DECJUBA

2022 MODERN SLAVERY STATEMENT

DECJUBA is proud to submit our third Modern Slavery Statement, which includes DECJUBA Australia and New Zealand[1], and DECJUBA Foundation[2] (ABN 22 611 918 873). Our online offering is managed through our Australian Head Office, located at 56-60 Gwynne St, Cremorne, VIC, 3121, Australia. The DECJUBA Modern Slavery Statement 2022 outlines the actions taken to identify, address and remediate potential risks of modern slavery in our business operations and supply chain from financial year 1 July 2021 until 30 June 2022 (FY22) under the Australian Modern Slavery Act 2018 (Cth) (MSA).

The reporting entity is DECJUBA Pty Ltd (ABN 22 611 918 873) and that DECJUBA is a single reporting entity for the purposes of Modern Slavery Act 2018 (Cth).



A note from Tania Austin, DECJUBA Owner and CEO

"At DECJUBA, our brand promise is to 'deliver amazing' and as part of this promise, we are committed to eliminating modern slavery. We understand that modern slavery is part of a complex set of issues and challenges, and we are committed to a long-term and considered approach which will allow us to be part of this change.

At DECJUBA, we define modern slavery as any practices such as human trafficking, slavery, forced labour, child labour and slavery-like practices where one person has taken away another person's freedom by threats, violence, coercion, abuse of power and deception.

DECJUBA understands that modern slavery disproportionately affects women. As a female-led organization with more than 1500 employees, and additional partner suppliers across the globe, we take the responsibility to lead from the front and work towards eradicating modern slavery and human trafficking very seriously.

In FY22, we continued to demonstrate our commitment to eradicating modern slavery by further embedding our responsible sourcing due diligence processes, which are helping us to better identify, address, and remediate potential modern slavery risk in our business activities. Our Responsible Sourcing Policy provides an avenue for us to work cohesively with our Supplier Network navigating transparency throughout our operations.

In preparing this statement, we have consulted with our executive leadership team, and more broadly across our business, to report on our collectively agreed actions taken to address modern slavery risk as detailed in this statement.

As DECJUBA continues to grow, so does our commitment towards ending modern slavery at every touch point through better understanding, increased knowledge and constant accountability."

Tania Austin, DECJUBA, Owner and CEO

Mandatory reporting criteria of the Modern Slavery Act¹

This DECJUBA Modern Slavery Statement was prepared to meet the mandatory reporting criteria set out under the Modern Slavery Act 2018 (Cth). The table below details the Act's criteria and the contents of this report.

Modern Slavery Act 2018 (Cth) Mandatory Reporting Criteria	Reference in this statement	Page
(16.1.a) Identify each reporting entity covered by the joint statement.	Note from Owner and CEO	1
(16.1.b) Describe the structure, operations and supply chains of each reporting entity covered by the joint statement.	Our Approach Our Operations Our Supply Chain	3-9
(16.1.c) Describe the risks of modern slavery practices in the operations and supply chains of each reporting entity covered by the joint statement and any entities.	Understanding the risks	10
(16.1.d) Describe the actions taken by each reporting entity covered by the joint statement and any entities that each of those reporting entities owns or controls to assess and address these risks, including due diligence and remediation processes.	Note from Owner and CEO Our Actions	1 12
(16.1.e) Describe how each reporting entity covered by the joint statement assesses the effectiveness of actions being taken to assess and address modern slavery risks.	Assessing our Actions	16
(16.1.f) Describe the process of consultation with each reporting entity covered by the joint statement and with any entities that each of those reporting entities owns or controls.	Note from owner and CEO Understanding the risks Our Actions Assessing our actions Consultation	1 10 12 16 20
(16.1.g) Any other relevant information.	FY23 Grievance Mechanism	19

Our Approach

DECJUBA is a privately owned Australian fashion retailer relaunched in 2008 by Owner and CEO Tania Austin with a vision is to deliver AMAZING at every touch point.

Today, DECJUBA is one of the leading fashion retailers in Australia and New Zealand, with a footprint grown from five stores to over 140 stores and two online sites.

Over the past fourteen years, the DECJUBA product offering has also expanded with the launch of two additional brands 'D-LUXE Basics' in 2016 and DECJUBA Kids in 2017.

