

Modern Slavery Statement FY 2022

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Introduction

Reporting Entity and Purpose of this Statement

This statement is made in accordance with section 14 of the Australian Modern Slavery Act 2018 for the period 1 July 2021 – 30 June 2022. This is a joint statement made on behalf of Bis Industries Holdings Limited (ARBN 622 481 752), as well as its wholly owned subsidiaries including:

- Bis Finance Pty Limited (ACN 125 201 185)
- Bis Industries Limited (125 202 253)

These wholly owned subsidiaries are also reporting entities and have been consulted in preparing this statement.

This statement intends to address and report on the identified risks of modern slavery and human trafficking within Bis' business and operations and the actions taken by Bis to address those risks.

All Bis entities are subject to the same group policies and procedures and the information provided in this Statement applies to all Bis reporting entities.

Throughout the remainder of this statement, these entities will be collectively referred to as Bis.

Operations

From its origins in 1915, Bis has grown into one of Australia’s leading privately owned resources logistics companies. Bis offers an extensive range of services covering haulage, underground services, materials handling, automation and consulting.

Bis is headquartered in Perth, Western Australia and has other offices based in North Sydney, New South Wales and Brisbane, Queensland.

With all operations currently based in Australia, Bis is fully compliant with Australian law and with its robust labour practices, therefore the risk of modern slavery in our operations has been deemed to be low.

Bis currently employs 1326 people across approximately 50 operations in Australia.

Approximately 1104 employees are in permanent positions, 222 in temporary/casual positions and out of these figures, 200 are labour-hire employees.

Key

- Bis Offices
- Underground Equipment
- Iron Ore
- Gold/Silver/Copper
- Quarries
- Steel/Lead
- Coal
- Specialised Equipment Services
- Infrastructure
- Nickel
- Mineral Sands
- Manganese
- Bauxite



Structure

Bis Industries Holdings Limited is the ultimate parent company and its wholly owned subsidiary Bis Finance Pty Ltd, is the holding company and debt holder.

Bis Industries Limited is the wholly owned subsidiary of Bis Finance Pty Limited.

Supply Chains

Bis has over 2,000 suppliers across a diverse range of products and services.

Key products procured include prime movers, heavy earth moving equipment, spare parts, diesel fuel, tyres, specialised mining equipment, IT equipment and personal protective equipment for use in our operations.

Bis' supply chain also includes services such as external repair and maintenance diesel fitters and mechanics.

Bis on occasion uses labour hire companies to meet its operational requirements such as Workpac Pty Ltd, and Chandler MacLeod Group Pty Ltd.

Most of Bis' suppliers are based in Australia, but international suppliers such as Scania, Volvo, Cummins, Ampol, Komatsu and CAT dealers such as Westrac, Hastings Deering and Cavpower are also used.

As per the table below, Materials, Fuel & Lubricants and External Repairs & Maintenance are the top 3 product categories with the highest procurement spend across Bis.

Spending order (highest to lowest)	Product category	Sub-category	Modern slavery risk? (y/n)
1.	Materials	Tyres	Y
		Yellow gear	N
		Underground equipment	N
		Hydraulics, pumps & hoses	Y
		Driveline and diffs	N
		Prime movers	N
		Engines and related parts	N
		Fittings, bearings and valves	N
		Electrical	N
2.	Fuels & Lubricants	Bulk fuel	N
		Fuel cards	N
3.	External Repairs & Maintenance		N
4.	Heavy Haulage		N
5.	Specialised labour hire		N

Acknowledging the Risks of Modern Slavery

Pursuant to the Modern Slavery Act 2018, the term modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.

Bis recognises the importance of protecting human rights and opposes slavery in all its forms. Bis also recognises the responsibility of ensuring that its supply chains and business operations do not allow modern slavery practices to occur. It is committed to being a responsible corporate entity by effectively identifying risks in its operations.

Tools used to strengthen Bis' assessment and response to risks include the Global Slavery Index and Modern Slavery Registry.

Risks in our operations

Bis' internal operations have been assessed as low or no risk. The prevalence of modern slavery in Australia is deemed to be low according to the Global Slavery Index.¹

Risks in our supply chains

Based on the Global Slavery Index, Bis does not source the supply of any product or service from any country with the top 10 highest prevalence rate of modern slavery: North Korea, Eritrea, Burundi, the Central African Republic, Afghanistan, Mauritania, South Sudan, Pakistan, Cambodia or Iran.²

In assessing potential risks of modern slavery, Bis focuses on the product and service category and considers there to be a heightened risk of modern slavery in the categories listed in the table below.

Modern slavery risk factor (highest to lowest)	Product category	Material	Industry risks
1.	Tyres	Rubber	<ul style="list-style-type: none"> ▪ Use of child labour on rubber plantations ▪ Substandard working conditions in manufacturing ▪ Forced labour in transportation ▪ Components may be sourced in countries with high risks of labour exploitation
2.	Hydraulics, pumps & hoses		
3.	Conveyor belts		
4.	Tele-communications	Rare earth materials (Titanium, aluminium, lithium, cobalt, graphite, silicon etc)	<ul style="list-style-type: none"> ▪ Products sourced from major multinational companies including Apple, Dell etc often have complex supply chains ▪ Sourcing of raw materials that go into components carries risk of child labour ▪ Poor working conditions on mine sites in developing countries ▪ Forced production lines in countries such as China, Thailand, Philippines and Malaysia ▪ Widespread reliance on unskilled workers
5.	IT equipment		

¹ [Maps | Global Slavery Index](#)

² [Global Findings | Global Slavery Index](#)

Policies and Governance

Bis has developed policies that underpin its robust corporate governance framework and strategy against Modern Slavery:

- Bis Human Resources Policy
- Bis Workplace Harassment & Bullying Standard
- Bis Equal Employment Opportunity Standard
- Bis' Fair Treatment Process
- Bis Whistleblowing Policy
- Procurement and Purchasing Standards of Ethical Behaviour Policy (Purchasing Policy)

The policies apply to all employees and contractors and are accessible via the Bis Intranet. They have been endorsed by the Chief Executive Officer and are supported by the Bis Code of Conduct which has been updated to include Bis' commitment to opposing modern slavery in all forms.

