

**BRIGGS AND STRATTON AUSTRALIA**  
**ANNUAL MODERN SLAVERY STATEMENT 2021**  
**3 Imperata Close, Kemps Creek NSW 2178**  
[briggsandstratton.com.au](http://briggsandstratton.com.au)



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## INTRODUCTION

Briggs and Stratton Australia is owned by Briggs and Stratton LLC, headquartered in Milwaukee, Wisconsin, USA.

Briggs and Stratton LLC, provides innovative products and diverse power solutions to help people get work done. Briggs & Stratton is the world's largest producer of engines for outdoor power equipment, and is a leading designer, manufacturer and marketer of lithium-ion battery, standby generator, energy storage system, lawn and garden, turf care and job site products through its Briggs & Stratton®, Simplicity®, Snapper®, Ferris®, Vanguard®, Allmand®, Billy Goat®, Murray®, Branco® and Victa® brands.

Briggs & Stratton products are designed, manufactured, marketed and serviced in more than 100 countries on six continents, including Australia, New Zealand, Asia, China, Europe, Latin America, United States and Canada.

Briggs and Stratton Australia recognises the impact Modern Slavery has on many lives and families and remains committed to drive change, ensure human lives are respected and treated fairly and wherever possible to mitigate risks of modern slavery in its business operations and supply chains.

Briggs and Stratton Australia acknowledges that modern slavery can occur in different forms such as human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting for labour or services.

Briggs and Stratton Australia has prepared this Modern Slavery Statement, its first, to address the key risks of Modern Slavery within our business to ensure greater awareness and responsibility within our supply chain and operations and to be the catalyst for a better life for our supply chain, customers, team members and the community in which we live and work.

We recognize the continuous efforts required to combat modern slavery in our operations and supply chains and we are committed to an ongoing assessment of our strategies and approaches.

**MANDATORY CRITERIA ONE AND TWO:**

**IDENTIFY THE REPORTING ENTITY AND DESCRIBE ITS STRUCTURE, OPERATIONS AND SUPPLY CHAINS**

This modern slavery statement is prepared and provided for by Briggs and Stratton Australia Pty Ltd (ACN 006 576 656) as a single reporting entity.

Briggs & Stratton Australia and Victa Limited (which is owned by Briggs and Stratton Australia) report to the parent Company Briggs and Stratton LLC, which provides innovative products and diverse power solutions to help people get work done. Briggs and Stratton LLC source suppliers for products sent to and distributed by Briggs and Stratton Australia and have had due diligence and risk assessment processes for a number of years to combat modern slavery in its supplier network throughout the world.

Briggs and Stratton Australia is headquartered at Kemps Creek, New South Wales and has sites in Mansfield, Queensland and Moorabbin, Victoria.

Briggs and Stratton Australia sells garden care products, including small outdoor engines, pressure washers and portable generators, by wholesale to dealers and retail outlets throughout Australia.

Briggs and Stratton Australia employs approximately 140 people, spread across warehousing and distribution, manufacturing, engineering, sales, marketing, customer service, finance and management functions.

Briggs and Stratton LLC engages a range of suppliers in the general activities of machinery manufacturing and associated repairs and maintenance, protective clothing and equipment, telecommunications, office services and business technologies and professional services.

Most of Briggs and Stratton LLC's suppliers of the components for our products are based in China, but all products are otherwise assembled and manufactured in the USA.

## OUR SUPPLY CHAIN

Briggs and Stratton LLC operates around the world and its supply chains include the sourcing of raw materials, components and subcontracted manufacturing activities related to the manufacture of engines, products, parts and accessories.

