



Best&Less Group

# MODERN SLAVERY STATEMENT

**BABY**  
PREMATURE - 24 MONTHS

FINANCIAL YEAR 2020

**Best&Less Postie**

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## Acknowledgement

Best & Less Group acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters, and community. We pay our respects to them and their cultures, and to Elders both past and present.



## Registered Office

657-673 Parramatta Road  
Leichhardt NSW 2040

# INTRODUCTION

Family is at the heart of the Best & Less Group and this translates to every aspect of our business and the relationships we create with our customers, employees, suppliers, and partners. We believe in the importance of investing in quality and safety while undertaking a genuine effort to lift social, environmental and community outcomes. It is a global responsibility we can all take on together.

Modern slavery is an egregious violation of fundamental human rights, affecting 40.3 million people with 24.9 million people held in forced labour.<sup>1</sup> We have zero tolerance for slavery and vigorously support an individual's right to live and work freely. We are committed to continuously improve our systems, processes, and interventions to mitigate risks of and prevent modern slavery in our operations and our supply chain. Where actual or potential situations of modern slavery are identified we will always act in the best interests of the potentially affected worker.

This Statement has been published in accordance with the Modern Slavery Act 2018 (Cth). It identifies the steps taken by Best & Less Group (Best & Less Group Pty Limited ABN 80 081 408 791), during the year ending 30 September 2020, to prevent modern slavery in its business and supply chains.

The following Best & Less Group subsidiaries are considered reporting entities:

**Best&Less** Best & Less Pty Ltd  
ABN 29 003 724 696 (Australia)

**Postie** Postie Plus Group Ltd  
NZBN 9429041282472 (New Zealand)

The management, buying and logistics teams of both reporting entities were consulted in the preparation of this report. Best & Less Group has another subsidiary B&L IP Pty Ltd (ACN 642 843 089) however it does not participate in trade other than as the owner of various IP belonging to Best & Less Group.

This statement has been made on behalf of the above entities and has been reviewed and approved by the Best & Less Group Board.



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<sup>1</sup> International Labour Organisation 'Forced Labour, modern slavery and human trafficking' (Web page, accessed 11 January 2021) < <https://www.ilo.org/global/topics/forced-labour/lang--en/index.htm>>.

# CHIEF EXECUTIVE OFFICER'S MESSAGE

It is incredulous to think that in 2020 an estimated 40.3 million people around the world are in some way enslaved, with 24.9 million victims of forced labour, either through government sanctioned imposed labour, private enterprise and or sexual exploitation. One in four of these victims are children.

Best & Less Group is a business with family at its core. As one of Australia & New Zealand's largest retailers of family clothing we are committed to safeguarding human rights across our operations and supply chain. We have zero tolerance for modern slavery. It is essential, therefore, that we have a robust and concise approach to identify, report, address and stamp out any exploitation of vulnerable individuals or groups with whom we may be involved directly or indirectly. We recognise that this is significant for our team, customers, stakeholders, and business.

While the Group has always endeavoured to do the right thing, a transparent approach to ethical sourcing, with a particular focus on worker's rights, was established in 2014. Essential to managing the risk of modern slavery or poor working conditions is establishing a well-known and well inspected number of merchandise manufacturers, whom, like us, are committed to constant improvement in business practices.

One of our key controls is the decision to work with only a small number of manufacturers as this provides us with the opportunity to work collaboratively and communicate regularly with them. It also allows us to audit every tier one merchandise manufacturer bi-annually. This year we conducted 217 audits and we will continue to be vigilant in this area. Our factory audits, inspections and corrective action plans are delivered through third parties to minimise any opportunity for corruption.

This year we also focused on educating our merchandise manufacturers and suppliers on our Ethical Sourcing Code and trading terms, translating into various local languages to ensure clarity, and understanding of our requirements.

We proudly made a commitment to ensuring a living wage for all workers throughout our entire supply chain by 2025 and are working diligently to deliver on this commitment. We have also terminated trade with suppliers who fail to comply with our Ethical Sourcing Code and will continue to identify, assess, and respond to any risk of exploitation throughout our supply chain.

