### **PIP AUSTRALIA HEAD OFFICE**

Level 5, 163-175 O'Riordan Street Mascot, NSW, 2020 Australia

### **PIP AUSTRALIA LOCATIONS**

980 Abernathy Road High Wycombe, WA, 6057 57-63 Henderson Road Rowville, VIC, 3178 17 Dunn Road Smeaton Grange, NSW, 2567

37 Transport Street Yatala, QLD, 4207 6 Interchange Drive Eastern Creek, NSW, 2766

### **PIP NEW ZEALAND LOCATIONS**

5 Tiri Place, Mt Wellington Auckland, 1642 7 Sir Woolf Fisher Drive, Highbrook, Auckland, 2013

ethicalsourcingsustainability@bisley.com.au ESG@pipaustralia.com ethicalsourcing@paramountsafety.com.au



# GLOBAL SAFETY





PARAMOUNT SAFETY PRODUCTS PIP Australia Pty Ltd ACN: 632 076 487 and its subsidiaries

### Operating as:

DJG Corporation PTY LTD Trading as Bisley Sales Pty Ltd ABN 90 608 776 816

WRB Nominees Pty Ltd trading as Paramount Safety Products ABN 68 008 801 072

## INTRODUCTION

This Modern Slavery Act Statement is made by PIP Australia Pty Ltd incorporating Bisley Sales Pty Ltd (Bisley Workwear or "Bisley") & WRB Nominees PTY Ltd (Paramount Safety Products (PSP) or "Paramount Safety") pursuant to the Australian Modern Slavery Act 2018.

This is the fourth statement made by Bisley Workwear. It is the second statement by Paramount Safety and PIP Australia Pty Ltd and, under the Act, is for the reporting year ending 31 January 2024. This statement outlines the steps taken by Bisley Workwear & Paramount Safety to mitigate and address the risks of modern slavery and human trafficking within our operations and supply chain, in accordance with the Australian Modern Slavery Act 2018.

We also acknowledge the requirements of the Modern Slavery Act 2015 in the United Kingdom and the recommendations for business stated in the International Covenant on Civil and Political Rights (ICCPR) 1976.

Throughout the statement, we will reference actions taken in this reporting year and since our last statement to demonstrate both the improvements towards and our commitment to tackling modern slavery risk in our value chain.

# **OUR COMMITMENTS** As a global company, we recognise that we are responsible for ethical conduct within our value-chain. Our business partners must sign and demonstrate compliance with our Ethical Sourcing Policy - which has provisions forbidding modern slavery and related practices and requiring compliance with laws on decent working conditions - and participate in our ethical sourcing and supplier compliance programs. We have longstanding partnerships with our sourcing partners and factories and are working collaboratively with them to take positive actions for society and the environment. Regarding our employees, we commit to providing a fun, safe and secure place to work, free from modern slavery and any associated human rights abuses, through our policies and practices. These are detailed throughout the statement. Bisley Workwear & Paramount Safety have a zero-tolerance policy to Modern Slavery. Any act or practice where freedom is taken away from the employee is considered modern slavery. The definition of Modern slavery is any act of: 1. Forced labor. 2. Involuntary servitude 3. Human trafficking L Debt bondage 5. Child Slavery **6.** or any other form of slavery exploitation **7.** Forced prostitution.



# UPDATES AGAINST COMMITMENTS FROM 2023

Strengthening our processes for assessing and monitoring modern slavery risk and impacts by using Sedex Analytics to conduct risk and impact assessment across our entire supply chain, consistently reviewing supplier performance and identifying high risk suppliers, and developing risk management and contingency plans by country and product.

Implementing TrusTrace to additional BU's & suppliers Increase visibility and mapping our supply chain by reviewing existing supply chain mapping against the Global Slavery Index and Amfori's Countries Risk Classification, as well as implementing traceability and transparency tools. On the latter, we will aim to partner with a renown international digital source mapping transparency company to map and ensure full traceability with our supply chain.

**PROGRESS** 

COMMENTS

COMMITMENT



In-progress and ongoing



In-progress and ongoing



The One Global Supply Chain (OGSC) Team was established, and the Supplier Compliance process strengthened (more details below).

A new risk assessment of suppliers was conducted, and risk-based due diligence began via OGSC. All of our high-risk suppliers have been audited and signed our policy documents. The team have now moved on to engaging with low and medium risk suppliers. Further information throughout the statement.

TrusTrace is in the rollout phase. In 2024 we will continue to onboard our suppliers

Creation of OGSC team and supplier compliance team and portal

High Risk countries and Top 60 suppliers (high spend) are all complaint.

Team is now working on medium and low risk countries. Supplier consolidation project is removing small spend supplier and suppliers who are not willing or able to meet our new Supplier Compliance Program. We have partnered with TrusTrace to standardise our supply chain and material traceability data

COMMITMENT

Expand modern slavery training offer for all PIP employees, including extensive training for all employees in the supply, production & procurement departments.

Engage with suppliers on capacity building and continuous improvement on social issues, including modern slavery.

Supplier Relationship Building and Management

**PROGRESS** 

In-progress and ongoing



New Supplier Compliance Programme Communication and Conference - Complete



In progress and Ongoing



COMMENTS

Upon launch of the new Supplier Compliance Programme, we provided training to PIP employees who work in production, planning, purchasing, product managers and product designers. This gave an overview of document requirements, Sedex platform and partnership, SMETA 4P audit methodology, training on what constitutes Modern Slavery and the steps that PIP are taking to mitigate the risk. They were introduced to international legislation relating to forced labour and guided through how the laws may impact their roles. We also covered roles, responsibility, and escalation matrix for managing suppliers. There are some colleagues remaining to receive training in 2024.

In May 2023 we held our first PIP Supplier Conference in Shanghai to coincide with our newly launched Supplier Compliance Programme. During these presentations, we reiterated our expectations and commitments to international standards and upcoming international legislation that relates to Modern Slavery and Forced Labour. We discussed Sedex, how it works and why we use it, with a Sedex representative present. In addition to the supplier conference, we conducted multiple webinars. The Scorecard was presented to our suppliers during the session 'Being a good global Supplier'.

We work closely with our supply chain and partners and are in constant communication with them. We will continue to communicate with them throughout our trading relationship and keep them up to date with any changes in our programmes or modern slavery related learnings.

# **ORGANISATIONAL STRUCTURE**

Bisley Sales Pty Ltd, also known as Bisley Workwear, is owned by Parent Holding company DJG Corporation. David Gazal and Tim Bird are both Directors of DJG Corporation and Bisley Sales PTY LTD.

WRB Nominees Pty Ltd also known as Paramount Safety Products (Paramount Safety) whose parent company is PIP Australia Pty Ltd. Tim Bird is Director.

**OUR BRANDS** 

Bisley

PARAMOUNT SAFETY PRODUCTS

























# **OWN OPERATIONS AND EMPLOYEES**

We operate in every state in Australia, New Zealand, and the United Kingdom, with sales offices present in these

The head offices for Bisley and Paramount Safety are located in Australia. In Mascot New South Wales and Gnangara Western Australia respectively. In Australia, we collectively employee 205 people.

In Australia, our warehouses are located in Eastern Creek and Smeaton Grange in New South Wales, High Wycombe and Gnangara in Western Australia, Rowville Victoria, and Yalata in Queensland. We also have warehouses in Auckland and Christchurch in New Zealand and in the Wakefield, United Kingdom



### **BISLEY WORKWEAR**



Bisley Workwear has been a strong part of the Australian clothing industry since the 1950's.