### Manufacturing Operation

Briggs and Stratton LLC have a range of product components sourced from China, Malaysia, Japan, the United States and locally in Australia. Sourcing is as follows:

- Batteries, walker mower chassis, engines, walker mowers, trimmer lines, trimmer service parts, hedgers trimmer service parts, blower service parts, chainsaw service parts/accessories, ride on lawn mower - service parts and walk mower blades are sourced from China;<sup>1</sup>
- Batteries from Malaysia;<sup>2</sup>
- Hedger trimmer parts, blower service parts and chainsaw service parts/accessories from Japan;<sup>3</sup>
- engines, engine service parts, trimmer line, blower service parts, chainsaw service parts/accessories, ride on lawn mower service parts, portable power service parts, pressure washer service parts, oil from the United States of America;<sup>4</sup>
- Ride on lawn mower - service parts from Belgium;<sup>5</sup>
- Oil and walker mower blades from Australia.<sup>6</sup>

### Warehousing , Distribution and Servicing Operations

Products are delivered to, stored (and where necessary, assembled) at and dispatched from Briggs and Stratton Australia's Warehousing operations located at 3 Imperata Close, Kemps Creek NSW 2178.

### Labour

Victa Limited manages and coordinates Briggs and Stratton Australia's Australian operations" with both direct hire and labour hire staff. Individuals at Briggs and Stratton Australia's Australian operational locations perform warehouse picking packing, forklift work, inspection and repairing of returned products, and maintenance of plant and service equipment.

Administration, Marketing, Sales, Supply Chain and Engineering all include duties that are office based.

Licensed labour hire providers are engaged in compliance with applicable labour hire licensing laws.

Warehouse personal protective equipment (PPE) and uniforms are sourced from an Australian-based company.<sup>7</sup>

<sup>1</sup> Shanghai, Chongqing, Nanjing, Qingdao, Nansha

<sup>2</sup> Port Klang

<sup>3</sup> Tokyo

<sup>4</sup> Missouri, Georgia, Alabama, Menomonee Falls, Kansas City, Sherill, Indianapolis

<sup>5</sup> Antwerp

<sup>6</sup> Sydney, NSW

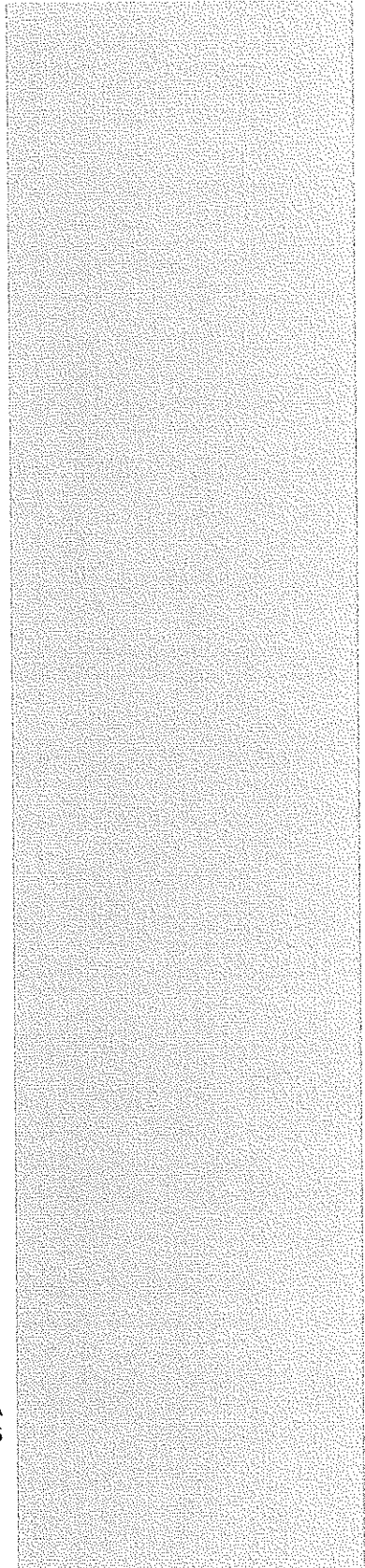
<sup>7</sup> RSEA Safety

**Transport Operation**

All goods delivered to and dispatched from Briggs and Stratton Australia's warehouses to Briggs and Stratton distributors and retail stores are managed by two Australian-based 3rd party providers.<sup>8</sup>

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<sup>8</sup> Toll Ipec, Toll Express and Velfex Transport



**MANDATORY CRITERION THREE:**

**DESCRIBE THE RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS AND SUPPLY CHAINS OF THE REPORTING ENTITY AND ANY ENTITIES THE REPORTING ENTITY OWNS OR CONTROLS.**

Briggs and Stratton Australia understands that certain products may pose higher risks of modern slavery due to the types of activities being associated with established risk factors including entity risks, geographical risks, products and service risks, and sector and industry risks. It also acknowledges that there are well-documented risks of modern slavery in particular geographical regions for manufacturing of certain products (such as electronic and mechanical components) as well as certain labour models applied in those regions.