In FY21 we will have established a grievance hotline for workers within our direct merchandise manufacturing operations to ensure an accessible mechanism for workers to raise complaints. We are taking our responsibility to ensuring that the standards we sign up to and communicate are acted upon through real and meaningful outcomes.

Consistent with our approach to all commitments we make, Best & Less Group will continue to learn, act, and improve our approach to identify, manage and mitigate any risk of modern slavery within our operation and our supply chain. Together, as an industry, we can work towards eliminating this egregious practice.



**Rodney Orrock**  
CEO Best & Less



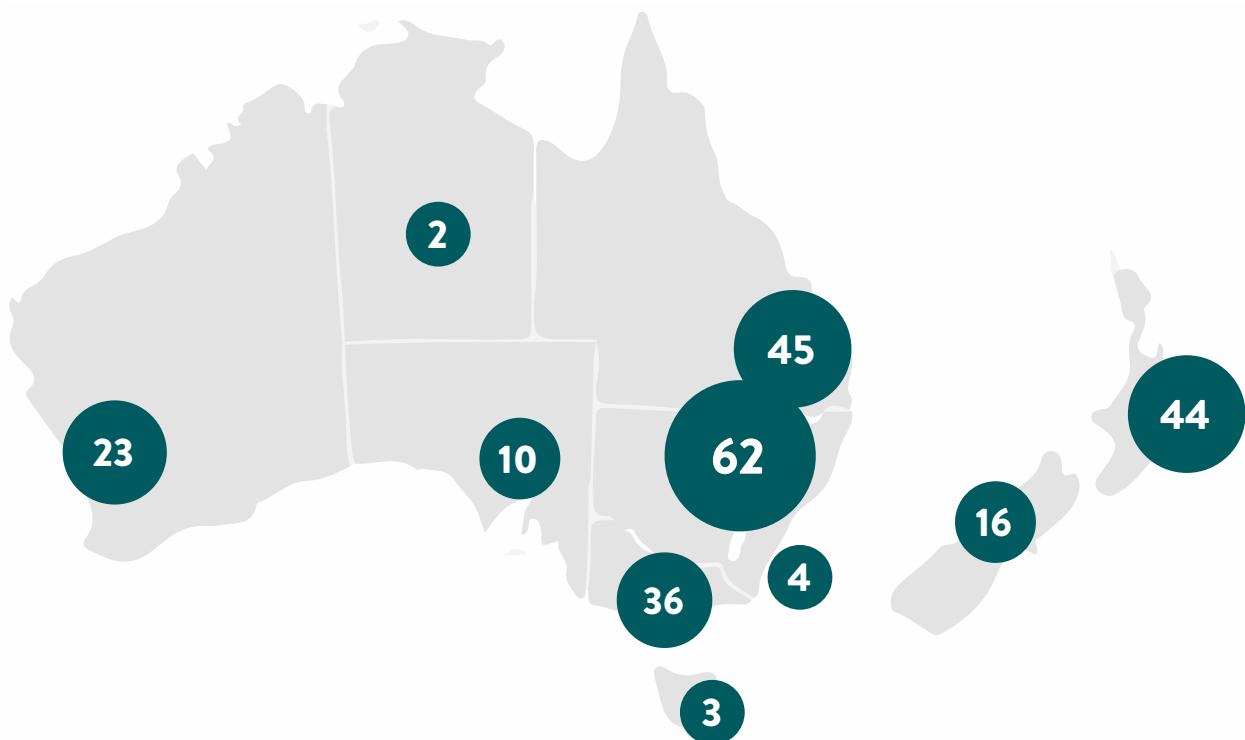
# A MULTI-YEAR FOCUS ON ETHICAL SOURCING

