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Modern Slavery Statement

This Modern Slavery Statement (**Statement**) is made by Outdoor Supacentre Pty Ltd ACN 609 212 624 (**Outdoor Supacentre**) pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) (**the Act**).

This is Outdoor Supacentre's first Modern Slavery Statement. It summarises the steps we have taken to identify, assess, and manage the risks of modern slavery in our operations and supply chains. This Statement relates to the reporting period ending 30 June 2020, the most recent financial year end for Outdoor Supacentre but also reflects the steps we have taken in the period between 30 June 2020 and the date of this Statement.

The gross annual revenue of Outdoor Supacentre from its operations exceeds the reporting threshold under the Act. Outdoor Supacentre is also the holding company for the Outdoor Supacentre group of companies. In this capacity, Outdoor Supacentre holds 100% of the shares in the following companies:

- Adventure Kings Pty Ltd ACN 622 305 677;
- Adventure Kings RV Pty Ltd ACN 622 905 113;
- Adventure Kings Pty Limited, a New Zealand company;
- 4WD Supacentre Pty Limited, a New Zealand company; and
- Outdoor Supacentre Pty Limited, a New Zealand company;

together "**the Group**".

Outdoor Supacentre is the only operating company in the Group and accounted for all the Group's consolidated revenue in the financial year ending 30 June 2020. This Modern Slavery Statement is made by Outdoor Supacentre as the reporting entity and includes relevant information in relation to its controlled entities in the Group.

Modern Slavery is defined in the Act. Modern Slavery describes situations where offenders use coercion, threats or deception to exploit workers and undermine their freedom. Practices that constitute modern slavery include human trafficking, slavery, servitude, forced labour, debt bondage, and the worst forms of child labour.

Our structure, operations, and supply chains

Outdoor Supacentre sells camping, outdoor, and four-wheel drive products and accessories in Australia and New Zealand including swags, awnings, rooftop tents, vehicle lights, generators, and camper trailers under brands including 4WD SUPACENTRE, KINGS, and ADVENTURE KINGS (Products).

Our team comprises approximately 400 members directly employed. All team members are located in Australia. We have a dedicated in-house Human Resources team and an extensive range of HR-related policies designed to ensure compliance with applicable laws and awards and to provide a safe place of work for our team, as well as a whistleblower policy to encourage members of our team to raise any issues of concern in a safe and confidential environment.

Our store network currently comprises 17 stores located throughout Australia. We also operate online in Australia and New Zealand and through other channels such as wholesale and marketplace.

A major part of our supply chain lies in sourcing the Products we sell. Most of the Products are sourced from suppliers based in China with manufacturing operations also in China. Most of these suppliers are based in the Zhejiang or Guangdong provinces. The rest of our Products are sourced from suppliers in Australia and Vietnam.

Our Product partners consist of over 70 different suppliers. We consolidate many of our purchases of key Products from China through an agent based in China with whom we have been dealing for many years. Our modern slavery due diligence to date has focused on these suppliers.

The remainder of our supply chain is made up of products and services that support our business and our operations. Our suppliers in this category include marketing, IT, and freight and logistics services.

Our business support partners comprise more than 50 Australian based third-party suppliers.

Our operational modern slavery risk assessment to date has focussed on areas of the business that may use contracted or third-party labour providers. This is because we have assessed there may be greater risks in this part of our operations.

Our modern slavery governance structure

Our Board has established a Steering Committee comprising representatives from our Legal and Products teams to oversee our compliance with the Act.

The Steering Committee has been empowered to make recommendations to the Board in relation to the management of modern slavery risks across the Company's operations and its supply chains.

We have introduced a Modern Slavery Policy, Modern Slavery Supplier Confirmation, and a Modern Slavery Due Diligence Checklist for new and ongoing suppliers. Our IP/Legal Manager reviews and assesses the information provided by suppliers in response to our modern slavery due diligence.

In addition, we will seek to introduce appropriate modern slavery specific provisions into our supply agreements where this is considered practical and appropriate.

We also recognise the importance of building a greater understanding within our team members of modern slavery risks and our requirements in this regard. We have started a process with our Product team members who are responsible for supplier relationships and oversight to raise awareness with our supply partners of our Modern Slavery Policy and our expectations in relation to managing these risks.

Our modern slavery due diligence framework

We have been working to incorporate modern slavery due diligence into our operations and supply chain based on the following approach:

1. Identify risks;
2. Mitigate risks;
3. Remediate, where necessary; and
4. Communicate with relevant stakeholders, and train where appropriate.

