



# 2021 MODERN SLAVERY STATEMENT



BSR AUSTRALIA LIMITED ABN 84 122 529 695



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[www.betta.com.au](http://www.betta.com.au)

BSR Group (or “group”) is the consolidated entity consisting of BSR Australia Limited (ABN 84 122 529 695) and its subsidiary BSR Franchising Pty Ltd (ABN 21 122 556 094).

# 1. A MESSAGE FROM OUR MANAGING DIRECTOR AND CEO

BSR Group is committed to ensuring the goods and services our corporate sites and associated retailers provide are free from modern slavery. As Australia's largest independent electrical and furniture buying group, our customers can have confidence in the knowledge that when they purchase goods or services from BSR Group, the human rights of workers who made those goods and involved in all aspects of the supply chain have been respected.

We recognise that even for products sold in Australia, modern slavery can occur early in the supply chain, so we focus on our due diligence within our supply chains, to ensure transparency from the initial stages of production, right through the process.

This is the third modern slavery statement the BSR Group has published and the second we have submitted to the Australian Border Force through the Online Register for Modern Slavery Statements. In 2019, we published our first statement on our public website, although we did not meet the financial reporting threshold, we believed it was an important step even if not required under the legislation. This demonstrated our solid commitment towards ensuring we had appropriate modern slavery due diligence and compliance frameworks in place, for when we met the legislative threshold during the 2020 financial year.

As we have continued to expand our operations into 2021, BSR Group has improved our access to modern slavery information by leveraging our existing membership with the National Associated Retail Traders of Australia (NARTA), via access to its Modern Slavery Initiative program. The MSI will streamline the Group's collection of modern slavery information from our major consumer electrical goods suppliers, further strengthening our confidence.

On behalf of the BSR Group, I am proud to submit our Modern Slavery Statement for the financial year ending March 2021.



**Graeme Cunningham**  
MANAGING DIRECTOR  
& CHIEF EXECUTIVE OFFICER



## 2. OVERVIEW

This statement, which is intended to meet the requirements of the Modern Slavery Act 2018 (Cth) and the Modern Slavery Act 2018 (NSW), outlines the steps taken by BSR Group during the financial year ending 31 March 2021 to minimise the risk of modern slavery occurring in our businesses or their supply chains.

To find out more about the nature of our business, you can visit <https://www.bsrgroup.com.au/>

## 3. OUR STRUCTURE AND OPERATIONS

BSR Group (**BSR Group**) is comprised of a parent company BSR Australia Ltd (ACN 122 529 695) (**BSR Australia**) which is an unlisted public company, and the following wholly owned subsidiaries:

1. BSR Franchising (ACN 122 556 094) (**BSR Franchising**).
2. Stan Cash Online Pty Ltd (ACN 142 725 997), which is a holding company for its wholly owned subsidiary Stan Cash Superstore Pty Ltd (ACN 160 223 914) (**Stan Cash Superstore**).

During the reporting period this statement covers, we established a Modern Slavery Working Group comprised of senior executives of BSR Australia, including those engaged in the businesses of BSR Franchising and Stan Cash Superstore to inform and contribute to the development of the statement. For clarity, all senior executives of the BSR Group are employed by BSR Australia. The directors of BSR Australia are also directors of all the subsidiaries.



## 3.1 BSR Franchising

BSR Franchising undertakes the following business operations:

- As a franchisor to a network of Australian retail stores operating in the electrical and furniture goods industries, under the brands Betta Home Living, Designer Appliances, Furniture Zone, and also as a service provider to retailers operating under their own brands (BBA's). There are over 200 independent retail businesses across Australia associated with BSR.
- two company owned electrical and furniture stores, Betta Home Living Underwood, and Betta Home Living Hervey Bay, both in Queensland;
- the retail sale of electrical and furniture goods via the following websites: [www.betta.com.au](http://www.betta.com.au), [www.designerappliances.com.au](http://www.designerappliances.com.au) and [www.furniturezone.com.au](http://www.furniturezone.com.au);
- the commercial sale of electrical and bathroom goods via the brand RT Edwards Commercial;
- the direct import of furniture, electrical, kitchen and bathroom goods for resale under the brands BSR Direct, Betta Direct, Torino, and Norj; and
- The resale of Australian made furniture under the brand KoZee Living. and Australian Made mattresses and beds under the Eversleep brand.

