



Caprice Australia Responsible Business Conduct Policy

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Introduction

Caprice Australia (Caprice) is committed to ensuring socially and environmentally responsible sourcing practices in our own operations and across our entire supply chain in accordance with the Caprice Values, the law, international obligations, OECD Guidelines, our customer, licensor, and certification compliance requirements.

A key means of implementing this commitment in our supply chain, where we have concluded holds the most risk, is through our Ethical Sourcing Code (“ESC”), which includes minimum standards of conduct that all suppliers must meet as a condition of doing business with Caprice.

The ESC has been designed to meet and exceed the compliance requirements of our customers and licensors by ensuring our supplier’s respect: internationally recognised labour standards and human rights obligations; business ethics; and principles of environmental sustainability.

Our Responsible Business Conduct policy is a complimentary policy to the ESC and the other documents listed below and cements our commitment to responsible business practice and the six steps of due diligence, as outlines by the OECD Due Diligence Guidance for Responsible Business Conduct, the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector, OECD Guidelines for Multinational Enterprises, and the GOTS Due Diligence Handbook for Certified Entities.

Policies that support the Responsible Business Conduct Policy include:

- Caprice Australia Ethical Sourcing Code (ESC)
- Ethical Sourcing Code Poster
- Caprice Ethical Sourcing Transparency Policy
- Ethical Sourcing Program Supplier Manual
- Caprice Modern Slavery statement
- Caprice Chemicals Policy
- Caprice Animal Welfare Policys
- GOTS 7 Supplier Checklist
- Caprice Values
- Caprice Sustainability Strategy
- Caprice H&S Policy
- Caprice Prevention of Discrimination, Harassment and Bullying Policy

The Caprice Managing Directors have overall responsibility for Caprice’s Responsible Business Conduct Policy.



Compliance with our Responsible Business Practice Policy

Caprice's Responsible Business Policy (RBC) and the above-mentioned supporting policies and documents apply to all employees of Caprice; inclusive of the executive team; contractors, consultants, freelancers, and licensees.

The relevant ESC policies above mentioned apply to all suppliers contracted by Caprice to supply merchandise to, or on behalf of, Caprice. When the terms "factory" or "factories" are used in this ESC, it refers to a factory or factories registered by a supplier to undertake Caprice related production, unless specified otherwise.

Suppliers must review the ESC and be familiar with its requirements. The ESC forms part of the contract with our suppliers. Accordingly, suppliers must review the ESC and be familiar with its requirements. Suppliers must also ensure their own suppliers, or any third party providing raw materials, components, labour or services to the supplier, also comply with the standards of conduct outlined in this ESC.

The ESC does not replace the local laws of the countries in which our suppliers operate. In the event of a conflict between the ESC and a local law, the more stringent requirement should be followed.

The ESC is part of Caprice's wider ethical sourcing program, which has been built around a Prevent, Detect, Respond model. Under the program, Caprice will provide training to suppliers on the ESC and will actively monitor compliance. In addition, Caprice, or our representatives, may visit factories to carry out compliance audits against the standards contained in the ESC. These audits may occur at any time and be announced or unannounced. Any breaches of our ESC will be reported to the supplier for follow up and corrective action. If there is a critical breach, or pattern of ongoing breaches indicating a supplier does not demonstrate a willingness to comply, we reserve the right to terminate our business relationship with that supplier.

Reporting Violations

Any person, including Caprice staff, factory workers, may report actual or suspected violations of the Caprice Responsible Business Conduct Policy and related documents to Caprice via compliance@caprice.com.au. All reports will be followed up. The identity of anyone who makes a report will be kept strictly confidential, unless requested otherwise.

Internal grievances are to be sent to Caprices People and Culture Manager, Wendy Greenhalgh on wgreenhalgh@caprice.com.au, and will be treated, as above, in a strictly confidential manner.

Caprice's commitment to Responsible Business Conduct

Caprice commits to:

- Follow the above-mentioned policies and related procedures.
- Conduct ongoing due diligence on the using a risk-based approach in our own operations and supply chain, to protect human rights, the environment and foster responsible business



practices. We will do this through meaningful engagement with affected stakeholders, as set out in our Ethical Sourcing Code and Supplier Manual.

- We commit to working to prevent our contribution to harmful impacts through our sourcing practices, by engaging responsible sourcing practices. Our long-term supplier relationships are key to this.
- We will continue to educate our workforce on environmental and social sustainability.

Reporting

Reporting will be ongoing on our website and in our annual modern slavery statements, published on our website. Our sustainability strategy and Ethical Sourcing Program is continuously monitored and reported to the executive team internally.

Date: 15/02/2024



Harvey Lewis, Managing Director

