



BWP MANAGEMENT LIMITED  
Responsible Entity for BWP Trust

## **Modern Slavery Statement**

For the financial year ended 30 June 2021

The term modern slavery is used to cover a broad range of exploitive practices, including, but not limited to: slavery and servitude, forced labour, debt bondage, child exploitation, child labour and other slavery like practices, including; human trafficking, forced marriage, deceptive recruiting and sexual offences.

BWP opposes slavery in all its forms. BWP conducts its business to high levels of ethical and professional standards and is committed to addressing the risk of modern slavery in its business, supply chains and investments. During FY21, BWP continued its quest to identify and understand the nature and extent of modern slavery risk in its supply chain.

### **About this statement**

This Modern Slavery Statement (Statement) is made in accordance with the Australian Modern Slavery Act 2018 (Cth) (the Act). This statement is made by BWP Management Limited (BWP Management) on behalf of BWP Trust (also referred to as the Trust) for the financial year ended 30 June 2021. This Statement sets out the steps we have taken from 1 July 2020 through to 30 June 2021 (FY21) to prevent modern slavery in our business and supply chains.

### **Our structure, operations and supply chain**

Headquartered in WA	Large format retail customer base - primarily Bunnings	Land & building assets located in Australia
Operated by small team of 8	Less than 100 suppliers - mostly Australian	Owned by 24,000 unitholders

### **About BWP**

BWP Management Limited (BWP Management) is the responsible entity and manager for BWP Trust. BWP Trust is an Australian ASX-listed property trust with more than 24,000 unitholders.

Wesfarmers Limited (Wesfarmers) is the parent company of BWP Management and holds approximately 25 per cent of the units in BWP Trust. Wesfarmers is a reporting entity under the Australian Modern Slavery Act, and publishes a group statement that considers the modern slavery risks and actions for its various businesses and subsidiaries, including Bunnings Group Limited ("Bunnings"). As BWP Trust is a separate ASX-listed entity and not a wholly owned Wesfarmers entity, it is appropriate for BWP Trust to publish its own modern slavery statement. Notwithstanding, the Wesfarmers relationship provides BWP Management and BWP Trust with valuable partnering opportunities within the broader Wesfarmers Group including opportunities to develop a coordinated approach to tackling modern slavery issues in our common supply chains.

This statement is submitted by BWP Management for and on behalf of BWP Trust which is a reporting entity under the Modern Slavery Act. (BWP Management and BWP Trust are collectively referred to as "BWP" in this statement.)

## Our values

Our core values of respectfulness, responsibility and resourcefulness require us, among other behaviours, to seek mutually beneficial relationships with all stakeholders and treat others as we expect to be treated. Respecting the human rights of others is a natural extension to our values and we are committed to understanding modern slavery risks and contributing to global efforts to end modern slavery.

## Our Board

The Board of BWP Management is comprised of a majority of external non-executive directors responsible for ensuring the Trust is managed in a manner that protects and enhances the interests of its unitholders and takes into account the interests of customers, suppliers, lenders and the wider community.

The Board is responsible for overseeing BWP's response to modern slavery risks and for the approval of ethical sourcing standards and this Modern Slavery Statement. BWP's approach to modern slavery risk management is reviewed by the Audit & Risk Committee. Complaints and incidents of modern slavery are required to be reported to the Board.

## Our workforce

BWP Trust has no direct employees. BWP Management has a small workforce of eight team members located in either the Perth headquarters or Melbourne office and who have been seconded from Wesfarmers to focus exclusively on the operations of BWP Management and the Trust. BWP's team members are subject to the same terms and conditions of employment as other Wesfarmers employees.

BWP's team members are responsible for leasing, property management, development management and all of the corporate and compliance functions of an ASX-listed entity operating in the financial services sector under an Australian Financial Services License (AFSL).

