we are fully supportive of any measures to eradicate this criminal activity.

MACVAD is legally required to prepare and publish an annual Modern Slavery Statement in accordance with the **UK Modern Slavery Act 2015** and the **Australian Modern Slavery Act 2018**.

In addition to meeting these statutory obligations, MACVAD recognises the importance of broader global standards and voluntarily aligns its practices with the requirements of the **California Transparency in Supply Chains Act**, **Canada's Bill S-211 (Fighting Against Forced Labour and Child Labour in Supply Chains Act)**, and the **EU Corporate Sustainability Due Diligence Directive (CSDDD)**. These frameworks guide our approach to supply chain transparency, risk mitigation, and ethical sourcing, and reinforce our commitment to responsible business conduct across all markets in which we operate.

This statement details the steps MACVAD Ltd and the companies in its corporate group listed below* (the "Company") take to identify, prevent, and address modern slavery risks within our operations and supply chain.

*This statement covers the activities of MACVAD Ltd and the following companies which are its subsidiary undertakings:

MACVAD Ltd
Urban Leisure Ltd
MACVAD Australia Pty Limited
MACVAD Europa GmbH
MACVAD Trading (Hangzhou) Co., Ltd.
MACVAD (Canada USA) Limited
MACVAD (UK) Limited
MACVAD USA Ltd

"Modern slavery" encompasses slavery, servitude, human trafficking and forced labour. MACVAD has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically, with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or supply chain.



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Governance

Modern slavery is a consideration for the whole of MACVAD's business: the premises from which we operate, the supply chain for the products which we sell and which we use, and the services which we outsource. For this reason, MACVAD's approach to modern slavery is managed by a group consisting of the Operations Director and Head of HR, with valuable input from departments around the business. The Operations Director reports to the MACVAD Board on modern slavery issues.

The MACVAD Board has approved this statement and formally reviews policy and performance on ethical trading and modern slavery annually.



Company Structure



MACVAD is an agent, importer and supplier of goods operating in New Zealand, Australia, Germany, Canada, United States of America, and the United Kingdom. Headquartered in Auckland, NZ, we operate Support offices in Hangzhou, China and Hanoi, Vietnam with Sales offices in,

- Chicago, United States
- Potters Bar, United Kingdom
- Düsseldorf, Germany
- Mississauga, Canada
- North Ryde, Australia

Most staff have their workplace in a MACVAD office although a few in New Zealand, China, UK and USA work remotely on a permanent basis.

MACVAD operates a warehousing facility at the Auckland Head office location and uses third party logistic providers in New Zealand, Australia, Canada, China, Germany, United States of America, and United Kingdom.

OPERATIONS AND SUPPLY CHAIN

Overview

MACVAD operates a direct-to-consumer online model in many territories however, most products are sold as consignments under 'house' brands to retailers across the broad categories of Garments, Footwear, Textiles, Furniture, Housewares, Home Décor, Sports, Toys, and Outdoor activities.

The product sold during the FY25 year was produced in a total of 539 primary manufacturing sites located in nine countries including,

- China, India, Indonesia, Vietnam, Cambodia
- South Africa
- United States of America
- Brazil

In addition to contracted warehousing, we also outsource support services, international and domestic freight, local deliveries, professional and IT services, cleaning, and maintenance in all offices.





Modern Slavery Risks

IN OUR OPERATIONS
AND SUPPLY CHAINS



MACVAD continues to identify and assess the risk of modern slavery in its operations and supply chain by reviewing country and industry risk indicators provided by the Ethical Trade Initiative and Amfori.

Supply Chain: The supply chain risk is high based on the breadth, location, job types and the higher probability of migrant, contracted or temporary workers.

Contractors: Risks are also noted in some of the contracted third-party service providers which may require informal, seasonal or temporary labour-intensive work because these roles are more likely to be outsourced to a third party and filled by foreign nationals on temporary visas. Examples of these roles include cleaners and warehouse operators.

Employees: It is considered that the risk is comparatively low with MACVAD staff as all staff are screened and directly employed by MACVAD.



Our Policies and Actions

MACVAD remains firmly committed to eliminating modern slavery and human trafficking from all aspects of our business and supply chain.

Our Modern Slavery Policy reinforces this commitment by promoting ethical conduct and integrity in our business relationships. It is supported by our [Ethical Code of Conduct](#), which is based on the Ethical Trading Initiative (ETI) Base Code, and complemented by our Corporate Responsibility Procedures, Internal Due Diligence and Labour Policies.

To uphold these standards:

- We commission third-party audits through BSCI and SEDEX to provide detailed analysis of each manufacturing site. Audit reports for other comparable standards are accepted, and the MACVAD rating assessment is available to our team through internal software platforms.
- The MACVAD Corporate Responsibility team continue to perform in site social audits to verify the findings of third-party providers and assess supplier practices, raise awareness, and strengthen compliance to our ethical expectations.
- We achieved a 6% reduction in the number of primary manufacturing sites through strategic consolidation, while simultaneously increasing overall sales and expanding non-China sources.

MACVAD retains 100% ownership of all subsidiaries, with each site represented at quarterly management meetings, where modern slavery reporting is reviewed.

During the reporting period, a small number of manufacturing sites were found to have inadequate record-keeping. In these cases, MACVAD staff followed procedures outlined in the Corporate Responsibility Procedure manual. Remote reviews of monthly records over consecutive months were followed up with unannounced audits. In some instances, supply relationships were discontinued. However, no evidence of modern slavery was found.

All staff in Sales, Sourcing, Merchandising, and Compliance completed the updated Corporate Responsibility training module, either online or in person. This module remains a core part of MACVAD's staff induction programme. Additionally, management at our UK site completed a full day refresher course on Tackling Modern Slavery.

The planned risk assessment of contracted service providers was not completed during the year due to resource constraints. This remains a priority for the coming year.



FY25 Initiatives



WHAT'S AHEAD

Our commitment to continuously improve risk identification and minimization is progressing through,

- Continued monitoring of similar new legislation from US states and overseas markets and incorporate requirements into our annual process review
- Incorporate Modern Slavery process review into updated corporate Quality System risk assessment cycle.
- Proactively educate suppliers on best-practice through inclusion in modern slavery training and surveys
- Complete Modern Slavery survey of contractors to all business units.

BOARD OF DIRECTORS APPROVAL

MACVAD will never knowingly enter into a business relationship with any organisation involved with slavery, servitude or human trafficking. The senior management of the Company accepts responsibility for the implementation of any policy in relation to this matter and for the provision of adequate resources to ensure that slavery, servitude or human trafficking is not taking place in the Company or its supply chain.

This statement has been approved by the Board of Directors of MACVAD Ltd and signed by the Managing Director of MACVAD.

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Managing Director

Forth statement published September 2025

Last reviewed and approved by the Board of MACVAD Ltd on 24 September 2025.

