

63 YEARS OF SERVICING LOCAL COMMUNITIES

2024
MODERN
SLAVERY
STATEMENT



BSR AUSTRALIA LIMITED ABN 84 122 529 695



Our Vision

To be Australia's independent retailer group of choice for customers, whilst supporting the local communities we serve.

Our Purpose

To deliver trusted service and value, making lives better everyday.

Our Values

INTEGRITY

To operate an organisation that values honesty, transparency and integrity

COLLABORATION

To generate positive collaborations with all internal and external stakeholders

COMMUNITY

To facilitate socially responsible activities that contribute to the local community and minimise the impact on the environment

COMMITMENT

To commit ourselves to providing consumers with products and services that exceed their expectations

EFFICIENCY

To provide members with effective, timely and efficient business support

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1. A message from our CEO

This is BSR Group's sixth Modern Slavery Statement, which sets out our commitment and improving efforts to identify, manage and address modern slavery risks in our operations and supply chains.

Today 50 million¹ people globally are affected by the harsh realities of modern slavery. Rising living costs, global conflict and supply chain pressures contribute to this number as well as the availability of better data. These statistics are a stark reminder of the importance of our commitment to supporting and respecting human rights, by ensuring the goods and services our corporate stores and associated retailers provide are free from modern slavery.

At BSR Group, we aim to instil confidence in customers that the human rights of workers involved in producing our goods are upheld. We continue to deliver on our due diligence obligations through the close and transparent engagement of our domestic and global supply chains. As we continue to collect essential compliance data from our suppliers, we are empowered to make more informed supply chain decisions and reject and address any evidence of unethical practices in our operations.

We understand that modern slavery cannot be solved by any one company and recognise that it is a problem that affects every country worldwide. We are cognisant that modern slavery can occur anywhere throughout the supply chain with a heightened focus on suppliers and product categories high on the Global Slavery Index 2023². To ensure transparency from the initial stages of production, right through the supply chain, we continue to work with the National Associated Retail Traders of Australia (NARTA), through our support of its Modern Slavery Initiative (MSI). As it matures, this initiative will complement and support our internal compliance and due diligence practices of modern slavery information from our major product suppliers, further strengthening our confidence.

The electrical and furniture retailing industry continues to evolve with competitive challenges and a retail landscape that is evolving through changing consumer expectations. Whilst our business continues to grow, it is imperative we maintain strong vigilance to be part of the solution to resolve this global issue. We are fully committed to continuous improvement, transparency and collaboration in our systems and processes to assess and address evidence of modern slavery in all our operations.



Gavin Carter

CHIEF EXECUTIVE OFFICER

18 December 2024

¹ Sourced from www.walkfree.org – walk free is an international human rights Group dedicated to eradicating modern slavery in all its forms.

² The Global Slavery Index outlines Asia Pacific Region as an “at risk” region and electronics as a high risk product import category [Global-Slavery-Index-2023.pdf](#)



2. Overview

This Modern Slavery Statement reflects the position and efforts of the BSR Group to modern slavery risks in accordance with the Modern Slavery Act 2018 (Cth) (Act) and the Commonwealth Modern Slavery Act 2018 Guideline for Reporting Entities dated May 2023.

It is issued by BSR Australia Limited on behalf of all the BSR Group's reporting entities and controlled subsidiaries.

To find out more about the nature of our business, you can visit www.bsrgroup.com.au



3. Our structure and operations

BSR Group (**BSR Group**) is comprised of a parent company BSR Australia Ltd (ACN 122 529 695) (**BSR Australia**) which is an unlisted public company ('BSR Australia'), and the following wholly owned subsidiaries:

1. BSR Franchising Pty Ltd (ACN 122 556 094) (**BSR Franchising** -Trading Entity).
2. Stan Cash Superstore Pty Ltd (ACN 160 223 914) (**Stan Cash Superstore** - Trading Entity).
3. Betta Pty Ltd (ACN 142 725 997), the holding company of Stan Cash Superstore.

Employees

All senior executives of the BSR Group are employed by BSR Australia. The directors of BSR Australia are also directors of all the subsidiaries.

During the reporting period, key senior executives of BSR Australia, including those engaged in the businesses of BSR Franchising and Stan Cash Superstore, actively maintained commitment and contribution to inform the development of this statement.

