

STATEMENT

Modern Slavery

Reporting Entity

Bestbar Pty Ltd
2 Venture Place
East Rockingham 6168

ABN 48 068 713 539

1. Entity Structure & Operations

Bestbar Pty Ltd is a private company that is 100% owned by Rokeby Nominees Pty Ltd.

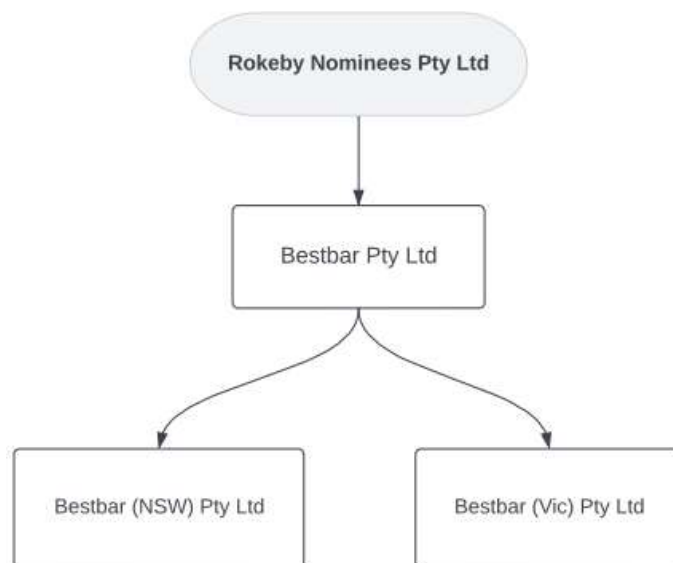
Bestbar sources locally manufactured and imported reinforcement steel as a raw material that it then converts into finished goods that are sold by to end-users in the building and construction industries.

Bestbar also sources locally manufactured and imported sundry components to support the primary product range.

Bestbar has operations in Western Australia, Northern Territory, South Australia, Victoria and New South Wales.

Bestbar employs approximately 485 people across 9 factories all located in Australia. Bestbar has no operations or associated entities offshore.

1.1 Corporate Structure



1.2 Other Entities

Bestbar (Vic) Pty Ltd and Bestbar (NSW) Pty Ltd are wholly owned by Bestbar Pty Ltd and come under the group procurement controls of the primary company so are subject to the controls below.



1.3 Distribution & Factories

Bestbar Factories and distribution sites are located within 5 different states and territory:

Western Australia, South Australia, Victoria, New South Wales & Northern Territory.

 **Manufacturing Sites**



2. Supply Chain

Bestbar’s sourcing of raw material is primarily direct from manufacturers but can also be through the manufacturer’s representatives and distributors.

Imported products are typically delivered on a CIF basis utilising the shipping services contracted with our suppliers and / or the agents.

All procurement is centralised to ensure adherence to company policy and corporate governance requirements.

Purchases are only allowed from previously approved and accredited suppliers. This also includes suppliers of services and consumables for the day-to-day operational requirements.

Finished goods are delivered using locally owned and operated transport providers.

2.1 Good and Services Origin

Bestbar purchases various goods and services from local, domestic, and international suppliers. The table below defines Bestbar main expense categories.

Product Service	Supplier	Source	Risk Class	Type of Risk	Country
Raw Material	Local	Local	Low	Indicators of modern slavery	Australia
	Local	Imported	High / Med	Geographic Risk (Turkey) Product & Service Risk (both)	Turkey, S.E. Asia
	Overseas	Imported	Med	Product & Service Risk (South Africa)	Singapore, South Africa
Shipping	Overseas	Agency	Med	Sector & Industry Risk	
Transport	Local	Local	Low	Indicators of modern slavery	Australia
Staff	Local	In House	Low	Indicators of modern slavery	Australia
	Local	Agency	Med	Product & Service Risk	Philippines
	Overseas	Agency	Med	Product & Service Risk Geographic Risk (India)	India, South Africa, Philippines
Temp Staff	Local	Local Agency	Low	Indicators of modern slavery	Australia
Sundry Products	Local	Local	Low	Indicators of modern slavery	Australia
	Local	Imported	Med	Product & Service Risk (all)	China, Malaysia, Vietnam
	Overseas	Imported	Med	Product & Service Risk (all)	China
Consumables	Local	Local	Low	Indicators of modern slavery	Australia
	Local	Imported	Med	Product & Service Risk (all)	China
Services	Local	Local	Low	Indicators of modern slavery	Australia

