

MACVAD
GLOBAL SOURCING AND SUPPLY SOLUTIONS

MODERN SLAVERY STATEMENT

FOR THE FINANCIAL YEAR TO 31 MARCH 2026





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.

INTRODUCTION

MACVAD is legally required to prepare and publish an annual modern slavery statement in accordance with the **UK Modern Slavery Act 2015**, the **Australian Modern Slavery Act 2018 (Cth)**, and **Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211)**. This statement has been prepared as a single, consolidated report using the joint modern slavery reporting template developed by the Governments of the United Kingdom, Australia and Canada, and is intended to satisfy the requirements of all three regimes for the financial year to 31 March 2026 (1 April 2025 to 31 March 2026).

In addition to meeting these statutory obligations, MACVAD recognises the importance of broader global standards and voluntarily aligns its practices with the **California Transparency in Supply Chains Act**, the **EU Corporate Sustainability Due Diligence Directive (CSDDD)** and **EU Forced Labour Regulation**, and the **United States Tariff Act 1930 (Section 307)** and **Uyghur Forced Labor Prevention Act**. We are also monitoring the **New Zealand Modern Slavery Bill** currently before Parliament and are preparing to report under that regime once it is enacted. 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. MACVAD Ltd is the reporting entity and controlling entity for the purposes of this joint report, which covers the activities of MACVAD Ltd and its subsidiary undertakings:

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

"Modern slavery" encompasses slavery, servitude, human trafficking and forced labour. In respect of our Canadian reporting, it also includes forced labour and child labour as defined in the Fighting Against Forced Labour and Child Labour in Supply Chains Act. 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.



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, the 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
- Los Angeles, United States
- Potters Bar, United Kingdom
- Düsseldorf, Germany
- Mississauga, Canada
- North Ryde, Australia

Most staff have their workplace in a MACVAD office, although a small number of employees in New Zealand, China and the UK work remotely on a permanent basis. In addition, MACVAD engages contracted staff who work remotely in the Philippines and Vietnam.

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

OPERATIONS AND SUPPLY CHAIN

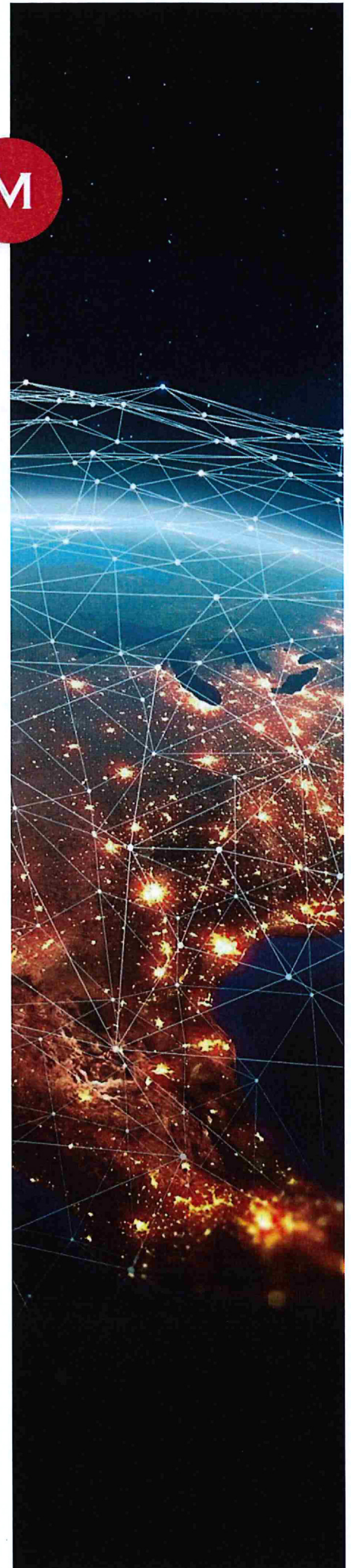
Overview

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 FY26 year was produced in a total of 562 primary manufacturing sites located in eight countries:

- China, Vietnam, India, Cambodia, Indonesia, Pakistan
- Turkey, Israel

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 identifies and assesses the risk of modern slavery in its operations and supply chains using a structured, risk-based methodology. Country and sector risk is assessed primarily through the **amfori ESG Risk Compass** and the underlying **amfori BSCI Country Risk Classification**, which draws on the World Bank's Worldwide Governance Indicators to rate sourcing countries by governance, human rights and labour-condition risk. This is supplemented by the risk-assessment framework promoted by the **Ethical Trading Initiative (ETI)** — under which risks are disaggregated by country, region, sector, the type of good or service supplied, and the nature of the working relationship — together with the **International Labour Organization (ILO) indicators of forced labour**.