2014....	<b>SEP</b>	Launched the <i>Ethical Sourcing Code</i> , Ethical Sourcing Policy and a comprehensive supplier manual.
2015....	<b>FEB</b>	Zero tolerance introduced for breaches of the Ethical Sourcing Code.
	<b>JUN</b>	Ethical Sourcing Code published on Best & Less website.
	<b>AUG</b>	Commenced program to develop specific ethical, technical, social and environment audits protocols for manufacturers.
2016....	<b>FEB</b>	Best & Less bans the use of cotton from Uzbekistan.
	<b>JUL</b>	Sustainability Committee meets for the first time.
2018....	<b>AUG</b>	Compulsory audits of all factories introduced with Group Global Sourcing offices to assist with training and conducting audits.
	<b>NOV</b>	Supplier workshops established to drive awareness and understanding of the Ethical Sourcing Code.
2019....	<b>MAR</b>	China Audits Management Office opens in Shanghai with a dedicated compliance team member.
	<b>JUN</b>	Ethical Sourcing Code translated into Mandarin and Bengali, with all factories displaying the code on the factory floor.
	<b>OCT</b>	Merchandise manufacturers transparency list published on Best & Less & Postie websites.
	<b>NOV</b>	Commitment with all direct merchandise manufacturers to pay a living wage by 2025.
2020....	<b>JAN</b>	Merchandise manufacturers attend supplier workshops which include introducing 'Living Wages'.
	<b>JUL</b>	New Merchandise Supplier Agreement includes clauses addressing modern slavery.
	<b>SEP</b>	217 direct suppliers completed compulsory third-party audits.
	<b>DEC</b>	Dedicated Workers Grievance Hotline launched and promoted to audited merchandise manufacturers.



# SECTION 1: BUSINESS STRUCTURE, OPERATIONS AND SUPPLY CHAIN

## — OUR NETWORK AND OPERATIONS —



**2**  
Distribution centres in Sydney & Auckland

**3**  
Office locations in Sydney, Auckland, and Shanghai

**245**  
stores

**26,000**  
factory orders with over 9,000 styles and approx. 80 million individual items

**930,000**  
online orders shipped

Over **5,000 TEU**  
shipping containers from Asia per year

## OUR TEAM

**4,069**

total team members



**2**

Enterprise Bargaining Agreements covering 63.3% of staff

**3,900**

directly employed

**169**

contractors

**5.5%**

team members are members of a trade union

## OUR CUSTOMERS



**457,300**

customers on average per week

**730,700**

online visits per week

**1,473,000**

Reward Program Members

## OUR SUPPLY PARTNERS

**3,704**

total suppliers



**3,548**

suppliers of non-trade goods and services

**156**

merchandise manufacturers from 188 audited factories across 6 countries

**28**

concession brands

## OUR ETHICAL SOURCING PROGRAM

**100%**

of non-concession merchandise manufacturers signed Supplier Code of Conduct



**6**

merchandise manufacturers workshops with a total of 250 participants

**217**

merchandise manufacturers audits conducted in FY20

**Fortnightly**

workshops for buyers



## OUR BUSINESS

Best & Less Group is a leading retailer and manufacturer of value apparel, footwear, home and accessories for the family and includes the brands Best & Less in Australia and Postie in New Zealand. We employ 4,069 team members serving around 23 million customers in 245 stores and online each year.

Key functions of our operations include:

- Retail operations
- E-commerce
- Product manufacture and sourcing
- Supply chain logistics
- Marketing and Media
- IT, Data and Administration.

## OUR SUPPLY CHAIN



Our supply chain is global, working with more than 3,700 direct suppliers across both merchandising and non-trade goods and services.

Merchandise suppliers produce the diverse range of products that we sell in our stores and online including apparel, footwear, swimwear, home wear and accessories. Merchandise is classified into two categories:

- Owned brands and directly licensed products designed and manufactured by Best & Less Group which include apparel, footwear, and accessories.
- Concession brands which are well known brands such as Bonds, Tradie and Underworks that are stocked in our stores.

Ninety-nine per cent of our Owned Brands are sourced and manufactured in China, Bangladesh, India, Pakistan, Vietnam, and Cambodia, produced by 156 manufacturing partners in 188 audited factories. These manufacturers source fabrics mostly local to their region including cotton, cotton-blend, viscose, and synthetic polyester.

A list of our [merchandise manufacturers and factory locations](#) is published on our websites and is updated regularly.

