Barbeques Galore Pty Ltd Modern Slavery Statement 2024



Introduction

Barbeques Galore Pty Ltd is committed to limiting the risk of modern slavery within its own business, within its supply chains or through any other business relationships. This statement, which is intended to meet the requirements of section 13 of the Modern Slavery Act 2018 (Cth), outlines the steps taken by Barbeques Galore during the past year to seek to minimise the risk of modern slavery occurring in its business and its supply chains.

1. Identity of the reporting entity

Barbeques Galore Pty Ltd (ACN 008 577 759) and its subsidiaries

A2/350-374 Parramatta Rd, Homebush West NSW 2140

2. Structure, operations and supply chains of the reporting entity

Barbeques Galore Pty Ltd is an Australian retailer and wholesaler of Barbeques and Accessories, Outdoor Furniture, and Heating products, directly employing 494 people in the operation of its retail store network, and supply of domestic and international wholesale customers. All divisions of the company are coordinated and operated from the corporate head office located at A2/350-374 Parramatta Rd, Homebush West NSW 2140.

The operational areas of the business are as follows:

Retail store network

64 company owned stores, and 27 franchisees and licensees located across Australia. In addition to physical stores, the company also operates an online store which offers home delivery to all areas of Australia, and a click and collect service through the store network.

Wholesale distribution business

The company operates wholesale distribution businesses in Australia and New Zealand, supplying products to a number of independent and national retail customers, shipping goods from distribution centres in Melbourne, Brisbane, Sydney, Perth, Adelaide, and Auckland.

Export business

Some of Barbeques Galore's exclusive products are exported to customers in several countries, including Thailand, Singapore, Italy, and Israel. These products may either be dispatched directly from the company's contracted manufacturers in China, or from one of its Australian distribution centres.

Supply chain and distribution

A significant proportion of products sold across all divisions are sourced directly from overseas manufacturers and produced under the company's own brands. These products are predominantly sourced from China, Vietnam, and Indonesia. Other products are purchased from local distributors, manufacturers and wholesalers based in Australia.

Most products are shipped from the country of origin directly to one of the company's distribution centres which are operated by 3rd party logistics partners, located in Melbourne, Sydney, Brisbane, Perth, Adelaide and Auckland. From these distribution centres, products are then shipped to the store or customer via a road transport contractor.

Support Office Operations

The majority of head office activities are completed in the Support Office facility located in Homebush, NSW. There are additional team members working as part of the support office team who conduct their duties at store locations around the country, and also remotely away from company locations. In addition to the Australian operation, some administrative support activities are also completed through Business Process Outsourcing providers based in the Philippines.

3. The risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls

The company engages a number of overseas manufacturers to produce products on its behalf, and other internationally located service providers to perform activities on behalf of the company. These arrangements are subject to increased risk of the following:

- 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.

Within the company's domestic operations, the following areas are also subject to increased levels of risk:

- Compliance with employment conditions, standards and workplace health and safety by independently owned and operated Franchisee and Licensee stores.
- Compliance with employment conditions, standards and workplace health and safety by transport and logistics service providers engaged by Barbeques Galore.

4. 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

Implementation of Modern Slavery Policy

The company implemented a Modern Slavery Policy in November 2020, outlining requirements for all employees, suppliers, directors, officers, agency workers, contractors, consultants or other third-party representatives engaged by the company. The policy outlines the company's approach to identifying, investigating and addressing any modern slavery practices, including the conduct of risk assessments, auditing, and completion of training for its employees in the identification of modern slavery practices.

Barbeques Galore expects that all who have, or seek to have a relationship with Barbeques Galore to familiarise themselves with the company's Modern Slavery Policy and to act in a way that is consistent to its values. Barbeques Galore requires that all suppliers fully comply with its Modern Slavery Policy, or are taking verifiable steps towards full compliance.

Additional audit requirements for overseas manufacturers

The company has introduced the requirement for overseas manufacturers engaged directly by the company to provide regular independent audit reports measuring the manufacturers compliance with relevant UN International Labour Organization conventions.

As of June 23rd 2024, 94% of products sourced for the company's own brands are from suppliers who have provided current independent audits, which has decreased from 96% at the same time last year. The company continues to work on establishing independent factory audits with all suppliers, or to transitioning away from those suppliers unable to provide current independent factory audits.

Training for key employees

Employees engaged to complete audits with third party logistics providers, or with Licensees and Franchisees have also received additional training to support the identification of non-compliance with employment conditions and workplace standards.

To increase awareness and support proactive identification of modern slavery risks within the company's supply chain, key employees who work with overseas factories also periodically complete additional training.

Business Processing Outsourcing arrangements

Where internationally based service providers perform activities on behalf of the company, the company requires that these activities are completed only through partners with appropriate anti-slavery policies and assessment frameworks in place to measure compliance with these policies.

5. How the reporting entity assesses the effectiveness of these actions

Trade partner factory audit register

Copies of current independent audit reports from overseas manufacturers are maintained in a central file. Where a factory is unable to meet the company's requirements or achieve an acceptable standard in the independent audit, the company will initiate steps to cease doing business with that overseas manufacturer.

Physical visits by company representatives

As part of normal business activities, company representatives routinely visit international supplier locations to review performance across a range of areas, including compliance with our modern slavery policy. Instances where potential breaches of workplace safety or working conditions are identified are initially raised with the supplier, and also reported internally for escalation to senior management where required.

Company Whistleblower Policy

The company has a Whistleblower Policy which is intended to ensure that concerns regarding unethical or illegal practices, including modern slavery concerns, can be reported. These reports can be made anonymously via an independently operated Whistleblower hotline. Whistleblowing protection processes are in place to ensure that the anonymity of people making whistleblowing reports, as required by the Whistleblower Protection Act. Where issues are investigated and substantiated, Barbeques Galore will take appropriate action.

Inclusion of Modern Slavery risks within the company's corporate risk register

Modern slavery risks are identified on the company's corporate risk register, providing additional oversight of the key risk areas and control measures by the company's senior executives and company directors. The risk register is periodically reviewed and updated, with any new risks or control measures set in place as required.

6. The process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)

All subsidiaries of Barbeques Galore Pty Ltd are wholly owned and operated as a single consolidated entity. Therefore, any control measures, policy settings or auditing processes set in place apply consistently across all subsidiaries and divisions of the company.

7. Any other relevant information

Not applicable

Approval of this statement

This statement was approved by the board of Barbeques Galore Pty Ltd which is the principal governing body of Barbeques Galore Pty Ltd on the 9th of October, 2024. This statement is signed by Angus McDonald in his role as member of the Board of Directors on the 9th of October, 2024.

Angus McDonald Director 9th October, 2024.