On this basis, MACVAD assesses its modern slavery risk as follows:

Supply Chain: As per previous reports the supply chain risk is assessed as high, based on the breadth and location of sourcing, the types of work involved, and the higher probability of migrant, contracted or temporary workers. A proportion of manufacturing is undertaken in countries classified as higher-risk under the amfori country risk classification, which elevates the inherent risk profile.

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

Employees: The risk associated with MACVAD's own staff is considered comparatively low, as most staff are screened and directly employed by MACVAD. Those who are not directly employed are contracted through organisations that have been previously vetted.



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 on-site social audits to verify the findings of third-party audits. Where no third-party audit is available for a facility, the team conducts its own on-site social audit of that site. In both cases, these audits assess supplier practices, raise awareness, and strengthen compliance with our ethical expectations.

Where audits or reviews identify gaps such as inadequate record-keeping, MACVAD staff follow the procedures set out in the Corporate Responsibility Procedure manual. This includes remote reviews of monthly records over consecutive months, followed up with unannounced audits. Where concerns cannot be resolved, supply relationships are discontinued. During the reporting period, no evidence of modern slavery was identified in our operations or supply chain.

Progress on our FY25 commitments

In our FY25 statement we set out a number of actions to advance during FY26. Our progress was as follows:

- **Monitoring new legislation.** We established a legislation tracking project, supported by monthly updates, to monitor new and emerging modern slavery and forced-labour legislation across the markets we serve. Relevant requirements are incorporated into our annual process review.
- **Quality System integration.** We incorporated modern slavery process review into our corporate Quality System risk assessment cycle, embedding modern slavery considerations within our broader risk-management framework.
- **Supplier education and contractor surveys.** We designed the supporting systems and developed the questionnaires and educational materials for proactive supplier best-practice education and for the modern slavery survey of contractors across all business units. These were not deployed during FY26; deployment is scheduled for early FY27.



Training

MACVAD maintains a Corporate Responsibility and modern slavery training module, delivered online and in person, which forms part of the staff induction programme for in-scope teams.

During FY26, 16 staff completed the training. In reviewing delivery against our effectiveness measures, we identified that the training had not been incorporated consistently across all staff induction programmes during the year.

We regard consistent, group-wide delivery of modern slavery training as a priority. During FY27 the training will be updated to reflect recent and forthcoming legislative developments and delivered to all staff across all MACVAD entities and induction programmes.

Management at our UK site also completed a full-day refresher course on Tackling Modern Slavery.

Reported Incidents and Grievances

MACVAD maintains grievance and whistleblower channels through which workers, staff and third parties can confidentially raise concerns relating to modern slavery, forced labour or child labour.

During the FY26 reporting period:

- no modern slavery incidents were reported in MACVAD's operations or supply chain; and
- no communications were received through the MACVAD whistleblower channel.

As no instances of forced labour or child labour were identified during the reporting period, no remediation measures were required, and MACVAD took no measures that resulted in a loss of income to vulnerable families. MACVAD's remediation procedures, including the discontinuation of non-compliant supply relationships, remain in place should any concern be identified.



Assessing Our Effectiveness

MACVAD assesses the effectiveness of its actions to combat modern slavery through a range of measures, which are monitored by the Operations Director and reported to the Board:

- the proportion of primary manufacturing sites covered by current third-party social audits (BSCI / SEDEX) and MACVAD social audits;
- the tracking of supplier corrective-action plans through to closure, and the MACVAD rating assessment recorded on our internal software platforms;
- completion rates for Corporate Responsibility and modern slavery training across in-scope teams;
- the number of modern slavery incidents and grievances reported and remediated during the year; and
- a review of these indicators at quarterly management meetings, and an annual review by the Board.

Against these measures, our FY26 results were as follows:



Audit coverage. Third-party social audits (BSCI / SEDEX or comparable) and MACVAD audits were in place for 553 of our 562 primary manufacturing sites, representing coverage of approximately 98%. MACVAD has conducted its own social audits at 208 (37%) of these sites, of which 117 were conducted and assessed during the FY26 reporting period.