During the FY22 reporting period DECJUBA's Sustainability Strategy (FY21-25), helped to strengthen the brand's approach to responsible sourcing and procurement practices. The DECJUBA strategy defines five sustainability pillars;

- OUR PROMISE Deliver an amazing experience
- **OUR PARTNERS** Know how our clothes are made
- **OUR PLANET** Be kind to the earth
- OUR PRODUCT Create feel-good fashion
- **OUR PEOPLE** Give back

Each pillar guides the DECJUBA mission to become Australia's most responsible fashion label - as it should be. The 'partner' pillar to 'Know how our clothes are made" highlights DECJUBA's commitment to better manage potential human rights and modern slavery risk.



DECJUBA's governance structures (Table 3), provide the framework by which we aim to identify and remediate modern slavery risk. This framework is strengthened by legal and strategic oversight, supported by regular monitoring and reporting at an operational, Executive Leadership Team (ELT) and Board level (see figure 1).



Figure 1: Details DECJUBA's governance structure that assesses potential modern slavery risk.



Our Operations

DECJUBA's commitment to embedding modern slavery due diligence acknowledges the continued impact of COVID-19, which resulted in continued periods of lockdowns, shifts in production, and increased health and safety requirements in our operations and supply chains during FY22. When faced with such challenges, DECJUBA makes decisions based on our values.

Our Values				
Joining Team DECJUBA is joining a team that embraces and lives its values. It is simply the way we do things.				
Our values are the foundation of our culture and result in a fun, open, adaptable, collaborative, and positive team DECJUBA.				
HONESTY	BRAVERY	INTEGRITY	INNOVATION	OPTIMISM

Table 1: Our values are simply the way we do things at DECJUBA.

At DECJUBA we believe our greatest asset is our people across our retail, head office and warehouse teams. As of 30 June 2022, we directly employed 1,566 team members in our operations, represented by a mixture of fulltime, part-time, and casual team members (see table 2 below).

Their terms and conditions are set out in our employment contracts, which are guided by the General Retail Industry Award² in Australia and Collective Employment Agreements³ in New Zealand. As such, the likelihood of modern slavery risk in our direct operations we have assessed as low.

Location	Full time	Part time	Casual	Totals
Australia	388	88	883	1,359
New Zealand	42	88	77	207

Table 2: Shows the number of fulltime, part-time, and casual team members in our direct operations.

Inducting New Team Members

At DECJUBA, our governance reflects our values within policies, statements and processes. We are focused on providing continuous growth and development opportunities for our team members. Our ways of working begin with recruitment and onboarding, helping each new team member to understand our values, policies and statements, including Modern Slavery processes relevant to them (see Table 3); This information is also available on our internal intranet D:Portal.

Policies, Statements, and Procedures	Purpose
Equal Employment Opportunity Policy	At DECJUBA we celebrate and encourage respect for the differences that make us unique as individuals. Reference the Equal Employment Opportunity Policy provided.
Health Safety and wellbeing compliance training and Issues Resolution	In FY22 we conducted an analysis of our health and safety incident data, along with a recap on status of mitigating actions.
Inclusion and Diversity Statement	At DECJUBA we are committed to inclusion, diversity, and equality. We understand that everyone is unique, and we want to celebrate those differences. 2022 Diversity and Inclusion Action Plan (3).pdf
Speak-up Whistle-blower Policy	We are committed to providing a safe and enjoyable space where team members are encouraged to speak up and report conduct that causes them concern.

Table 3: Details our governance structures and policies.

Right to Work Policy

At DECJUBA, we understand that employing visa holders comes with additional compliance obligations. As such, we check the visa status of new recruits where applicable through the Australian Federal Government's Visa Entitlement Verification Online (VEVO) system⁴.

In FY22, DECJUBA Foundation committed to supporting Deakin CREATE8 via their career clinic mentoring program, connecting people from refugee backgrounds with mentors, including our DECJUBA Head Office team. The goal was to identify career opportunities, provide tools to build networks, and explore pathways to meaningful employment.

Our Supply Chain

At DECJUBA, we are proud to have partnerships with our suppliers, many of which are long-term and fundamental to the success of our journey.

During non-COVID affected times, our leadership team regularly visits our suppliers and their manufacturing sites, continually building and developing transparent and authentic relationships. During FY22, whilst travel restrictions remained, we regularly engaged with suppliers and factories via zoom enabling face to face updates and developments.

