



2020 Modern Slavery Statement for BSR Group

BSR Group (**BSR**) is made up of BSR Australia Ltd (ACN 122 529 695) and its wholly owned subsidiary BSR Franchising (ACN 122 556 094).

BSR is a franchisor operating in the home living, electrical, kitchen, bathroom and furniture, industry and provides services to its franchisees and associated retailers, and to a lesser extent some product for re-sale. There are over 200 independent retail businesses across Australia associated with BSR. BSR itself has approximately 100 employees at its headquarters located at Eagle Farm Brisbane, and its corporate stores at Underwood and Hervey Bay in Queensland.

BSR opposes slavery in all its forms. This statement, which is intended to meet the requirements of section 13 of the *Modern Slavery Act 2018* (Cth) and section 24 of the *Modern Slavery Act 2018* (NSW), outlines the steps taken by BSR during the financial year ending 31 March 2020 to seek to minimise the risk of modern slavery occurring in our businesses or their supply chains.

BSR has an annual turnover exceeding \$100M. To find out more about the nature of our business, you can visit <https://www.bsrgroup.com.au/>.

Our commitment

BSR is committed to taking all reasonable steps to ensure that there is no modern slavery in our supply chains or in any part of our business and acknowledge our role and responsibility in seeking to safeguard human rights through ethical and sustainable business practices.

Our direct import product range consists of upholstered and timber furniture along with electrical appliances and front of wall plumbing and is sourced from China, Vietnam, Thailand and Malaysia. This allows us to focus our oversight over reviewed, approved and discrete geographic areas.

Our wider supply chain relationships include local wholesale importer and reseller businesses. We strive to ensure these suppliers meet the required standards and demonstrate consistency in ethical practices throughout their supply chains.

Where possible, we engage suppliers who have relationships with existing suppliers so that we can contain our supplier network and improve consistency in ethical practices throughout the supply chain.

Potential modern slavery risks

We have identified the following modern slavery risks which we may be involved with directly or indirectly through our business activities or relationships:

- 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.

Our governance of modern slavery risks

BSR expects all those in our supply chain to comply with our zero tolerance to slavery. To identify and mitigate risk, BSR has the following systems in place:

Modern Slavery Policy

We have developed a Modern Slavery Policy which sets clear objectives around our supplier engagement process, grievance mechanisms and supplier collaboration.

Compliance Questionnaire

We require our business partners to complete an annual Compliance Questionnaire outlining any modern slavery in their operations and supply chains and actions to address those risks.

We expect our suppliers to have anti-slavery policies or equivalent and request copies of these documents at various intervals (for example, at contract renewal, or annually for longer contracts). Where possible, we have incorporated modern slavery clauses into our contracts with third party supplier manufacturers.

Reporting suspicions of slavery

All personnel, and other eligible whistleblowers can report any suspicions of breaches of the Modern Slavery Policy through the procedures set out in the BSR Whistleblowing Policy, which is available on our public website.

Training

The BSR executive management team is responsible for compliance in managing supplier relationships.

All personnel undergo an induction process where our policies, procedures and expectations are outlined. In addition, training on our Modern Slavery policy and incident reporting is provided at least annually.

Key performance indicators and assessing the effectiveness of our actions

BSR has the following key performance indicators in place to measure its effectiveness in taking all reasonable steps to reduce the risk of modern slavery:

- A review of modern slavery statement and policies;
- Communication and personal contact with the supply chain to ensure their understanding of, compliance with our expectations;
- Review of supplier responses to annual Compliance Questionnaire regarding modern slavery risks and mitigation;
- Spot check audits of supplier manufacturer factories located overseas (where possible – see COVID-19 Pandemic Risk Review).

COVID-19 Pandemic Risk Review

In response to the COVID-19 pandemic, BSR is requiring supplier manufacturers to complete a COVID-19 questionnaire, outlining the steps they have taken to protect their vulnerable workers from COVID-19, to ensure workers are not underpaid or overworked due to the pandemic, and systems in place to support the safe return of migrant workers in the event of a shutdown of factories due to COVID-19.

Due to the Government imposed travel restrictions during the pandemic, it has not been possible for BSR staff to attend factories of supplier manufacturers in order to conduct routine spot audit checks, however, BSR is continuing to use its best endeavours to undertake alternative due diligence on these overseas manufacturers to monitor supply chain exposure to modern slavery risks.

This statement was approved by the Board of Directors on 27 August 2020.



Garry Thyer
Chairman of the Board