

Bridgestone Mining Solutions Australia Pty Ltd

Modern Slavery Statement 2021

Introduction

This Modern Slavery Statement for 2021, submitted by Bridgestone Mining Solutions Australia Pty Ltd (“**BMSA**” or “**the Company**”), has been prepared with the intention to comply with the reporting criteria of the Modern Slavery Act 2018 for the period of BMSA’s 2021 Financial Year (1 January 2021 to 31 December 2021).

“BMSA is committed to ensuring, that as far as reasonably practicable, it does not cause or contribute to modern slavery within our own business, or supply chains.”

“BMSA is committed to introducing obligations into all supplier contracts that support the eradication of Modern Slavery within our suppliers, and therefore also within their own supply chains.”

The above statements are highlighted to identify the ongoing commitment that the Company has made in relation to ensuring that it plays its part towards the eradication of Modern Slavery within Australia, and globally. **Commitment** is one of the three elements of the Company’s Modern Slavery Policy.

The Organisation

Bridgestone Mining Solutions Australia Pty Ltd (ABN 74 000 069 714) is an Australian Private Company wholly owned by the Bridgestone Corporation (“**the Corporation**”), who are headquartered in Tokyo, Japan.

The Corporation was established in Japan in 1931, and the Bridgestone Group has grown to today having a presence in more than 150 countries, engaging a workforce of over 135,000 employees globally, and is primarily involved in the making and selling of:

Tyres: for a variety of equipment including passenger cars; trucks and buses; aircraft; construction and mining vehicles; motorcycles;

Diversified Products: being a range of rubber products and other diversified products used in a variety of everyday applications such as conveyor belts; hydraulic hose; seismic isolators for buildings; automotive components, golf equipment; and bicycles.

The Company, having been established in 1982 as Bridgestone Earthmover Tyres Pty Ltd has, following the 1 January 2018 integration with the Australian arm of Bridgestone Engineered Products of Asia, operated as Bridgestone Mining Solutions Australia Pty Ltd.

The Company Head Office is located at 223 Rookwood Road, Chullora NSW, and through its Branch network of 15 locations across Australia, and 320+ directly engaged employees, primarily imports and distributes Bridgestone ‘Off the Road’ tyres (from large earthmover tyres down to the small industrial tyres), conveyor belt, hydraulic hose and other diversified products, as well as provide tyre management services (including tyre fitting on both a contracted and ‘ad-hoc’ basis), tyre and wheel repair through dedicated facilities, and conveyor belt product support.

The Company has a subsidiary business in Papua New Guinea [Bridgestone Tyres (PNG) Ltd], which operates as an independent entity, primarily for the importing and distribution of Bridgestone tyres (i.e. car, truck and bus, construction and mining).

Supply Chains

The Company's primary supplier is the Corporation and its entities globally. During the 2021 Reporting Period, the Corporation and its entities globally made up in excess of 70% of the Company's total vendor expenditure. The products provided by the Corporation and its entities globally are primarily manufactured in Japan and the United States of America.

Other major direct suppliers of goods to the Company manufacture primarily in Japan, China, and the United States of America, and have been suppliers to the Company for many years.

A significant percentage of the remaining vendor expenditure is to suppliers of services to the Company, who are predominantly local based organisations, providing such as freight and logistics services; specialised labour services; and information technology services.

Risk of Modern Slavery Practices in the Company's operations and supply chains

Supply Chain Risks – The Corporation

As the primary supplier to the Company, the risk is deemed to be low, and the actions of the Corporation have been identified, reviewed and are reported on below;

The Corporation's commitment to ensuring Global Sustainable Procurement throughout the whole of the Bridgestone Group, which includes an expectation on its suppliers to demonstrate a respect for human rights, is expressed broadly by the Corporation through its Mission to:

“Create value to society through sustainable procurement practices”

(<https://www.bridgestone.com/responsibilities/procurement/>)

This commitment is expanded on and further illustrated through the:

“Global Sustainable Procurement Policy”

(<https://www.bridgestone.com/responsibilities/procurement/pdf/Policy.English.pdf>)

In formulating the policy, the Corporation paid close attention to international norms and fundamental principles for human rights reflected in a wide range of recognised commitments, including the United Nations Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, various International Labour Organisation conventions ISO 26000 and 20400 standards on sustainable procurement and social responsibility.

The Policy states that there is a clear expectation on suppliers to “Demonstrate Respect for Human Rights”, including in the areas of Child Labour; Forced Labour; Labour and Working Conditions and the Fair and Equal Treatment of employees and business partners.

The stated minimum requirement of suppliers is that they are required:

- * To comply with all laws and regulations regarding human rights in their country and/or region of operation; and
- * To make best efforts to have full knowledge of the source of the products and services they supply to enhance the Traceability of products and services and identify potential human rights impacts.

Together with other stakeholders, the Corporation and other tyre companies have also launched the Global Platform for Sustainable Natural Rubber (GPSNR) with the aim to transform the natural

rubber supply chain for the better. Through the GPSNR, the Corporation, along with other tyre companies and stakeholders, are harmonising standards to improve among other things, respect for human rights and increase supply chain transparency and traceability within the natural rubber supply chain.