Producing products ranging from apparel to footwear and accessories, the future DECJUBA sourcing model will see our products manufactured in multiple countries including Australia, China, Vietnam, Pakistan, Indonesia, Bangladesh, and Sri Lanka (see map below).



Figure 2: World map outlining the countries in which DECJUBA currently manufactures.

DECJUBA Responsible Sourcing Program (RSP)

DECJUBA's Responsible Sourcing Program is operationalised and digitally enabled through our internal Enterprise Resource Planning system. In FY22 DECJUBA invested in a best-in-class compliance system to facilitates greater transparency and traceability.

Together these systems provide a comprehensive framework that manages risk more broadly in the business, enabling more specific evaluation and monitoring of slavery risks in our supply chain.

DECJUBA's Terms and Conditions of supply govern the expectations of the working relationship between DECJUBA and its suppliers. These expectations are tested through our supplier onboarding and due diligence policies and processes which extend to suppliers in our operations, including - but not limited to - transport and logistics providers, property, cleaners, procurement (office suppliers), visual merchandising, and promotional materials.

In FY22, DECJUBA invested in a new digital platform to enhance supply chain traceability and transparency capability.

Through the data we collect, we analyse and support our visibility across all tiers of our Supply Chain.

Tier	DECJUBA Definitions
0	Supplier (Who we pay the invoice too)
1	Cut Make and Trim (CMT) Assembly
2	Printer Houses, Embroidery, Wash House, Dye House and Laundry
3	Fabric Mills, Trims/Hardwear
4	Packing, Raw Material, Plastic Processing

Table 4: Tiers of DECJUBA's supply chain.

DECJUBA Responsible Sourcing Program

DECJUBA Governance Framework Intends To Mitigate Risks Within Our Supply Chain.



Figure 3: Responsible Sourcing Program that assess risk for newly on-boarded suppliers.

Modern Slavery: Understanding The Risks

At DECJUBA, we understand the risks of modern slavery practices and the potential for DECJUBA to cause, contribute to, or be directly linked (see table 5) to modern slavery throughout our everyday business.

Our Responsible Sourcing Policy provides the structure for how we fundamentally manage our approach to social and human risk in our products and business.

As detailed below, modern slavery manifests itself across a range of interconnected aspects of industry, goods, geographic and business model risk, as detailed below. At DECJUBA we are committed to eradicating this across the industry.

Key Term	Explanation
Cause	A business may cause an adverse human rights impact, such as modern slavery, where it causes the impact through its own activities or omissions.
Contribute to	A business may contribute to an adverse human rights impact, such as modern slavery, where its actions or omissions facilitate or incentivise the impact to the extent that it would have been unlikely to occur without them.
Directly linked to	A business may be directly linked to an adverse human rights impact where it is connected to the impact through the actions of another entity with which it has a business relationship (such as a supplier).

Table 5: Details and explanation of the risks DECJUBA aims to address through our Responsible Sourcing Program.

Textile And Apparel Industry Risks

Due to the complex and characteristic nature of global textile and apparel supply chain, the fashion industry has a statistically high rate of modern slavery risks.

Reasons for this are many, including the use of unskilled, temporary, or seasonal labour or short-term contracts that affect the way we interact with different production stages within our supply chain.

Product and Services Risks

The way certain textile or apparel products and services are produced, provided, or used, may also attract a higher risk of modern slavery. For instance, unreasonable delivery timeframes may require suppliers to engage in excessive working hours.

Geographic Risks

Certain countries or regions are more likely to have higher risks of modern slavery where regulatory or compliance regimes are weak or unenforced. Migration flows and socio-economic factors like poverty also support local and international data identifying higher risk countries for modern slavery.

At DECJUBA, we govern these risks by working with our suppliers to adopt our responsible sourcing and procurement requirements in all tiers of the supply chain.

COVID-19 has presented a number of challenges when working with our suppliers and factories, such as international travel limitations. However, we have been able to develop short term workarounds to maintain due diligence processes.

We expect to resume in-person supplier/factory visits in FY23.



Modern Slavery Our Actions

DECJUBA's actions to address actual and potential modern slavery risks starts with our ongoing due diligence and remediation management process. These identify, prevent, mitigate, and account for how we address adverse human rights impacts in our business activities.

