

## MODERN SLAVERY STATEMENT 2020

#### INTRODUCTION

This statement is made pursuant to section 14 of the Modern Slavery Act 2018 (Cth) and is our first Modern Slavery Statement which is published on behalf of JB Metropolitan Distributors Pty Ltd ABN 72 088 821 023 (hereinafter referred to as JB Metro).

The purpose of this statement is to outline our approach to ensuring that JB Metro has comprehensive frameworks and processes in place to minimise the risks of modern slavery in our business operations and supply chain. JB Metro recognises that modern slavery can occur in many forms like human trafficking, forced marriage, forced labour, child labour, torture, debt bondage, servitude, deceptive recruitment for labour, etc.

We are committed to adhere to the highest ethical standards with a goal of identifying and working with its supply chain to eradicate the various forms of slavery.

# **OUR STRUCTURE, OPERATIONS AND BUSINESS**

JB Metropolitan Distributors Pty Ltd ABN 72 088 821 023 is a privately owned and operated company, registered in Australia. JB Metro is engaged in the activity of distribution and wholesale of various products like confectionery, non-alcoholic drinks, grocery, food products like chips, biscuits, cleaning products, etc. JB Metro has an affiliated family trust managed by B&D Spiteri Investments Pty Ltd ABN 74 127 016 630 which does not have any employees or source any purchases or undertakes any sales.



JB Metro sources the products mainly from the manufacturers and other wholesalers or distributors in Australia. These suppliers range from large multinational companies to small domestic suppliers. JB Metro operates in Sydney metropolitan region, South Coast region of NSW, Adelaide metropolitan region of South Australia and Northern Territory. We also service orders received online.

We are a family owned and operated business, employing more than 150 people directly and through contractors including labour hire companies.

JB Metro is a member of a group called The Distributors which is a group of nationwide members engaged in similar business activity. The Distributors has a Modern Slavery Policy which is applicable to JB Metro as well.

### RISK IDENTIFICATION

JB Metro has undertaken a review of the potential risk of modern slavery practices across our operations and supply chain taking into consideration factors such as sector, industry, product and service type and geographic location. In undertaking this review, JB Metro identified some low risk areas which will likely form part of future assessments as well as areas on which it should focus its immediate efforts including major suppliers in each product category. Our review also revealed limitations in the data captured and recorded on some of our suppliers. We will use these results to prioritise our supplier engagement activities next financial year.



#### RISK MANAGEMENT AND DUE DILIGENCE

To manage the risks of modern slavery in our supply chain, JB Metro has undertaken the certain measures to keep the possibility of modern slavery under continuous check:

- Introduction of modern slavery policy that has been created and implemented by The Distributors for itself and all its members
- Appointment of a single point of contact within the company where any employee whether direct or through labour hire can approach without any hesitation to raise complaint
- Encourage whistle blowers to come forward
- Direct contact of employees by the top management on continuous basis to check their mental status and issues
- Regular meetings with labour hire service providers to monitor that there is no modern slavery involved there
- Provide sufficient details to the customers in pursuant to their modern slavery mitigation practices
- Introduction of questionnaire for labour hire service provider
- Introduction of commitment statement from small and medium sized suppliers to ensure that no modern slavery is involved in their operation
- Commencement of process to ascertain that no modern slavery is involved in the whole supply chain of the company by involving all suppliers for commitment statement
- Provide annual training to our employees on Modern Slavery Act and make this training mandatory as a part of induction process which also includes staff hired through external contractors



## **FUTURE ASSESSMENT AND MITIGATION OF RISK**

In 2020, and the years to come, JB Metro will work to increase collaboration with internal and external stakeholders to prevent and address any contribution that E&S may have to the global issue of modern slavery. JB Metro will achieve this by focusing on raising awareness of the forms of modern slavery among our employees and suppliers, continuing to evolve our due diligence processes to aid in the identification of risks, expanding the scope of our supply chain risk assessment, reviewing existing processes and exploring ways to improve identification and action on risks throughout our supply chain.

This statement was approved by the board of JB Metropolitan Distributors Pty Ltd ABN 72 088 821 023 on the 1st of March 2021.

Signed:

Bruce Spiteri

Director: JB Metropolitan Distributors Pty Ltd ABN 72 088 821 023