Bisley offers a comprehensive range of Workwear, Safety wear and Protective wear, Health Care, Hospitality and Corporate clothing for both men and women. Long regarded as one of Australasia's most trustworthy, solid, and honest brands, Bisley is the market leader in specialist branded Workwear apparel.

Bisley operates BSA Brands in the UK. They have permanent staff of 5 people and distribute stock through a 3PL warehouse partner in the UK who has several dedicated staff. BSA Brands (UK) company number 11722798 is completely owned by Bisley and operates under Bisley's requirements within UK law. While we acknowledge that there are some risks of modern slavery issues in warehouse operations in the UK, we are assured that BSA Brands have processes in place to prevent modern slavery in their organisation and the operations run-in joint venture with Bisley.

Bisley also distributes products through third parties into Africa, the USA, the Middle East, Asia, Canada, Mexico and even to regions as remote as Kazakhstan. These organisations are considered customers and therefore not Bisley entities.



Bisley employees 91 full-time staff across Australia and New Zealand. Our Sydney Head office consists of Senior Management Team, Product Development, Production, Sales, Marketing, Finance, and Customer Service Teams, with sales offices in every state employing Territory Sales Managers.

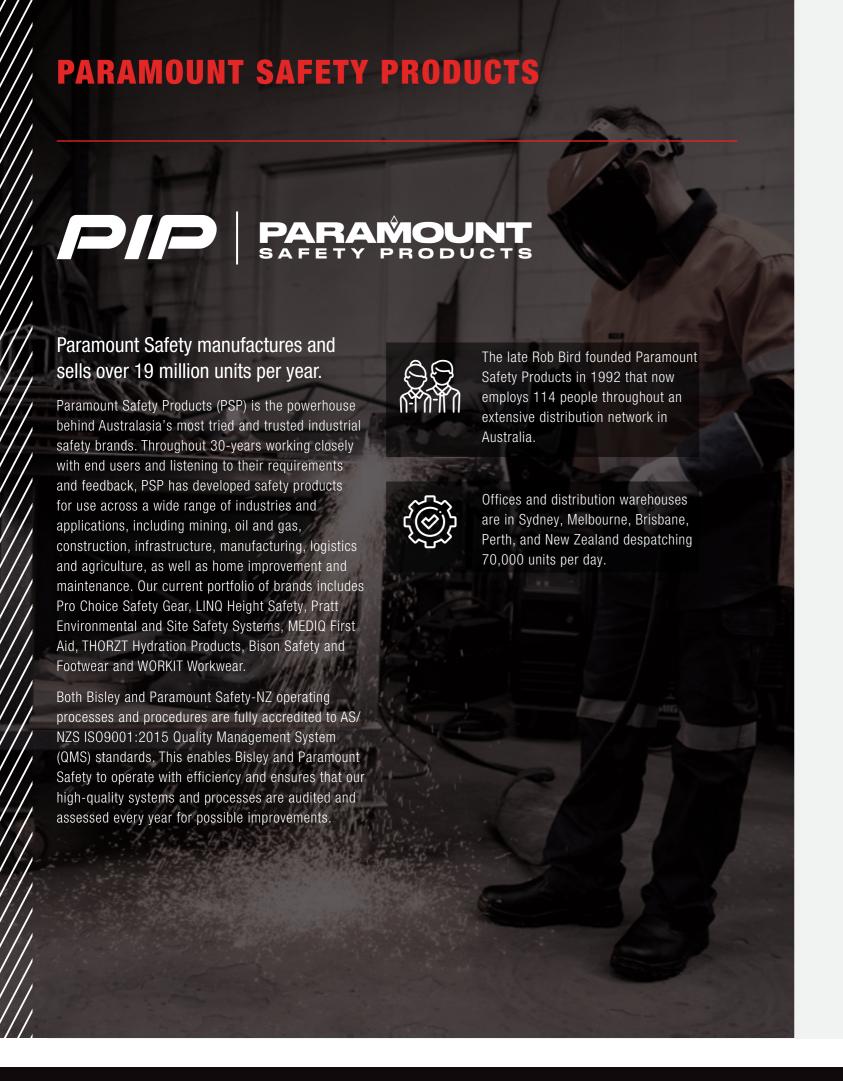


We have three warehouses in Sydney, Perth, and Auckland dispatching over 17,000 units each day.



Bisley Workwear manufactures and distributes more than 4.2 million garments per year.

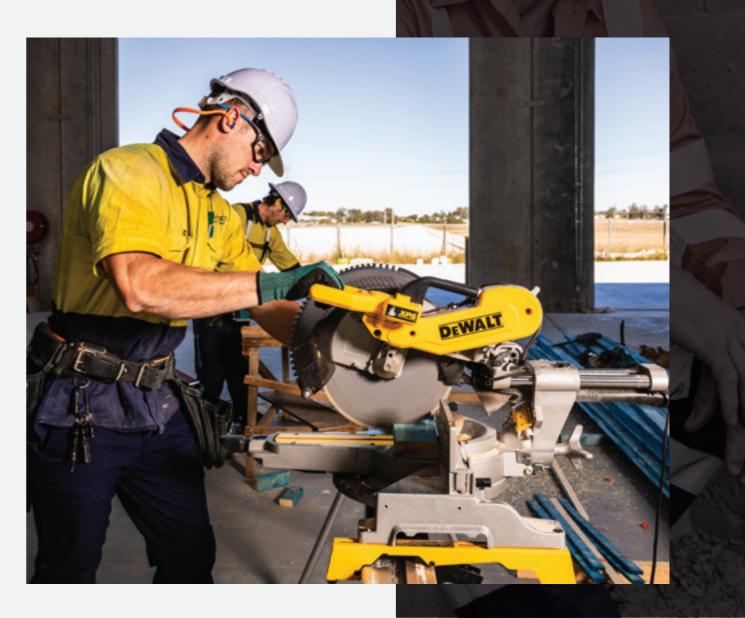




## PIP AND BRANDS

PIP AUSTRALIA is currently completing an Integrated Management System (IMS) for our combined businesses. This includes ISO 9001, ISO 14001, ISO 45001. Audit and certification are expected to be completed in July 2024.

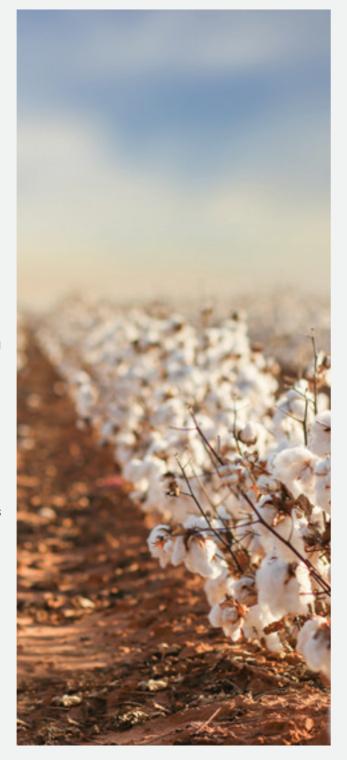
We are also including SA8000 in this programme, currently there is no certification for this standard, we are choosing to implement and audit SA8000 with our IMS.