"Responsible and sustainability practices are at the core of our values as a business."

Supply Chain Policies, State- ments and Procedures	Purpose
Modern Slavery Statement	We have reported on our Modern Slavery Act 2018 (Cth) compliance for FY20, 21 and 22.
Responsible Sourcing and Social Compliance Policy	Our objective is to have full transparency across our supply chain.
Modern Slavery Policy	Modern Slavery constitutes a violation of fundamental human rights.
Forced Labour Policy	DECJUBA has committed to eradicate all forms of forced labour.
Escalation Policy for Modern Slavery	Our 2022 Escalation Policy for Modern Slavery (Reference the 2022 Escalation Policy for Modern Slavery Policy provided). Supports DECJUBA to define and determine action when modern slavery risk is identified.
Factory Code of Conduct	Suppliers complete this form to ensure they meet global regulations including that pertaining to modern slavery.
Factory Capability Assessment	Suppliers complete this form to ensure they indicate their capacity. This assessment also enables DECJUBA to check if suppliers subcontract work out to unregistered factories or homeworkers.
Screening	Ensure current suppliers certifications meet responsible sourcing values.
Supplier Manual	Houses Modern Slavery, Child Labour and Forced Labour Policies.
Annual Data Integrity Review	Check reports to ensure the suppliers are continually enforcing our modern slavery requirement as to the policy.

Table 6: Details the comprehensive policy suite that DECJUBA operationalises to better identify and address potential modern slavery.

Establishing the DECJUBA Responsible Sourcing and Social Compliance Policy is our first step in addressing the risk of modern slavery within the DECJUBA supply chain and operations.

Additionally, we have developed supporting policies to the code, including a Modern Slavery Policy and a Forced Labour Policy, giving a more detailed approach to our expectations of suppliers and factories. This includes our remediation process in the event of a confirmed case of modern slavery.

In addition to developing our DECJUBA Responsible Sourcing and Social Compliance Code and supporting policies, we have implemented the following to assist us to minimize the risk of modern slavery while improving our sourcing practices:

1. SUPPLIER AGREEMENT

DECJUBA suppliers must agree to all terms and sign our Supplier Agreement. This agreement covers our operational business relationship and all trading terms including governance of the supply chain.

Suppliers cannot be used for any activity until a signed Supplier Agreement has been received and approved by DECJUBA.

2. TRACEABILITY

DECJUBA has established traceability as a key pillar of our Responsible Partnerships. We have completed tracing 100% of our Tier 1 factories. Our Supplier Agreement also stipulates that all Tier 1 sub-contractors are disclosed and have current audits in place before being approved to manufacture for DECJUBA.

At DECJUBA, we are currently working through Tiers 2 (Inputs) and 3 (Fabrics) and have taken steps to traceability with our Tier 4 (Raw Materials) suppliers and will continue this process over the 2022 year.

3. ONBOARDING PROCESS

In 2021, we implemented further changes to strengthen our requirements towards developing a more controlled supplier onboarding process. We now review every new supplier business model - including ownership, size, scope, and capability - before proceeding to a final assessment of the Social Compliance Audit Report.

At DECJUBA, this new onboarding process allows us to refine our Supplier base and identify those partners with a shared view of what responsibility means in our trading relationship.

Our standard practice involves visiting each of our factories to look at the premises and manufacturing processes. Our teams meet with the factory owners to understand their views and policies on environmental and social issues before approval.

Due to COVID-19 travel restrictions, we are currently conducting this process electronically with the plan to revert to our standard practice with suppliers once travel restrictions cease.

4. FACTORY AUDITS

To ensure our workers are protected from the risk of modern slavery, at DECJUBA we utilise an independent factory audit program. Within these audits are confidential individual and group worker interviews where concerns can be raised. From this, we conduct annual follow up audits to address concerns and ensure corrective actions. DECJUBA's compliance team communicates any corrective action plans with key stakeholders both internally and with suppliers. Actions are set against a timeframe and managed until closed off.

5. INTERNAL SUPPLIER RATING SYSTEM

Our internal Supplier Rating system is carried out by our Compliance Manager. Suppliers receive a rating on several set criteria that include metrics around sustainability and ethical practices. At DECJUBA we regularly review this information and speak with Suppliers to drive continuous improvement.