## About BWP Trust

- ❖ *BWP Trust was established and listed on the ASX in 1998 as a real estate investment trust investing in and managing commercial properties, in particular Bunnings Warehouses, leased to Bunnings.*
- ❖ *The Trust is managed by an external responsible entity, BWP Management Limited ("the responsible entity"), which is appointed under the Trust's Constitution and operates under an Australian Financial Services Licence.*
- ❖ *The responsible entity is a 100% owned subsidiary of Wesfarmers Limited. It is solely committed to managing the Trust.*
- ❖ *The Trust is owned by 24,000 unitholders. Wesfarmers owns approximately 25% of the Trust and the other 75% is owned by institutional and retail unitholders.*
- ❖ *In FY21, BWP Trust's total revenue was A\$152.2 million.*
- ❖ *All of the Trust's investments are located in Australia.*

As the units in BWP Trust are ASX-listed, the financial services provided by BWP Management are limited to general advisory only (i.e. by way of general announcements released on the ASX platform for access by all unitholders) and no individual private client advisory or asset management services are provided.

## **Our offices**

Our team members occupy a corporate office footprint of less than 70 square metres within the larger Wesfarmers' tenancies in Perth and Melbourne.

Office services provided to BWP (floor space, communications services, technology, furnishings, stationery supplies and cleaning services) are procured and managed by Wesfarmers. BWP has no direct role or discretion in relation to the procurement or direction of these services. Any reporting under the Act in relation to the modern slavery risks of these suppliers is dealt with under Wesfarmers' modern slavery compliance and reporting obligations.

## **Our investments**

BWP Trust invests in large format retailing properties, primarily Bunnings Warehouses leased to Bunnings. The Trust also invests in a number of other multi-tenanted large format retail properties, some with a Bunnings business in the tenancy mix and some without.

As at 30 June 2021, BWP Trust owned 74 investment properties, all within Australia, with a total value of \$2.6 billion.

These comprised:

- 58 standalone Bunnings warehouses
- 7 Bunnings warehouses with other showrooms on the property
- 6 large format retail showroom properties and
- 3 vacant properties.

### **Standalone Bunnings warehouses**

Other than for the negotiation and renewal of leases, our standalone Bunnings Warehouse investments require minimal direct operational input by BWP.

Bunnings, as the tenant with a whole-of-site lease, is operationally responsible for its own workforce and for the majority of supplier engagements and interactions relevant to those properties throughout the course of the Bunnings lease.

Under the terms and conditions of its lease, Bunnings is responsible for the repairs and maintenance activities at its properties. Bunnings engages its own cleaners, security, waste management and maintenance contractors.

BWP is only required to engage directly with suppliers of equipment and services to these properties for some capital expenditure items when these are due for replacement e.g. when the air conditioners, lighting and skylights have reached the end of their useful life.

### **Large format retail showrooms**

BWP has 13 multi-tenanted large format retail properties, seven of which have a Bunnings Warehouse tenant. Of the 13 multi-tenanted properties, 11 are managed by commercial property management companies. The tenants are responsible for their own workforces and the engagement of services for their within-tenancy requirements.

As well as their leasing responsibilities, the property management companies are responsible for the engagement of suppliers of services relating to the upkeep of the common areas of these properties including cleaning, security, waste management, landscaping, repairs and maintenance.

The remaining two multi-tenanted retail properties (with only a small number of tenants) and the three vacant properties are managed directly by BWP. For these, BWP engages directly with a landscaper/gardener/cleaner and security company to patrol vacant properties.

## Our suppliers in perspective

- ❖ **BWP has less than 100 direct suppliers**, (representing 0.3 of a per cent of all suppliers to the Wesfarmers Group\*).
- ❖ **Our direct suppliers are mostly Australian businesses.** We develop long term relationships with trusted suppliers that have proven to be reliable and professional business partners.
- ❖ **Our direct suppliers are mainly providers of professional services.** They comprise: our banks, audit and legal firms, share registry, valuers, insurers, architects, town planners, ratings agencies, energy providers, specialist advisers and consultants, software providers, property managers, real estate agents, project managers, construction and maintenance contractors.
- ❖ **Our FY21 supplier spend was \$69 million.**

\* Reference: Wesfarmers 2021 Modern Slavery Statement

## Our supply chain

Due to the nature of BWP's business and the limited operational interventions required of BWP as landlord, we have a relatively small number of direct suppliers (less than 100 in total during FY21) compared to many other reporting entities, some of whom have thousands of suppliers. BWP works with its suppliers to ensure they adhere to high levels of professional and ethical standards.