# THE ONE GLOBAL SUPPLY CHAIN TEAM

Our production of goods is managed in conjunction with our Registered Office in Shanghai, Hong Kong, Bangkok and Manila, that are dedicated to quality control and sourcing requirements. This team is known as The One Global Supply Chain (OGSC) team, with more than 90 employees, formed in early 2023 who monitor and manage the PIP Global Supply chain, to ensure consistency and superior business practices are adhered to. This team is responsible for sourcing and supplier management. Within this team, we formed a Supplier Compliance team to monitor, review and manage our supplier compliance in terms of Sedex Membership, Policy Documentation agreements and audits. It is the Supplier Compliance team's purpose to ensure that our suppliers are audited annually, and to remediate any Non-Conformances (NC's), CAP (corrective action plan) by the date specified by the 3rd party auditor.

Within the OGSC team, our Shanghai QC team, Bangkok QC and Manila Sourcing team are fully responsible for checking all quality points from fabric, garment, and product construction to labelling and packaging. In line inspections are conducted by the Bisley & Paramount Safety staff employed in Asia, who travel and inspect garments and products during the production phase. Paramounts Safety's Sourcing Manager resides in the Philippines and travels extensively to factories in Southeast Asia throughout the year. Our QC team in Bangkok, Thailand and a QC Engineer in Penang, Malaysia, to conduct inspections in the countries outside of China where we have production. For Factories outside of Southeast Asia, such as India and Pakistan, we employee 3rd party professionals to conduct our inline QC prior to shipping. Our Hong Kong team focus on sourcing and supply chain logistics. The introduction of this team is vital in our pro-active approach to identifying, managing and remediating any risks or suspicions of modern slavery in our supply chain.



# **MANUFACTURING FACILITIES**

Bisley nor Paramount Safety own or operate any of our Manufacturing facilities, with the exception of the two Australian facilities listed below. PIP Australia owns two manufacturing sites in Australia – LINQ Heigh Safety and Smeaton Garage NSW. Both of these facilities are now considered as 'own operations' for Paramount Safety, following the same processes and policies as other Paramount facilities – including adherence with Australian laws.



Within the Paramount Smeaton Garage NSW facilities PIP Australia owns and operates a Pad Printing facility. The printing team consists of 5 full time and 2 casual employees, who apply company logos to Hard hats and helmets. The team average 2,000 prints per day, approximately 500,000 prints per year.

LINQ Height Safety Paramounts QLD facility, PIP Australia manufacture height safety harnesses and are governed by the rigorous standards of the NATA Quality Assurance Programme and BSI Benchmark Certification. They produce in excess of 10,000 per year and have 6 full time employees.





# **OUR SUPPLIER COMPLIANCE PROGRAMME**

In May 2023 a communication was sent to our suppliers informing them of our expectations and requirements to trade with PIP Global, including Bisley and Paramount suppliers. This email was from Senior Managers and detailed change in annual requirements and expectations. We will detail this programme further in the statement. This programme is an enhancement of the existing Bisley programme, which was implemented for Bisley in 2020 and Paramount in 2022. We created a supplier handbook to guide them through the process and highlight the importance of Sedex and annual SMETA 4 Pillar (4P) audits.

In addition to forming the dedicated Supplier Compliance team, we launched a purpose-built platform for Supplier Compliance Programme to retain and monitor signed policies and acknowledgments.

Policy Agreements 2023	Sent	Signed
Paramount	75	69
Bisley	18	18

Audits Total	Factories	Audits Complete 2023
Paramount	86	41
Bisley	27	25

Low Risk Countries	Factories	Audits Complete 2023
Paramount	13	8
Bisley	0	0

Medium Risk Countries	Factories	Audits Complete 2023
Paramount	73	33
Bisley	26	24

High Risk Countries	Factories	Audits Complete 2023
Paramount	0	0
Bisley	1	1

More information about the Programme can be found on page 21-27.

# **SUPPLIER CONSOLIDATION PROJECT** Our OGSC team are leading a supplier consolidation project to reduce the number of suppliers within our supply chain The project aims for us to transition to using the highest quality suppliers with advanced ethical practices, where we have overlap manufacturing similar products The sourcing team within the OGSC team are responsible for sourcing high quality factories with advanced business ethics and processes, and work on a continuous improvement strategy. Our aim is to replace legacy factories that are not capable of meeting the standards that we have set for our value chain. The additional requirements of Sedex SAQ, SMETA 4P and TrusTrace require a level of business quality management systems that a small number of legacy factories do not Year on year, we commit to making improvements to our supply chain through our supplier compliance programme. Modern Slavery and sustainability are topics that are ever changing, and we commit to doing our best to eradicate modern slavery and champion sustainability in our supply chains.

# **RISKS**

Bisley & Paramount Safety acknowledge that our industry's supply chain is High Risk in terms of Modern Slavery and Human Rights abuses. As a result, we have recalibrated the way we formalise our relationships and acknowledgements with our suppliers.

Our suppliers must comply with our policies, and manufacturing requirements as outlined on page 8. We have listed the EU REACH and California Proposition 65, listed below.

https://echa.europa.eu/substances-restricted-under-reach

https://oehha.ca.gov/proposition-65/proposition-65-list

# RISK ASSESSMENT PROCESS

In 2023, following this process our Supplier Compliance team prioritized our top 60 suppliers, and suppliers in High risk of slavery per capita countries (as listed by BSCI Amfori Modern Slavery index).

Once these factories were compliant with our programme, the Supplier Compliance team commenced to concentrate on medium risk and lower product volume facilities.

# HIGH RISKS IDENTIFIED

# 1. Xinjiang cottor

Bisley sources goods made from cotton from Brazil and the USA for the selling and distributing into the US Market. Our organisation understands the UFLPA and Section 307 of the Tariff Act of 1930, and the implications of the region wide Withhold Release Order on any goods produced in, or materials sourced from the Xinjiang Uyghur Autonomous Region (XUAR). This is the primary reason that we engaged with TrusTrace to digitally track and trace the fibres used in our products for the US market.

This law can lead to our future order(s) being subject to a Customs and Border Protection (CBP) detention if the authorities suspect that any of the Purchase Orders or components of the same, were grown, processed, or purchased from the Xinjiang Providence of China.

### 2. Sub-contracting

We recognise that the area of highest risk of Modern Slavery and Human rights abuses within apparel manufacturing, is Unauthorised Sub-Contracting. Bisley & Paramount Safety have a zero-tolerance policy on Unauthorised Subcontracting. All stages of manufacture, branding and packing of Bisley & Paramount products must occur in the Bisley & Paramount Safety authorized, accredited, and known factory that the purchase order was placed with.

Only after goods pass our final QC, they are then approved for shipment. This extra security assists Bisley & Paramount Safety to minimise Unauthorised Subcontracting from occurring during production. The Bisley & Paramount Safety QA and sourcing teams can confirm that productions are being produced in the factory where the PO was placed to further ensure that unauthorised subcontracting is not occurring for our production orders.

### 3. Overtime

The 2022 and 2023 Audits have identified a consistent and widespread issue in China with overtime being conducted above the People Republic of China's mandated acceptable limits. Overtime is a complex issue as workers often want the extra income. Overtime needs to be elective and not mandated therefore, a careful balancing act is required when assessing the hours as there is an acceptable rate and a non-acceptable rate of overtime. In our Corrective Action Plans, we have noted that we will continue to use our suppliers, but they must introduce measures to bring down the overtime levels which may include hiring more

staff, accepting fewer purchase orders and any other initiative to reduce the hours of overtime required. During the 2023 auditing period we have reinforced that the hours are reduced as per our discussions and Corrective Action Plan reports (CAPR) from 2022. Our supplier compliance team review and discuss ways to reduce overtime, in an effort to understand why overtime levels are so high.

This is an area that the government of the People's Republic of China are reviewing and will mandate in the near future.

