

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

2022



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**OUR PEOPLE
OUR PRODUCTS
OUR SERVICE**

INTRODUCTION

This is the first Modern Slavery Statement (“Statement”) for R & J Batteries Pty Ltd and R&J Batteries (NZ) Ltd (R&J Batteries) and has been made pursuant to the Modern Slavery Act 2018 (Cth) in relation to the operations and supply chains of both R&J Batteries entities.

The purpose of this statement is to outline our approach to ensuring that R&J Batteries has robust frameworks and processes in place to minimise the risk of modern slavery in our business operations and supply chain.

At R&J Batteries, we recognise that slavery and human trafficking can occur in many forms, as outlined in the Act. This can include slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services.

R&J Batteries is fully committed to operating responsibly and establishing and adhering to the highest ethical standards across our company. We will not tolerate any forms of slavery or human trafficking in our business.

We are strongly committed to supporting the eradication of all forms of modern slavery.



OUR BUSINESS

Founded in 1995, R&J Batteries has become one of the leading battery importers and distributors across Australia and New Zealand.

Our product range includes lead acid batteries for the majority of Australian and New Zealand Car Parks and a wide range of specialty, renewable energy, commercial and industrial batteries.

We also import and distribute a comprehensive range of Lithium Ion Phosphate (LiFePo_4) and Lithium Titanate (LTO) cyclic and energy storage batteries.

We also supply a comprehensive range of lubrication and fluid products across Australia.

COMPANY STRUCTURE



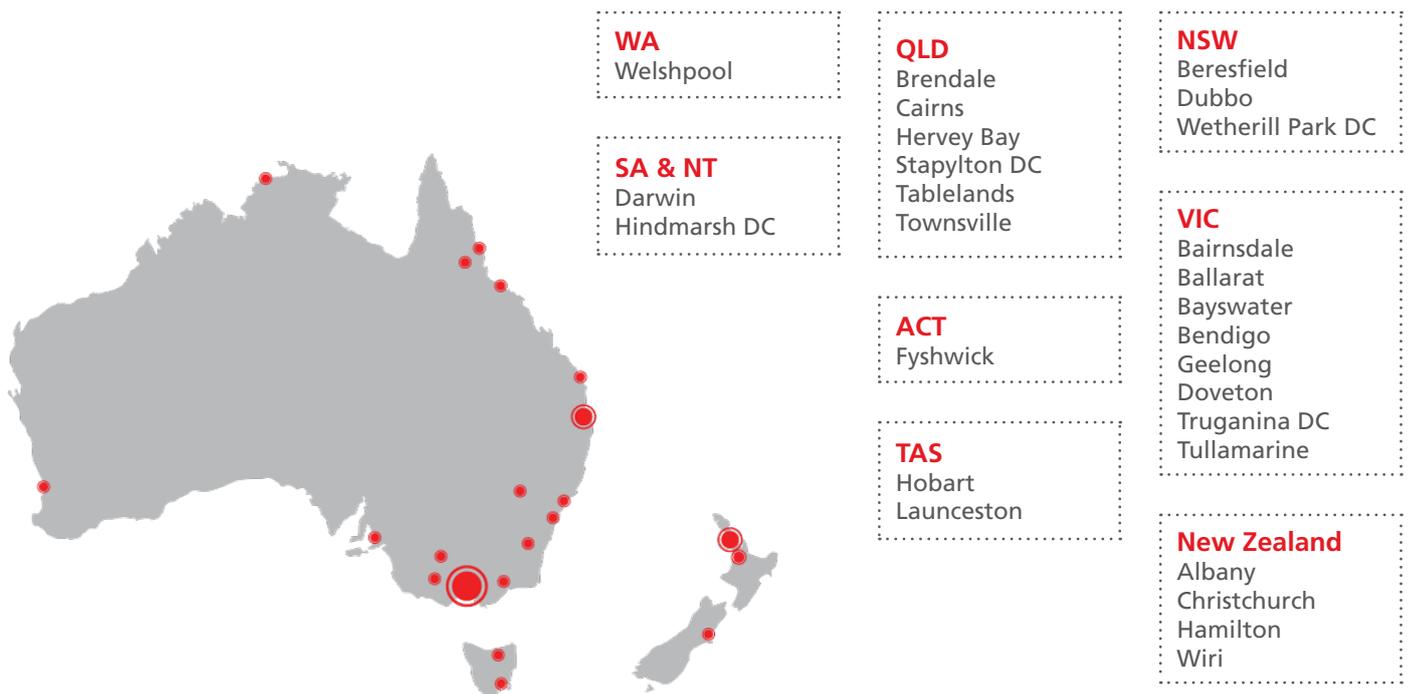
R&J Batteries Pty Ltd and R&J Batteries (NZ) Ltd are private companies incorporated in Australia and New Zealand respectively.