156 MANUFACTURERS WITH 188 AUDITED FACTORIES					
UNITS	73%	19%	6%	.09%	.01%
FACTORIES	CHINA	BANGLADESH	INDIA	PAKISTAN	VIET/CAMB
<b>FABRICS</b> 	<ul style="list-style-type: none"> <li>• SYNTHETIC POLYESTER</li> <li>• TECHNICAL</li> <li>• MAN MADE</li> <li>• VISCOSE</li> <li>• COTTON</li> </ul>	<ul style="list-style-type: none"> <li>• COTTON</li> <li>• COTTON BLEND</li> <li>• VISCOSE</li> </ul>	<ul style="list-style-type: none"> <li>• COTTON</li> <li>• COTTON BLEND</li> <li>• VISCOSE</li> </ul>	<ul style="list-style-type: none"> <li>• COTTON</li> </ul>	<ul style="list-style-type: none"> <li>• COTTON</li> <li>• MOSTLY IMPORTED</li> </ul>
<b>SPECIALITY</b> 	<ul style="list-style-type: none"> <li>• WOVEN / KNIT</li> <li>• OUTERWEAR</li> <li>• SLEEPWEAR</li> <li>• UNDERWEAR</li> <li>• SWIM</li> <li>• FOOTWEAR</li> <li>• ACCESSORIES</li> </ul>	<ul style="list-style-type: none"> <li>• WOVEN / KNIT</li> <li>• OUTERWEAR</li> <li>• SLEEPWEAR</li> </ul>	<ul style="list-style-type: none"> <li>• WOVEN / KNIT</li> <li>• OUTERWEAR</li> <li>• SLEEPWEAR</li> <li>• HOME</li> </ul>	<ul style="list-style-type: none"> <li>• TOWELLING</li> <li>• HOME</li> </ul>	<ul style="list-style-type: none"> <li>• OUTERWEAR</li> <li>• SWIM</li> </ul>

Non-Trade suppliers (excluding rent and utilities) provide goods and services to support our business with the biggest categories by spend including transport and logistics (28%), marketing and media (20%), labour hire (6%), software & IT (6%), cleaning services (4%), property repairs and maintenance (2%), and shop fitouts (2%). We will focus on these suppliers in the FY21 reporting period.



# SECTION 2:

## FY20 GOVERNANCE AND POLICIES



The Best & Less Group Board approves the Ethical Sourcing Strategy. Each entity's Board is responsible for monitoring the implementation of the Ethical Sourcing Strategy and reporting to the Best & Less Group Board.

The Group CEO and Executives from each entity are accountable and responsible for implementing the strategy with assistance from the Head of Merchandise Operations and the Sustainability Committee.

The policies and processes that support the Group's day-to-day operations require that universally recognised human rights are respected and safeguarded. Policies which support our modern slavery program include:

- Employee Code of Conduct
- Ethical Sourcing Code
- Whistle-blower policy
- Equal Employment Opportunity Statement
- Employee Assistance Program
- Anti-bribery and Corruption Policy

Best & Less Group is committed to complying with the laws and regulations of the countries in which our business operates. Our policies prohibit any activities involving modern slavery and are committed to the safe and healthy working conditions, including the right to freedom of association and collective bargaining.



## CASE STUDY: COMMITMENT TO A LIVING WAGE

We are committed to paying living wages throughout our supply chain.

Best & Less Group defines a living wage as remuneration earned in a standard work week (no more than 48 hours) by a worker being sufficient to afford a decent standard of living for the worker and her or his family. We have adopted the benchmarks set by the Anker Living Wage Methodology to establish the living wage in regions where our suppliers are located. Whilst our manufacturers pay legal minimum wages or higher, we recognise that in some countries there is a gap between minimum wages and living wages and we are committed to working towards closing this gap. With an initial focus on our direct merchandise manufacturers, this commitment includes:

- Developing and publishing our roadmap to living wages and report on yearly progress.
- Conducting a wage gap analysis to identify the gaps between current wages and living wage benchmarks.
- Reviewing and implementing clear and measurable sourcing standards to reduce downward pressure on wages.
- Utilising a software program to allow us to collect data on living wages, enabling open costings that include separated labour rates and production costs.
- Recognising that the issues around living wages are complex and achieving them will require collaboration between brands, factory owners, managers, government and NGO's and we are committed to working with them to close any gaps we identify.

