



2018 Modern Slavery Statement

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Chairman

2018 MODERN SLAVERY STATEMENT

The Buckner Group opposes slavery in all its forms. This statement, which is intended to meet the requirements of s54 of the United Kingdom's Modern Slavery Act 2015, s12 of the proposed Australian Modern Slavery Bill1 and s24 of the Modern Slavery Act 2018 (NSW), describes the steps taken by The Buckner Group to minimise the risk of modern slavery occurring in our business and Supply Chains.

At The Buckner Group, we acknowledge our role and responsibility in seeking to safeguard human rights through ethical and sustainable business practices. We also recognise that human rights are an area of growing importance to our employees, shareholders, customers, and the communities in which we operate.

We recognise that we are on a journey to improve our modern slavery risk identification and mitigation and we are committed to continuous improvement.

We support the following globally recognised declarations, principles and goals:

- Universal Declaration on Human Rights
- United Nations Guiding Principles on Business and Human Rights
- United Nations Global Compact
- International Labour Organisation Declaration of Fundamental Principles and Rights at Work
- United Nations Women's Empowerment Principles
- United Nations Sustainable Development Goals

APPROACH AND DUE DILIGENCE

The Buckner Group has adopted a risk-based approach to modern slavery due diligence and has primarily focused on the human rights of direct employees and the human rights of those in the tier one factories (factories producing the final product for resale) of our supply chains. We recognised that this was the area where we could make the most significant contribution.

OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

Established in 1926, The Buckner Group has become a marketing services business specialising in the management of global supply chains whilst offering creative services, technology and marketing production across all media type; including printed, digital and in-store channels. The Buckner Group works within a diverse supply chain of partners and stakeholders. Each entity in this chain has its own independent duty to respect human rights in all areas of its operations.

Our businesses directly source products for resale from a range of locations with the largest volume sourced from Australia, China, Bangladesh, New Zealand and Vietnam. With the exception of Australia and New Zealand, global risk and strategic consulting firm Verisk Maplecroft classify these countries as 'high' or 'extreme risk' for human rights risks.

Our aim is to ensure that human rights are understood, respected and upheld. We expect our partners and stakeholders to adhere to ethical business conduct consistent with our own and are committed to working with them to fulfil this common goal.

The policies and frameworks that support the Group's day to day operations are designed to make sure all relevant universally recognised human rights are safeguarded. Consistent with the principles detailed in

our [Code of Practice](#) and [Ethical Sourcing Policy](#), The Buckner Group is committed to making positive economic, social and environmental contributions to society, consistent with the principles of honesty, integrity, fairness and respect. We prohibit discrimination and forced, trafficked and child labour and are committed to safe and healthy working conditions, including the right to freedom of association and collective bargaining.

ACTIONS TAKEN TO ADDRESS MODERN SLAVERY RISKS

We are currently implementing the following actions to mitigate the potential modern slavery risks.

Table 1 - Actions to mitigate potential modern slavery risks

POTENTIAL MODERN SLAVERY RISK	ACTION
<p>Non-compliance with our labour standards in the supply chain including health and safety, working hours, wages, forced labour and child labour, and freedom of association.</p>	<p>Action: Establishing which suppliers to work with</p> <p>Most of our businesses take a risk-based approach when making the decision to conduct detailed due diligence on a supplier of goods for resale, based on the goods or services, country of origin and vendor. Before we contract with a new supplier we assess its risk against our criteria and require high-risk suppliers to complete a risk assessment questionnaire and/or be audited. We investigate the supplier to understand risks of human rights breaches. We also consider whether there may be any sanctions that may be in place against that supplier or the country in which it is located.</p> <p>Action: Communicating our Ethical Sourcing Policy to suppliers who supply goods for sale to our customers</p> <p>We have an Ethical Sourcing Policy, which sets the minimum standards. All suppliers engaged to supply goods for resale to our customers must take all reasonable steps to comply with our minimum standards.</p> <p>We will only work with suppliers to supply goods who operate in line with our company’s Ethical Sourcing Policies. Under the relevant Policy, all suppliers producing goods must agree to comply with the following minimum standards in their agreements with our businesses:</p> <ul style="list-style-type: none"> • No forced or bonded labour • No child labour • Transparent record-keeping of wages and benefits • Working hours must comply with applicable local laws • No discrimination • No harassment or abuse • Freedom of association • Working conditions: suppliers shall provide a safe and hygienic working environment that is without risk to health,

POTENTIAL MODERN SLAVERY RISK	ACTION
	<p>taking into consideration knowledge of the relevant industry and any specific hazards</p> <ul style="list-style-type: none"> • No bribery • Environmental compliance <p>Action: Mapping our supply chain To manage business and sustainability issues with such a complex supply chain we have commended mapping our tier-one suppliers.</p> <p>Action: Building long-term relationships We aim to build long-term direct relationships with suppliers to work with them to safeguard human rights. This may have a number of additional benefits. For example, a long-term relationship may provide increased certainty for their businesses, may lead to increased efficiencies and productivity, and may result in the delivery of enhanced services and products.</p> <p>Action: Auditing our suppliers To mitigate the risk of unethical practices occurring in our supply chains, we apply a human rights and ethical sourcing audit program to certain suppliers.</p> <p>Where non-compliance with our Ethical Sourcing Policy is identified, the supplier is required to fix the issue within an appropriate period of time depending on the nature and severity of the non-compliance. Suppliers are ‘conditionally approved’ if non-critical non-compliances have been identified and notice has been given that they must be remedied. If a supplier then addresses non-compliance, it is deemed to be an ‘approved’ supplier site. In this way, our audit process is contributing to remediating supplier non-compliance and improving conditions for workers by working with supplier site owners to address any issues. If a supplier site is not willing or able to address a critical breach, our business will stop buying from that supplier site.</p> <p>Action: Training and capacity building We keep our teams up-to-date on our ethical sourcing and human rights commitments and how their actions may impact workers’ rights. The findings from our audit program and stakeholder engagements are fed into this training to ensure that our teams improve their understanding of ethical sourcing and human rights. We train relevant employees on how to incorporate respect for human rights into all business decisions, making employees aware of the impact their actions can have on human rights</p>

POTENTIAL MODERN SLAVERY RISK	ACTION
<p>Non-compliance with broader human rights which can be connected to or indicative of modern slavery risk, including employee rights to equality, fair pay, safety and privacy.</p>	<p>Action: Developing employee policies and standards</p> <p>We have policies which embed the importance of “respect for the rights of all”, including our employees. Wesfarmers strives to create a work environment which is inclusive of all people regardless of gender, age, race, disability, sexual orientation, cultural background, religion, family responsibilities or other areas of potential difference. Each division/business unit must establish and communicate policies, procedures and programs that are in line with our Equal Opportunity Policy.</p> <p>We have worked to grow the number of women at senior levels throughout the organisation and to close the gender pay gap by conducting a review of gender pay equity annually, with results reviewed by the Board and Leadership team Any apparent gaps are analysed to ensure such gaps can be explained with reference to market forces which may include, for example, different rates of pay in different industries, location and the relative supply and demand for different qualifications, individual performance and experience.</p> <p>We recognise the right of those we employ to negotiate their wages either individually or collectively, with or without the involvement of third parties. We also believe in maximising the flexibility of workplace arrangements available to our employees.</p> <p>Employee safety is our highest priority and we continue to make improvements to safety in all our operations.</p>

We are committed to continuous improvement and recognise that we are on a journey to improve our modern slavery risk identification and mitigation.



Malcolm Buckner
CHAIRMAN

13 September 2018