- Australian ABN - 71 151 273 675
- New Zealand NZBN - 94 290 464 251 88

Our Corporate Head Office is located at 852 Latrobe St, Ballarat, Vic, Australia. All Head Office and Corporate functions for both Australia and New Zealand are controlled and overseen by our Corporate Head Office.

As of June 30th 2022, we had 216 Australian employees and 26 New Zealand employees. A total of 242 staff.

A map of our 27 Distribution and Branch locations is shown below



OUR STRUCTURE, OPERATIONS, AND SUPPLY CHAIN

All of our battery products and the majority of battery related accessories are sourced internationally and shipped into Australia and New Zealand. On average we import 100+ containers of batteries and related products each month and distribute these products across both countries.

We also distribute approximately 115,000 litres of lubrication and fluid products across Australia each calendar month. Lubrication and fluid products are all sourced in Australia or New Zealand.

Our supply chain also procures a wide range of products and consumables to support our day to day operations. Such products are all sourced locally in either Australia or New Zealand.

Countries we source or import our products from are Australia, New Zealand, South Korea, China, USA, Germany, Thailand and the United Kingdom. Using the **Walk Free Global Slavery Index**, we have determined all of our suppliers are in countries with a CC rating or higher. Our suppliers are all part of international businesses with high levels of automation, governance, labour standards and awareness of Modern Slavery Risks.

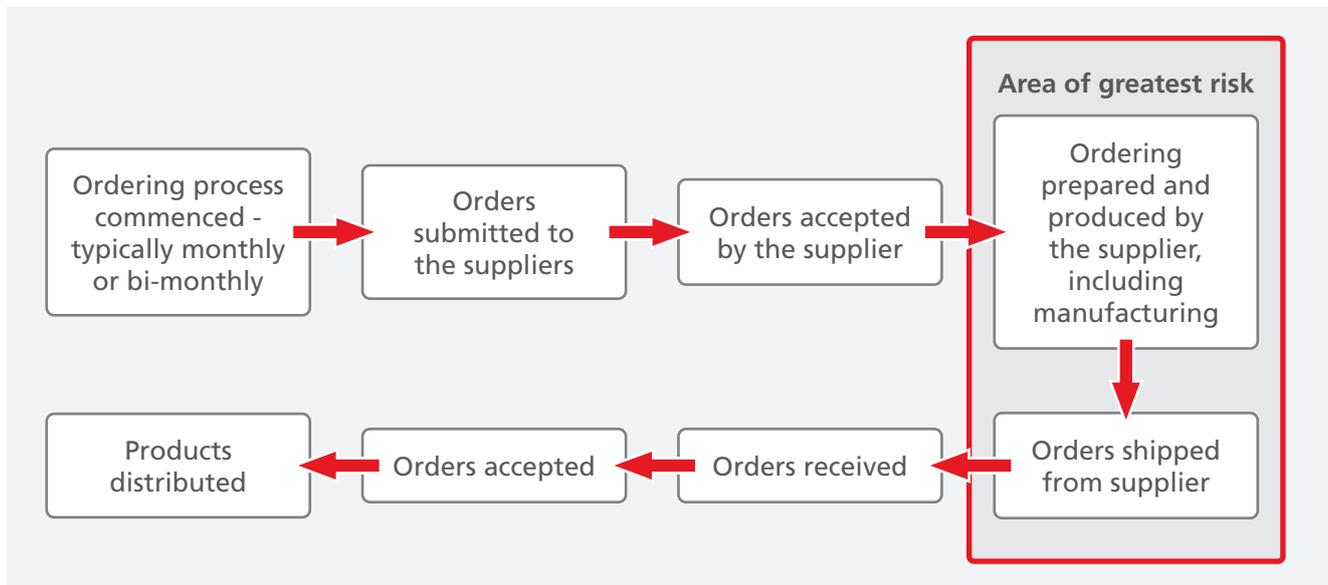


KEY BUSINESS AREAS AND SUPPLY CHAIN NEEDS

Business Area	Operational Activity	Supply Chain Need
Corporate Functions		
Head Office	Operation of business	Office consumables
Operations	Executive leadership	Technology (Hardware, software, services)
IT	Planning	Uniforms and PPE
Finance	Advertising	Publishing and printing
Marketing	Promotion	Financial Services
Human Resource	Marketing material	Legal Services
Sales	WHS	Energy
Research & Development	Procurement	Asset maintenance
Training		3rd party services
Branches & Distribution Centres		
Sales	Sales calls	Lead Acid Batteries
Customer service	Order fulfilment	Lithium Batteries
Warehousing	Stock control	Single use (alkaline) Batteries
Distribution	Deliveries	Battery accessories
	Inwards and outwards freight	Lubricants
	WHS	Fluid products
		Office consumables
		Technology (Hardware, software, services)
		Uniforms and PPE
		Publishing and printing
		Energy
		Asset maintenance



MAPPING OF R&J BATTERIES SUPPLY CHAIN AND RISK AREA



MODERN SLAVERY RISKS

Modern Slavery is a serious exploitation issue and one that R&J Batteries is committed to eradicate from its supply chains.