RISK CATEGORY	INDICATORS MAY INCLUDE
Industry Sector	Certain sectors and industries, such as the industry in which we operate, may have higher modern slavery risks because of the nature of the manufacturing industry, particularly in relation to labour-intensive processes, given the volume of production required to remain competitive, as well as workplace health and safety considerations in respect of proper use and maintenance of machinery for production, and the cleanliness of the working environment.
Product and Services Risks	Certain machinery parts used in our products (including electrical components) may have higher modern slavery risks because of the way in which they are manufactured in this industry.
Geographic Risks	<p>We consider there to be higher risks in China and Malaysia as identified by a range of public sources revealing slavery risks in particular regions around the globe.</p> <p>We acknowledge that approximately 11 out of 15 (being 70%) of our manufacturing components types are sourced from China, and one component type from Malaysia both being the sole suppliers of those specific component types (batteries).</p>
Entity Risks	We acknowledge that our non-Australia and non-USA suppliers may not have formalised systematic approaches to labour management. As such Briggs and Stratton LLC conducts pre-engagement and regular post-engagement audits and assessments of their processes as outlined in Mandatory Criterion Four.

#### MANDATORY CRITERION FOUR:

##### DESCRIBE THE ACTIONS TAKEN BY THE REPORTING ENTITY AND ANY ENTITIES THAT THE REPORTING ENTITY OWNS OR CONTROLS TO ASSESS AND ADDRESS THESE RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSE

Briggs and Stratton Australia has worked, and will continue to work, in collaboration with key internal and external stakeholders to prevent and address modern slavery risks occurring both locally and around the globe.

Supported by its parent company Briggs and Stratton LLC, Briggs and Stratton Australia is committed to addressing Modern Slavery within its supply chain, raising awareness of what Modern Slavery is and encouraging individuals to be on the lookout for and report any suspected acts of Modern Slavery. This will involve consistently aligning our purchasing practices and our supplier selection with policies which strive to eradicate modern slavery in our supply chain, and diligently applying and regularly reviewing and improving on our due diligence processes to ensure accurate identification of risks in our supply chain.

Having regard to our risk matrix as set out under Mandatory Criterion Three, we have implemented a range of due diligence measures to reduce risks of modern slavery. Some of our key due diligence measures currently in place are described below.

#### APPROPRIATE POLICIES

As a responsible corporate citizen, we strive to ensure that human rights are upheld for our employees and all workers in our supply chain. We are committed to compliance with applicable laws and strive to ensure that the use of child, slave and forced labour, and human trafficking, are absent from our supply chain through the following:

- Our **Supplier Code of Conduct**, first introduced by Briggs and Stratton LLC in 2008 and applied by Briggs and Stratton Australia, and reviewed regularly, clearly establishes guidelines for the standard of ethical behaviour expected from our suppliers. It states that suppliers, to ensure they conduct business with a high degree of integrity and in a socially and environmentally responsible manner, must not use child or forced labour, or human trafficking, and that this is a condition on which suppliers must agree if they are to engage with our parent company and in turn Briggs and Stratton Australia. A copy of this Code of Conduct is available to the public through [www.basco.com](http://www.basco.com) and to suppliers through the Briggs and Stratton Supplier Portal. The Briggs and Stratton LLC (and by extension Briggs and Stratton Australia) Standard Conditions of Purchase also require supplier compliance with the Supplier Code of Conduct, as a condition on which purchases are made from the supplier.
- The **Briggs And Stratton Integrity Manual**, updated in 2021, highlights the continued corporate commitment to upholding human rights and prohibiting child labour, slavery, human trafficking and forced labour within our supply chain. This applies to all officers, directors and employees, and provides guidance on suitable decision making in relation to ethical dilemmas including



those relating to human rights and business practices which undermine Briggs and Stratton LLC's efforts to eliminate abuses such as child labour, slavery, human trafficking and forced labour.