In 2021, Bis' Purchasing Policy was updated to include an expectation that all employees involved in purchasing will ensure that suppliers comply with modern slavery laws and regulations including the *Modern Slavery Act 2018 (Cth)*.

Through its Whistleblower policy, Bis utilises an externally monitored Whistleblower hotline that enables any Bis employee - past or present - to report any suspected incidences of modern slavery confidentially and without fear of reprisal. This helps to support a culture of honest and ethical behaviour across the business and enables all Bis employees and contractors access to protections and remedies.

Actions Taken to Assess and Address Risks of Modern Slavery FY22

Modern Slavery Questionnaire

In 2021 The Working Group created a Modern Slavery “Deep Dive” Questionnaire that was designed to provide further insight into our supplier practices, potential risks and to identify areas for further due diligence.

This has been issued to all of Bis’ tyre suppliers (the product category with the highest modern slavery risk and spending) as well as labour hire providers in 2022.

The deep dive questionnaire requires suppliers to provide information regarding their workforce, auditing history, certification and supply chain management. It also enquires about relevant internal policies pertaining to modern slavery.

Training and Awareness Campaign

Bis’ Modern Slavery Awareness Campaign was launched in December 2021 using a range of communication and engagement tools including the Bis employee social media application and the Bis Intranet.

An educational post defined modern slavery, the risks in Bis’ operations and provided a link to the 2021 Modern Slavery Statement.

A Modern Slavery Update was also communicated to all employees through the Bis Intranet linking a Modern Slavery Supplier Training Video and showcasing Bis’ initiatives to combat modern slavery risks.

The update also provided contacts within senior management where modern slavery concerns could be reported to as well as an anonymous method via the whistleblower hotline

Addressing risks in tyre supply

Tyres represent the supply chain of Bis with the highest modern slavery risks. Bis had 15 tyre suppliers in 2021 and in 2022 a new procurement strategy was implemented to reduce the number of overall suppliers to make it easier to diligently monitor for modern slavery practices and risks.

Two distributors for Bis’ East and West divisions have been retained who distribute tyres from only 4 suppliers each. Both distributors have been required to confirm their compliance with anti-slavery laws including the Modern Slavery Act 2018 (Cth).

Earth moving tyres carry a higher modern slavery risk and currently Bis is looking into using only one direct supplier for this category so monitoring and evaluating will be easier.

MODERN SLAVERY QUESTIONNAIRE

Issued to all tyre suppliers and labour hire providers in 2022.



MODERN SLAVERY TRAINING AND AWARENESS CAMPAIGN



Launched in December 2021 to provide educational information and raise awareness of risks.

NEW TYRE STRATEGY

To address risks in our tyre supply chain.



Bis

Assessing the effectiveness of our actions

Bis currently assess its effectiveness in modern slavery risk identification and management by engaging with suppliers, being responsive and transparent to customers as well as by issuing and analysing its supplier deep dive questionnaires.

Supplier information

Bis evaluates the information it receives from suppliers in its deep dive questionnaires to assess its performance in reducing modern slavery risks. It also conduct risk assessments during the tender and new supplier request process.

Client and supplier requests

Bis cooperates with all client and supplier due diligence requirements and acts promptly on any areas of improvements identified in questionnaires.

Individual concerns or allegations

Bis has multiple platforms for employees and contractors to report concerns either directly to senior management or anonymously through the whistleblower process. The whistleblower hotline is monitored by an external and independent organisation Lighthouse that deals with any concerns discretely.

Bis acts on any and all allegations raised promptly and values concerns being raised to inform its performance.

Reviewing our progress

FY22 Action	Achieved?	Comments
Modern Slavery Awareness Campaign	✓	
Require all labour hire providers to confirm adherence to Modern Slavery laws	✓	
Circulate Deep Dive Questionnaire to all suppliers of goods/services in high-risk categories or geographic areas	✓	
Undertake a detailed, specialist analysis of Indonesian supply chains	✗	Operations in Indonesia ceased during FY22.
Assess and mitigate the risks involved in overseas recruitment	✗	International recruitment did not occur during FY22.
Complete the new tender process to retain up to 10 tyre suppliers	✗	A new tyre strategy was approved and adopted by the procurement team to use two tyre distributors.

Actions for FY23

1. Expand Bis' supply chain mapping and modern slavery risk analysis to incorporate the geographical areas that its suppliers in high-risk categories operate in.
2. Create a modern slavery risk data tracking tool to record the status of deep dive questionnaires issued to suppliers, any risks identified and concerns raised.
3. Increase general awareness and knowledge, company wide, by incorporating relevant subject matter into the Bis Learning Management System, new employee onboard training modules and the company's Code of Conduct.
4. In addition to raising general awareness (bullet 3), design and implement dedicated and mandatory training for all employees who have a direct or influential role in selecting new suppliers (e.g site administrators, site managers, procurement and supply managers).
5. [From FY22] Assess and mitigate the risks involved in overseas recruitment
6. Develop a formal Modern Slavery Policy.

Consultation and approvals

The Legal, Procurement and Human Resources Teams were consulted during the preparation of this statement.

This statement was approved by the Board of Bis Industries Holdings Limited on 07 February 2023.

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Simon Atkinson
Chief Executive Officer
Bis Industries Holdings Limited

