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Modern Slavery Statement 2022

1. Introduction

This Modern Slavery Statement is made in accordance with the *Modern Slavery Act 2018 (Cth)* and covers the activities of Bowen & Pomeroy Pty Ltd ABN 78 004 174 887 and its related bodies corporate (collectively referred to as **Bowens**). This policy sets out actions taken by Bowens to address modern slavery and human trafficking risks in our business and supply chain for the financial year ending 30 June 2022.

This is our third statement and describes our actions over the past year to strengthen our policies and our continued efforts to detect and ensure we have an appropriate response to those risks.

2. Our Structure, Operation and Supply chains

The Bowens group includes 16 Bowens stores and a warehouse throughout Melbourne and Regional Victoria, offering an extensive range of building materials, hardware, and on-site hire products suitable for all stages of the building process. Also included is Timbertruss, Australia's leading prefabricated manufacturer, specializing in Roof Trusses, Wall Frames, Posi Struts and Cassette Floor Panels, with operations in Victoria and Queensland.

Our supply chain includes trading stock and manufacturing inputs that are sourced widely within Australia and a smaller portion sourced overseas, including China & Malaysia. Staff are employed across Victoria and Queensland, and services are procured for various operational needs including but not limited to IT, marketing, hospitality, travel and transport, postal, and building and maintenance services.

3. Identifying and addressing risk - Employees

Bowens takes its employment compliance obligations seriously. We have robust policies and processes in place to ensure compliance with all legislation and industrial instruments. Bowens has two Enterprise Agreements in place that govern two separate sites in Victoria. These Enterprise Agreements determine the terms and conditions of employees who fall within the scope of coverage. The remainder of our staff are covered by a combination of Federal Awards and the National Employment Standards contained in the Fair Work Act.

Bowens conduct regular audits to ensure compliance with all applicable industrial instruments. As well as that, Bowens have comprehensive company policies in place which are regularly reviewed and updated. Staff receive training on all applicable Bowens policies.

4. Identifying and addressing risk - Supply Chain.

Following an initial review of our supply chain, we have identified that there exists the potential for modern slavery in certain higher risk geographies. This includes a small number of direct overseas suppliers, and second and third tier suppliers based overseas. The potential for risk is also identified in industries from which we procure services within Australia, that may have higher proportions of high-risk business models, such as transport, hospitality and building maintenance.

5. Actions taken to address risk

During the reporting period, the Bowens Modern Slavery Risk management team has continued to ensure our board, senior management and Merchandising team are aware of our obligations to address Modern Slavery risk in our Supply Chain and has provided training to new members of those groups throughout the year. We have continued to progressively roll out our Modern Slavery questionnaire, and Modern Slavery due diligence and acknowledgement form to our existing supply chain, in addition to ensuring all new inventory suppliers complete this process prior to commencing our trade with them.

While we did not identify any incidents or risks of modern slavery in our supply chain, Bowens takes its responsibility seriously and will continue to further review and strengthen our policies and processes, continue to undertake staff risk management training and further rollout our supplier questionnaire and acknowledgement form to our supply chain.

6. Assessing the effectiveness of our actions

Bowens Modern Slavery Risk management team has continued to meet regularly to plan and implement the continued strengthening of our policies and processes to identify and appropriately address Modern Slavery risk, undertake ongoing audits on the effectiveness of those processes and update when required. 21% of all our purchases during the year were covered in the rollout of our Modern Slavery questionnaire and Due diligence and Acknowledgment form, as at 30th June 2022. Our entire senior management team and all senior members of our Merchandising team have undertaken Modern Slavery training to date. We recognize that this review and assessment of effectiveness is ongoing and will broaden and strengthen over time.

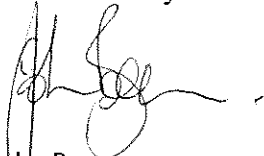
7. Consultation with entities owned or controlled

Bowens has a small subsidiary formed in India in July 2020 for the provision of design services. As this subsidiary is still in its infancy, no consultation was undertaken in the preparation of this statement. Consultation will occur during the next reporting period.

8. Approval

This Modern Slavery Statement was approved by the Board of Bowen & Pomeroy Pty Ltd.

Yours faithfully



John Bowen
Managing Director

Date 17th November 2022