TORINO  
INSPIRED LIVING

bsr  
DIRECT

NORJ

koZee  
Living

## 3.2 Stan Cash

On 1 July 2021 BSR Australia acquired the Stan Cash businesses: Stan Cash Online, and its operating subsidiary, Stan Cash Superstore.

Stan Cash Superstore undertakes the following business operations:

- the sale of electrical and furniture goods via the websites [www.stancash.com.au](http://www.stancash.com.au) and [www.billyguyatts.com.au](http://www.billyguyatts.com.au);
- the sale of electrical and furniture goods via its retail shop at Brooklyn and Keilor in Melbourne, Victoria;
- the direct import of electrical goods for limited resale.

stan cash™  
est 1978  
Electrical, Furniture & Bedding Superstore

Billy Guyatts  
Online Store Only



## 4. OUR SUPPLY CHAINS

Our direct import product range consists of upholstered and timber furniture along with electrical appliances and front of wall plumbing.

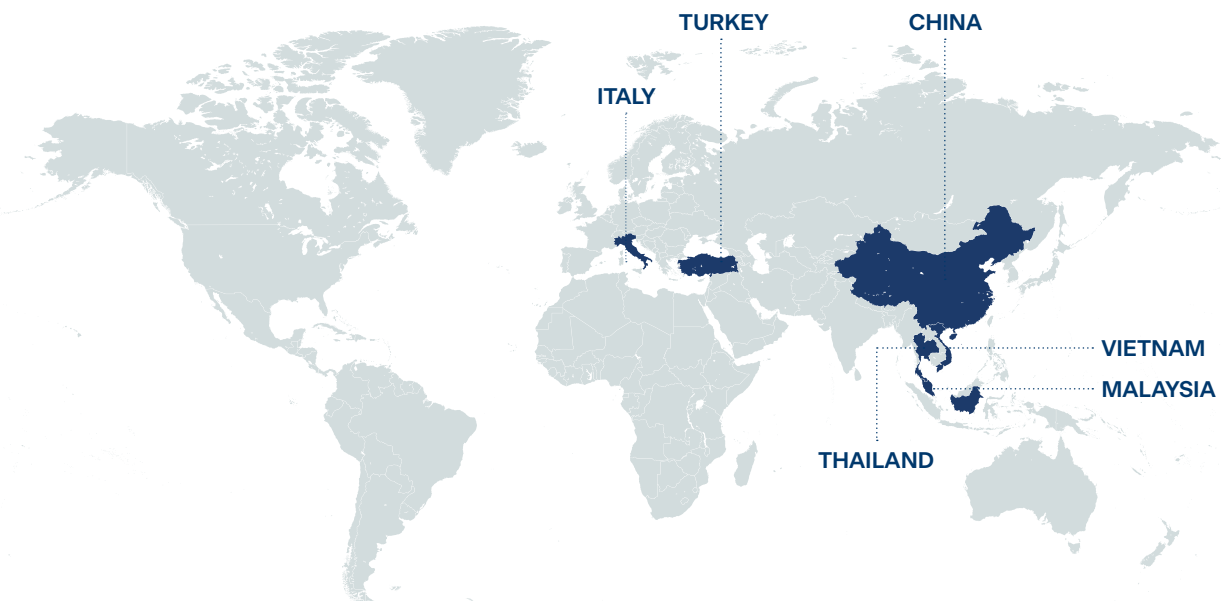
Furniture finished goods are sourced from China, Vietnam, Thailand and Malaysia.

Electrical and front of wall plumbing finished goods are sourced from China, Turkey and Italy.

This allows us to focus our oversight over reviewed, approved and discrete geographic areas.

Our wider supply chain relationships include local wholesale importer and reseller businesses. We strive via our governance processes to ensure these suppliers meet the required standards and demonstrate consistency in ethical practices throughout their supply chains.

Where possible, we engage suppliers who have relationships with existing suppliers so that we can contain our supplier network and improve consistency in ethical practices throughout the supply chain.