BWP operates only in Australia, and as a result, the majority of its tier 1 suppliers are also Australian. We are aware that a very small number of companies further down in our supply chain (i.e. tier 2 or 3) are domiciled internationally.

The products and services provided by our supply chain can generally be grouped into:

- **Property development** - development management, design, construction, labour, manufactured products and equipment (heating, ventilation & cooling, solar panels, lifts, electrical) and raw materials (cement, paint, steel, ceramic)
- **Property operations** - external property management services for some multi-tenanted properties (cleaning, security, installation and maintenance) and other professional services
- **Corporate** - external service providers provide a range of professional services e.g. unit registry services, banking and financial, property valuation, travel, audit, compliance and specialist advice such as legal and tax.

### Property development

When developing a new Bunnings Warehouse property or upgrading an existing Bunnings Warehouse, BWP

Management appoints Bunnings as developer and project manager under a Development Deed. As the project manager, Bunnings is responsible for managing the supply chain relationships for that development.

Bunnings' parent entity, Wesfarmers, is a reporting entity under the Modern Slavery Act and Bunnings reports to its parent entity on its supply chain relationships and the actions it takes to minimise the risk of modern slavery. These supply chain relationships and activities are reported on in the Wesfarmers Modern Slavery Statement.

In relation to Trust-owned properties where Bunnings has vacated the property, and the property is to be sold as is or as vacant land; or re-purposed for other uses; BWP Management appoints only reputable third party project managers and developers to carry out the works. Our construction partners are selected through a competitive tender process and formally appointed under a written agreement. The tender selection criteria is not limited to cost competitiveness, but also considers among other things: reputation, experience, their health and safety systems and record as well as ethical sourcing considerations.

BWP Management also directly engages some skilled professionals to provide advice on recommended best use of vacated sites and in some instances, this might involve application to councils for re-zoning; or it might involve demolition works and/or marketing of the property for sale by professional real estate agencies.

## Property Operations

### Properties occupied by Bunnings as sole tenant

The majority of the Trust's Bunnings Warehouse properties are occupied by sole tenant, Bunnings. Operational control of these properties and their business is retained by Bunnings. Bunnings is responsible for its own workforce, and for procurement of the daily maintenance services that keep the building clean, safe and secure. Bunnings maintains direct oversight and operational control of this supply chain.

### Multi-tenanted properties with common areas

BWP has 13 multi-tenanted large format retail properties. Property management is outsourced for 10 of these properties to professional property management companies through a property management agreement.

As well as their leasing responsibilities, the property management companies are responsible for delivery of each property's day-to-day services such as cleaning, security, waste management, landscaping, repairs and maintenance.

BWP's only material tier 1 supplier for these properties is, in most operational instances, the property management company.

For the remaining two multi-tenanted properties, BWP Management is directly responsible for maintenance and services relating to the common areas, which typically includes the upkeep of landscaped areas and carparks.

## Corporate

Reputable external service providers are engaged to support our corporate functions. These service providers include among others: banks, audit firms, law firms, registry managers, specialist advisers, environment specialists, town planners, tax experts and travel agencies. Wesfarmers is also a key external service provider to BWP supplying office, communications and IT services, insurance, human resources, tax and treasury functions.

## Risks of modern slavery practices in BWP operations and supply chains

### Modern slavery risk in BWP's operations

BWP Management has assessed the risk of modern slavery in BWP operations as negligible to none. Our employees are skilled professionals operating exclusively in Australia. There is no direct exposure to child labour, forced labour, or other modern slavery key risk areas.

We have a small workforce of eight team members who operate out of either the company's Perth or Melbourne offices. All team members have been seconded from the Wesfarmers workforce and are entitled to the same rights and conditions as other Wesfarmers employees. All team members have individual contracts that confer minimum pay and entitlements and typically provide for consultation regarding significant operational changes.

