

Bisley & Co Pty Ltd

Modern Slavery Statement

Reporting Year FYE June 2023



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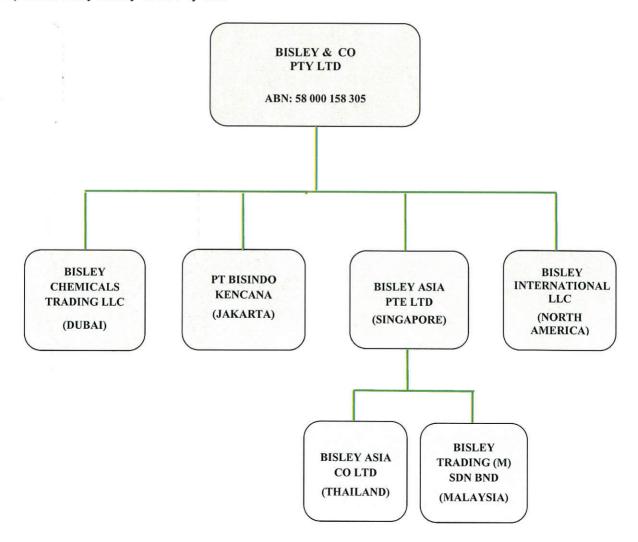
1 Introductory Statement

Bisley & Co Pty Ltd (ACN 000158305) and its subsidiaries (Bisley) are committed to upholding the principles of the Australian Modern Slavery Act 2018 (the Act). This statement defines the steps taken and ongoing actions to ensure that slavery and human trafficking is not taking place in any part of the business.

2 Bisley's Structure, Operations and Supply Chain

Bisley is a multinational marketer and distributor of quality industrial raw materials and chemicals. The company was established in Sydney in 1955 and focuses on markets across ANZ, Asia Pacific, Middle East, USA and Canada. Bisley's products range from fine chemicals for highly specialised applications, to bulk raw materials delivered in shiploads to major regional manufacturers. We have multiple entities under our control. The entities are grouped into geographic regions. Each Regional has a Region director. Each region Director is responsible to frame our expectations, raise awareness and understand their approach in mitigating modern slavery risks.

Bisley is a privately held company with six trading subsidiaries, all subsidiaries are controlled by the parent entity Bisley & Co Pty Ltd.





Our suppliers span the globe and Bisley is committed to working with our suppliers to ensure modern slavery is not part for our supply chains.

The number of our suppliers according to geographic regions (as defined by the www.globalslaveryindex.org) are:

- Africa 28
- Americas 49
- Arab States 39
- Asia & The Pacific 1389
- Europe & Central Asia 117

The above numbers include all suppliers from product, freight, shipping and third-party logistics providers, through to service providers.

We acknowledge that the risks of modern slavery may be heightened in some of our groups supply chains and operations as a result of the geographical location of some suppliers, our areas of operation, and the source of materials used in products supplied to us. In particular, some materials are sourced from remote provinces in China. We also acknowledge that; we lack visibility in certain overseas markets however we endeavour to visit key suppliers even in these remote locations frequently, albeit constrained by recent travel and other restrictions

3 Policies

The policies and frameworks that support Bisley's day-to-day operations require that we respect and safeguard universally recognised human rights, consistent with the principles in our Code of Conduct,

Global Commercial Risk Management, Global Foreign Bribery Prevention and Modern Slavery policies, Bisley is committed to complying with the laws and regulations of the countries in which we operate. We also monitor and address modern slavery issues in our workplace under other various policies and procedures, including Privacy Policy, Confidential Information Policy, Discrimination, Harassment Bullying & Appropriate Workplace Behaviour Policy, Commercial Risk Policy.

These policies and grievance mechanisms create greater transparency in consideration of modern slavery issues in our operations which we consider to be low risk..

4 Due Diligence

Bisley performs detailed due diligence on potential suppliers utilising questionnaire templates which have recently been updated and ensures staff follow procedures to evaluate potential risks along with visits to suppliers facilities, including utilising agents in USA and China for site inspections.

As a result of these procedures and the location of our suppliers, Bisley believes the overall risk level of modern slavery in our supply chains is low. However we continue to upgrade our processes as we continue to mitigate risks. And in the case where modern slavery risks are high, we have implemented a Modern Slavery Policy outlining the cessation and/or remediation of that supply partner. Yearly reviews of such policy ensures it is effectively implemented and adapted.



5 Actions Taken so far

The following actions have been taken:

- 1. Introduced a Modern Slavery Policy.
- 2. Modified our Purchase Terms and Conditions to include a clause referencing the International Labour Organisation convention No. 138,182 and 190.
- 3. Completed an analysis of our supplier's location (region) as ranked by the Global Slavery Index (www.globalslaveryindex.org).
- 4. Completed a ranking of suppliers by annual spend.
- 5. Completed audits of selected suppliers using a targeted questionnaire.
- 6. Introduced a modern slavery component into the supplier due diligence template.

6 Ongoing assessment of risk

We are monitoring the effectiveness of the processes and procedures to address the modern slavery risks that our business causes, contributes to, or is directly linked to, in line with the UN Guiding Principles. We will continually assess the effectiveness of our actions in identifying and managing modern slavery risks by: tracking our actions and outcomes, partnering with suppliers and other external partners, including visits and Audits whenever practical, and undertaking regular internal governance and external assurance processes. Based on the results of these processes, we will adapt and strengthen our actions to continually improve our response to modern slavery.

In FY 2023 and beyond, Bisley has continued and will continue to increase collaboration with internal and external stakeholders to address the issue of modern slavery.

Bisley will achieve this by raising awareness of modern slavery among employees and suppliers, continuing to evolve and improve our supplier due diligence and audit procedures and further improve our purchase terms and conditions.

7 Approval of this Statement

This statement was reviewed and approved by the Bisley & Co Board of Directors on 26 September 2023.

Signed,

John Tobin

CEO / Managing Director