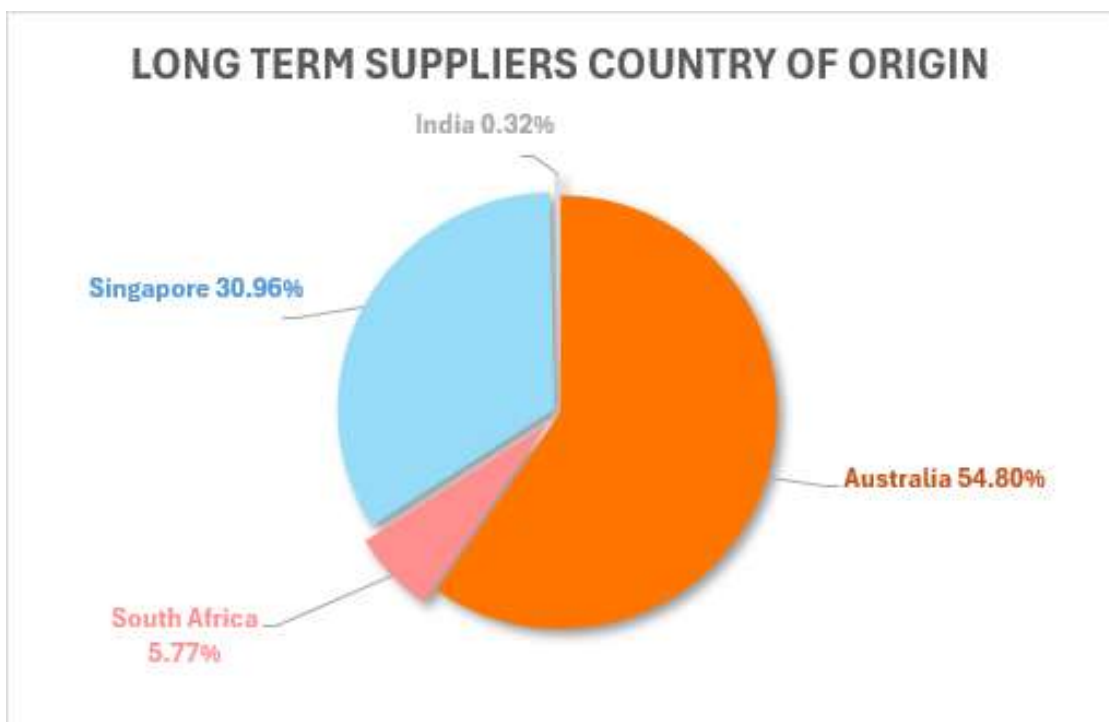
2.2 Supplier’s relationship to Bestbar

Below is a list of Bestbar long-term suppliers. The definition of long-term suppliers includes a supply of goods and service with a minimum of \$0.5 Million yearly for the last 5 continuous years.

Bestbar formed this long-term relationship with the suppliers on mutual value, common goals and deep understanding of each other’s business and commitment.

Bestbar prides itself in its long-term partnerships as they account for 92% of our total business supply.