Identifying risks of modern slavery practices

Our Modern Slavery Policy has been communicated to our suppliers to provide clarity about our requirements and expectations in relation to modern slavery in our supply chain.

We have also obtained written Modern Slavery Supplier Confirmations from key trade suppliers that they do not, and their upstream suppliers do not, engage in modern slavery practices such as the use of forced labour and that no child labour works in their factories or supply chains.

In addition, we have developed and distributed a Modern Slavery Due Diligence Checklist to existing and new suppliers to complete as part of our ongoing due diligence and compliance with the requirements of the Act.

Describing potential modern slavery risks in the operations and supply chains of the reporting entity and any entities it owns or controls

Potential risks in our operations

All of Outdoor Supacentre's staff are based in Australia. Apart from a small number of sales in New Zealand and other overseas countries, all of our sales are in Australia. All of our operations are in Australia and New Zealand. We do not manufacture our Products. They are supplied by third parties. Since Outdoor Supacentre is the only trading entity in the Group, the operations and supply chains of Outdoor Supacentre are in effect the same operations and supply chains of our Group.

As stated above, we have a dedicated Human Resources team and an extensive range of HR policies designed to ensure compliance with applicable laws and awards, to provide a safe place of work and a whistleblower policy to encourage members of our team to raise any issues of concern in a safe and confidential environment.

We operate out of 3 modern offices in Sydney, Canberra, and Brisbane. Our national store footprint is based in the cities and certain major regional centres of Australia.

Our operations are focused on sales, marketing, IT, and freight and logistics to support our leading omni-channel retail operations. Our suppliers of the services we use to support each of these functions are largely long-standing and/or well-known Australian-based suppliers of such services. We interact very frequently with these suppliers and we have a high level of visibility to their services and many of their people.

Based on our review of the industry in which we operate (retail), the countries in which we operate (Australia and New Zealand), and the nature and type of suppliers that support us to conduct our operations, we have assessed the modern slavery risks in our Australian and New Zealand operations as low.

Third-party labour providers of cleaning services were identified as a potential risk but again, because of our limited office and store footprint and the high degree of visibility we have to the services provided to us, we have assessed our risks in this context as low. One particularly relevant factor in this determination was that our store network largely operates in rural and regional centres where links to community are much more visible than in major cities. We know the service providers to our operations and have a high degree of transparency in relation to the people providing the services and the conditions under which they work.

Potential risks in our supply chain

Potential risks in our supply chain lie in our overseas suppliers of Products.

We have long-standing and close relationships with many of our key suppliers. Before the pandemic, we conducted regular visits to China and to many of the factories of our key suppliers. As a result, we have had a high level of visibility to these direct supply chains and have developed a close and trusted relationship with many of the suppliers.

Our Modern Slavery Policy, Modern Slavery Confirmation (Suppliers) and our Modern Slavery Due Diligence Checklist have been translated to Chinese and have been provided to our Product suppliers.

Many of our suppliers of Products have been asked to provide a written and signed Modern Slavery Confirmation that they do not, and their upstream suppliers do not, engage in any modern slavery practices such as the use of Uyghur or other forced labour or any child labour in their factories, operations, or supply chains.

We have obtained signed Modern Slavery Confirmations from many our suppliers of Products as at the date of this Statement. We will follow up with those suppliers that have not yet provided this Confirmation. If we are unable to obtain this Confirmation, we will look at options to replace or phase out such suppliers if there is not a satisfactory reason for their failure.

One of the key areas of focus in our assessment of potential risks has been our suppliers of canvas-based products which can be made from cotton. The reason we have highlighted this is that the issue of Uyghur forced labour on cotton farms in China has been the subject of recent credible media reporting. In addition to specifically referring to this potential risk in our Supplier Confirmations, we have spoken to our agent in China who has extensive knowledge of our supply chain as well as our direct suppliers in China. The answer we have consistently been given is that our

suppliers and their sources of cotton do not come from areas anywhere near the areas in China in which the Uyghur camps are reported to operate. We will continue to closely monitor and assess this potential risk.

We have also obtained a signed Modern Slavery Due Diligence Checklist from many of our suppliers of Products as at the date of this Statement. We will follow up with those suppliers that have not yet provided this signed Due Diligence Checklist to us. If we are unable to obtain a completed Checklist from a supplier, we will look at options to replace or phase out such suppliers if there is not a satisfactory reason for their failure.