The Group directly employs 241 employees across direct retail operations and head office roles. As of 30 June 2024, the breakdown of employees by gender, age and type of employment was:

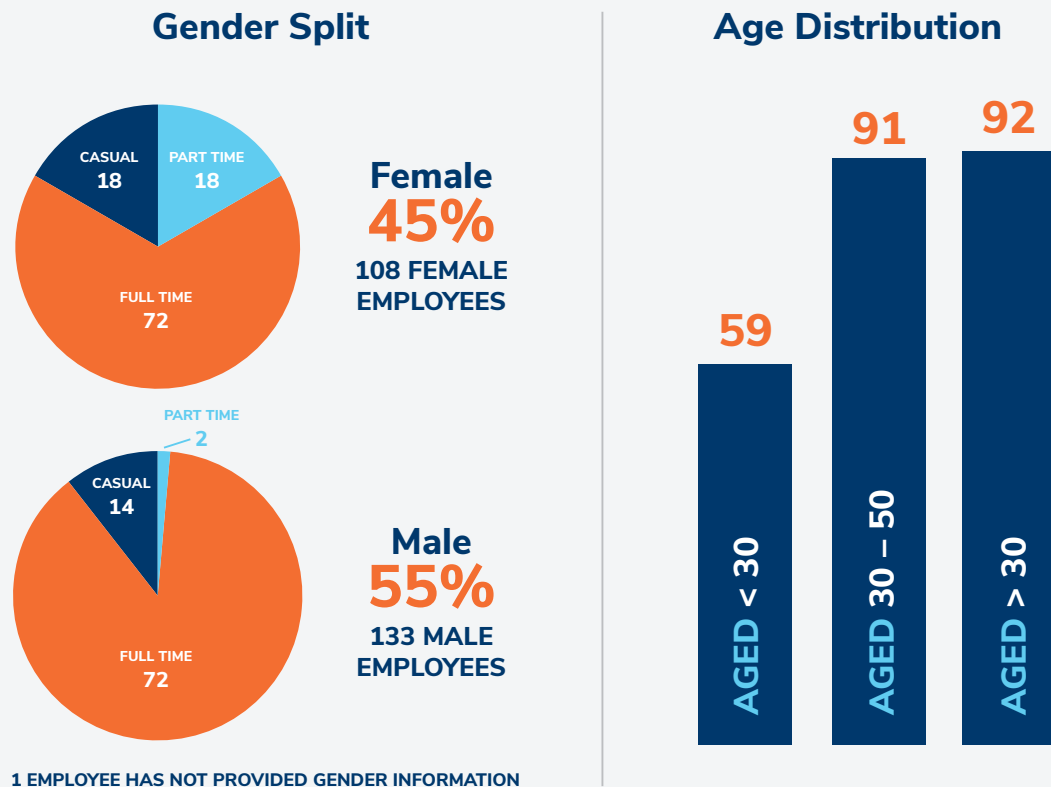


Figure 1 - Breakdown of gender, age and employment type

BSR Franchising (Trading Entity)

BSR Franchising undertakes the following business operations:

- **As a franchisor** to a network of Australian retail stores operating in the electrical and furniture goods industries, under the brands Betta, Designer Appliances and Furniture Zone, and also, as a service provider to retailers operating under their own brands (BBA's). There are approximately 185 independent retail businesses across Australia associated with BSR.
- **As joint venturer** in the retail business Whitford's Home Appliances providing marketing assistance and supplying goods to the store network for resale.
- **As logistics partner** holding stock for resale in warehouses.
- As retail operator through 10 company owned electrical and furniture stores, Betta Underwood, Betta Cannon Hill, Betta Hervey Bay, Betta Belmont, Betta Parkes, Betta Camberwell, Betta Ayr, Begents Devonport, Begents Launceston and Begents Ulverstone.
- **As online retailer** of electrical and furniture goods via the following websites:
 - www.betta.com.au
 - www.designerappliances.com.au
 - www.furniturezone.com.au
- **As a commercial supplier** of furniture, electrical and bathroom goods via the brands RT Edwards Commercial and BSR Commercial.
- **As supplier of appliances** through our insurance partners.
- **As direct importer** of furniture, electrical, kitchen and front of wall plumbing goods for resale under the brands BSR Direct and Norj.
- **As retailer** of Australian made mattresses and beds under the Eversleep brand.

