



BX BUNKA AUSTRALIA

Bunka Shutter Group



Modern Slavery Statement

2024

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Introduction

On behalf of BX Bunka Australia Pty Ltd ACN 124 163 793 (**BX**), I am proud to submit our Modern Slavery Statement for the reporting period 1 January 2024 – 31 December 2024 (**Reporting Period**), which has been prepared in accordance with the requirements of the *Modern Slavery Act 2018* (Cth) (**Act**).

Modern slavery is a significant global concern and in the broadest sense, incorporates any circumstance of exploitation, including, but not limited to, slavery, servitude, forced labour, child labour, human trafficking, abuse of power, threats, withholding of wages and deprivation of freedom.

The BX Group is committed to vigilance to the risks of modern slavery in our operations and supply chains and actions to address those risks. This statement was approved by the Board of BX and is signed by me on behalf of the Board.

Signed,



CEO & Director,
BX Bunka Australia Pty Ltd



Our Business & Structure

BX is a subsidiary of Bunka Shutter Co. Ltd (**Bunka Shutter**), a Japan based entity engaged in the manufacturing, supplying, installing and servicing of residential and commercial doors. The entities owned or controlled by BX undertaking those activities in Australia are:

➔ Steel-Line Garage Doors Australia Pty Ltd	52 124 164 003
➔ Steel-Line Garage Doors (WA) Pty Ltd	41 092 508 499
➔ Steel-Line Installations Australia Pty Ltd	97 128 107 344
➔ Dynamic Door Service	51 109 750 950
➔ Arco (QLD) Pty Ltd	27 108 275 896
➔ Max Door Solutions Pty Ltd	82 146 466 828
➔ Doorworks Australia Pty Ltd	69 152 593 167
➔ Sprint Roller Shutters Pty Ltd	73 634 410 718

In this statement:

- the above entities are collectively referred to as the **BX Subsidiaries**.
- BX and the BX Subsidiaries and collectively referred to as the **BX Group** or “**we**”, “**us**” or “**our**”.

Our Operations



BX is headquartered in Brisbane, Australia and provides a wider global presence for Bunka Shutter through operations across Australia and further afield.

The BX Group collectively employs 602 staff across Australia.

All products are manufactured in Australia by BX Subsidiaries predominantly from locally sourced materials.

Our operations span production, sales, logistics, research and development and direct employment.

Through services including marketing, financial control, people and culture, procurement and IT systems and support (**Corporate Services**), BX supports the BX Subsidiaries.

Our Supply Chains

During the Reporting Period, the BX Group has engaged directly with more than:

- 1,569 suppliers in thirteen (13) countries of materials and pre-assembled products used in our operations.
- 315 subcontractors across Australia.

The BX Group's largest category of spending was for locally sourced steel coil.

**1,569
SUPPLIERS**

**315
SUB
CONTRACTORS**

**13
COUNTRIES**

Potential Risks

➔ Risks of modern slavery practices in our operations

As our direct workforce, resellers and installers are based almost exclusively within Australia, we have determined that the risks of modern slavery within our operations and supply chains are **low**.

BX is attune to risks of modern slavery practices in its operations and supply chains including risk of exploiting labour through the setting of unrealistic cost targets and delivery timeframes.

Through learning and development initiatives BX continues to raise awareness of modern slavery and maintains open communication with suppliers about modern slavery practices and any concerns.

BX has a dedicated People and Culture team to ensure compliance with all workplace laws and best practice and is proud of the culture and vigilance that exists within the BX Group.

BX places a focus on work-life balance. BX offers a comprehensive range of wellbeing initiatives to keep our team healthy, happy and productive and is committed to programs that enhance the physical, mental and financial health of every employee of the BX Group.

Potential Risks

➔ Risks of modern slavery practices in our supply chains

Steel coil is the most utilised material in the operations of the BX Group and is procured predominately from an Australian supplier, BlueScope Steel, which operates a global supply chain.

The BX Group procures motors, automation components, hardware and storage equipment from overseas suppliers. While the majority of our packaging is procured locally, some packing materials including cardboard and stretch wrap are also procured from overseas suppliers.

The BX Group reduces risks of modern slavery practices in its supply chains by preferring suppliers in countries without a known prevalence of modern slavery.

Before engaging with suppliers, the BX Group conducts due diligence and post engagement monitors for reports and indicators of modern slavery practices in the operations and supply chains of its suppliers.



Actions

Actions we take to assess and address risks of modern slavery practices

BX continues to take steps to improve on and implement measures to increase employee awareness and engagement regarding modern slavery.

In this Reporting Period, BX undertook in-person audits, engaged in the ongoing education of its various teams at the local level about its obligations under the Act and the actions it takes to identify and address the risks of modern slavery and how it assesses and aims to improve those measures.

BX recognises its responsibility, as one of the leading companies in the garage door manufacturing industry, to support a balanced and collaborative approach to all aspects of sustainability.