### 4. Third party distributors

We have included our third-party distributors in our risk assessment and have determined that they are not highrisk for modern slavery and are therefore not required

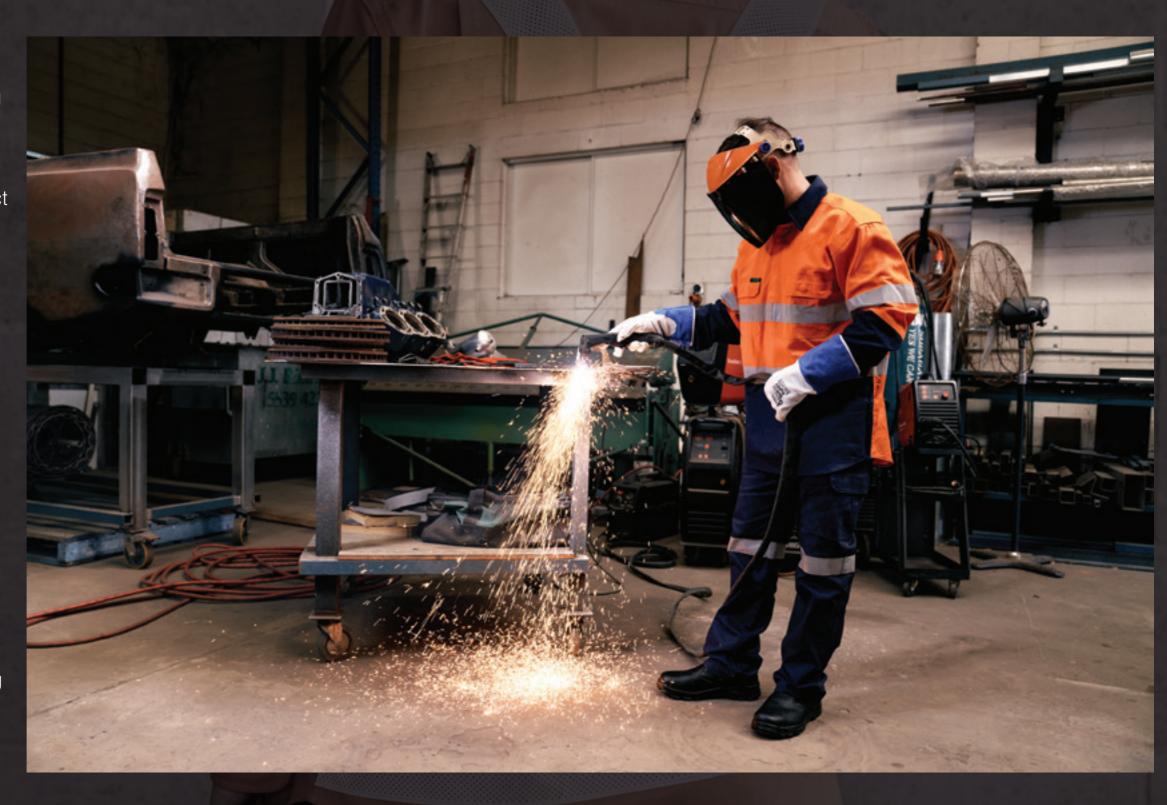
to be audited. We remain in close contact with these organizations throughout the year, so we can react appropriately and change approach if required at any time.



# **ACTIONS TAKEN TO ADDRESS RISKS**

# **Own Employees**

Bisley & Paramount Safety have strong policies and processes in place to ensure that both Bisley & Paramount Safety are great, safe places to work. We ensure through our code of conduct and other policies that our employees' rights and all relevant labor laws are met or exceeded. Bisley & Paramount Safety employees in Australia are all registered on MyGov, which ensures that all employees are who they say they are and have their own bank accounts minimising the risk of people who have been trafficked or who do not have full access to and control of their wages, being employed at Bisley. All employees in overseas territories are employed under local law and undergo similar checks to ensure that they are safely and correctly employed and paid. We have internal training for employees on modern slavery (listed below), and all employees have access to whistleblowing and reporting mechanisms in case they suspect modern slavery in their role or are in trouble themselves.



Balay



### Corruption and Bribery **Supplier** Acknow-Harsh or ledgement Inhumane treatment is not allowed **Contracts and** No subcontracting policies that are permitted **Human Rights** signed and agreed and Ethical Environmental including to by all our Supply Sourcing Policy **Policy Partners** Regular employment is provided **Employment** is freely chosen 3 Living wages are paid Code of Freedom Conduct of association and collective bargaining Safe and Discrimination hygienic Working working No Child nours are not conditions Labour excessive

# **SUPPLY CHAIN AND SUPPLIERS**

The process below applies to all our Tier 1 Suppliers, such as CMT (Cut, Make, Trim) garment factories and finished product factories.

### 1. Onboarding

We have implemented increased scrutiny for onboarding factories and potential suppliers. All new Bisley & Paramount Safety supply partners must agree to our Policies and Agreements and all new PIP AUSTRALIA suppliers must agree to conduct SMETA 4P Audits prior to us considering them as a supplier. The only suppliers that are exempt from providing a SMETA 4P audit before commencing trade are Australian based suppliers incurring less than \$30,000 spend per year. As stated above, these polices and the SMETA 4P audits form part of PIP Australia's onboarding process.

We have high moral and ethical standards and expect that our business partners share these values. There are several values that are so important to us that we have formalised them by way of contracts and policies that are signed and agreed to by all our Supply Partners:

We also launched a purpose-built portal as part of the Supplier Compliance Programme to retain and monitor suppliers' signed policies and acknowledgments. Once our suppliers receive the link to the portal, they sign in and request access. Our Supplier compliance team verify the supplier and allow access to the portal. Once they have obtained access, they then download the 4 policies for agreement and signing. Once the documents are signed and stamped the supplier uploads them into the portal, the documents are reviewed and verified by our supplier compliance team to ensure they are accurate. If correct they are verified, and the supplier is marked as 'approved' to trade with PIP Globally. The supplier compliance team has transparency on suppliers who have not signed our agreements via the system and follow up accordingly.

### 1. Supplier Acknowledgement

- 2. Human Rights and Ethical Sourcing Policy including:
- Employment is freely chosen.
- Freedom of association and collective bargaining
- Safe and hygienic working conditions
- No Child Labour
- Working hours are not excessive.
- No Discrimination
- Living wages are paid.
- Regular employment is provided.
- No subcontracting permitted.
- Harsh or Inhumane treatment is not allowed.
- Anti-Corruption and Bribery
- 3. Code of Conduct
- 4. Environmental Policy







# **SUPPLY CHAIN AND SUPPLIERS**

# 2. Ongoing supplier management

We believe that by working together to see these policies and standards enforced, our company and its suppliers and their factories, contractors and business partners can help achieve a genuine improvement in the lives of working people around the world. Therefore, we conduct ongoing supplier risk management.

Suppliers must comply with all applicable Anti-Slavery and Modern Slavery Laws and must not engage in any modern slavery practices. The above policies must be signed and adhered to by our supply partners on an annual basis. We review the policies annually and update with new requirements to ensure that the policies are relevant to current legislation. We audit our tier one suppliers annually, and if required using our knowledge of risks in the clothing and PPE industry and other risk assessment, activities additional audits are conducted.

### 3. Supplier scorecards

The supplier Scorecard was developed as a way of identifying areas for improvement at suppliers' facilities. It is completed by members of the OGSC team and reviewed by Senior managers prior to Annual Business reviews. The scorecard also ensures that our approach to managing modern slavery risks is incorporated into broader supplier relationship and management processes.