Modern Slavery can include human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and child labour. We accept that Modern Slavery does not include practices like substandard working conditions, or underpayment of workers. Notwithstanding these exclusions, R&J Batteries reserves the right to treat these matters as Modern Slavery should we see fit.

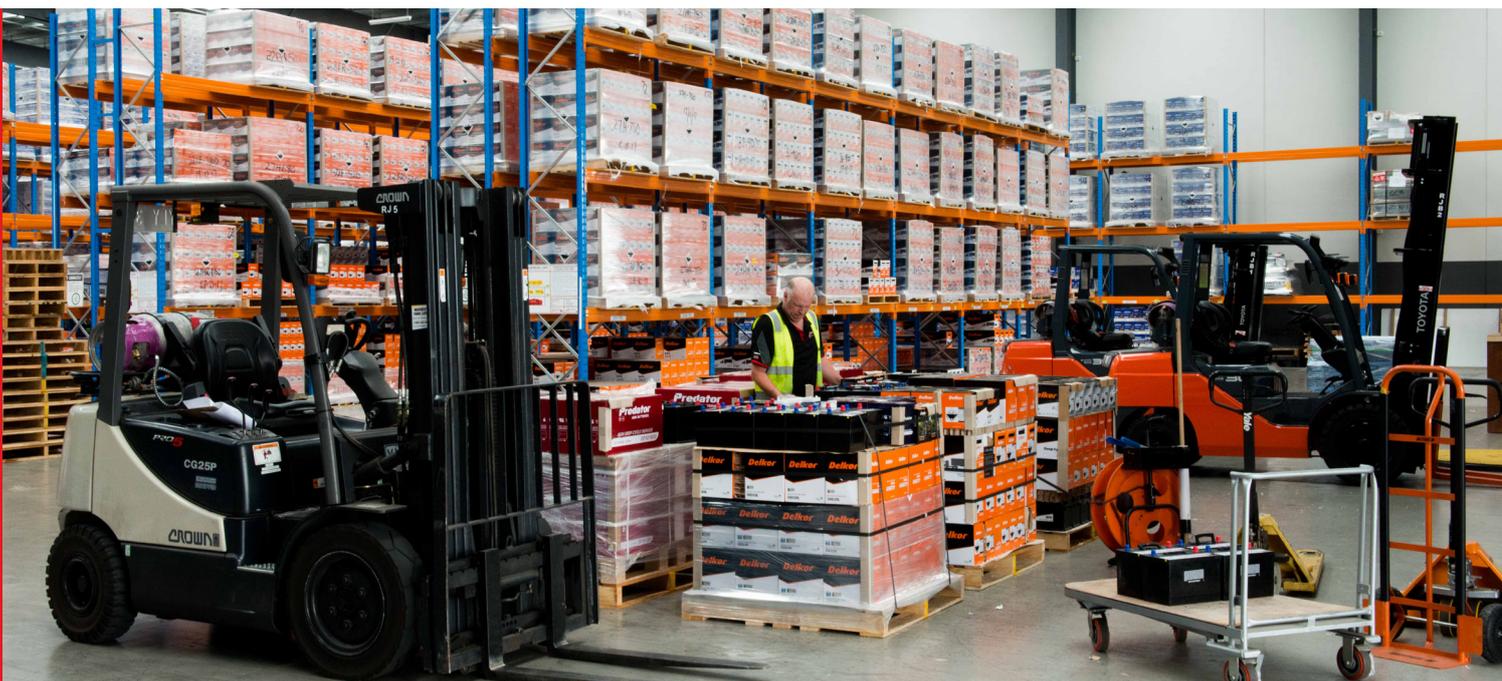
R&J Batteries has identified the biggest risks of modern slavery practices is in respect to suppliers and manufacturers in overseas countries. Domestically our staff are treated with exceptionally high standards of workplace amenities, flexible work, wages well in excess of awards and minimum rates and a considerable range of benefits and rewards.

SUPPLY CHAIN RISK ASSESSMENT

Our risk assessment approach is based on identifying the potential risks associated within our supply chain, and the ability of the supplier to respond to the potential risks. Areas we include in our risk assessment are;

- Country or Region(s) the supplier/supply chain operates in
- Country or Region(s) the supplier/supply chain sources their materials and products from
- The industry or sector the supplier operates in
- The potential for vulnerable Populations
- The products the supplier provides
- The supplier itself
- Continuous improvement

Our risk assessment concludes that our current Modern Slavery level of risk is **Low**.