Our objective is to ensure our employees, suppliers, agents, sub-contractors and other associates place significance on human rights and sourcing labour, materials and products in a sustainable, ethical and responsible manner. Any behaviour or actions under the broad sense of modern slavery will not be tolerated.

To facilitate this, our total partnership approach engages our leadership teams with our customers and suppliers to address the risks of modern slavery and strive to demonstrate best practice. Our commitments show that we are on the right track.

Whilst the noted improvements, listed below, are continuing to develop and improve, we anticipate that as these initiatives will become more established, and subsequently the effects will be more apparent.

The BX Group does not engage with suppliers unwilling to provide visibility of risks of modern slavery practices.

We require our suppliers to use our auditing framework for their supply chain allowing us to meet our commitment to increased due diligence. A core competency of the business is our partnership with suppliers. This assures we can have an open and transparent relationship. We have in recent years rolled out additional auditing systems to local suppliers as well as international partners, which we have found has been an effective tool to manage compliance of our supply chain partners with the Act. Further, we have now incorporated the relevant modern slavery compliance requirements into our tender process which we have found has had no detrimental impact to our process, with all vendors willing to complete and meet requirements.

During the Reporting Period, senior managers of BX visited some international suppliers to complete in-person audits and to ensure there is no evidence of non-compliance with modern slavery laws. Whilst most suppliers reported pleasing results, risks were identified. Factories demonstrated varying levels of compliance with modern slavery standards, safety protocols, and automation investment.

Higher-risk factories exhibited poor machine guarding, ventilation issues, and heavy reliance on manual processes, increasing worker exposure to hazards.

Lower-risk factories invested in automation, workplace organisation, and safety measures, reducing operational risks.

Common challenges included inconsistent adherence to 5S principles, limited hearing protection, and inadequate air quality management.

Over the next 12 months, we aim to complete further in-person audits of our overseas vendors to ensure adherence to guidelines and recommendations previously provided.

ACTIONS

- Strengthen audit frequency for medium to high-risk factories.
- Engage suppliers in collaborative safety improvements and modern slavery compliance training.
- Prioritise investments in automation and infrastructure to enhance worker safety.
- Implement corrective action plans for factories with repeated compliance gaps.
- Monitor high-risk suppliers for ongoing adherence to ethical and operational standards.

BX has mapped its supply chain, including all existing and potential suppliers, from high risk countries.

BX has assessed the risks throughout its supply chain by conducting onsite audits.

- We are aware that we purchase some raw materials from high risk rated countries. As an example, we have identified China as a country that may continue to present some challenges.
- The geographical distance from Australia and cultural differences that exist in China make it particularly difficult to assess compliance and gain an understanding of their statutory regulation and how that compares to Australian regulation.
- This has been previously identified and robust audit systems were put in place (such as site visits to vendors overseas for inspection and reporting of the working conditions).

⊕ Processes & Procedures

We are committed to a process of upholding practices against modern slavery or human trafficking in our supply chains or in any part of our business.

We commit to acting ethically and with integrity in all our business relationships. Our commitment is also supported by our initiatives, namely:

ACTION ITEM 1

- Systems that allow workers to anonymously report modern slavery concerns using our Whistleblower Policy; and

ACTION ITEM 2

- Company grievance procedures and Human Rights Policy provide a medium for reporting, investigation, action and resolution.

ACTION ITEM 3

- All senior managers, key permanent employees and directors will continue to undergo annual modern slavery awareness training, which we have found has consistently and effectively kept all relevant persons informed of the importance of modern slavery laws while also ensuring compliance with the relevant provisions.

➔ How we assess the effectiveness of actions we take

BX monitors its ability to follow the protocols it establishes for high risk rated countries. In the event BX is unable to follow that protocol, it has required overseas suppliers to complete questionnaires to enable BX to gather data about working conditions, identify modern slavery risks, and confirm supplier standards.

The mapping of our supply base at BX sites has improved transparency, which is pivotal in maintaining control and confidence. Through the auditing process, we have gained a better understanding of our supply chain beyond just the first tier.

We have found that since these measures have been implemented BX has been able to effectively and efficiently address modern slavery risks, however we will continue to monitor the effectiveness of these measures by regular engagement with key areas and oversight of senior management review and develop our frameworks and processes to improve the effectiveness of our actions.



Our Process of Consultation

BX has and continues to engage in extensive consultation with each member of the BX Group for the purpose of developing this statement and ensuring awareness of the actions needed to be taken to identify, assess and address modern slavery risks in our operations.

Specifically, BX has undertaken the following consultation activities, and intends to do so annually:

➔ Senior Management

- Consultation with senior management in relation to the reporting requirements of the Act and information relevant to addressing those requirements.

➔ Subsidiaries

- Consultation with key team members of the Subsidiaries in the provision of Corporate Services.

➔ Comprehensive Reporting

- In doing the above, BX gains input from all key members across the Subsidiaries to compile a comprehensive report and derive action items for the year ahead.