Due to the small size of our workforce, all team members have direct access to the Managing Director and any issues or concerns individuals may have can be discussed with him directly. Team member safety and well-being is of highest importance at BWP and is on all team meeting agendas. Team members have considerable flexibility to structure their work commitments around their personal and family commitments resulting in a high workforce job satisfaction and retention rate.

The rights of all personnel are addressed under the Wesfarmers Code of Conduct, Equal Employment Opportunity Policy and Inclusion Policy. All new employees participate in induction procedures and training to ensure they understand their rights and the rights of those they deal with in their work environment.

Modern slavery training is available to our employees through Wesfarmers' online training modules and augmented by additional self-education opportunities provided by BWP.

## Our team members and the Covid-19 pandemic

During the Covid-19 pandemic, our team members were asked to work from home and some continue to do so. Videoconferencing technology was used extensively to maintain daily contact between team members with an increased focus on team member wellbeing and mental health. Team members working from home are provided with the appropriate equipment including technology to ensure they can continue to work effectively.

## Modern slavery risk in BWP's supply chains

We consider that there will be people in BWP's supply chains who will be at higher risk of modern slavery than our direct workforce. Our risk assessment focussed initially on tier 1 suppliers. Over time, our aim will be to increase the scope of risk assessment to include suppliers at tier 2 levels.

The following risk factors have been identified as having the potential to be directly linked or may contribute to modern slavery in our supply chains from time to time:

- Use of low-skilled, contract and/or migrant labour
- Subcontracting and use of third-party labour hire agencies
- The procurement of some imported construction materials, supplies or building equipment (where modern slavery may have been involved in their manufacture)
- Outsourcing of operations by suppliers to countries with weak or opaque commitments to human rights
- Cost competitiveness of suppliers tendering for construction projects.

Based on our preliminary analysis of our supply chain and supplier risk, we have identified the following categories as focus areas:

- Capital works at operational assets
- Development works
- Procurement of raw materials/products/equipment from overseas
- Cleaning services
- Security services.

These risks are more likely to be found at tier 2 and below supplier levels.

The focus continues to be on tier 1 suppliers, being those suppliers with whom BWP has a direct contractual relationship. Future focus areas will extend to tier 2 suppliers (entities who supply our tier 1 suppliers).

All suppliers, whether tier 1 or below, are expected to comply with BWP's Minimum Standards Expected of Suppliers. These Minimum Standards are published on the BWP website. All new tier 1 suppliers are provided with a copy of our Minimum Standards and asked to confirm that their practices are compliant with these expectations.

Our expectations for suppliers are communicated through:

- the inclusion of modern slavery provisions in our contractual documentation with suppliers where appropriate
- consideration of modern slavery risk factors during the supplier selection process
- surveys of material suppliers to ascertain their understanding of modern slavery risks, their use of labour hire services, outsourcing to overseas suppliers and procurement of raw materials from high risk countries.

In FY21, some additional suppliers were engaged. An expanded survey is being developed to understand if new suppliers understand their obligations to minimise modern slavery risks.

## Related party suppliers

### Wesfarmers as a supplier

When BWP is the recipient of services provided by Wesfarmers that carry a higher risk of modern slavery (such as electronic devices or office cleaning services), we engage with Wesfarmers team members responsible for procurement. We acknowledge the Wesfarmers commitment to the safeguarding of human rights and the due diligence processes it has implemented. More detail on these can be found in the Wesfarmers 2021 Modern Slavery Statement on the Wesfarmers website.

### Bunnings as a supplier

Bunnings provides development and project management services to BWP during the construction or upgrade phases of a BWP-owned Bunnings Warehouse. We engage with Bunnings personnel to understand the due diligence processes it has adopted prior to the engagement of key contractors for these developments. Bunnings has long-term relationships with its Australian building contractors and is working with those contractors to improve visibility beyond these tier 1 suppliers. It is anticipated that this understanding will grow with time. BWP will continue to work with Bunnings to improve our own understanding of modern slavery risks and how these are being managed in our common supply chains. For the ongoing actions taken by Bunnings to manage its modern slavery risk, refer to the Wesfarmers 2021 Modern Slavery Statement.