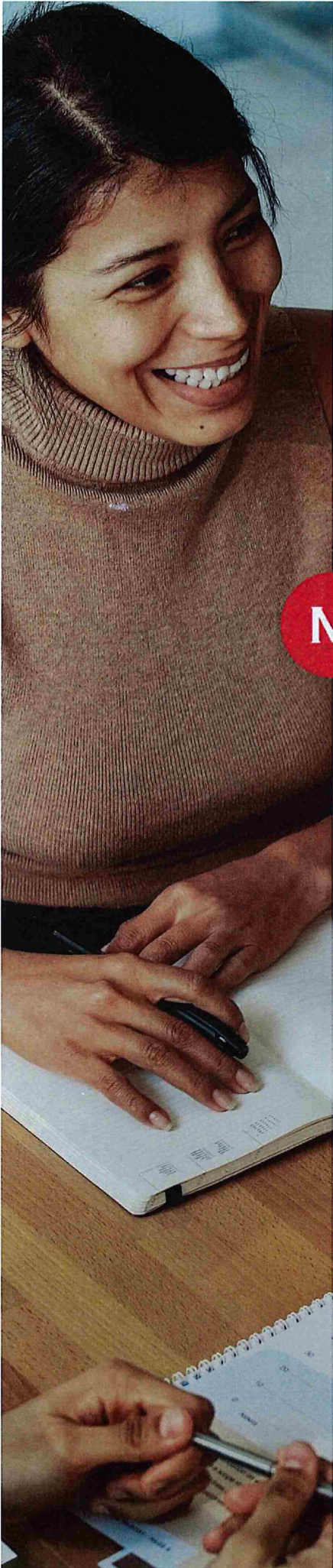
Corrective actions and ratings. Of the 117 sites assessed by MACVAD during the year, minor non-conformities were raised and closed through verification of supporting evidence at 26 sites, and a further 5 sites worked through comprehensive corrective action plans to our satisfaction. Outcomes and ratings are recorded on our internal software platforms. These non-conformities and corrective actions were raised as part of MACVAD's Social and Ethical programme assessments. None amounted to modern slavery, and no modern slavery remediation was required.

Training. During FY26, 16 staff completed Corporate Responsibility and modern slavery training. In reviewing delivery against this measure, we identified that the training had not been incorporated consistently across all staff induction programmes during the year. To address this, the training will be updated to reflect recent and forthcoming legislative changes and delivered to all staff across the group during FY27.

Incidents and grievances. No modern slavery incidents were reported, and no communications were received through our grievance or whistleblower channels during the year.

Governance review. These indicators are reviewed at quarterly management meetings and annually by the Board.





Consultation

WITH COVERED ENTITIES

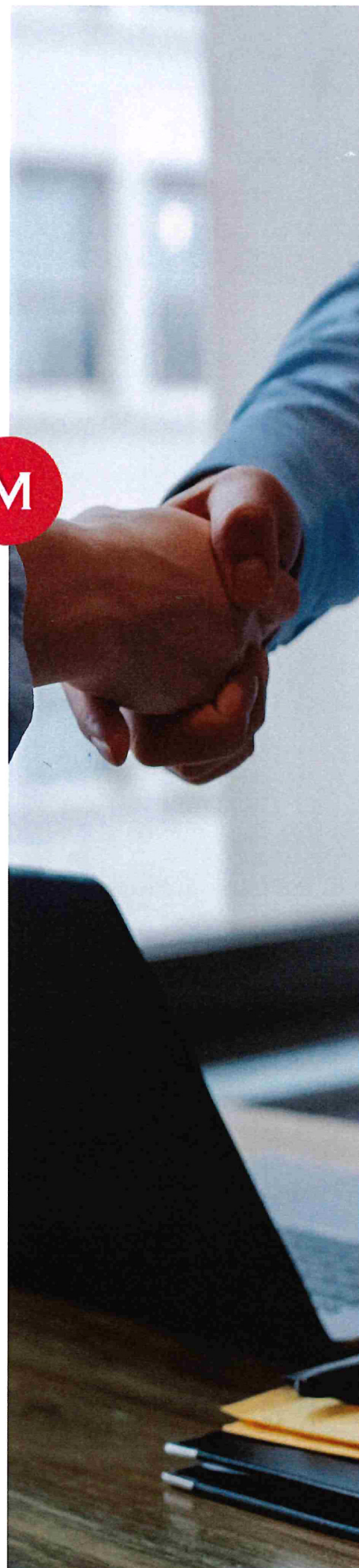
MACVAD Ltd owns 100% of each of the entities covered by this statement. Modern slavery matters are reviewed at quarterly management meetings at which each entity is represented, and this joint statement was prepared in consultation with, and approved on behalf of, all entities listed in the Introduction.

FY27 Initiatives

WHAT'S AHEAD

Our commitment to continuously improve risk identification and minimisation is progressing through:


- Group-wide modern slavery training. Update our Corporate Responsibility and modern slavery training to reflect recent legislative changes, and deliver it to all staff across every MACVAD entity and staff induction programme.
- Supplier education and contractor surveys. Deploy, in early FY27, the supplier Due Diligence programme incorporating the modern slavery survey of service and product suppliers across all business units, using the systems, questionnaires and educational materials developed during FY26. Data gathered through this process will inform our FY27 statement.
- Continued legislation monitoring. Maintain our legislation tracking project, with monthly updates, to monitor developments across our operating markets and incorporate relevant obligations into our annual process review.



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.



Struan Kingan

Managing Director, MACVAD Ltd

Fifth statement published June 2026

Last reviewed and approved by the Board of MACVAD Ltd on 11 June 2026.

ATTESTATION – CANADA (FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT)

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind MACVAD Ltd and all the entities listed in this report.



Struan Kingan

Managing Director, MACVAD Ltd

Date: 11 June 2026