This Manual encourages employees to ask questions and report possible violations and suspicions of human rights abuses in the Briggs and Stratton LLC operations (applying also to Briggs and Stratton Australia) or in the operations of the associated businesses. All employees participate in annual online mandatory training on integrity and all new employees are required to complete induction modules which cover these topics.

Feedback may be provided as follows:

- Any Briggs & Stratton employee, supplier or concerned individual can anonymously report a potential ethical violation or suspected violation of our standards, including human trafficking by a Briggs & Stratton supplier, through any of the following methods:
  - Briggs and Stratton Safety & Integrity Helpline Telephone. 1800 431 173 which is multi-lingual, toll-free and available 7 days/week 24 hours a day
  - QR Code displayed within the business to easily access the Safety & Integrity Helpline
  - Online at <https://briggsandstratton.alertline.com/gcs/welcome>
  - In writing to: Compliance Helpline Committee in Australia addressed to the Human Resources Business Partner
    - 3 Imperata Close,
    - Kemps Creek
    - New South Wales, Australia 2178.
  - Or in writing to: the SVP Human Resources and Administration in the United States
    - 3300 N 124th Street
    - Wauwatosa, WI 53222-3106 USA
  - Reporting to a Briggs and Stratton Australia Human Resources Business Partner, direct or departmental manager, and/or the Briggs and Stratton LLC legal team.

Reporting is further encouraged through a non-retaliation approach to reporting undertaken in good faith. Offenders will be reported to the police as appropriate. Employees are invited to advise their managers and/or HR if they feel they have been targeted in this way.

Based on feedback/ reporting through these channels, the Briggs and Stratton LLC Legal department will coordinate an investigation with tracking numbers provided to facilitate easy follow-ups and updates on the progress and/or outcome of a report.

#### **TRAINING OF STAFF**

To ensure a high level of understanding of the risks of modern slavery and human trafficking on our supply chains and our business, we provide training to all members of staff at the commencement of their engagement and then annually through the Briggs and Stratton LLC Global University (an internal training tool).

Additionally, all Briggs & Stratton LLC salaried employees, including those engaged by Briggs and Stratton Australia, are required to undergo our Integrity training and certify compliance with the Integrity Manual, which outlines the company's commitment to human rights, and solicits reporting of

suspected human trafficking or forced, indentured or child labour. This training occurs immediately as new Briggs & Stratton employees join the company and participate in the training as part of their onboarding process and is completed within 30 days of the commencement of their employment. All employees are recertified on a periodical basis.

#### **DUE DILIGENCE**

Briggs and Stratton LCC, and by extension Briggs and Stratton Australia, undertakes due diligence when considering taking on new suppliers and regularly reviews existing suppliers. Due diligence includes:

- Identifying, mitigating and monitoring potential risk areas in our supply chains
- Evaluating the modern slavery and human trafficking risks of new and existing suppliers
- Encourage the reporting of any wrongdoing through internal and external reporting procedures as outlined above.

Further, Briggs and Stratton LCC is a member of Sedex<sup>9</sup> which undertakes audits of suppliers and business partners to ensure compliance with the Supplier Code of Conduct.

#### **RISK ASSESSMENT**

Briggs and Stratton Australia's management believes that our risk of contributing to or being directly involved in modern slavery or human trafficking activities is minimal. We perform extensive due diligence on new suppliers prior to establishing formal relationships and require all suppliers to adhere to our Supplier Code of Conduct, which strictly prohibits modern slavery and human trafficking.

Briggs and Stratton LLC, and by extension Briggs and Stratton Australia, has an audit program which includes questions pertaining to social accountability matters in our quality systems site audits and third party social accountability site audits of targeted suppliers.