Supplier	Type	Country of supply
Bianco Reinforcing Pty Ltd	Sundries	Australia
Concrete Accessories	Sundries	Australia
Dith Australia Pty Ltd	Raw Material	South Africa
Fero Reinforcing Pty Ltd	Raw Material	Australia
InfraBuild Pty Ltd	Raw Material	Australia
ITW Australia Pty Ltd	Sundries	Australia
Kosto Holdings Ltd	Raw Material	South Africa
MB Direct Pty Ltd	Sundries	Australia
NatSteel Holding Pty Ltd	Raw Material	Singapore
Novaplas Pty Ltd	Sundries	Australia
MJunction	Offshore Resource	India



3. Risk Analysis

Bestbar acknowledges present risks of modern slavery in some of their supply chains and operations. The factors discovered are both the geographical location of some suppliers, and the source of materials used in products supplied to Bestbar.

Labors risk in some geographic location like Turkey where some of our steel (Raw Material) come from can be at risks of modern slavery.

Bestbar also acknowledges the possible lack of visibility in certain overseas suppliers to carries additional risks of modern slavery especially Toer 2 and 3 of the supply chain.

3.1 Countries of Origin’s Risk

Bestbar identified the different risks relying on the country of origin of our Tier 1 suppliers, as well as Tier 2 and 3 when known. Bestbar understands the different characteristics that form the Modern Slavery risks and applied this knowledge to the below assessment.

Bestbar identified the risks of each country considering key information such as: poor governance, inequality, lack of basic needs and disenfranchised groups.

The table below defines Bestbar’s countries of purchase.

Risk Rating	Country
High	Turkey
Moderate	China, Malaysia, Vietnam, Philippines , India
Low	Singapore, Australia, South Africa

Note : The country risk score is issued from the Global Slavery Index 2023 dataset table 26.

Score lower than 4 is Low Risk

Score between 5 and 8 is Moderate

Score over 9 is High



4. Supply Chain Risk Management

At Bestbar Pty Ltd prior to entering into any supply arrangements with our partners we conduct a detailed review of their capabilities and business status.

Potential suppliers are required to provide us with details of their compliance in the following areas:

- Business insurance coverage
- Environmental
- Health and Safety
- Quality Accreditation

Potential suppliers are also required to agree to our supplier code of conduct which covers the following critical items:

- Supplier Expectations
- Integrity ethics and conduct
- Conflict of interest; gifts, benefits, and hospitality
- Audits and assessments
- Labor and Human Rights
- Health and Safety

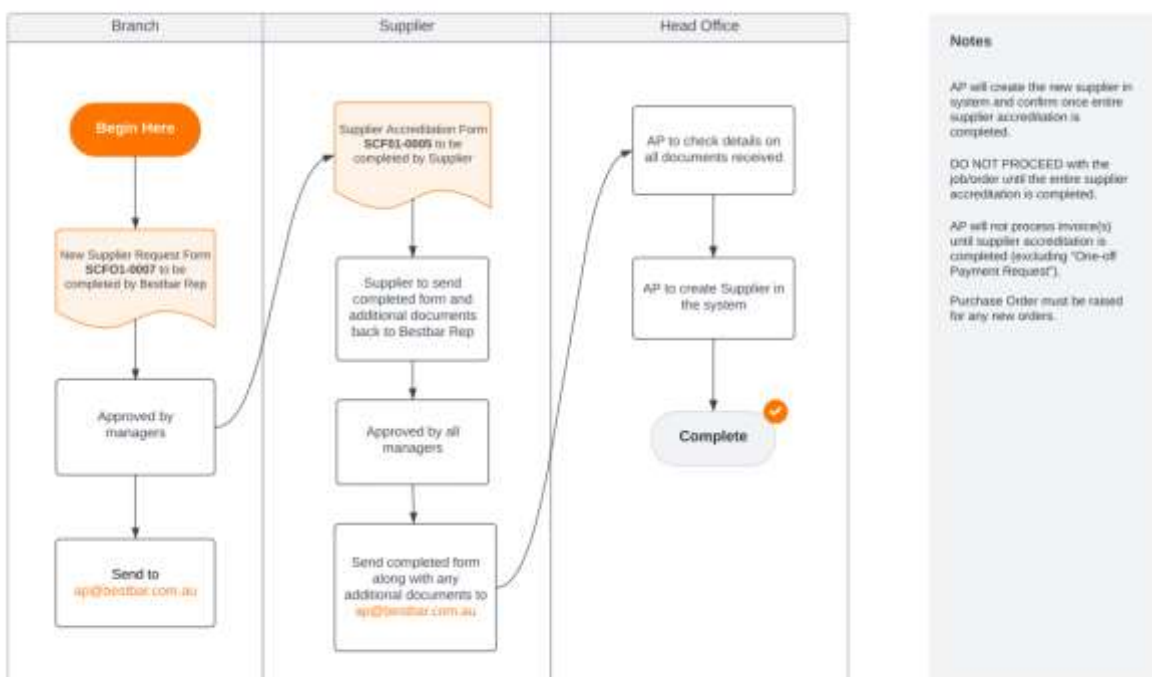
An agreement to the supplier code of conduct is also a condition on every purchase order made by Bestbar Pty Ltd which is accepted by suppliers.

