

MODERN SLAVERY STATEMENT 2025

Risk Identification, Assessment,
and Mitigation

DEVELOPED FOR

The Attorney-General's Department

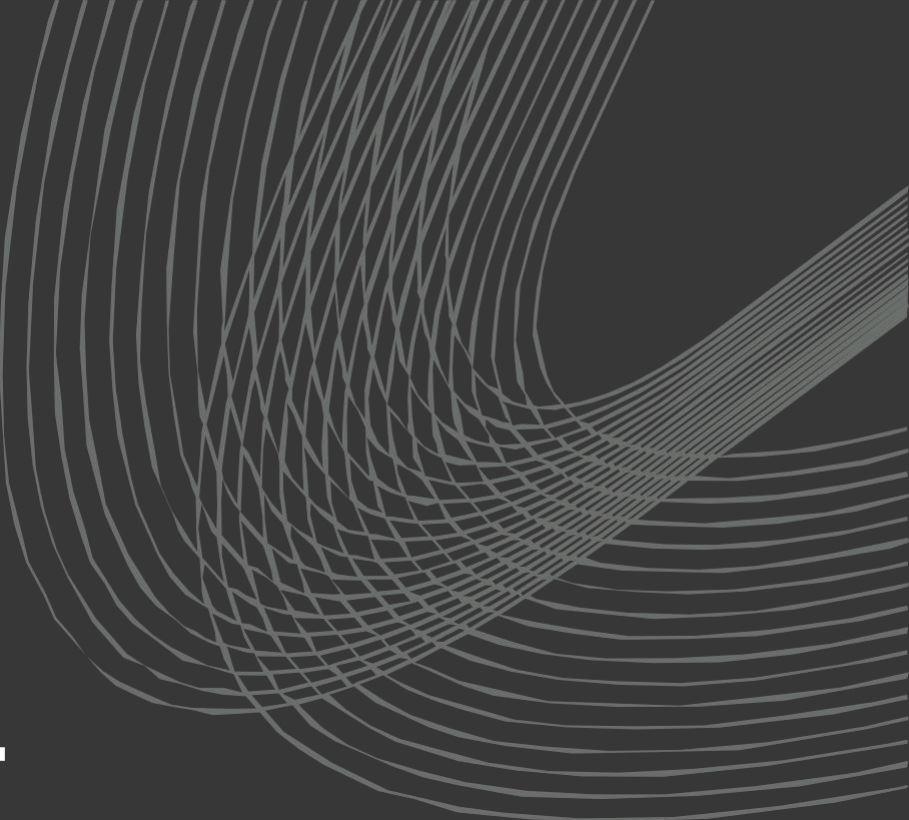


TABLE OF CONTENTS

Bisley's 2025 Modern Slavery Statement	3
Bisley Structure, Operations, and Supply Chain	4
Identifying Bisley's Modern Slavery Risk	5
Addressing Bisley's Modern Slavery Risks	6
Employee Awareness	7
Our Policies	8
Bisley Supplier Assessments	9
Ongoing Evaluation and Assessment	10
Our Consultation Process	11
Signatory	13

BISLEY'S 2025 MODERN SLAVERY STATEMENT

Bisley & Co Pty Ltd (ACN 000158305) and its subsidiaries (Bisley) are dedicated to upholding the highest ethical standards and strongly oppose all forms of slavery. This modern slavery statement describes the action taken by Bisley to ensure that all operations, including procurement, logistics, and transportation, are monitored, identified, and evaluated for potential risks of modern slavery, in accordance with the Australian Modern Slavery Act 2018 to which Bisley is the reporting entity.

Bisley is a multinational marketer and distributor of quality industrial raw materials and chemicals. The company was established in Sydney in 1955 and focuses on markets across ANZ, Asia Pacific, Middle East, USA and Canada. Bisley's products range from fine chemicals for highly specialised applications, to bulk raw materials delivered in shiploads to major regional manufacturers.