### Our suppliers during the Covid-19 pandemic

BWP conducted preliminary enquiries of its tier 1 suppliers in 2020 coinciding with the commencement of the Covid-19 pandemic. Supplier response rates and our follow up enquiries continue to be impacted by: the slowdown in business activity which prevailed to the end of the financial year (and beyond); as well as compulsory business lockdowns in many Australian States; and restrictions on team member interstate and intrastate movements.

BWP's focus during the pandemic has been directed to the support of our team members and our customers, i.e. rent relief or deferrals for tenants whose businesses have been most severely impacted by the pandemic. In relation to our suppliers, the majority of whom were other Australian businesses, our preliminary and subsequent analysis of tier 1 supplier responses indicated that there were no obvious modern slavery risks requiring immediate follow-up enquiries and/or remediation. Our planned follow-up enquiries of our suppliers has been deferred to FY22 to allow them to focus their attention on their workforce and the ongoing viability of their businesses.

## Remediation

We did not identify any modern slavery practices either at our operations or in our supply chain during FY21.

We recognise our responsibility to provide or participate in the remediation of any identified human rights impact that we have caused or contributed towards. BWP has a Whistleblowing Policy which includes safe and transparent grievance mechanisms available to stakeholders including individuals who supply goods or services to BWP or an employee of a person who supplies goods or services to BWP.

No reports were received from whistleblowers with work-related grievances from within or from outside our operations.

Where a concern is raised, or we otherwise become aware that an individual in our supply chain is impacted by modern slavery, we will investigate the matter and take appropriate action. The action we take will be determined by the circumstances of the impact. In all cases, the focus will be in mitigating the risk to the individual impacted and may involve our working with the supplier entity to encourage a change of practice or continuous improvement in their practices.

All grievances, incidents and concerns are required to be reported to the BWP Board.

## Assessing effectiveness

We assessed effectiveness in FY20 by tracking our actions and outcomes which included: updating or adding to our governance documents; building on our internal knowledge and understanding of modern slavery; identifying all of our direct suppliers; preliminary engagement with our suppliers and establishing the

groundwork that will allow us to better identify, analyse, assess and, if required, report and/or remediate incidences of modern slavery in our supply chains.

Specific actions and outcomes included:

<b>Governance</b>	<ul style="list-style-type: none"> <li>• Policies and frameworks that address risk, including Modern Slavery risk, are reviewed annually, as overseen by the Board</li> </ul>	✓ Actioned in FY21
	<ul style="list-style-type: none"> <li>• Adopted a Modern Slavery Policy</li> </ul>	✓ Actioned during FY21
<b>Risk assessment and management</b>	Key risk assessment and management activities in FY21 included:	
	<ul style="list-style-type: none"> <li>• Educating our team members on what is modern slavery and how it manifests in supply chains</li> </ul>	✓ Continued in FY21
	<ul style="list-style-type: none"> <li>• Minimum Standards for Ethical Sourcing provided to material new suppliers</li> </ul>	✓ Continued in FY21
	<ul style="list-style-type: none"> <li>• Inclusion of modern slavery compliance expectation clauses in material supplier contracts where practicable</li> </ul>	✓ Ongoing in FY21
	<ul style="list-style-type: none"> <li>• Engaging with our related parties Wesfarmers and Bunnings, who are also key suppliers to BWP to understand the steps they take to manage supply chain risks</li> </ul>	✓ Ongoing in FY21
	<ul style="list-style-type: none"> <li>• Identify all tier 1 suppliers to BWP who supplied product or services during the financial year</li> </ul>	✓ Actioned in FY21,
	<ul style="list-style-type: none"> <li>• Follow-up survey of tier 1 suppliers and commence collection of tier 2 supplier information</li> </ul>	✗ Planned but deferred to FY22 due to continued Covid-19 impacts on BWP team and its customers
<b>Incident reporting and remediation</b>	<ul style="list-style-type: none"> <li>• Investigating successful initiatives undertaken by peer group entities to identify if they offer continuous improvement opportunities for BWP</li> </ul>	✓ Ongoing in FY21
	<ul style="list-style-type: none"> <li>• We encourage prompt reporting of concerns relating to modern slavery in our operations and supply chain</li> </ul>	✓ Ongoing - no slavery incidents observed or reported
	<ul style="list-style-type: none"> <li>• We have a quarterly process for reporting to the Board any complaints or other grievances received</li> </ul>	✓ Ongoing - no complaints received
	<ul style="list-style-type: none"> <li>• Our Whistleblower Policy offers protections for individuals from supplier entities to raise concerns directly with us</li> </ul>	✓ Standing policy - no reported grievances in FY21