A specific questionnaire covering Modern Slavery requirements as covered by the act is also required to be completed and kept on file.

New Supplier Setup



Aug 11, 2022



4.1 Supplier's modern slavery statements and open book policy.

Additionally to the automatic screening of the prospective suppliers from Bestbar supply chain team, there is a research and review of the suppliers' Modern slavery statement if they submitted one.

This steps helps Bestbar to confidently understand the entities deeper impact on the supply chain by going into more details into the Tier 2 and Tier 3 suppliers.

Furthermore, Bestbar requests its Offshore resources suppliers to apply an open book policy. This initiative assure that Bestbar, by contracting this suppliers, is positively impacting the supplier's workers and providing them with a safe and fair work environment with an above pay rate, to afford them a comfortable and opportunistic life.

4.2 Policies & Employees training

Bestbar endeavors to communicate and demonstrate its values through policies and codes of conduct.

These documents are aimed at our suppliers and easily accessible to all the employees.

To raise awareness and educate the employees the company created mandatory training in line with the below policies. These training courses are renewable on a yearly to 2 yearly basis and are periodically reviewed by our National Training team.

Additionally, the modern slavery module provides information about modern slavery act requirements, awareness on what modern slavery is and what needs to be done to preventive effects of modern slavery infiltrating the organizations operation.

- Modern Slavery and Ethical Sourcing Policy
- Bestbar Supplier Code of Conduct
- Sustainability Policy
- Recruitment Policy
- Offshore Recruitment Policy
- Anti-Bribery and Corruption Policy
- Whistleblower Policy
- Internal Grievance Policy

5. Effectiveness of the actions & Future steps

Bestbar improved its understanding and reporting system since last Financial Year (2023), by the collection and filing of data from its suppliers.

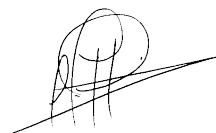
Bestbar can measure then compare from year to year the effectiveness of this actions and how with the suppliers it can contribute to abolish potential modern slavery in the supply chain.

Bestbar also created, reviewed and/or updated the following documents :

- Offshore Recruitment Policy
- Modern Slavery Policy
- Modern slavery induction now required to be done by all employees

Bestbar will continue to take actions and tracking its outcomes by undertaking regular internal report and striving to improve the following point by the end of our FY 2025 :

- Open Book Policy extended to our long-term supplier in the Offshore resource services
- Creation of a remediation process
- Finalisation of Bestbar the Sustainability statement
- Conduct of a modern slavery remediation gap analysis
- Review of our Suppliers accreditation form by an external auditor
- Improvement of our supplier accreditation form and requirements and Process

A handwritten signature in black ink, appearing to be "G. Johnston", written over a horizontal line.

Grant Johnston
Director
September 2024

For and on behalf of Bestbar Pty Ltd