# SECTION 3:

## RISKS OF MODERN SLAVERY

### OUR OPERATIONS

Best & Less Group has identified the residual risk of modern slavery in our operations as low. The Group employs most of our team members directly on full time, permanent or casual contracts. Labour Hire contractors are employed in our Australian distribution centre. These contractors are directly managed by Best & Less on our premises and paid by the labour hire firm. Contractual obligations with labour hire firms stipulate compliance with Australian laws including payment of award wages and the rights of workers to collectively negotiate.

Best & Less Group's Employee Code of Conduct outlines the expectations of employees and contractors including zero tolerance for workplace harassment, bullying, bribery, corruption discrimination and serious misconduct including worker exploitation. All team members are required to undertake induction training which includes the organisation's expectations outlined within the Employee Code of Conduct.

Around 68% per cent of the Best & Less Group's workforce is covered by Enterprise Bargaining Agreements with the remaining 32% per cent employed via individual agreements. All agreements confer minimum pay, hours of work, break entitlements, deductions and leave entitlements, health and safety, termination of employment and grievances. Best & Less Group recognises the rights of team members to negotiate collectively, with or without the involvement of third parties including unions.

### OUR SUPPLY CHAIN: MERCHANDISE SUPPLIERS

Best & Less Group has zero-tolerance for any form of modern slavery including the use of child labour, forced labour or prison labour in the manufacturing or sale of our garments. We strive for full transparency and do not allow outsourcing or subcontracting unless subcontractors are also audited and approved.

However, we recognise that all products and services carry some risk of modern slavery in the supply chain. Best & Less Group has identified its merchandise manufacturers and their supply chain as carrying the highest risk of modern slavery. In this reporting period, the focus has been to assess the risk with tier one merchandise manufacturers, which predominately operate in high-risk countries including:

COUNTRY	TYPE OF RISK
CHINA	Forced labour, forced child labour, bonded labour, harsh or inhumane treatment, limited or no freedom of association, excessive overtime.
BANGLADESH	Forced labour, migrant labour exploitation, bonded labour, harsh or inhumane treatment, excessive overtime, poor working conditions.
INDIA	Forced labour, migrant labour exploitation, bonded labour, harsh or inhumane treatment, excessive overtime, poor working conditions.
PAKISTAN	Forced labour, forced child labour, migrant labour exploitation, bonded labour, harsh or inhumane treatment, excessive overtime.
VIETNAM AND CAMBODIA	Forced labour, migrant labour exploitation, bonded labour, human trafficking, harsh or inhumane treatment, excessive overtime.

Best & Less Group has a direct relationship with all tier one merchandise manufacturers other than for its Concession Brands, and this allows for active management of these risks. We build long term and lasting relationships with an average length of 10 years and our buying and sourcing teams are in regular contact to ensure fair pricing and realistic production volumes and delivery expectations. We do not allow subcontracting unless approved by the Head of Merchandise Operations and after completion of a satisfactory audit.

A list of all Owned Brand merchandise manufacturers is published on our websites and updated regularly.

There may be a heightened risk of modern slavery among tier two and tier three merchandise suppliers, where visibility is not as clear given the lack of direct relationships. These may include in the provision of raw materials such as cotton and wool, textiles production including yarn, fabric and synthetic fibre production; and in subcontracting arrangements in the manufacturing process.

There is also a heightened parallel risk of modern slavery within the supply chain of our Concession Brands who also manufacture in the locations in which Best & Less Group manufacture. Best & Less Group has engaged with its major Concession Brands to ensure they have similar processes in place to manage modern slavery risk in their supply chains, including obtaining audit reports for their factories.

## OUR SUPPLY CHAIN: NON-MERCHANDISE SUPPLIERS

We also recognise that there is a risk of modern slavery within our non-trade suppliers and have begun investigating and mapping these risks. While some are relatively low risk, such as our media partners, there is higher risk with suppliers providing cleaning services, international freight or fabrication of materials such as the fixturing for our stores. These suppliers are predominantly Australian companies so the tier one risk is reduced, however tier two and three subcontracting in cleaning and freight or with fabrication occurring in overseas jurisdictions carries greater risks. The property services sector also carries risk where tier two and tier three suppliers include cleaning and security services.

Work to assess tier two and tier three merchandise suppliers and work to assess non-trade suppliers will continue in FY21. Both will inform the future workplan.



