



BMS Retail Group Holdings ACN 090 448 007

Modern Slavery Statement 2023

INTRODUCTION

We are proud of the steps we have taken to combat modern slavery.

Our approach to human rights is founded in the United Nations Framework and Guiding Principles on Business and Human Rights and the eight international (ILO) fundamental conventions.

REPORTING ENTITY

The entity preparing this statement is BMS Retail Group Holdings Pty Ltd (**“Champions IGA”**). This statement discloses the steps Champions IGA have taken to identify, manage and mitigate the specific risks of modern slavery in our business operations and supply chain.

This statement is prepared in accordance with the requirements of section 13 of the *Modern Slavery Act 2018* (Cth) (**“Act”**).

The Act requires reporting entities subject to the Act to produce an annual modern slavery statement.

Champions IGA will only engage with businesses and organisations that comply with this policy, or those who are taking appropriate and verifiable actions towards compliance.

STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Structure

Champions IGA is structured as a privately owned company incorporated within Australia. Champions IGA has two shareholder groups with an ASX listed company owning 49% and the sole financial director’s family group owning the remaining 51%. The company headquarters are located at Long Gully in Victoria. Champions IGA currently employees over 800 staff situated across Victoria.

Operations

Champions IGA currently operate 11 supermarkets across regional Victoria operating under the IGA banner.

Champions IGA believes in the fair treatment and remuneration of all employees. It complies with all applicable employment legislation and industrial awards and promotes safety, health and wellbeing in the workplace.

Supply Chains

As part of its supply chain, Champions IGA utilises a large range of independent and local suppliers in the procurement of groceries, fresh produce and liquor.

Champions IGA also engages an Australian leading wholesaler and distributor, as a major supplier and distributor of our products to our stores. The Australian conglomerate company supplies our supermarkets with a range of the best locally and internationally acquired produce and liquor. We recognise that these services provided are integral to our supply chain. Champions IGA is aware that this company is committed to complying with the Modern Slavery legislation and opposes all forms of modern slavery such as servitude, human trafficking and enforced labour.

Champions IGA supply chains include services that contribute to its operations, such as engaging professional cleaning services to clean and sanitise at store level and at our head office.

Champions IGA seeks to partner with suppliers that ensure a fair and ethical workplace, where the highest standards of human rights are upheld.

CONSULTATION

Champions IGA has, when preparing this statement, consulted with any entities it owns or controls by discussing this statement with senior management in such entities.

MODERN SLAVERY RISK

We are not directly involved in activities which are sectors with known modern slavery risks however we do identify that the cleaning and sanitation services are our highest risk of modern slavery, and we focus on ensuring that this is considered in our engagement of service providers. We also acknowledge that risks of modern slavery may be heightened depending on geographical locations of some suppliers and we appreciate that we may lack visibility to such risk given we engage an Australian leading wholesaler and distributor in supplying products to our stores, resulting in potential additional risks of modern slavery due to such secondary levels of our chain of suppliers.

Our policies on slavery

We are committed to ensuring that there is no modern slavery in our supply chains or in any part of our business. Our Modern Slavery Policy reflects our commitment to acting

ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery is not taking place anywhere in our supply chains.

Our Modern Slavery Policy is accessible on request.

MODERN SLAVERY ACTION

Due diligence processes for slavery

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery occurring in our business operations and supply chains.
- Monitor potential risk areas in our business operations and supply chains.
- Remediate harm caused.
- Protect whistleblowers.

As part of our initiative to identify modern slavery and mitigate associated risks in our business and supply chain, we follow the processes set out in our Modern Slavery Policy and will add a Modern slavery clause to all new and renewing contracts with our suppliers to ensure that our suppliers are taking all reasonable steps to ensure that there is no modern slavery in their supply chains.

Supplier adherence to our values

We have zero tolerance of slavery. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme. This consists of ensuring that for any new contracts we enter into with our suppliers following the date of this Statement, we impose an obligation on the supplier to:

- (a) comply with all applicable modern slavery laws, statutes, regulations and codes from time to time in force including but not limited to the Modern Slavery Act 2018 (Cth); and
- (b) comply with our Modern Slavery Policy; and
- (c) hold their own suppliers and subcontractors to the same standards.

We have a dedicated compliance team, which consists of involvement from the following departments:

- Finance
- Human resources and Payroll.
- Merchandise and Marketing

OUR EFFECTIVENESS IN COMBATING SLAVERY

We acknowledge that there is always a risk of modern slavery. We assess and address/manage that risk by:

- Implementing, maintaining and complying with our Modern Slavery Policy;
- Including modern slavery prevention clauses in our supply contracts where practicable;
- Being alert to modern slavery issues when screening suppliers; and
- Otherwise maintaining consistent and high standards of due diligence and risk mitigation processes to monitor for and avoid modern slavery in all environments in which we operate in, regardless of whether the environment or the suppliers with whom we work are more or less vulnerable to modern slavery.

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery is not taking place in any part of our business or supply chains:

- Whistleblowing: the number of reported breaches in the past year; and
- Remedial action: the instances of remedial action being needed.

FURTHER STEPS AND REMEDIATION

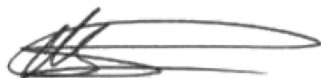
Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery in our supply chains we intend to take the following further remedial steps to combat slavery in our operations and supply chain:

- Increase the number of Champions IGA employees who are provided with dedicated training on modern slavery laws; and
- Set up an annual review process with members of senior management of Champions IGA to discuss modern slavery.

Approval

This modern slavery statement is made by BMS Retail Group Holdings Pty Ltd for the financial year ending 30 June 2023.

This statement was approved by our Board of Directors on 17th November 2023.



Signature of Michael Zervakis

BMS Retail Group Holdings Pty Ltd

Date: 21st November 2023