In Fiscal Year 2021, Briggs & Stratton LLC underwent a targeted audit of our supply chain to ensure that there were no suppliers or sub-suppliers located in the Xinjiang region of China. None were identified/Briggs and Stratton LLC ceased to continue using suppliers identified.

Briggs and Stratton LLC recognises the risk of indirect exposure to modern slavery and human trafficking within our supply chain. As such, Briggs and Stratton LLC, continually assesses and refines how best to evaluate the operations of our suppliers in non low-risk regions, being China and Malaysia.

A Supplier Quality System Survey is conducted on all potential suppliers in China and Malaysia, by a team of Procurement and Supplier Quality Assurance and Engineering specialists. This is done prior to a commercial arrangement being entered into with Briggs and Stratton LLC and periodically throughout the engagement, on average being annually.

This initial assessment determines the adequacy of the Supplier's quality system as well as their technical and managerial capability. Thereafter, Suppliers are periodically re-surveyed to ensure the

<sup>9</sup> One of the world's leading ethical trade membership organization, working with businesses to improve working conditions in global supply chains. [About us | Sedex](#)

system remains optimal and is in a state of continuous improvement. Suppliers must have a satisfactory quality rating against each of the 11 criteria in the Survey to be awarded future business with Briggs and Stratton LLC (and by extension in order to supply products for sale and distribution via Briggs and Stratton Australia).

Relevantly, quality areas assessed which relate to modern slavery risks include assessing the suitability of working conditions of those engaged by the supplier, being 3 of the 11 criteria in the Survey. This includes a requirement that:

- Work areas are safe having regard to the state of cleanliness of work operations and employee areas;<sup>10</sup>
- A people and culture type framework exists which provides for suitable remuneration, employee communication including representation, staff recognition, the encouragement of feedback and suggestions from all staff and the upgrading of skills;<sup>11</sup>
- Quality management systems permit quality personnel to identify and rectify quality issues with tools and equipment;
- There be an investment in adequate upgrading and improvement of machinery as well as having a suitable defined system for qualifying and certifying new equipment to align with industry standards within certain timeframes;
- There be an investment in training systems to ensure adequate training and upgrading of skills including quality processes and procedures.

The supplier is provided with results of the Assessment, as well as a summary of areas they are doing well in and those that require improvement.

Where the risk assessment result is rated as being 'conditionally acceptable,' recommendations are made by Briggs and Stratton LLC along with a timeframe for implementation. A follow-up audit is conducted to ensure the recommendations have been fully implemented within a 12 month period.

#### REMEDIATION

All allegations are thoroughly investigated by an internal Briggs and Stratton LLC team that includes Supply Management representatives. Allegations that are found to be credible are dealt with as appropriate, which may include suppliers making amendments to their current practices and, if deficits are not rectified in a timely manner, may include the business relationship being terminated.

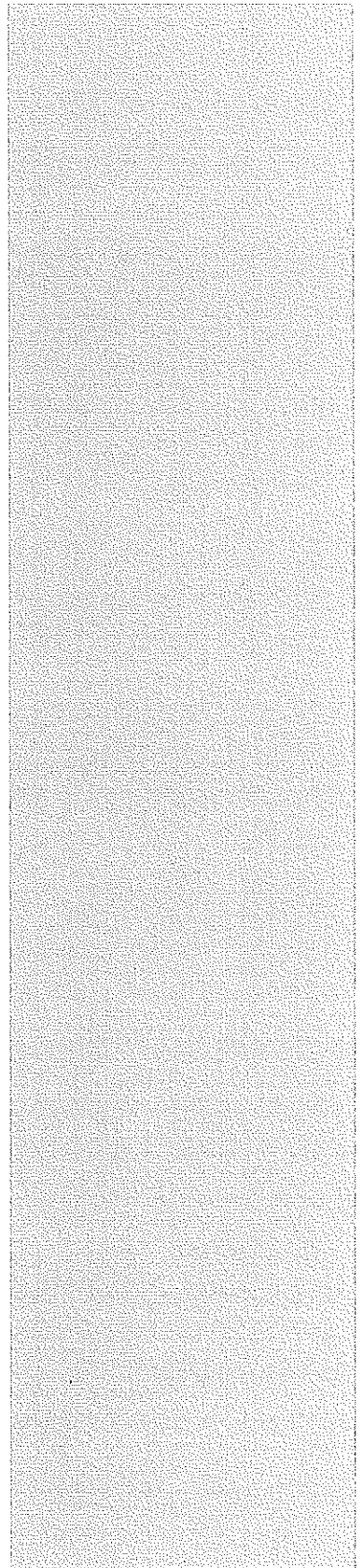
If modern slavery is found to have occurred in our operations and/or supply chains, we will, adopt a remedial approach to prevent further incidents and to ensure safety of the victim/s. We may also exercise remedial action in suspected cases of modern slavery including in the absence of a criminal conviction or formal court finding.