## CASE STUDY: COVID-19 RESPONSE

At Best & Less Group we have built strong long-standing successful relationships with our manufacturers with good consistent communication.

During the COVID-19 pandemic, it was more important than ever to communicate with our overseas manufacturers allowing us to openly discuss options to ensure we all survived with the heightened level of uncertainty.

All manufacturers were contacted directly, and we agreed to either accept delivery of garments already produced as well as goods in production or in some cases moved or paused orders to a later date to be able to honour our commitment. We only cancelled orders that had not been started, or in a limited number of instances by mutual agreement. Since that time, we also placed additional orders and removed the hold we had on the production of orders.

We spoke directly with all manufacturers to ensure that they could pay their workers and worked through payment plans with them. Bangladesh and India were in extended periods of lockdown and we constantly checked in with our factories to ensure that no additional pressure was placed on workforce expectations during the shutdown periods. We adjusted our order fulfilment dates to accommodate the health and safety needs of the workforce employed to produce our orders.

Factories have now all re-opened and workers in Bangladesh and India are returning to work now as they ease back into a full production capacity. Our factories in China are already back to full production.

# SECTION 4: ACTIONS TAKEN TO ADDRESS MODERN SLAVERY RISKS

To manage the risk of modern slavery, Best & Less Group has in place a rigorous Ethical Sourcing Strategy. Ethical sourcing is a complex matter, that reaches the global retail environment and requires a commitment from world organisations and factory owners themselves to achieve systemic change. At Best & Less Group, the movement towards ethical sourcing is not new, and is something we have worked towards for over six years.

The program includes:

- **Stringent supplier selection** which includes aligning with suppliers who also supply to larger retailers including Walmart, Primark, Next, H&M, Aldi.
- **Ethical Sourcing Code (ESC)** which outlines the code of conduct and policies in relation to social, environmental and standards of compliance that we require from our business partners. The ESC covers thirteen points and each one represents the values of our business. Our code is translated into Chinese and Bengali and is displayed in our factories for all workers to read. The ESC can be viewed on our websites.
- **All new and renewed merchandise supplier contracts** include specific clauses on modern slavery.
- **Onboarding, supplier training and communications** is provided to all suppliers. Onboarding processes include the requirement for all suppliers to sign and agree to abide by the ESC prior to working with us. Suppliers are also provided with regular training either in- person through our office in China or via video conferencing. In FY20 we conducted 6 training sessions with 250 participants. Training included:
  - Living Wages capacity building workshops
  - Ethical Sourcing Code and policy awareness training
  - Compliance and auditing protocols
  - Sustainable Packaging

Furthermore, our team are in regular communications with our suppliers to ensure adherence to the ESC.

- **Our Global Auditing Program** undertaken by an independent third party to review the ethical, social, and environmental factory conditions and mandates alliance to the ESC. Best & Less Group audits all tier one merchandise manufacturers bi-annually and reports to the Board on key measures including the number of manufacturers who are non-compliant, the number of manufacturers with critical breaches, the nature of any critical breaches, what remediation is require, the speed of improvement and what ongoing monitoring is in place. Best & Less Group have a zero tolerance for modern slavery and those suppliers found to have such a breach are immediately terminated and receive no further orders unless they can demonstrate remediation of their processes.

In FY20, 217 tier one merchandise manufacturers were audited with all factories compliant overall. Some areas of improvement were identified including appropriate record keeping, use of safety equipment, compliance to newly introduced legislation and evidence of compliance to the ESC. Corrective actions plans are in place and Best & Less Group are working with suppliers to agreed timelines to achieve the required improvements. The factories we work with were found to be also fully compliant with Social Compliance Initiatives and have passed many other audits such as BSCI, SEDEX, WRAP, Disney, and Walmart.