In the area of human rights generally the Corporation has also expressed its own “commitment to be a true global leader” by “advancing fundamental human rights and responsible labour practices throughout our worldwide operations”, which is contained in the:

“Bridgestone Group Global Human Rights Policy”
(https://www.bridgestone.com/responsibilities/human_rights/)

To help ensure compliance with the Global Human Rights Policy, the Corporation launched a global, independently operated, **whistle-blower** reporting system to encourage employees and stakeholders (which include contractors, suppliers, customers or anyone else) to confidentially report, amongst other things, human rights concerns

Supply Chain Risks – Non-Corporation

In respect of the Non-Corporation suppliers, the Company has continued its focus on those first tier suppliers where expenditure was above an identified threshold and which also included those suppliers who are located outside of Australia.

As part of our own due diligence, the Company initially undertook a survey of the suppliers to further assess the risks, and continues to monitor these suppliers on a regular basis.

For the suppliers located outside of Australia, as identified earlier, they have generally been business partners with the Company for many years, and the risk of modern slavery within their organisations is considered to be low. The Company recognises that these suppliers have their own supply chains which the Company has limited visibility into, and accepts that these suppliers may link it to modern slavery by way of their own supply chains.

For the suppliers located within Australia, the majority identified are providers of services to the Company, primarily in the areas of freight and logistics services; specialised labour services; and information technology services.

The Company has also commenced implementation of more substantial contracts with our suppliers to ensure provision of services are in line with our requirements and commitment to Modern Slavery.

The risk of modern slavery within these organisations is considered to be low.

As part of our own due diligence, the Company requested that each of these organisations respond to a survey in regards to the practices of their organisations, particularly around those practices that may be seen as indicators of the existence of modern slavery within their organisation.

The Company recognises that, of itself, a survey reliant on the suppliers honesty in responding to questions is not a perfect scenario. However given that these suppliers are located in Australia, and are primarily providers of services, in an environment where there are significant workplace regulations in regards to working practices, be that as employees or contractors to and for these suppliers, it is considered a low risk environment for modern slavery practices.

Organisation Risks – The Company

The risk with the Company is considered to be low. All employees are employed directly by the Company, with all of those being under permanent employment agreements, which generally are on a full time basis. All employees are remunerated above the statutory requirements, and Company policies and processes in relation to its dealings with employees are as a minimum aligned to statutory obligations and community expectations, if not in excess of these.

Employees have unfettered access to the Corporation's global **whistle-blower** reporting system to raise concerns on matters that may (or may not) be considered risks as defined as modern slavery if they do not feel that they are able to raise those concerns on a local basis.

Remediation

While the Company is not currently aware of any modern slavery practices that it may have caused, contributed to, or been directly linked with, there are identified remediation guidelines and policies that exist which may be undertaken. **Remediation** is one of the three elements of the Company's Modern Slavery Policy.

Should the Company become aware of claims of modern slavery practices within our own business, it will investigate all claims and if valid will resolve the issue in line with the values expressed by the Modern Slavery Policy, which for employees may include disciplinary action up to and including the termination of their employment.

Should the Company become aware of claims of modern slavery practices in a supplier, it will work collaboratively with the supplier to identify and review the modern slavery risks and develop commercial and actionable solutions. Where it becomes apparent that the supplier has not taken reasonable steps to prevent or specifically prohibit modern slavery within their operations, the Company would discontinue its arrangements with that supplier.

Assessing the effectiveness of our actions

It is identified by the Company that the risk of there being modern slavery practices, or of these practices being introduced/developing, within the supply chains or employment practices of the Company and its suppliers is always present, and requires the Company to maintain an ongoing vigilance. **Due Diligence** is one of three of the elements of the Company's Modern Slavery Policy.

The Company also recognises that addressing the risks, both real and potential, requires a **continuous improvement** approach by the Company, and that what has been undertaken (particularly in relation to due diligence of non-corporation suppliers) will be required to be reviewed and expanded into the future. To that end, the following actions have been implemented to further ensure we meet our commitments:

- Engagement of a Strategic Procurement professional into our team
- Introduction of a clause on modern slavery into our Terms and Conditions currently underway
- Reviewed supplier contracts (as mentioned above)
- Third Party screening was implemented in late 2021 and will continue on an ongoing basis for all suppliers & vendors. The purpose of this process is to ensure that suppliers meet the requirements expected by Bridgestone with regard to compliance & governance.

This also applies to the Company itself, and the actions and practises that it takes internally, in regards to the training of its employees in increasing their understanding of modern slavery, and the practices it introduces and/or maintains to ensure that they are/do not promote or instigate actions that constitute modern slavery. This continues with the assistance of continued collaboration across our teams.

Consultation

As described earlier, the Company has a subsidiary business in Papua New Guinea, which operates as a separate entity. The Corporation is the primary supplier to this business.

We have acquired a business, Otraco, from an ASX50 listed organisation that had stringent compliance rules in place. This business will continue to operate at that level and over time cascading company policies and procedures into the day-to-day operations of that business will occur as needed to ensure consistency in day-to-day operations and governance.

Other Relevant Information

Bridgestone Mining Solutions Australia Pty Ltd will continue to strive to ensure the prevention of modern slavery through its own operations, and through supplier driven processes across its supply chains.

The Company will continue to collaborate with internal and external stakeholders to address, and continue to improve, modern slavery risks and the processes of all stakeholders.

The Company recognises that this is just the start, and is;

“committed to ensuring, that as far as reasonably practicable, it does not cause or contribute to modern slavery within our own business, or supply chains.”

This statement is signed on behalf of the Board of Directors of Bridgestone Mining Solutions Australia Pty Ltd on 10th June 2022.



Gerry Duffy
Chief Executive Officer
Bridgestone Mining Solutions Australia Pty Ltd