### Key set of criteria that is weighted in the scorecard:

- 1. Good operational procedures & facility maintenance. Safe chemical storage, environmental improvements i.e. water harvesting solar panels.
- 2. Collaboration and relationship health check
- 3. Product quality and innovation- transitioning to sustainable alternatives, packaging trims materials.
- 4. Innovation- transitioning to sustainable alternatives.



# **SUPPLY CHAIN AND SUPPLIERS**

The process below applies to all our Tier 1 Suppliers, such as CMT (Cut, Make, Trim) garment factories and finished product factories.

### 4. Audit programme

Regardless of location, it is our policy that our overseas Tier The Sedex platform stores and manages all the Factory 1 factories undergo a SMETA 4-pillar audit (Sedex Members Ethical Trade Audits) as part of the onboarding process. This audit methodology covers four key topics: Labor Standards, Health and Safety, Environment, and Business Ethics. This is the most comprehensive social auditing methodology currently in practice. While we accept audits from a select number of internationally recognized audit companies, we require suppliers to work with auditors that are members of APSCA (Association of Professional Social Compliance Auditors) in order to safeguard the integrity of

As per our Supplier agreement, our supply partners must provide documents to qualified independent auditors proving that staff are being paid minimum wage and working hours are not excessive on an annual basis. During the annual audits, the independent auditors will randomly select employees and conduct interviews without supervisors being present. This assists us with ensuring that no Modern Slavery practices are present at the facility. The independent auditors are trained to identify when false or misleading information is being provided. The annual audits will also include inspections of living quarters, communal dining areas, sleeping quarters, bathroom facilities, exits and fire escapes, as well as the right to work and freedom of movement of workers.

audits which are conducted by independent 3rd party auditors- APSCA members. This initiative has provided Bisley Workwear & Paramount Safety Products with a platform to become open and transparent with our supply chain. Sedex is driving social improvements internationally. The Sedex platform is not only a due diligence and teaching tool, but the platform also maintains all SMETA audits and reporting for review from our internal stakeholders and

As our Tier 1 manufacturing supply partners are Sedex members, joining Sedex has elevated their factory practices, improved Business Ethics, and better conditions for the factory workers as a result. Bisley & Paramount Safety can provide access to our customers to view and assess our supply chain via the Sedex platform for transparency and assurance of our approach to tackling modern slavery and driving ethical sourcing behaviours. We believe that by working together on product and production matters collaboratively, we can improve the facilities, quality and therefore working conditions of the



# **SUPPLY CHAIN AND SUPPLIERS**

### 5. Handling non-compliances

Bisley & Paramount Safety's trading terms state that the supplier will act if an issue is identified during the audits, such as Corrective Action Plan. Our Supplier Compliance team and Shanghai office mitigate risk by having constant contact and visitation with our supply partners.

We have a detailed NC Matrix for each question in a SMETA 4-Pillar Audit, with an action and escalation process and procedure for each question. The team refer to this document to guide them through individual supplier audits.

The Supplier Compliance Team in Shanghai run reports to identify any NC's and contact the supplier for detail on how they will remediate the issue and close off the NC by the expected date, and method as specified by the independent auditor. If we suspect an issue, or any form of Slavery at one of our suppliers' facilities, we can arrange OGSC team members to travel and conduct an unannounced visit. With the extra scrutiny and focus implemented, Bisley & Paramount Safety aim to prevent future breaches and failures, and ultimately mitigate future risk and improve the lives of workers who manufacture our garments and products.

If there are any Business Critical, Critical or Major NC's that cannot be closed off by the date specified, our supplier compliance team work together with the supplier to create an action timeline and remediation plan. We request that after the remediation plan has been implemented and actioned, the supplier to arrange an additional SMETA 4-Pillar audit.

However, if any Modern Slavery or Human rights abuses are identified, the first action is to ensure the safety and wellbeing of the victim/s. Once their safety is assured Bisley & Paramount Safety will immediately seek to rectify the issue with our suppliers and if the Corrective Action Plan (CAP) is not being resolved in the agreed timeframes, Bisley & Paramount Safety will terminate the contract with the supplier. This would be the last resort, as Bisley & Paramount Safety support our suppliers to overcome the

CAP or CAP's either by providing training or support from our offices. This mission has been at the very core of the company's values and principles and will continue in the future, with our ongoing relationships.

If all avenues have been exhausted and remediation programme has failed to improve the issues identified, we have created an exit strategy procedure and policy.

Our Supplier compliance team work with the OGSC team to exit the supplier with minimal disruption to product supply.



# **SUPPLY CHAIN AND SUPPLIERS**

The process below applies to all our Tier 1 Suppliers, such as CMT (Cut, Make, Trim) garment factories and finished product factories.

### 6. Partnership with TrusTrace

In June 2023 we partnered with TrusTrace, supply chain data platform. TrusTrace is a platform for real-time supply chain traceability beyond tier 2 and compliance enabling PIP and suppliers to standardise our supply chain and material traceability data which is captured, digitised, and shared. Through providing access to validated supply chain data, TrusTrace empowers PIP to know, prove and improve the impact of our supply chain. PIP can utilise the data for risk management, compliance, product claims, footprint calculations, the ability to share data confidently about product origin and impact.

We are able to leverage verified data on the TrusTrace platform to provide deeper visibility into the cotton used within our PPE and workwear products. The partnership will also improve the efficiency of chain of custody chain data collection for UFLPA compliance — a U.S. regulation that is compelling companies to assess risks in their supply chain and implement processes to ensure that suppliers are not using forced labour. In 2024 we are working to further implement the system and onboard more suppliers onto Trustrace.

### 7. Quality Assurance

In addition to annual SMETA 4-Pillar audits, our dedicated Quality Assurance team in Shanghai China has over 90 employees and maintains our standards by visiting the factories to conduct in-line quality inspections for each production. We also have a production Manager in Manilla, the Philippines, a QC team in Bangkok, Thailand, and a QC Engineer in Penang, Malaysia, to conduct inspections in the regions outside of China where we have production. During these inspections our team members are skilled at assessing the factories and speaking with employees to ensure that the standard reported during the annual audits is being upheld post audits. This extra scrutiny provides the factory workers with an opportunity to speak to the QA team members during the inspections. Our Quality team members inspect orders prior to factories despatching garments.

If we identify a concern, either by reviewing an audit, or by any other means of communication available, that there is a potential issue within a facility or the business owner, we arrange for a member of the OGSC to conduct an unannounced visit immediately.

Both Bisley and Paramount NZ entire manufacturing process, warehousing, sales offices, and Head office is strictly monitored via a series of quality control measures, adhering to the standards demanded by ISO 9001:2015 Quality Management System (QMS), which we are accredited. This accreditation ensures that our Production and Sourcing team are following strict processes in relation to onboarding new suppliers and working with our current supply chain.



# **SUPPLY CHAIN AND SUPPLIERS**

### 8. Process for local partners - Australia and New Zealand

Our supply partners in Australia and New Zealand are assessed according to risk, staff numbers and dollar spend with PIP Australia, and risk-appropriate further due diligence activities are conducted. A number of suppliers conduct a very specific function and are owner operated facilities with very low staff numbers. For suppliers who fit into this category, we request an annual policy document agreement as previously listed.

For suppliers that have a large number of staff and PIP Australia's spend is above AU\$30K annually, we conduct full audits of the factory facilities.