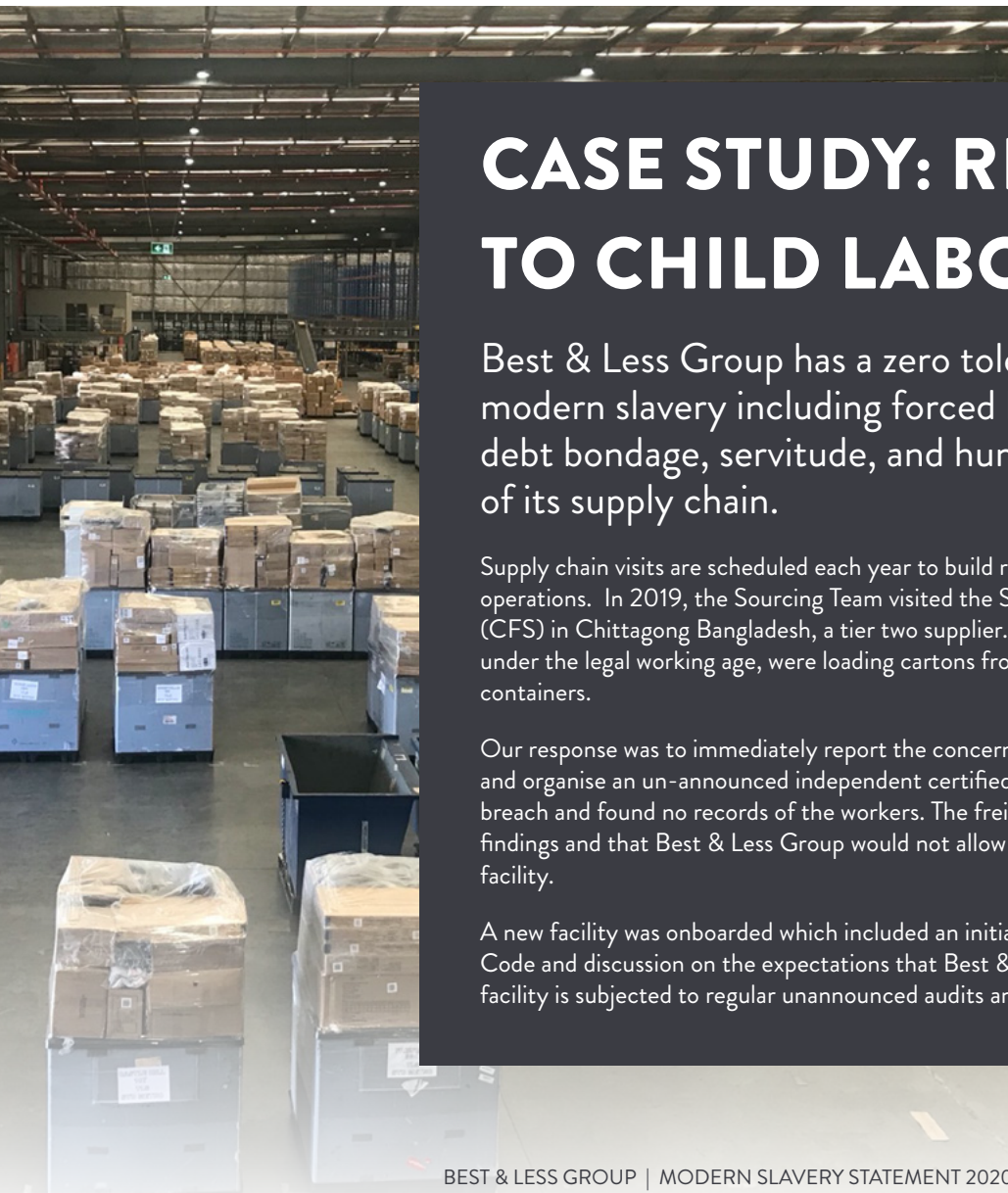
Our aim was to also audit all tier two factories during FY20 however this was put on hold due to the COVID-19 pandemic. This program will be re-initiated once it is safe to do so.



- **In-line and final inspections** are conducted in factories regularly by our team and third party inspectors in country to ensure standards are maintained. If issues are identified, appropriate investigative and remedial actions are taken.
- **Worker Engagement** including interviews and worker voice surveys.
- **Inspections of wage records** and purchasing practices.
- **Company-wide grievance mechanisms** enable employees to report issues as outlined in our Whistle-blower policy and Grievance policy. Team members are encouraged to voice their concerns without fear of retribution and with full confidentiality. In FY21, the Group launched a Worker Voice Grievance Hotline (December 2020) which will enable workers within our direct merchandise suppliers to access similar grievance mechanisms. Best & Less Group has commenced an awareness campaign for all locations in which we operate, including factories posters to ensure workers are aware of and can access this program.