Stan Cash

Stan Cash Superstore undertakes the following business operations:

- As an online retailer of electrical and furniture goods via the following website: www.stancash.com.au
- As an online retailer of electrical goods via the following website: www.billyguyatts.com.au
- As a retailer of electrical and furniture goods via its retail shops in Brooklyn and Keilor in Melbourne, Victoria.





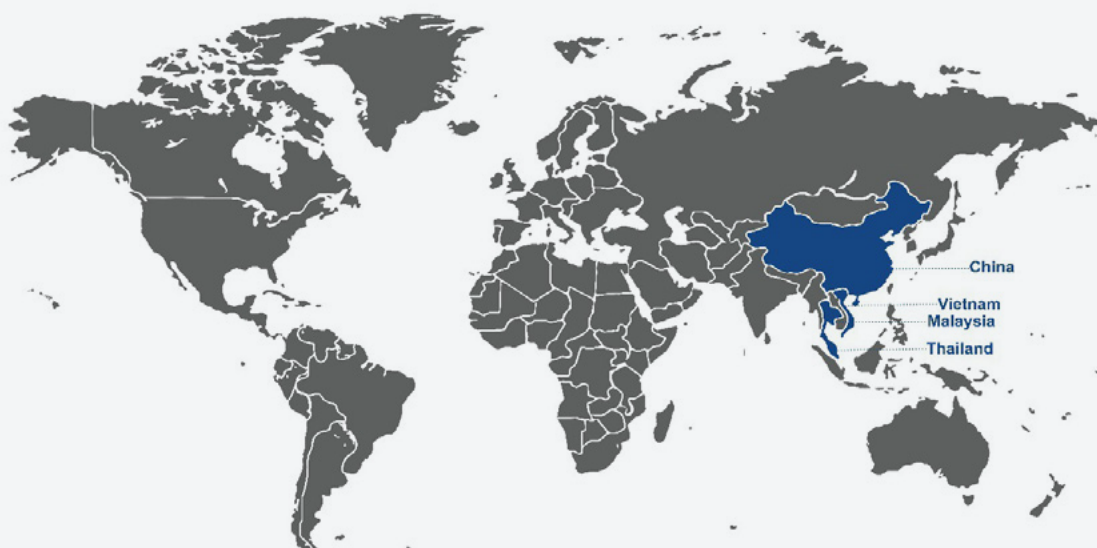
Figure 2 - BSR Group presence nationwide

4. Our supply chains

Our direct import product range consists of upholstered and timber furniture along with electrical appliances and front of wall plumbing.

Furniture finished goods are sourced from China, Vietnam, Thailand, and Malaysia.

Electrical and front of wall plumbing finished goods are sourced from China.



We limit our procurement to well-established suppliers within discrete geographic areas which have verifiable international client bases and complete compliance questionnaire data. This allows us to work towards our commitment to control and mitigate the risk of modern slavery within our supply chains by:

- restricting our dealings to suppliers experienced in complying with standard due diligence requirements including those relating to ethical sourcing of components and modern slavery;
- avoiding smaller factories which may be incentivised to take advantage of perceived commercial benefits of engaging in unlawful business practices; and
- engaging with internationally recognised logistics operators with readily verifiable business practices which comply with all relevant legislation including modern slavery laws.

Our wider supply chain includes engagement with local wholesale importers and resellers. Through our governance processes we ensure these business partners' business practices:

- are ethical through our compliance questionnaire validation.
- align with the BSR Group's values; and
- meet all relevant legislative requirements.

5. Risks of modern slavery practices in our operations and supply chains

We recognise and have identified the following modern slavery risks which may arise through our business activities or relationships, either directly or indirectly:

- Geographical Risk in our supply chain. Given our reliance on products manufactured within the Asia Pacific Region.
- Broader non-compliance with human rights in our operations including employee rights to equality, fair pay, safety which if not addressed may develop into modern slavery.



6. How we address modern slavery risks

BSR Group is committed to taking all reasonable steps to ensure that any evidence of modern slavery, in any part of our business, is identified and addressed. We acknowledge our role and responsibility to continuously improve and evolve our approach to ethical and sustainable business practices.

To identify and address risk, BSR Group has the following systems in place:

Grievance mechanisms

BSR Group is committed to fostering an honest, safe and supportive workplace for our employees, with open and positive relationships with all our suppliers. As part of this commitment, BSR Group encourages employees and other eligible whistleblowers to speak up when they see something wrong and will protect eligible whistleblowers in accordance with the legislation. The Whistleblower Policy is available on our website. We review and update our whistleblower policy annually and provide whistleblower training to staff.