We have partnered with Sustainable Assurance Solutions (SAS) to create an audit protocol that incorporates the 9 ETI Base code elements - also listed in our policies and Australian and New Zealand laws. The purpose of this audit protocol is to ensure that all Australian and New Zealand labour and environmental laws are being adhered to with particular emphasis on human rights, employees renumeration, leave, and working conditions. For suppliers where we 'buy in' finished goods, or have very small spend value, we request that they agree to our policy documents as Australia is a low-risk country in terms of Modern



# **SUPPLY CHAIN AND SUPPLIERS**

The process below applies to all our Tier 1 Suppliers, such as CMT (Cut, Make, Trim) garment factories and finished product factories.

# **9.** Recent improvement for future benefit

We have recently created a 'Walkthrough' programme, which is a checklist of scenarios and issues for our OGSC team members to be aware of, monitor and observe during factory visits. This additional procedure will assist us in documenting and identifying breaches or non-conformities in between annual audits. The walk-through programme will be utilised by all members of the OGSC team and Senior management when visiting facilities for any reason.

Minor issues can be addressed with the supplier at the time, i.e. missing needle guards. More serious issues, where our employees may feel intimidated to address directly with the supplier, will be noted and immediately escalated to senior members of the OGSC team and Supply Manager to action. The walkthrough sheets will be stored in the suppliers' folders and discussed during business reviews. This initiative is being rolled out in April 2024, once the team have had training.

## 10. Recent improvement for future benefit

All employees have access to whistleblowing and reporting mechanisms in case they suspect modern slavery in their role or are in trouble themselves. The following email addresses can be contacted by anyone wanting to report unethical behaviour as an anonymous "whistle blower"

ethicalsourcingsustainability@bisley.com.au,

ethicalsourcing@paramountsafety.com.au and

ESG@pipaustralia.com



# ACTIONS TAKEN TO ASSESS EFFECTIVENESS

Bisley & Paramount have several mechanisms in place to check the effectiveness of our actions to combat Modern Slavery throughout the organization.

Firstly, we review our own policies and processes against our core commitments on an ongoing basis. We have put in place KPIs and targets to assess the effectiveness of our actions, gather feedback and identify what is or is not working, such as how many suppliers have been onboarding through Sedex. As part of our monitoring and evaluation efforts, we will continue to review the effectiveness and suitability of our audit process throughout 2024, including the new Supplier Compliance programme. We also review our processes against our ISO 9001:2015 Quality Management System (QMS) standard to ensure the processes around our modern slavery approach are appropriate and update where needed.

Secondly, our membership of Sedex provides us with real-time feedback on how our suppliers are improving their labor practices and standards over time in alignment with our policies. The results of supplier self-assessment questionnaires (SAQs) and audits are clearly broken down on the platform, alongside any corrective actions and remediation plans that may be needed. This allows Bisley & Paramount to see an overview of the effectiveness of our policies, actions, and requirements of suppliers on tackling modern slavery within their sites and organizations.

Thirdly, we have joined many initiatives and peer working groups related to sustainable business and tackling modern slavery (see Annex). Our participation allows us to keep abreast of changes and trends in the industry, as well as learning about best-practice activities from other organizations. We feed back the best-practice ideas and lessons learned from our peers into our own processes to ensure we are taking the best approach possible for Bisley and Paramount Safety.

Finally, we are engaging with external consultants to review our modern slavery and broader sustainability approaches and receive feedback and guidance on how to improve going forward. This includes consultation and projects with New Romantics and Sedex Consulting.

Bisley & Paramount joined SEDEX as part of our transition to better transparency of our supply and value chain. Our factories commenced SMETA audits are part of this effort (Sedex Members Ethical Trade Audit). Sedex is a membership organisation that provides one of the world's leading online platforms for companies to manage and improve working conditions in global supply chains. Sedex provide practical tools, services, and a community network to help companies improve their responsible and sustainable business practices, and source responsibly. https://www.sedex.com/

Bisley & Paramount Safety utilize the Sedex platform as a learning and training tool, as well as for complete supply chain transparency, reporting and record keeping. Sedex conducts multiple webinars and training sessions on platform upgrades, new Self-Assessment Questionnaires (SAQ), legislative changes and supplier collaboration sessions. These sessions are recorded so that they can be watched and rewatched at a convenient time frame and are considered an essential part of our Ethical business practices programme.

# PROCESS OF CONSULTATION





# **ONGOING INITIATIVES AND TRAINING**

Our Ethical Sourcing and Sustainability teams are responsible for the Bisley & Paramount Safety modern slavery approach and meet fortnightly to discuss new initiatives, including any with, Non-Government Organisations (NGO) and any issue or new development pertaining to Ethical Sourcing, Modern Slavery, or Sustainability. The team can be contacted at any time via:

ethicalsourcingsustainability@bisley.com.au,

ethicalsourcing@paramountsafety.com.au and

### ESG@pipaustralia.com.

The above email addresses are included on our Policies and Agreements to ensure that our Supply Partners are aware of whom to contact should any Modern Slavery, Corruption or any other breaches of our policies be identified. This can also be used by anyone wanting to report unethical behaviour as an anonymous "whistle blower". The email addresses are listed on our websites to enable our potential and current customers to ask any questions they may have in relation to our

The Team consists of the Bisley & Paramount Safety Senior Sales Executive, the Bisley & Paramount Production Manager, and is championed by the PIP Australia CEO David Gazal. The business has also appointed an ESG Manager, Moira Smythe to spearhead the initiative.



The Ethical Sourcing and Sustainability team regularly attend training and conferences regarding Anti- Modern Slavery, Ethical Sourcing and Sustainable practices, to further their knowledge and understanding. As more companies move to web-based training and conferencing, our team are able to attend far more conferences and information sessions presented in Web based platforms. The Team Leads attend several webinars a week in relation to Ethical Supply chain and Sustainable initiatives and advancements. Our partners, BSCD Aust, Sedex, TrusTrace, Textile Exchange share information, improvements on an ongoing basis.



This enables the team at Bisley & Paramount Safety to be up to date with the latest advancements in supply chain efficiencies and any legislative changes. We in turn share any new development that would benefit our supply chain partners and staff as they become available.



Our Ethical Sourcing and Sustainability Team are also on working groups with BCSD Aust, Sedex, Textile Exchange and industry bodies working collectively for product 'end of life' solutions. We work collaboratively with BlockTexx as our preferred 'end of life' partner.



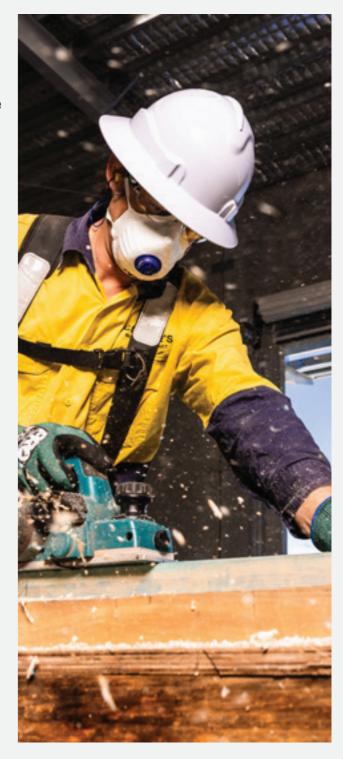
In addition to the Annual SMETA Audits, our OGSC teams constantly monitor factories to ensure the standard is the same throughout the year, as it was during the annual audit. We believe this change in how we manage our manufacturing partners, will reduce the likelihood of Modern Slavery and Unethical behaviours occurring in the Bisley & Paramount Safety supply chain.