As a result of our inquiries to suppliers of Products regarding modern slavery, we received a response from one supplier which has refused to sign the checklist without a satisfactory explanation and we are now seeking alternative suppliers to replace this supplier.

The risks of modern slavery practices are potentially higher in our supply chain for low revenue and/or low purchase price Products where we may not know the supplier as well as we know the suppliers of our more high revenue/high purchase price Products. Because many of these sorts of low revenue and/or low purchase price Products are sourced and consolidated for us by our long term agent in China, we have been able to conduct due diligence on these suppliers through our agent. As a result of the information received from our agent, we have assessed this risk as low.

The greater potential risk, as assessed by us, is in the supply chains to our suppliers. While the Modern Slavery Confirmation received from our Product suppliers addresses this risk specifically, we are relying on the honesty of the responses of our suppliers. This is because we do not have a high level of visibility to, or any direct relationship with, their suppliers of components or parts.

This risk has, to some extent, been increased by the COVID-19 pandemic. We have not been able to travel to China so inevitably our due diligence has been limited to the Checklists and Confirmations described above.

Once international travel can safely resume, we intend to increase our efforts to obtain Modern Slavery Confirmations and Modern Slavery Due Diligence Checklist responses from some of these indirect suppliers. It should be noted in this regard that getting good visibility to all suppliers of all materials and components to our direct suppliers will likely be very difficult and perhaps impossible so we will take a materiality and risk-based approach in any mapping we seek to undertake in relation to our indirect suppliers.

Describing actions taken by Outdoor Supacentre to assess and address modern slavery risks, including due diligence and remediation processes

The actions taken to assess the potential modern slavery risks in the operations and supply chains of Outdoor Supacentre and any entities it owns or controls have been summarised earlier in this Statement.

We identified that potential risks are hardest to identify in our indirect supply chain. These potential risks exist because of our lack of knowledge about these indirect suppliers and the potentially very

large number of indirect suppliers. We noted a lack of visibility and accountability in this part of our supply chain given these suppliers do not directly contract with us.

Also, many of these indirect supplier relationships are understandably regarded by our Product suppliers as very valuable and commercially sensitive. This reality makes a thorough and complete mapping of the indirect supply chain for all the components and parts in the hundreds of Products that we sell very difficult.

Accordingly, we identified that we needed to get our Product suppliers, as part of their Modern Slavery Confirmation to us, to confirm in writing to us, that their upstream suppliers do not engage in any modern slavery practices such as the use of Ugyhur or other forced labour or any child labour.

We have been encouraged that through the implementation of our Modern Slavery Due Diligence Framework described above, potential risks have been identified. This give us confidence that our due diligence is working.

Where suppliers have refused to sign our Modern Slavery Confirmation and/or our Modern Slavery Due Diligence Checklist, without adequate explanation, we have decided to seek alternative suppliers.

Describing the effectiveness of Outdoor Supacentre's actions

Outdoor Supacentre has employed a full time IP/Legal Manager to raise internal awareness of, and ensure compliance with laws such as the Act and to develop policies and to drive the due diligence process and modern slavery framework described in this Statement.

Some of the potential modern slavery risks that have been identified and described in this Statement in relation to particular suppliers demonstrate that our actions are working.

Paper-based due diligence has been required during the pandemic in relation to our key risk area of suppliers based in China. The case study of potential modern slavery risk in a supplier refusing to sign the checklist without a satisfactory explanation and our search for alternative suppliers to replace this supplier indicates to us that our actions to date have been effective.

Once we see the return of safe, international travel to China, we will resume our program of regularly visiting suppliers. This ability to witness first-hand the conditions at the factories that supply us, and to build strong relationships with our suppliers, is an important element of our due diligence which we have not been able to undertake during the current global pandemic.

Describing the process of consultation with any controlled entities and any other relevant information

Outdoor Supacentre, the reporting entity, in effect, controls and manages all aspects of the Group's operations and employs all the team members of the Group. All key operational and supply chain relationships are held by Outdoor Supacentre. Accordingly, the process of separate consultation with our controlled entities has necessarily been very limited. We are satisfied that this Statement includes all material risks in relation to any controlled entities.

Other matters including details of approval by the principal governing body

The Board of Directors of Outdoor Supacentre (**Board**) approves any company director being a responsible member as defined in the Act and authorises any company director to sign modern slavery statements, including this Statement.

This Statement is approved by the Board.

This Statement is dated 24 March 2021.

Approved by Lachlan Rolfe
Director of Outdoor Supacentre Pty Ltd
Responsible Member under the Act



Signature