Environment Social Governance (ESG) Committee

The role of the ESG Committee is to embed environmental and social initiatives into decision-making and long-term growth strategies, and to monitor and report on best practice corporate governance initiatives. During the reporting period, BSR Group published its first Sustainability Report for the Group which outlines the growth and commitment to continuous improvement in this space. Initiatives such as workplace culture and engagement, workplace health and safety and diversity and inclusion demonstrate our commitment to our people and upholding ethical business practices for our suppliers, customers and communities.

Audit and Risk Committee

The Audit and Risk Committee oversees the systems of internal control and its risk management framework ensuring compliance with all laws, regulations and best practice guidelines including the Modern Slavery Act. The committee aims to ensure an ethical culture is embedded throughout the Group and that all material risks are managed effectively.



NARTA Modern Slavery Initiative

BSR Group is a member of the National Associated Retail Traders of Australia (**NARTA**). Members of NARTA benefit from NARTA's Modern Slavery Initiative (**MSI**), an industry focused program which supports businesses in reviewing practices within their supply chain to deliver best-in-class ethical standards and meet reporting requirements under the Act.

NARTA facilitates the collection of modern slavery content from consumer electronics suppliers (non-direct import) via a standardised reporting system. NARTA then shares that content with its members to assist them in meeting modern slavery reporting requirements. This aims to ensure a higher level of transparency across the industry.

BSR will continue to incorporate the MSI data, together with our own compliance questionnaires to streamline our collection of annual and ongoing modern slavery data from our suppliers.



Compliance questionnaire

We require all product suppliers to complete an annual Compliance Questionnaire to:

- verify the supplier's status as a "reporting entity" under the Modern Slavery Act or otherwise;
- describe any identified risks of modern slavery in their operations and supply chains and actions taken to address those risks; and
- provide details of all policies and procedures implemented to monitor, identify, investigate, disclose, and remediate any instances or potential instances of modern slavery.

All Group suppliers must have modern slavery policies or equivalent which must be provided during onboard and contract renewal.

We continue to collect this essential compliance data to provide transparency on our complete supply chain with more scrutiny on our top product suppliers. This data will continue to support ethical business decisions in all of our operations.

Year on year, the modern slavery data collection from our suppliers continues to become more streamlined to ensure the data we collect provides meaningful insights into the behaviours of our operations and supply chain. We continue to collaborate closely with our suppliers ensuring they understand our expectations on all aspects of ethical business practices and our firm commitment to identifying and addressing instances of modern slavery.

Supplier contracts

Where possible, we have incorporated modern slavery clauses into our contracts with all suppliers (including suppliers of transportation and logistics services) and product manufacturers. This includes our product supplier agreements which are updated on an annual basis. The clauses include obligations requiring suppliers to:

- warrant compliance with modern slavery laws;
- take reasonable steps to eliminate modern slavery risks within their supply chains or the supply chains of their subcontractors;
- notify us in the event of actual or suspected incidences of modern slavery in their business operations or supply chain that has a connection to our business; and
- agree to our right to terminate the agreement if the supplier breaches any of the modern slavery provisions of the agreement.

Training

All employees undergo an induction process where our policies, procedures and expectations are outlined. The BSR Handbook outlines minimum obligations for our staff on topics such as; Group Values, Code of Conduct, Equal Employment Opportunity and Discrimination Policy, Grievance Policy, Whistleblower Policy, Work Health and Safety Policy.

Specific training on our modern slavery obligations and the Whistleblower Policy is available to all employees.

Key performance indicators

BSR Group has the following key performance indicators in place to measure its effectiveness in taking all reasonable steps to reduce the risk of modern slavery:

- Close collaboration and communication with our suppliers to ensure their understanding of our compliance expectations.
- Review of supplier responses to the annual BSR Compliance Questionnaire regarding modern slavery risks and mitigation and following up where data is unclear or not in line with our ethical expectations.
- Receiving modern slavery compliance information regarding indirect furniture and electrical suppliers via its membership with NARTA;
- Review of our grievance mechanisms annually and review and address all whistleblower incidents.

7. Board approval

This statement was approved by the Board of Directors of BSR Australia Ltd and adopted by all BSR Group subsidiaries on 18 December 2024.



Graeme Cunningham
EXECUTIVE CHAIRMAN OF THE BOARD





BSR AUSTRALIA LIMITED ABN 84 122 529 695

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