# PARTICIPATION AND MEMBERSHIPS **TACKLING MODERN SLAVERY AND HUMAN RIGHTS ABUSES**

Bisley and Paramount Safety have invested in programmes and initiatives to improve our supply chain impacts on the environment and workers.

Solidifying our commitment and creating pathways for execution and creating our Supplier Compliance programme were our focus this year.

Through key stakeholder partnerships, we elevated our ethical sourcing work, additional scrutiny of supplier onboarding and audit review, transitioned to lower impact alternatives across areas of our operations and product and became signatories to key industry programs. Information on these programmes can be found in the annex.





# **FUTURE COMMITMENTS**

We are committed to being a responsible company, taking care of our employees and striving to have a responsible supply chain. In order to do this, in 2024 we commit to:

- Continue to strengthen our supply chain compliance programme, including reviewing its effectiveness and making any changes that are needed.
- Continue to expand our modern slavery training to all PIP employees and offer refresher training to those who have already received it.
- Continue to implement TrusTrace to additional business units and suppliers.
- Continue to engage withs suppliers on capacity building and continuous improvement on social issues, including modern slavery.
- Continue to work with our partners and affiliates to prevent modern slavery and have a positive social and environmental impact.

# **CONFIRMATION**

This statement has been made on behalf of PIP Australia Pty Ltd ACN: 632 076 487. It was approved and signed on behalf of Bisley and Paramount Safety by:

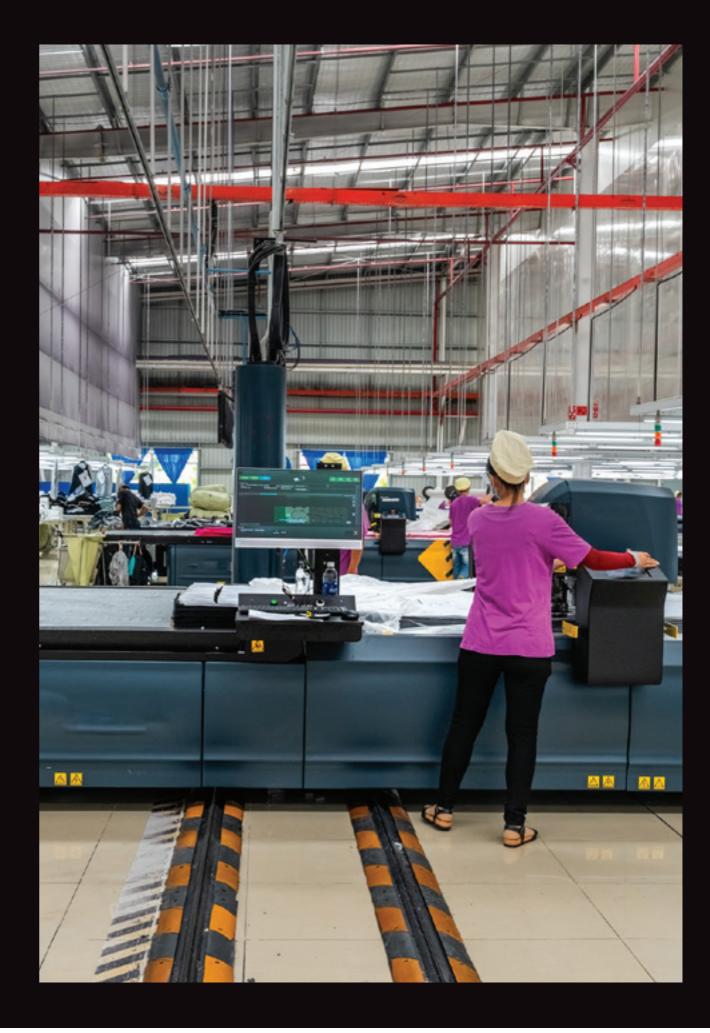
CEO PIP Australia & New Zealand Date 5 April 2024

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Secretary & Director Date 5 April 2024

Director Date 5 April 2024 Joe Milot Director

Date 5 April 2024





# **ANNEX**

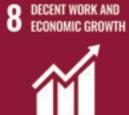
Bisley and Paramount Safety have invested in programmes and initiatives to improve our supply chain impacts on the environment and workers. Solidifying our commitment and creating pathways for execution and creating our Supplier Compliance programme were our focus this year. Through key stakeholder partnerships, we elevated our ethical sourcing work, additional scrutiny of supplier onboarding and audit review, transitioned to lower impact alternatives across areas of our operations and product and became signatories to key industry programs.

We support the UN Sustainable Development Goals and have aligned our business activities and partnerships to the relevant global goals.

5 GENDER EQUALITY





























Bisley and Paramount Safety joined SEDEX in March 2021 as part of our transition to better transparency of our supply and value chain. Post Chinese New Year our factories commenced SMETA audits (Sedex Members Ethical Trade Audit). Sedex is a membership organisation that provides one of the world's leading online platforms for companies to manage and improve working conditions in global supply chains. They provide practical tools, services, and a community network to help companies improve their responsible and sustainable business practices, and source responsibly. https://www.sedex.com/

Bisley and Paramount Safety utilise the Sedex platform as a learning and training tool, as well as for complete supply chain transparency, reporting and record keeping.

# Acceptable Auditing Companies- APSCA members only

We have a large supply base located in multiple countries, and as a result we accept audits from a select number of internationally recognized audit companies. Our supplier agreements mandate annual SMETA 4 Pillar audits. Only highly skilled auditors who have received rigorous training, assessment and certification are able to conduct SMETA P4 methodology audits.

We request that the auditors conducting our audits are members of APSCA (Association of Professional Social Compliance Auditors). Our preference is that our suppliers use different auditing firms each year in order to safeguard the integrity of the audits, using multiple auditors helps to ensure that the reviews are unbiased and not compromised by an established relationship with the supplier. This is outlined in our Supplier Compliance Handbook, provided to all of our suppliers in May 2023. All new suppliers are provided with the handbook to ensure that they will comply with our programme prior to being considered or commencing the onboarding

The below link lists the approved auditing firms that we will accept an audit from. This ensures that SMETA audits are conducted to the high standard that we expect.

https://www.theapsca.org/apsca-member-firms/



# **ANNEX**

# **%** trustrace

Founded in 2016, TrusTrace offers a market-leading platform for supply chain traceability and compliance enabling brands and suppliers around the world to standardize how supply chain and material traceability data is captured, digitised, and shared. Through providing access to validated supply chain data, TrusTrace empowers brands to know, prove and improve the impact of their supply chain, and the data can be used for risk management, compliance, product claims, footprint calculations, the ability to share data confidently and easily about product origin and impact, and much more.

TrusTrace is leading global-scale traceability programs for many of the world's largest brands, and is headquartered in Stockholm, Sweden, with offices in India, France, and the US. Please visit www.trustrace.com

www.trustrace.com



In March 2021 Bisley joined BSCD Australia to collaborate with like-minded industry leaders towards a more sustainable

The Business Council for Sustainable Development Australia (BCSD Australia) is the national peak body representing forward-thinking companies and organisations that are working towards the transition to a sustainable Australia. The BCSD's mission is to accelerate this transition by making sustainable business more successful.

BCSD Australia are the Australian partner of the World Business Council for Sustainable Development (WBCSD).

Members believe that by integrating social and environmental impacts with financial results, business lowers its risk profile, makes better decisions, and creates the solutions needed to meet the Sustainable Development Goals.