<sup>10</sup> Including the state of cleanliness of the floors, equipment, spills, leaks, noise, lighting, paint, dust, air quality, employee dress, restroom conditions, desks and workbench order and cleanliness, material flow order and cleanliness, colour coding for safety and order.

<sup>11</sup> Including communication s and recognition environment, team meeting areas and performance charts, training investments, educational support, benefit package and costs, unionization activity, workforce management relationship, company-supported activities (picnics, open-houses, sports teams, work instruction standards).

Where possible, we will work with suppliers to identify how modern slavery has occurred and to implement measures to prevent future incidents.

We may also elect to invoke sanctions against suppliers that fail to improve required performance or seriously violate our Supplier Code of Conduct, including the termination of the business relationship.



**MANDATORY CRITERION FIVE:**

**DESCRIBE HOW THE REPORTING ENTITY ASSESSES THE EFFECTIVENESS OF ACTIONS BEING TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS**

Briggs and Stratton LLC, and by extension Briggs and Stratton Australia, has developed a range of key performance indicators to assess the effectiveness of our risk mitigation process to prevent modern slavery in any part of our business or supply chains.

We use the following key performance indicators (KPIs) to measure any slavery and human trafficking occurring within the business:

- Completion of Audits by external and internal experts, Sedex, which provides Briggs and Stratton with the capability of complying with audits via Sedex.
- Briggs and Stratton LLC's Legal team reviews investigations into concerns raised or reports of potential violations or non-compliance with the Briggs and Stratton LCC policies relating to modern slavery and human trafficking pursuant to the Briggs and Stratton Integrity Manual.
  - Head Office Legal completes further audit and compliance checks with the third party provider.
  - Identified breaches have corrective actions that must be completed in a specific timeline.
  - A follow up audit or report of the completed actions is provided to the Head Office Legal team.
  - If a third party company is not compliant by the specified timeframe, Head Office Legal will terminate the third party company from doing any business with Briggs & Stratton LLC
  - The Australian Human Resources Business Partner will have an active participation in ensuring the above is coordinated and complied with locally.
- Any identified areas of risk that need rectifying are investigated and an improvement plan is implemented to mitigate the risk.
- Leadership meetings or committees within Briggs and Stratton LLC or Briggs and Stratton Australia consider the effectiveness of these risk assessments.
- Legal Team and Human Resources review any complaints from the Integrity & Safety Helpline.

## MANDATORY CRITERION SIX

### DESCRIBE THE PROCESS OF CONSULTATION WITH ANY ENTITIES THE REPORTING ENTITY OWNS OR CONTROLS

Briggs and Stratton LLC's policies mentioned in Mandatory Criterion Four also apply to Briggs and Stratton Australia, and in turn to Victa Limited operations to ensure uniform processes are in place to identify and reduce risks of modern slavery across our business operations.

Briggs and Stratton Australia have a range of consultation measures in place to support consultation and dialogue with Victa Limited and Briggs & Stratton LLC about modern slavery risks.