RISK RESPONSE



Our risk response follows a practical but robust methodology:

1 IDENTIFY THE MODERN SLAVERY RISKS

Via our current policies and processes we have been able to identify the areas of risk in our supply chain

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2 DETERMINE WHAT ACTIONS WILL BE TAKEN IN RESPONSE TO SUCH RISKS

Should any supplier or supply chain be identified as medium or high risk, communication with that supplier will commence seeking what remedial action will be undertaken to reduce or eliminate the risk(s).

Should a supplier fail to implement processes to remediate or eliminate the risk(s) to R&J Batteries satisfaction, R&J Batteries may cease dealing with that supplier until such time as appropriate actions have been taken

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3 MEASURING THE EFFECTIVENESS OF OUR RESPONSES AND ACTIONS

As our assessment and commitment to eradicate modern slavery risks in our supply chain is in its very formative stages, it is difficult to yet determine our effectiveness.

By adhering to our policies and processes, and conducting robust annual audits, we will be better positioned to be able to analyse and assess our effectiveness. R&J Batteries is committed to making any necessary improvements as required

COMPLIANCE AND MONITORING

We monitor our supply chains commitment to eradicating slavery and trafficking by undertaking the following actions;

NEW SUPPLIER ASSESSMENTS

All new suppliers are vetted and assessed to ensure their supply chains meet our obligations under the Modern Slavery Act. This assessment includes a risk assessment of the Modern Slavery Risk

DEVELOP AND MAINTAIN MEANINGFUL AND ROBUST RELATIONSHIPS WITH OUR SUPPLIERS

Meaningful and robust relationships foster communication, understanding, trust and transparency

WARRANTIES, ASSURANCES AND CODE OF CONDUCT

R&J Batteries requires suppliers to provide warranties and assurances that the supplier does not engage in modern slavery practices, and that the supplier is not aware of such practices in their supply chains. R&J Batteries suppliers are also bound by our Supplier Code of Conduct

ANNUAL SUPPLIER VISITS

Irrespective of the location, senior staff from R&J Batteries visit all supplier factories annually. Such personal visits allow us to view work conditions firsthand to ensure worker conditions are acceptable

ANNUAL COMMUNICATION

We send all our suppliers an annual communication as to what it is required to ensure their supply chain is compliant with our needs to meet our obligations with the Modern Slavery Act

ANNUAL SURVEY

Our annual communication to our suppliers also includes a questionnaire we require them to complete so we have a written record of their commitments to eradicating slavery and trafficking

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COMPLIANCE AND MONITORING

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GRIEVANCE AND WHISTLEBLOWING

We have established Grievance and Whistleblowing policies and procedures so our staff can express any concerns they may have about their workplace, or our supply chains

CONTINUOUS IMPROVEMENT

R&J Batteries understands and is committed to ensuring we are doing all we can to eradicate Modern Slavery. This understanding includes the acknowledgment that the global environment can change, as can the demands on us to meet these changes. We are prepared to undertake continuous improvement to ensure our commitment to eradication is as up to date and effective as we can make it

NEXT STEPS

Having established our procedures for ensuring modern slavery compliance in our supply chain, and gathered data and commitments, we will continue to use this current methodology to assess the risks of modern slavery in our supply chain. All policies and process will be reviewed via an annual audit to analyse the effectiveness of our actions to ensure any risk of modern slavery within our control is minimised



COMPLIANCE

CONSULTATION FOR STATEMENT PREPARATION

This Statement was prepared after consultation with the R&J Batteries Executive and our Leadership Team.

As a private company, R&J Batteries does not operate under the guidance of a formal Board. Our Executive fulfill this capacity. The Executive comprises of the Managing Director, Chief Executive Officer (ANZ), General Manager – Australia and Operations Manager (ANZ).

Our Leadership Team was also involved in the consultancy for this Statement. Our Leadership Team comprises of our 13 most senior leaders across Australia and New Zealand (excluding the Executive) so we had a broad, comprehensive and insightful consultation process in preparing this Statement.

We also invited input and feedback from Employees and Suppliers.

We have also engaged with industry and group representatives for further feedback and advice. The collective data, advice and determinations have enabled this Statement to be prepared.

APPROVAL

R&J Batteries Pty Ltd and R&J Batteries(NZ) Ltd are both privately owned companies that operate independent of each other in their respective jurisdictions. Overall control, strategic direction, compliance, and operation for both companies are overseen by the Executive.

This statement has been approved by the R&J Batteries Executive in its controlling capacity as principal governing body on behalf of R&J Batteries Pty Ltd and R&J Batteries (NZ) Ltd.



Stuart Hamilton
Chief Executive Officer