## Looking ahead

This is BWP's second reporting year under the Australian Modern Slavery Act. We acknowledge that we are at the early stages of our modern slavery journey with progress interrupted by the impacts of Covid, particularly in terms of travel, and business impacts of border closures and lockdowns. There is more we can learn from observing the actions taken by other reporting entities who are further along in the journey.

We will continue working with our suppliers and other stakeholders; our aim being to ensure that no individual is subjected to modern slavery or related labour exploitation within our supply chains.

Looking ahead, specific focus areas include, among others:

<b>Governance</b>	<ul style="list-style-type: none"> <li>• Continue to investigate opportunities to expand our modern slavery expectations clauses into other contractual documentation</li> </ul>	
	<ul style="list-style-type: none"> <li>• Raise the awareness of any new suppliers of Modern Slavery risks and our Minimum Standards for Suppliers</li> </ul>	

<b>Improved systems and processes</b>	<ul style="list-style-type: none"> <li>• Continue to investigate collaborative property sector initiatives aiming to increase visibility over supplier performance through the collection, comparison and sharing of supplier performance data</li> </ul>
	<ul style="list-style-type: none"> <li>• Commence the mapping of modern slavery risks at levels below our tier 1 suppliers</li> </ul>
<b>Training and capability development</b>	<ul style="list-style-type: none"> <li>• Continue to research existing supplier education materials that can be adapted for our suppliers</li> </ul>
	<ul style="list-style-type: none"> <li>• Continue with internal education practices to further develop employee awareness and understanding of Modern Slavery and what it means in practice</li> </ul>
	<ul style="list-style-type: none"> <li>• Review peer entities' reported actions and case studies to improve our understanding of modern slavery risks in our industry and how these can be effectively managed</li> </ul>
	<ul style="list-style-type: none"> <li>• Specific training for new employees with procurement and property development or maintenance oversight roles to ensure they have the capability to identify modern slavery risks in the supply chain and what steps they might be expected to take to assist with supplier education and support improved practices</li> </ul>
	<ul style="list-style-type: none"> <li>•</li> </ul>

## Wesfarmers Group

The Wesfarmers Group, which includes BWP Management Limited, supports the following globally recognised declarations, principles and goals:

- Universal Declaration on Human Rights
- United Nations Guiding Principles on Business and Human Rights
- United Nations Global Compact
- International Labour Organisation Declaration on Fundamental Principles and Rights at Work
- United Nations Women's Empowerment Principles
- United Nations Sustainable Development Goals
- OECD Guidelines for Multinational Entities.

Wesfarmers collaborates with industry-wide initiatives, government and non-government organisations as part of managing slavery risks.

## Consultation and approval

There are no entities owned or controlled by BWP requiring consultation on the content of this Statement. However, in the process of developing this Statement, BWP consulted with its relevant related parties (Wesfarmers and Bunnings) who are also suppliers of services to BWP, to understand modern slavery actions and initiatives being practiced in other parts of the Wesfarmers Group and in particular where those businesses' suppliers were common to BWP supply chains.

This statement was approved by the Board of BWP Management Limited on 2 December 2021.



**Michael Wedgwood**  
 Managing Director  
 BWP Management Limited  
 Responsible entity for BWP Trust

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