Briggs and Stratton Australia engage regularly with Briggs and Stratton LLC about:

- modern slavery risks the parent company has identified in its supply chains through audits, and any associated changes to supply impacting products distributed to Victa Limited;
- any changes or revisions to the Briggs and Stratton Integrity Manual generally or specifically in relation to training requirements; and
- updates on reported matters and findings of investigations conducted by Briggs and Stratton LLC;

Briggs and Stratton Australia has appointed two Responsible Officers as local representatives to:

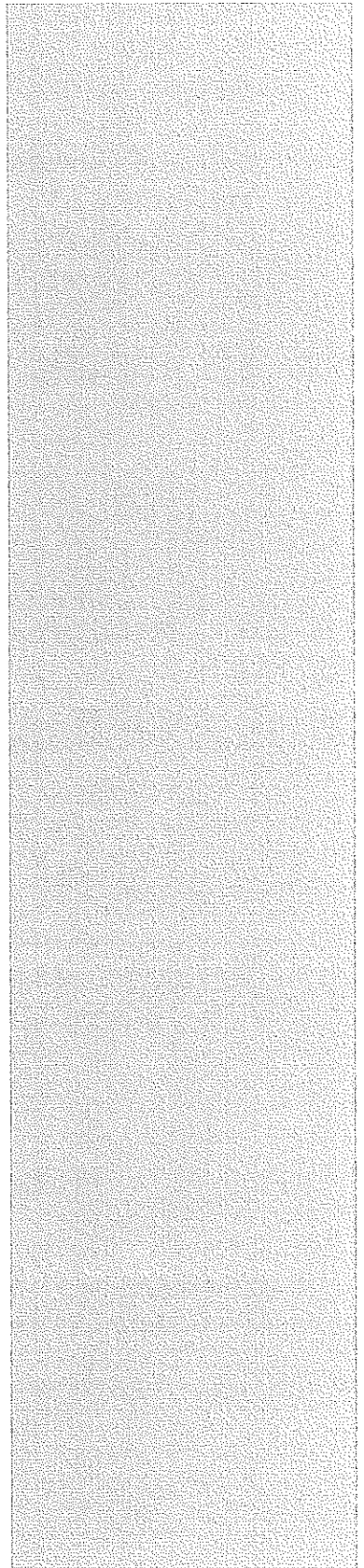
- receive and disseminate information provided by Briggs and Stratton LLC to Briggs and Stratton Australia; and
- liaise between Briggs and Stratton Australia and Victa Limited on modern slavery issues and any concerns identified locally in Australia either through the Compliance Helpline in Australia or informally through written or verbal communications with HR and Manager staff.

**MANDATORY CRITERION SEVEN**

**Any other relevant information**

Like many businesses, Briggs and Stratton Australia experienced unique challenges to its business operations as a result of the COVID-19 pandemic. Our efforts were largely directed at ensuring our workplaces and work sites were appropriately managed to reduce work health and safety risks associated with COVID-19 transmission.

In respect of our suppliers, our Supplier Code of Conduct and Supplier Quality Systems Survey (which both pre-dated the outbreak of COVID-19) remain in operation and shall continue to apply.



## **MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE**

### **Principal Governing Body Approval**

This modern slavery statement was approved by the *principal governing body* of

Briggs and Stratton Australia Pty Ltd

as defined by the *Modern Slavery Act 2018 (Cth)*<sup>1</sup> ("the Act") on

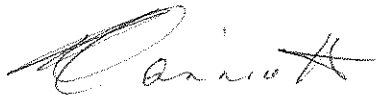
21<sup>st</sup> June, 2022

### **Signature of Responsible Member**

This modern slavery statement is signed by a *responsible member* of

the Briggs and Stratton Australia Board

as defined by the Act<sup>2</sup>::



**Dean Harriott**

Managing Director - Briggs and Stratton Australia Pty Ltd

### **Mandatory criteria**

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

<b>Mandatory criteria</b>	<b>Page number/s</b>
a) Identify the reporting entity.	4
b) Describe the reporting entity's structure, operations and supply chains.	5
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	7
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	8
e) Describe how the reporting entity assesses the effectiveness of these actions.	13
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).*	14
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**	15



- \* If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement 'Do not own or control any other entities' instead of a page number.
- \*\* You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

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1. Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.
  2. Section 4 of the Act defines a responsible member as: (a) an individual member of the entity's principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the *Corporations Act 2001*—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.