Recognising that the dynamics of international trade heighten the risk of involvement in slavery, Bisley has committed to implementing enhanced controls and training initiatives. Our approach for 2025 has bolstered our capabilities to better identify modern slavery risks, underscoring Bisley's unwavering commitment to maintain high standards and strive towards a world free from modern slavery. This report will highlight how Bisley is taking action through operating procedures, staff training, and procurement to achieve a responsible and ethical supply chain.

BISLEY STRUCTURE, OPERATIONS, AND SUPPLY CHAIN

Bisley & Company, established in Sydney in 1955, is a privately held company with six trading subsidiaries, all of which are under the control of the parent entity, Bisley & Co Pty Ltd. Bisley's market focus extends across ANZ, Asia Pacific, the Middle East, USA, and Canada. For a visual representation of Bisley's global structure, please refer to Image 1.

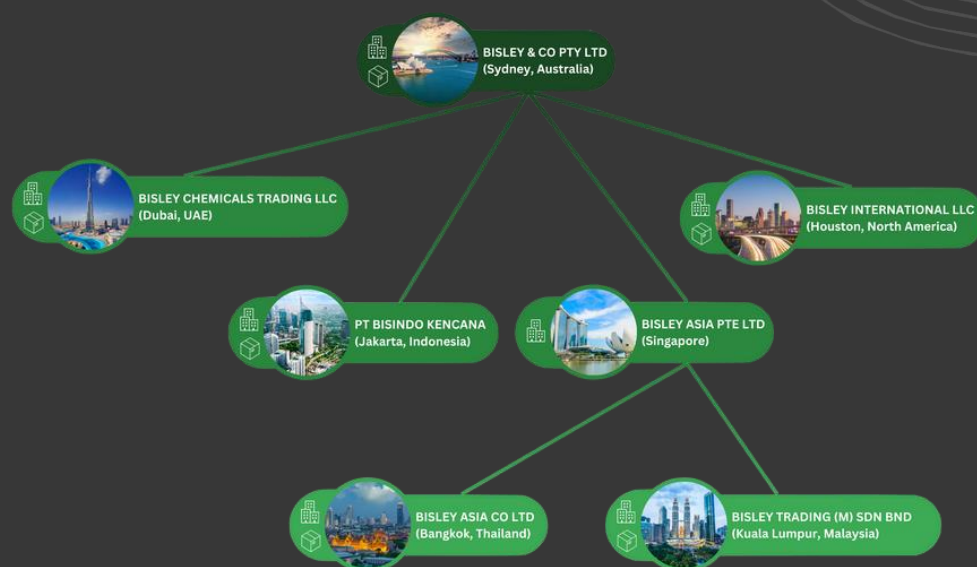


Image 1: Global Structure of Bisley & Co Pty Ltd.

Bisley's product supply chain is diverse, encompassing fine chemicals tailored for highly specialised applications, as well as bulk raw materials transported in shiploads to major regional manufacturers. Within our organisational structure, we oversee a multitude of entities, which are organised into distinct geographic regions. Each region is overseen by a dedicated Regional Manager tasked with framing our expectations, raising awareness, and comprehensively understanding the strategies employed to mitigate risks associated with modern slavery. These managers play a pivotal role in ensuring that our operations uphold ethical standards and prioritise human rights across all aspects of our supply chain management. Their proactive engagement is instrumental in fostering a culture of transparency, accountability, and social responsibility within Bisley and its affiliated entities.

IDENTIFYING BISLEY'S MODERN SLAVERY RISK

Bisley recognises that certain groups within our supply chains and operations may face heightened risks of modern slavery. These risks can be influenced by various factors, including the geographical locations of our suppliers, the regions where we operate, and the sources of materials used in our products. Specifically, some of our materials are procured from remote provinces in China. Additionally, we understand that our visibility into certain overseas markets is limited. Nonetheless, we are committed to actively engaging with our key suppliers, through frequent visits. We strive to maintain regular contact and oversight to mitigate the risks associated with modern slavery throughout our supply chain.