Bisley is an active member on a number of BCSD Australia working groups that meet weekly.

https://www.wbcsd.org/

# **FORMALISED TRAINING PROGRAMMES: GO 1 AND FOUND U**

Bisley senior management identified that ongoing and consistent training programmes as an area of improvement

We have launched a training platform to cover Business Ethics, including but not limited to, Price Fixing, Corruption, Modern Slavery, Collusion and Fraud. As well as Workplace Behaviour such as Anti Bullying, Sexual Harassment, Diversity, Age inclusion etc. We have paid particular attention to Modern Slavery and formalised our education process and updates on our supply chain improvements and initiatives.

We have partnered with Go1 Learning Management with a catalogue of over 80,000 courses. We work with our Account manager to select the most appropriate training modules for the mandatory training in both Business Ethics and Behaviour training as listed above. In addition, Individual teams and employees obtain training tailored to job specific roles as required or requested. Go1 is web based and available on demand, which gives our staff flexibility to schedule training according to their individual schedules and preferences.

The Go 1 platform is integrated with the Bisley's HR portal Found U to ensure that the access is convenient and available to everyone. Bisley staff are invited to access the portal and to participate in any training module of interest to them. Bisley is committed to further education and training programmes to advance our staff's knowledge and expertise whilst empowering them to choose their own modules. We believe that by offering elective training programmes we are providing staff with the skills to elevate their career opportunities both at Bisley and into the future.











# **SUSTAINABLE ASSURANCE SOLUTIONS (SAS)**

Sustainable Assurance Solutions (SAS) is a boutique Corporate Social Responsibility Australian Company working with corporations across the Asia Pacific region to meet their ethical and sustainable sourcing obligations, locally and globally.

SAS provides valuable services to a number of highprofile clients, including audits for SEDEX, the ethical supply chain trade membership organisation, and Fair Farms, an industry-led initiative aimed at fostering fair and responsible employment practices in Australian horticulture.

**Bisley and Paramount Safety** have started working with SAS for our local audits in Australia. As part of this, SAS created a tailored audit for PIP Australia's sites.



# ADDITIONAL PARTNERSHIPS AND SUSTAINABILITY SUPPLY CHAIN INITIATIVES



# Bisley BY PIP



Bisley has converted our Energy sources to environmentally sustainable options to reduce our emissions and impact on the environment.



Bisley Head office in Mascot uses Greenpower via AusGrid. Our lightbulbs have been converted to LED energy efficient bulbs.



Our Eastern Creek Distribution Centre uses GreenPower and is carbon neutral. Our Eastern Creek warehouse is managed by Goodman Group who are also in the process of converting buildings and infrastructure to solar power, including our warehouse.



Bisley's Perth Distribution Centre is provided by Synergy- NaturalPower which is Solar, Wind and traditional electricity power supply Our contract is for the highest amount of GreenPower that they offer. Western Australia is in the process of upgrading their power grids and anticipate that by 2050 they will be fully renewable.



Bisley Auckland Distribution Centre Electricity supply is Carbon Neutral via Carbon Zero via ecotricity -New Zealand's greenest electricity supply.















In July 2017, Paramount Safety Products were awarded by Department of Immigration, Border Protection and Australian Border Force full accreditation status as an Australian Trusted Trader (ATT).

Australian Trusted Trader is a voluntary trade facilitation initiative administered by the Department of Immigration, Border Protection and the Australian Border Force that is designed to recognise and reward businesses with secure supply chain security and compliant trade practices.

Some of the Benefits to Trusted Traders include:

- A Dedicated Account Manager
- Streamlined Priority Customs Clearance at the border
- **Priority Trade services**
- Use of the Australian Trusted Trader logo
- Mutual Recognition Arrangements.

Our service promise FLOOR TO STORE FAST through this partnership, delivers outcomes beneficial to both our customers and suppliers.



# **SUSTAINABLE PACKAGING**



Another brand enhancement is our partnership with Better Packaging company. In early 2022 we launched Bisley Recycle, all the packaging for this campaign was made by the Better Packaging company Pollastic range.

Post Chinese New Year 2022 all garment packaging used for Bisley products will be made from 100% Marine and post-consumer plastics- Pollastic by Better Packaging Company. Plastic Pollution and Poverty are inextricably linked. Better Packaging supports and employs communities in the world's poorest and most polluted coastal regions to clean up their beaches and rivers.

As a result, the communities are lifted out of poverty and provided with a living wage to collect the plastic. This has a 2-fold impact of higher standard of living and cleaner environments for the communities. Better Packaging is blockchain verified, B corporation Certified, Certified Carbon free and the programme meets UN Global Sustainable Development goals. The estimated impact of Bisley 6 monthly order is:

- 45.29 tonne of plastic pollution extracted.
- The equivalent of 2,264,500 plastic bottles by weight
- Contribution towards 13 of the UN's Sustainable Development Goals. For every 1 million bags impact 100 families in disadvantaged communities.





















### SUSTAINABLE PACKAGING

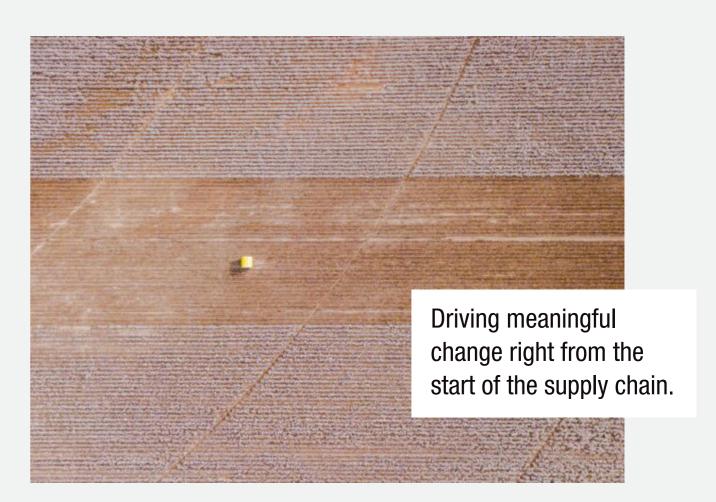




Bisley joined Textile Exchange in March 2021 as part of our commitment to the Sustainable and Ethical supply chain.

Textile Exchange is a global nonprofit that creates leaders in the preferred fibre and materials industry. Textile Exchange develop, manage, and promote a suite of leading industry standards, as well as collect and publish critical industry data and insights that enable brands and retailers to measure, manage, and track their use of preferred fibre and materials. With a robust membership representing leading brands, retailers, and suppliers, Textile Exchange is positively impacting the climate through accelerating the use of preferred fibre s across the global textile industry. With our new Climate+ strategy, Textile Exchange is the driving force for urgent climate action on textile fibre and materials with a goal of 45% reduced CO2 emissions from textile fibre and material production by 2030. By benchmarking the industry and providing actionable tools for improvement, Textile Exchange is driving a race to the top.

TextileExchange.org.





# **COMMUNITY SUPPORT**

## National Breast Cancer Foundation Platinum partner

The National Breast Cancer Foundation (NBCF) is Australia's leading national body funding game-changing breast cancer research with money raised entirely by the Australian public.

They receive no government funding. 'What we do, would not be possible without the support and generosity of people and organisations like YOU'.

Bisley has been a committed partner and supporter of the National Breast Cancer foundation since 2014.

Bisley has raised over \$670,000 since 2014 and will continue supporting this important foundation into









Since NBCF's inception in 1994, the five-year survival rates for breast cancer has increased from 76% to 91%



The aim of the NBCF is simple: Zero Deaths by breast cancer by 2030.



Bisley donates \$3 for every shirt sold from the embroidered NBCF range.

