# Modern Slavery Statement Year Ended 30 June 2020

Focus on Furniture Pty Ltd (Focus) takes a zero tolerance approach to any form of modern slavery including servitude, forced labour, debt bondage and child labour. We are committed to an ethical and transparent approach to business. We ensure effective systems and controls are in place to safeguard against any form of modern slavery within our business operations and our supply chain.

This statement outlines our business operations, the potential risks of modern slavery within our business operations, summarises our assessment of those risk and sets out the steps we have taken so far (and those we propose to undertake in the future) to mitigate the risks of modern slavery in our operations including our supply chains.

This statement is made in accordance with the *Modern Slavery Act 2018* (Act) for the year ended 30 June 2020.

## **Business Operations**

We are in the business of retailing premium quality furniture, bedding and related products within Australia.

We have grown to 23 retail stores throughout Victoria, New South Wales, South Australia, Queensland and the Australian Capital Territory and operate under the trading names: Focus On Furniture and Focus On Furniture & Bedding. In addition to our physical stores, we also operate an online store which offers home delivery options within Australia and a click& collect service through our physical stores and distribution centres. Our Head Office and central distribution centre is based in Victoria. We also have distribution centres in other Australian states.

We specialise in selling lounges, bedding, dining tables and other items of furniture and related accessories which we purchase: direct from manufacturers in Australia, China and Malaysia; and indirectly from sales agents and wholesalers which acquire our product largely from Australia, China, Vietnam, Malaysia and India. We use third party contractors in Australia for a variety of services including labour hire, freight, delivery & installation, cleaning and waste management. We procure a diverse range of other goods and services in connection with our business operations at our Head Office, distribution centres and physical stores including IT products (hardware & software), office supplies and professional consultants (legal, marketing and advertising)

We are proud of the great working relationships we have with each of our Australian and overseas based suppliers and we continually work closely with them to ensure the environments in which our products are made, and other goods and services are provided, are safe, fair, sustainable and responsible.

### Risk and Assessment

Risk assessments have been conducted to identify aspects of our business which are at risk from modern slavery and so that efforts can be focused on those areas deemed most "at risk".

Whilst noting potential risks through the use of our third party contractors in Australia, we have determined that our international supply chain poses the greatest risk of exposure to modern slavery through the potential for servitude, forced labour, debt bondage and child labour.

We aim to engage with all our major international suppliers in order to gain a proper understanding of the measures that they have in place to ensure that modern slavery is not occurring within their operations and encourage them to hold their own suppliers to the same standards.

We consider the risk of modern slavery within our international supply chain to be low given that:

- we utilise a small limited number of suppliers;
- we have close direct (mostly long term) working relationships with our suppliers; and
- where possible we have undertaken physical site visits of our major suppliers, with the last of these occurring in October 2019.

# **Managing Risks and Future Commitment**

We acknowledge the importance of seeking to ensure that modern slavery is eliminated from our supply chains and we understand the role we can play in achieving that.

The steps we have undertaken to date are the beginning of our efforts in this area. As a result of COVID-19 physical site visits of our international suppliers were not possible in the 2<sup>nd</sup> half of the Financial Year. We are thus aware that we must continue to engage with our suppliers and others and look for new ways to improve to further eliminate the risk of modern slavery in our business including our international supply chain particularly given that physical site visits by our management are expected to remain impractical in the short – medium term due to COVID-19.

During 2021 we will establish a Modern Slavery Policy (Policy). The Policy will apply to all our officers, employees, suppliers, contractors and consultants. The Policy will set out the minimum requirements expected of our officers, employees, suppliers, contractors and consultants and will encapsulate our zero tolerance approach to any form of modern slavery including servitude, forced labour, debt bondage and child labour. The Policy will outline our approach to compliance with the Policy. For instance, we recognise the importance of assisting our suppliers and others in our supply chain to continually improve their practices. However, if a supplier is unable to demonstrate a commitment to comply with the Act (or verifiable steps towards compliance with the Act), we may cease dealing with that supplier.

To increase awareness and support proactive identification of modern slavery risks within our supply chain, key employees who work with our international suppliers will also complete additional training during 2021.

Focus on Furniture Pty Ltd is the only operating entity within the Focus group of companies. Therefore all control measures and policy settings apply consistently across all of our business operations.

# **Approval of Statement**

This statement was approved on behalf of the Board of Directors of Focus on Furniture Pty Ltd on 17 May 2021\*.

Robert Santalucia Director

\*As a result of Covid-19 and the impact to our business and supply chain our Modern Slavery Statement for 2020 was delayed.