In 2025, we expanded our risk identification efforts to reflect increasing international expectations, including evolving regulatory frameworks in the EU, US, and Canada, which are introducing stricter import controls on goods potentially linked to forced labour. These developments present both compliance and reputational risks for global supply chains. In response, we enhanced our due diligence by referencing updated global indices such as the Walk Free Global Slavery Index and incorporating supplier region assessments and annual spend rankings into our prioritisation model. We also extended our focus beyond manufacturing to include third-party logistics providers and freight services, recognising that modern slavery risks can also emerge in distribution and handling stages.

While manufacturing represents Bisley's primary risk of modern slavery, in 2025, we've made a commitment to examine other potential risks within our supply chain, including logistics. Although less prevalent and more difficult to monitor, we are exploring measures and precautions to ensure that the overseas logistics services we utilise uphold ethical standards that avoid all forms of modern slavery.

ADDRESSING BISLEY'S MODERN SLAVERY RISKS

Bisley continues to apply a multi-layered approach to assessing and managing modern slavery risks across our operations and supply chains. Our current focus includes:

- ✓ Strengthening employee awareness and training
- ✓ maintaining and updating our core policies in line with evolving legal standards
- ✓ Enhancing supplier due diligence through structured assessments, audits, and on-site inspections.

In 2025, we also integrated regional risk data, spend-based supplier prioritisation, and updated compliance tools aligned with global developments.

These combined efforts reinforce shared responsibility across our teams and supply partners in identifying and addressing modern slavery risks. We remain committed to continuously improving our practices, adopting industry best practices, and responding proactively to emerging international obligations and stakeholder expectations.



EMPLOYEE AWARENESS

Employee awareness remains central to Bisley's modern slavery prevention strategy. In an increasingly global and complex supply chain environment, our employees play a vital role in identifying and responding to potential indicators of exploitation such as restricted freedom of movement, unsafe working conditions, or coercive employment practices. In 2025, we continued to invest in cultivating a culture of accountability, vigilance, and ethical responsibility across all levels of the organisation.

Bisley employs approximately 80 people world wide, in regions such as Australia, North America, Middle East and Asia. Bisley is proud to prioritise the well-being and satisfaction of its employees, however, we are aware that as our operations expand globally, we are unable to directly monitor how our suppliers treat their employees, and hence we have implemented monitoring processes and evaluation mechanisms to assess their modern slavery risk alignment with our commitment to ethical and responsible business practices. This underscores the crucial importance of training Bisley employees to analyse and assess suppliers based on their ethical standards, as it directly contributes to ensuring our first response is rooted in integrity and accountability.

Bisley has nominated several associates and procurement officers to partake in the relevant e-learning modules developed by the Attorney-General's Department. These modules have been key in ensuring Bisley can identify and assess modern slavery, and manage the associated risks. These training modules assist employees in better identifying, assessing, and managing modern slavery risks of our suppliers. Additionally, the modern slavery toolkit has also been imperative and has allowed Bisley procurement officers to take more in-depth looks at products which may be advertised at prices lower than expected.

Bisley has implemented a questionnaire for suppliers that assists us in determining a manufacturer's modern slavery risk. However, Bisley also aims to directly visit potential suppliers before any large-scale purchases are made to conduct thorough on-site inspections, engage with workers, and assess working conditions firsthand. This proactive approach not only strengthens our ability to identify and address potential instances of modern slavery but also reinforces our dedication to upholding ethical standards throughout our supply chain. Bisley remains committed to keeping employees informed about modern slavery concerns and actively encourages them to speak up if they become aware of any issues.

OUR POLICIES

Bisley's day-to-day operations are guided by policies and frameworks that prioritise the respect and safeguarding of universally recognised human rights. Aligned with the principles outlined in our Code of Conduct, Global Commercial Risk Management, Global Foreign Bribery Prevention, and Modern Slavery policies, we are dedicated to adhering to the laws and regulations of the countries where we operate.

Furthermore, we actively monitor and address modern slavery issues within our workplace through a variety of policies and procedures, including our Privacy Policy, Confidential Information Policy, Anti-Discrimination & Equal Employment Opportunity Policy, Workplace Bullying Policy, and Global Commercial Risk Policy.

These policies, along with our grievance mechanisms, enhance transparency and facilitate the consideration of modern slavery issues in our operations, which we assess to be of low risk.

