

Best Bar Pty Ltd

Commonwealth Modern Slavery Act 2018

The seven mandatory criteria require every statement to:

1. identify the reporting entity
2. describe the reporting entity's structure, operations and supply chains
3. describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls
4. describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes
5. describe how the reporting entity assesses the effectiveness of these actions
6. describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement), and
7. provide any other relevant information.

Reporting Entity

Best Bar Pty Ltd

367 Mandurah Road

East Rockingham 6168

ABN 48 068 713 539

Entity Structure & Operations

Best Bar Pty Ltd is a private company that is 100% owned by Rokeby Nominees Pty Ltd

Best Bar sources locally manufactured and imported reinforcement steel as a raw material that it then converts into finished goods that are sold by to end-users in the building and construction industries.

Best Bar also sources locally manufactured and imported sundry components to support the primary product range.

Best Bar has operations in Western Australia, Northern Territory, South Australia, Victoria and New South Wales

Best Bar employs approximately 300 people in its operations which are all located in Australia. Best Bar has no operations or associated entities offshore.

Supply Chain

Best Bar's sourcing of raw material is primarily direct from manufactures but can also be through manufacturer's representatives and distributors.

Imported products are typically delivered on a CIF basis utilising the shipping services contracted to our suppliers and or the agents.

All procurement is centralised to ensure adherence to company policy and corporate governance requirements.

Purchases are only allowed from previously approved and accredited suppliers. This also includes suppliers of services and consumables for the day to day operational requirements.

Finished goods are delivered using locally owned and operated transport providers.

Supply Chain Risk Profile

Product Service	Supplier	Source	Risk Class	Comment
Raw Material	Local	Local	Low	
Raw Material	Local	Imported	Low /Med	Turkey
Raw Material	Overseas	Imported	Med	Singapore
Shipping	Overseas	Agency	Med	
Transport	Local	Local	Low	
Staff	Local	In House	Low	
Temp Staff	Local	Local Agency	Low	
Sundry Products	Local	Local	Low	
Sundry Products	Local	Imported	Med	China, Malaysia
Sundry Products	Overseas	Imported	Med	China
Consumables	Local	Local	Low	
Consumables	Local	Imported	Med	China
Services	Local	Local	Low	

Supply Chain Risk Management

At Best Bar Pty Ltd prior to entering into any supply arrangements with our partners we conduct a detailed review of their capabilities and business status.

Potential suppliers are required to provide us with details of their compliance in the following areas.

- Business insurance coverage
- Environmental
- Health and Safety
- Quality Accreditation

Potential suppliers are also required to agree to our supplier code of conduct which covers the following critical items. (see attachment)

- Supplier Expectations
- Integrity ethics and conduct
- Conflict of interest; gifts, benefits and hospitality
- Audits and assessments
- Labour and Human Rights
- Health and Safety

Agreement to the supplier code of conduct is also a condition on every purchase order raised by Best Bar Pty Ltd which is accepted by suppliers.

Review Process

Each accredited supplier is reviewed utilizing an automated reminder system of expired documents. If a supplier fails to update their information or does not agree to the terms of supplier that supplier will be blocked from trading.

Other Entities

Best Bar (Vic) Pty Ltd and Best Bar (NSW) Pty Ltd are wholly owned by Best Bar Pty Ltd and come under the group procurement controls of the primary company so are subject to the controls above.

Improvements to be implemented

- Improved interrogation of supplier activities to support submitted documentation and statements

Best Bar Pty. Ltd. (the "Company")
Australian Company Number 068 713 539
(Incorporated in Western Australia)

**WRITTEN RESOLUTION OF DIRECTORS PASSED ON 4th FEBRUARY 2021
PURSUANT TO ARTICLE 77 OF CONSTITUTION OF COMPANY AND
SECTIONS 248A, 295(5) AND 298(2) OF THE CORPORATIONS ACT 2001**

IT IS RESOLVED THAT, the Best Bar Group "Modern Slavery and Ethical Sourcing Policy" document, enclosed as "Annex A", has been reviewed and hereby approved, effective immediately, and that the Best Bar Statement 2020 (annex B) has been reviewed and is approved for distribution.

BOARD OF DIRECTORS



GRANT BRUCE JOHNSTON



BRADLEY STEVEN JOHNSTON