## 5. POTENTIAL MODERN SLAVERY RISKS

We have identified the following modern slavery risks which we may be involved with directly or indirectly through our business activities or relationships:

- Non-compliance with health and safety requirements, working hours, wages, forced labour, child labour and freedom of association; and
- Non-compliance with broader human rights including employee rights to equality, fair pay, safety and privacy.





## 6. OUR GOVERNANCE OF MODERN SLAVERY RISKS

BSR Group is committed to taking all reasonable steps to ensure that there is no modern slavery in our supply chains or in any part of our business and acknowledge our role and responsibility in seeking to safeguard human rights through ethical and sustainable business practices. To identify and mitigate risk, BSR Group has the following systems in place:

### Modern Slavery Policy

We have developed a Modern Slavery Policy which sets clear objectives around our supplier engagement process, grievance mechanisms and supplier collaboration.

### NARTA Modern Slavery Initiative



BSR Group is a member of the National Associated Retail Traders of Australia (NARTA) and utilises this membership to share and benefit

from NARTA's Modern Slavery Initiative (MSI), an industry focused program which supports businesses in reviewing practices within their supply chain to deliver best-in-class ethical standards and meet reporting requirements under the Act. Through its procurement division, NARTA facilitates the collection of modern slavery content of mutual (non-direct import) consumer electronics suppliers through a standardised reporting system, to assist members in meeting their requirements. This aims to ensure a higher level of transparency across the industry.

From 2021, BSR Group compliance team has gained access to this MSI data, streamlining our collection of annual modern slavery content from many of our major suppliers.

### Compliance Questionnaire

We require all suppliers who are not part of the NARTA MSI to complete an annual Compliance Questionnaire outlining any modern slavery in their operations and supply chains and actions to address those risks. We expect our suppliers to have anti-slavery policies or equivalent and request copies of these documents at various intervals (for example, during onboarding, at contract renewal, or annually for longer contracts).





## Supplier Contracts

Where possible, we have incorporated modern slavery clauses into our contracts with third party suppliers and supplier manufacturers.

## Reporting suspicions of slavery

All personnel, and other eligible whistleblowers can report any suspicions of breaches of the Modern Slavery Policy through the procedures set out in the BSR Group Whistleblowing Policy, which is available internally on our employee intranet and externally on our public website [www.bsrgroup.com.au](http://www.bsrgroup.com.au).

## Training

The BSR Group executive management team is responsible for compliance in managing supplier relationships.

All employees undergo an induction process where our policies, procedures and expectations are outlined. In addition, training on our Modern Slavery policy and incident reporting is provided at least annually.

## Key performance indicators and assessing the effectiveness of our actions

BSR Group has the following key performance indicators in place to measure its effectiveness in taking all reasonable steps to reduce the risk of modern slavery:

- A review of modern slavery statement and policies;
- Communication and personal contact with the supply chain to ensure their understanding of and compliance with our expectations;
- Review of supplier responses to annual Compliance Questionnaire regarding modern slavery risks and mitigation;
- Sharing and receiving modern slavery compliance information regarding indirect furniture and electrical suppliers via its membership with NARTA;
- Regular spot check audits of supplier manufacturer factories located overseas (where possible – see COVID-19 Pandemic Risk Review).

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## 7. COVID-19 PANDEMIC RISK REVIEW

In response to the COVID-19 pandemic, BSR Group is requiring supplier manufacturers to complete a COVID-19 questionnaire, outlining the steps they have taken to protect their vulnerable workers from COVID-19. This aims to ensure workers are not underpaid or overworked due to the pandemic, and suppliers have systems in place to support the safe return of migrant workers in the event of a shutdown of factories due to COVID-19.

Due to the Government imposed travel restrictions during the pandemic, it has not been possible for BSR Group management to attend factories of supplier manufacturers in order to conduct routine spot audit checks, however, BSR Group is continuing to use its best endeavours to undertake alternative due diligence on these overseas manufacturers to monitor supply chain exposure to modern slavery risks, and has ensured supply has only occurred from factories audited and approved prior to travel restrictions.





## 8. BOARD APPROVAL

This statement was approved by the Board of Directors of BSR Australia Ltd and adopted by all BSR Group subsidiaries on 22 September 2021.

**Garry Thyer**  
CHAIRMAN





**BSR AUSTRALIA LIMITED ABN 84 122 529 695**