01

Modern Slavery Policy

02

Supplier Due-Diligence Forms

03

Code of Conduct

04

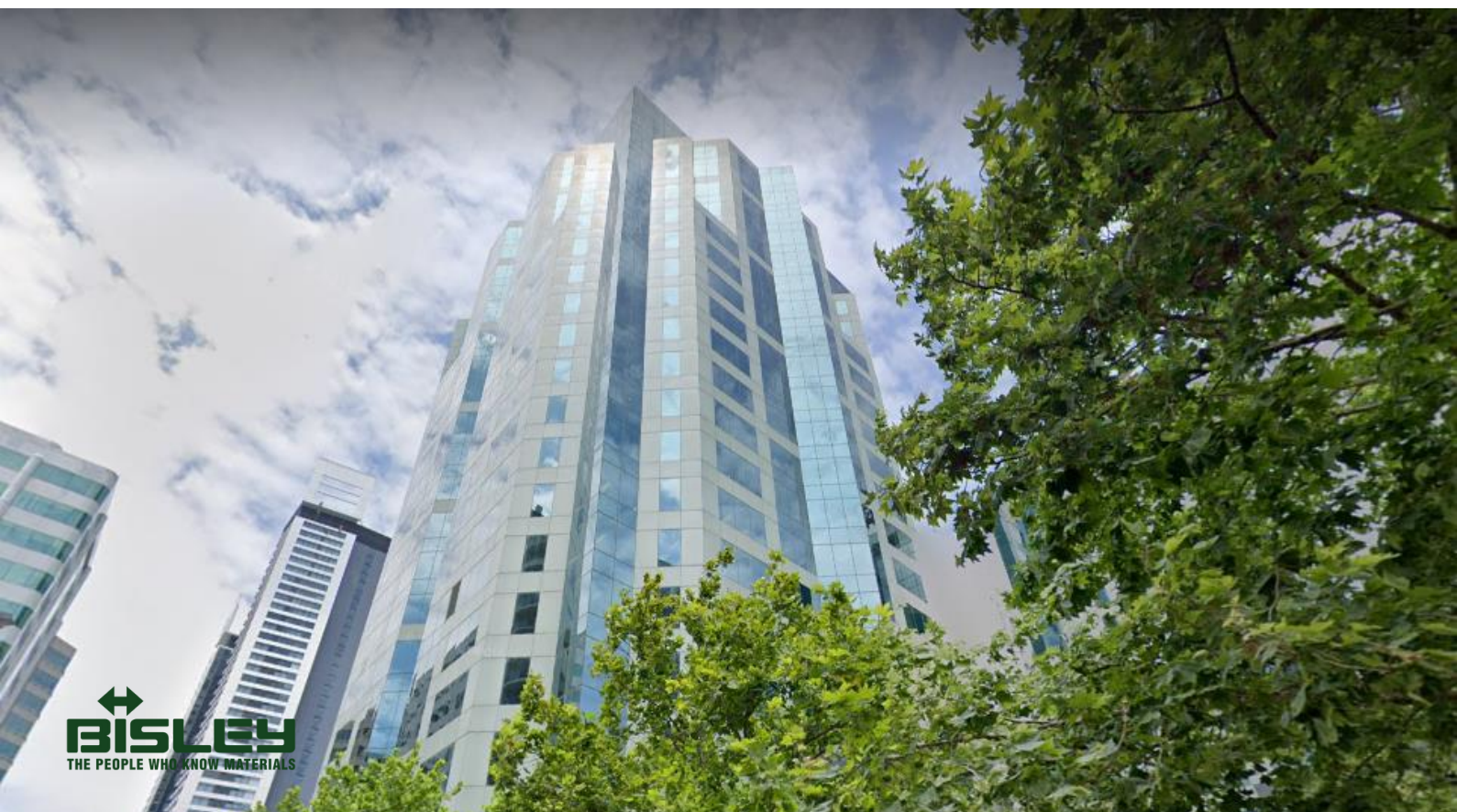
Global Bribery Prevention Policy

05Global Commercial Risk
Management Policy

BISLEY SUPPLIER ASSESSMENTS

Bisley performs detailed due diligence on potential key suppliers utilising questionnaire templates which have recently been updated to help staff follow procedures to evaluate potential risks along with visits to suppliers' facilities, including utilising agents in China for site inspections. Supplier assessments not only ensure quality, but also, help achieve ethical business practices.