6. TRAINING

At DECJUBA, we conduct MSS-related training for our employees and suppliers to establish a clear understanding surrounding the risk of modern slavery and DECJUBA's remediation program.

We are committed to delivering and improving our training programs over the coming years with internal and industry specialists to ensure we remain up to date with new identification and mitigation strategies across modern slavery.

In FY22, we delivered four one-hour modern slavery awareness sessions with key stakeholders with an interactive focus, allowing for questions, discussions and a greater level of understanding by all involved.

Reporting Our Progress

At DECJUBA we are committed to ensuring the constant communication of our ethical sourcing and sustainability messages via our external website, <u>here.</u>

The investment of a digital platform documenting our supplier network has accomplished reporting capabilities by where we can efficiently identify our global manufacturing, network. This also allows us to measure data integrity within our supply chain and target specific tiers.

Measures:

- 1. Reporting capabilities identifying where our goods are made and percentage by region.
- 2. Capacity, order volume on verses ability to deliver.
- 3. Raw material certification providing their origins.
- 4. Quality Assurance manufacture consistency across suppliers and assessing faulty goods.

Additional Measures

During FY22 DEJCUBA continued our focus on Supply Chain transparency. This includes:

- Expanding our Compliance Team to better manage suppliers' data inputs and measures.
- Share across our supplier network DECJUBA sustainability pillars.
- Attending multiple seminars, example, Raw Assembly, Textile Exchange and Demystifying Human Rights webinars.
- Introduced Australian manufacturing and sourcing of raw materials such as Australian Cotton and Merino Wool.
- Regular communications ensure we maintain the visibility of our suppliers and CSR practices remain embedded into our supply chain. We also ensure our suppliers know and are free to give feedback on our ordering process.

At DECJUBA we are continuing our journey to a more sustainable future by partnering with organisations who protect workers in the supply chain. Examples of these partnerships include BCI (Better Cotton Initiative). Verité, Walk Free and The Textile Exchange, all not-for-profit organisations that aim to improve the textile industry standards.

At DECJUBA, we understand that there are challenges in eradicating modern slavery and are committed to ensuring the protection of workers from all indicators of modern slavery across our business.

We acknowledge that even though we have begun our journey towards minimizing modern slavery, we will not stop in committing to - and implementing - these actions moving forward.

Assessing Our Actions

At DECJUBA, our Responsible Sourcing Program is the main mechanism by which we explore our approach to mitigating our likelihood to cause, contribute to, or be directly linked ^{6 7} to modern slavery. Under the Guidance for Reporting Entities on Modern Slavery Act 2018 (Cth)⁵ reporting, we are continuously assessing the effectiveness of our actions in identifying, addressing, and remediating modern slavery risk. As part of our due diligence framework, we are constantly evaluating, monitoring, and reporting on this risk to workers in the communities in which we operate.

When issues are identified - whether that is through our due diligence processes or from other sources - we first determine whether the issue is classified as Zero Tolerance, Critical, Major or Minor Non-conformances. This determination informs next steps and actions under our 2022 Escalation Process for Modern Slavery.

Escalation Process



In FY22, DECJUBA developed a road map to further support our approach to combatting modern slavery and effectively deliver our goals. (see table below)

Several actions and tools have been created to understand and assess if our commitment to eradicating modern slavery from our supply chain is effective or requires adjustment. This ongoing assessment ensures DECJUBA continues to provide an adequate level of protection to workers.

Road Map for Modern Slavery

Location	End of 2021	2022	2023	2024	2025
Update MSS	Dec 2021 Update MSS	Update MSS	Update MSS	Update MSS	Update MSS
Training Modern Slavery/Forced Labour		 Feb Internal Teams May-Sept External Suppliers 	 Feb Internal Teams update May-Sept External Suppliers update 		
Review internal polices relating to MSS/FL		 Feb update Supplier Manual Suppliers sign updated manual 	Feb update Supplier Manual	Feb update Supplier Manual	Feb update Supplier Manual
Partnerships	Textile Exchange, BCI	Walk Free, Verité	Other Local/ Global organisations		
Audits	Tier 1 Completed and monitor expiry.	Tier 2 Completed and monitor expiry. Tier 3-4 accessing information were available.	Tier 3-4 Begin deep dive.	Tier 3 Completed and monitor expiry.	Tier 4 Full trans parity.
Continually Research	Ongoing in relation to all above	Ongoing in relation to all above	Ongoing in elation to all above	Ongoing in relation to all above	Ongoing in relation to all above

Table 7: Details our annual governance cadence as it relates to modern slavery.