Best & Less Group supports the following globally recognised declarations, principles, and goals:

- Universal Declaration on Human Rights
- United Nations Guiding Principles on Business and Human Rights
- International Labour Organisation Declaration on Fundamental Principles and Rights at Work
- United Nations Sustainable Development Goals
- OECD Guidelines for Multinational Enterprises.



## CASE STUDY: RESPONDING TO CHILD LABOUR

Best & Less Group has a zero tolerance for any form of modern slavery including forced labour, forced child labour, debt bondage, servitude, and human trafficking in any part of its supply chain.

Supply chain visits are scheduled each year to build relationships and understand supplier operations. In 2019, the Sourcing Team visited the Shipping Port and Container Freight Station (CFS) in Chittagong Bangladesh, a tier two supplier. It was observed that children, potentially under the legal working age, were loading cartons from the warehouse into the shipping containers.

Our response was to immediately report the concern to our freight forwarders (tier one supplier) and organise an un-announced independent certified audit. The auditors observed the same breach and found no records of the workers. The freight forwarders were advised of the audit findings and that Best & Less Group would not allow its product to be managed through this facility.

A new facility was onboarded which included an initial audit, signing of the Ethical Sourcing Code and discussion on the expectations that Best & Less has regarding worker's rights. The new facility is subjected to regular unannounced audits and to date no breaches have been found.

# SECTION 5: ASSESSING THE EFFECTIVENESS OF ACTIONS

Best & Less Group currently track performance through several internal and external mechanisms. We are continually working to understand the effectiveness and impact of our Ethical Sourcing Strategy. These insights are used to inform our immediate and longer-term risk management approach.

	ACTIVITY	MEASURE
<b>GOVERNANCE</b>	<ul style="list-style-type: none"> <li>Board oversight</li> <li>Policy reviews</li> <li>Team Member training</li> </ul>	Annual reviews Number of training sessions held and number of participants (currently Ethical Sourcing-extending into purchasing practices)
<b>RISK MANAGEMENT</b>	<ul style="list-style-type: none"> <li>Regular Risk Assessments</li> <li>Supplier onboarding</li> <li>Regular review of risk matrix</li> </ul>	Annually All new stock suppliers Quarterly
<b>MONITORING</b>	<ul style="list-style-type: none"> <li>Third party audits</li> <li>Supplier Corrective Action plans</li> <li>Worker engagement</li> <li>Site visits</li> </ul>	Audits conducted per tier; quantum of non-compliance No. of plans in place and time to implement. Number of worker engagements Number of Site visits
<b>GRIEVANCE MECHANISMS</b>	<ul style="list-style-type: none"> <li>Mechanism for grievances to be raised.</li> <li>Cases remediated.</li> <li>Trend analysis</li> </ul>	Total number of issues raised and resolved. Number of cases remediated. Annual assessment to identify trends

# SECTION 6: THE WAY FORWARD

Best & Less Group has developed a roadmap to further advance its approach to Modern Slavery in its operations and supply chain. This roadmap includes the following activities in addition to the existing program of work.

- Implement learnings from COVID-19 into our future strategy.
- Map extended merchandise supply chain from raw material to customer.
- Commence audit program for tier two and three merchandise suppliers.
- Introduce new Product Lifecycle Management system which will provide open costings.
- Continue to build capacity of buying team to identify and mitigate any risks of modern slavery as well as ethical purchasing practices to ensure fair compensation for suppliers.
- Undertake a deep dive assessment of non- trade suppliers to ensure risk rating is appropriate.
- Review all merchandise and non-trade contracts to ensure modern slavery clauses are embedded when the risk is medium or high.
- Build on our worker engagement program to ensure all workers are aware and understand their rights and our commitment to our Ethical Sourcing Program.

For information about our Ethical Sourcing Strategy, Ethical Sourcing Code, and current merchandise manufacturers transparency list visit our websites.

# Best&Less



**Best&Less**  
bestandless.com.au

**Postie**  
postie.co.nz