As a result of these procedures and the location of our suppliers, Bisley believes the overall risk level of modern slavery in our supply chains is low. However, we continue to upgrade our processes as we continue to mitigate risks. And in the case where modern slavery risks are high, we have implemented a Modern Slavery Policy outlining the cessation and/or remediation of that supply partner. Yearly reviews of such policy target effective implementation and adaptation.



ONGOING EVALUATION AND ASSESSMENT



We are monitoring the effectiveness of the processes and procedures to address the modern slavery risks that our business causes, contributes to, or is directly linked to, in line with the UN Guiding Principles. We will continually assess the effectiveness of our actions in identifying and managing modern slavery risks by: tracking our actions and outcomes, partnering with suppliers and other external partners, including visits and Audits whenever practical, and undertaking regular internal governance and external assurance processes. Based on the results of these processes, we will adapt and strengthen our actions to continually improve our response to modern slavery.



In FY 2025 and beyond, Bisley has continued and will continue to increase collaboration with internal and external stakeholders to address the issue of modern slavery.

Bisley will achieve this by raising awareness of modern slavery among employees and suppliers, continuing to evolve and improve our supplier due diligence and audit procedures and further improve our purchase terms and conditions.

OUR CONSULTATION PROCESS

Bisley has taken a collaborative approach to developing our Modern Slavery Policy, and the ways in which it is implemented. We have worked with the several entities that we control, as well as entities that we do not control such as manufacturers and customers to ensure our policies are fit for purpose and effective. We have done this through direct discussion with our international offices on their monitoring capabilities and understanding of risk to not only ensure we are working to a common goal, but that the common goal is achievable.

The entities that Bisley controls include the six trading subsidiaries outlined in chapter 2. Bisley does not control entities such as the manufacturers we purchase from, or the customers that we supply to. However, we have continued to meet and discuss with our suppliers to ensure that our Modern Slavery policies and assessments are fit for purpose.

In 2025 Bisley met with many suppliers from a variety of regions such as Zhejiang, Shandong, Liaoning, Guangdong, Hubei, Hebei, Jiangsu, JiangXi, Sichuan, Shanghai, Qingdao, HohHot (Inner Mongolia), Weifang, Dalian, Changsha, Qinzhou and Henan. These visits were essential to validate that our modern slavery processes were effective and so that we could have better transparency of our supply chain.

Bisley's consultation process in 2025 built upon the changes introduced in 2024, continuing the implementation of our Modern Slavery Policy, supplier prioritisation based on spend and region, and enhanced audit procedures. This year, we further refined our risk assessment tools, expanded supplier engagement practices, and strengthened alignment with international reporting standards to improve consistency and accountability across our operations.

OUR CONSULTATION PROCESS

In 2025, Bisley continued to engage collaboratively with both controlled entities and external suppliers to improve the transparency and effectiveness of our modern slavery response. The following steps summarise our consultation and continuous improvement activities:

01

Maintained and reviewed the Modern Slavery Policy across all operations to ensure relevance and applicability based on current risks and supply chain realities.

02

Continued to enforce Purchase Terms and Conditions that include clauses referencing International Labour Organization Conventions No. 138, 182, and 190, reinforcing our commitment to fair labour standards.

03

Updated our regional risk assessments using the latest data from the Global Slavery Index, aligning supplier evaluations with changing geopolitical and industry-specific risk profiles.

04

Ranked suppliers based on annual spend and region to focus monitoring efforts on those considered high-risk. This ranking guided our audit schedule and frequency of engagement.

05

Conducted targeted audits and distributed updated questionnaires to assess supplier compliance with modern slavery standards. Findings from these assessments have informed ongoing training, supplier improvement plans, and, where necessary, escalation or remediation actions.

SIGNATORY

Jason Gorfine | Chief Executive Officer

Jason Gorfine

Date

3 November 2025

