



POLICY STATEMENT

DOCUMENT: EMPO1-0039

Modern Slavery and Ethical Sourcing Policy

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NEXT REVIEW:

SUPERSEDES: N/A

1.0 PURPOSE AND SCOPE

Business plays an important role in respecting and promoting human rights and eradicating modern slavery (1). We recognise that modern slavery is a growing and complex problem, best tackled by collective commitment and responsibility to bring it to an end and we are committed to working with all our stakeholders to fulfil this common goal.

If the policy is breached, we will act as quickly as practicable to remedy our adverse impacts on workers, individuals or communities and we will engage directly with affected stakeholders.

The Australian Modern Slavery Act 2018 took effect on 1 January 2019, and requires Best Bar to make annual public reports (Modern Slavery Statements) on the actions of its divisions to address modern slavery risks in their operations and supply chains.

The purpose of this Policy is to ensure that the Best Bar group of companies:

- is compliant with local, national and other applicable laws and regulations in the areas in which the businesses operate;
- sources products and services in accordance with legal obligations and community expectations while working with suppliers (2) to improve their social and environmental practices;
- act to prevent, mitigate and where appropriate, remedy modern slavery in their operations (3) and supply chains (4)

2.0 POLICY APPLICATION

The principles of this policy must be complied with or incorporated into policies within the division, business unit or Corporate Office (as applicable). This policy should be read in conjunction with the Best Bar Code of Conduct document.

3.0 POLICY

(a) Each division/business unit must adopt policies and procedures to ensure that it is addressing modern slavery and ethical sourcing risks in its operations and supply chains in a way that is appropriate for the relevant division/business unit.

(b) Each division/business unit must, as far as practicable, include in its operational and supplier contract terms, requirements that suppliers comply with all local, national and other applicable laws and regulations in the areas in which they operate.



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(c) Each division/business unit must, as far as practicable, use in its operational and supplier contract terms requirements that suppliers:

- (i) comply with the Minimum Standards set out in Best Bar Supplier Code of Conduct.;
- (ii) provide the division/business unit with rights of termination if the supplier is unable or unwilling to work towards full compliance with the Minimum Standards.

(d) As far as practicable, suppliers must be:

- (i) encouraged to exceed the Minimum Standards, and promote best practice and continuous improvement; and
- (ii) monitored for compliance with the Minimum Standards through supplier assessment processes as appropriate for the division/business unit, taking into account all relevant risk factors such as country risk and product risk.

(e) Each division/business unit must monitor and review the effectiveness of the policies and procedures referred to in paragraph (a) above, taking into account their suitability, adequacy and effectiveness as per the risk assessment.

(f) Each division/business unit must implement an approach to modern slavery risk management in accordance with the guidelines.

4.0 POLICY AMMENDMENT

This policy cannot be amended without approval of the Best Bar Board. The Best Bar Board is responsible for oversight of the company's ethical sourcing and modern slavery commitments and will review this policy regularly to ensure it continues to evolve and reflect community expectations

5.0 LAST AMMENDMENT

4th February 2021

6.0 DEFINITIONS

- (1) Modern slavery includes the crimes of human trafficking, slavery and slavery like practices such as servitude, forced labour, forced or servile marriage, the sale and exploitation of children, and debt bondage. Source: Walk Free Foundation.
- (2) 'Suppliers' is defined as factories, supplier sites and providers of goods or services to Best Bar and its divisions/business units.
- (3) 'Operations' is defined as activity controlled by Best Bar and its divisions/business units.
- (4) 'Supply chains' is defined as suppliers and service providers to Best Bar and its divisions/business units.