At DECJUBA, our ability to measure performance in reducing modern slavery across our business operations is key to understanding how we can continually improve as a business.

We utilise several indicators and tools to measure our approach, including modern slavery awareness training, feedback sessions and engagement in supplier conferences.

Action/Tools Timeline Why **Our Progress** Internal MS To determine if we are identifying DECJUBA have not identified Ongoing KPľs potential or actual incidence of any case of Modern Slavery modern slavery. in its business operations. Training Building awareness internally Internal – training session Ongoing Sessions and externally about what twice per year to include /Workshops modern slavery is and how new employees. we can report modern slavery risk/concerns. External – training session held in Supplier Workshops. Knowing how and where **External Data** We have used GSI (Global Ongoing. modern slavery occurs is key Slavery Index) dataset to Use and focus to eradicating it. By applying assess modern slavery in each attention dataset such as the Global of our sourcing countries/ durina Slavery Index (GSI). DECJUBA 2023-2025. regions to understand where has been provided with an the risk is highest, enabling us to focus our attention where it important perspective in identifying vulnerable people. is needed most. Product **Different product categories** Our digital tool takes a Ongoing. Categories involve different levels of risk-based approach to Amber/Red (Risk-based modern slavery risk such prioritising action on supplier/ flagging approach) as processes involved during factory Amber and Red system until Traffic Light manufacturing, or the materials system to identify risk or activate to system and components required. breach of policy, escalated green ongoing. to Compliance Manager, assesses, CAP plan issued and managed until resolved. **Factory Audits** Using 3rd Party independent Every Tier 1 and Tier 2 Factory Ongoing. (3rd Party) audits allows us to assess each used by DECJUBA in FY22 has Continued factory's social compliance. achieved this audit expectation. adherence This has been crucial to during 2023 maintaining our visibility when including Tier travel has not been possible. 3 factories.

Modern Slavery Business Operations Progress and Timelines

Worker Interviews	At DECJUBA, we know that listening to the factory workers is crucial to ensuring we are best protecting them.	Our independent 3rd Party factory ethical audit must include worker interviews. The audit also details non-conformances and classifies them as Zero Tolerance, Critical, Major and Minor. These matters are typically closed out through corrective action plans (CAP). In FY23, we plan to introduce a Confidential Grievance Mechanisms.	Focus on Grievance Mechanisms during FY22/23.
Supplier Conference	Supplier Conferences allow us to build supplier relationships and educate our Suppliers on DECJUBA's expectations towards eradicating Modern Slavery within Supply Chains and our business dealings.	Successfully delivered our annual supplier conference virtually in March 2022. We were able to share strategic goals and acknowledge the contribution made by our supplier group. The conferences will remain as virtual until international travel opportunities become clearer.	Annually. Next in March 2023.
Factory Visits	At DECJUBA, we know from experience that being on the factory floor, speaking with factory owners, managers, supervisors, and factory workers helps us gauge how workers are treated. Site visits also allow DECJUBA team members to assess factory managements attitude towards workers and provides visibility of workers performing their roles in the factory environment.	Virtual meetings have become more regular due to travel limitations and our Supplier visits to Head Office have allowed for face-to-face discussions on policies and roadmaps.	Ongoing

Table 8: Details the DECJUBA Modern Slavery Business progress and timelines currently in place.

Consultation

DECJUBA does not own or control any other business entity.

DECJUBA's FY22 Modern Slavery Statement has been developed by consulting across our business with senior management. We have also consulted with external bodies and relevant team members where required. The sub-entities such as D-LUXE and DECJUBA Kids are part of the DECJUBA business and managed by the same internal management team.

The DECJUBA team is committed to utilising our influence, driving change and improving people's lives.

We know our responsibility does not end here, and we will continue taking steps forward over the coming years to eradicate the risk of modern slavery from our end-to-end supply chain.

decjuba APPROVAL

This Modern Slavery Statement has been approved by Tania Austin, Sole Director, Owner and CEO.

SIGNATURE: Jonalan

DATE: 21 DECEMBER 2022

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