



# Modern Slavery Statement.

Approved by the Tyremax Group Board on 27 August 2024



# Introduction

Modern slavery is a term used to cover practices such as forced labour, slavery, debt bondage, extreme forms of child labour, forced marriage, deceptive recruitment, and human trafficking.

It is a human rights violation and exploitative crime with devastating consequences for the health and wellbeing of its victims. It describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom.

In 2021 the International Labour Organisation estimated that 50 million people were victims of modern slavery worldwide. The most prevalent form of modern slavery is forced labour, which disproportionately affects people in more vulnerable circumstances, such as children and young people, undocumented migrants and those living in poverty.

This Joint Modern Slavery Statement of the Tyremax Group for the 2024 financial year articulates our position on modern slavery and our plans to further understand and investigate the risk in our operations and supply chain. To assist us in this endeavour, we have consulted with Unchained Solutions Pty Ltd to develop a governance and risk management framework to assess the risks and develop a strategy for continuous improvement.

Our aim with reporting our actions against modern slavery is to be as transparent as possible. We hope our transparency will help other organisations to learn from our experiences, as they implement their own approaches. We welcome feedback, and look forward to learning from other organisations, as we work together with our members and stakeholders to address this serious human rights violation.

“Tyremax has an unwavering commitment to working against Modern slavery in all its forms. We are truly a values-based organisation, and we recognise that we have a crucial role to play in working against it as we build long-term relationships with our suppliers and customers.”

Marius Vermeulen CEO



**TyreMAX**  
mark of quality - assurance of service

# About Tyremax.



The Trustee for The On Track Tyres No. 2 Trust (ABN 98 050 635 023), TMA Imports Pty Ltd (ACN 646 270 706) and Tyremax Limited Partnership (NZBN 9429043244317) (together 'Tyremax') are the joint reporting entities for the purpose of this Modern Slavery Statement.

The Tyremax Group (Tyremax) includes the following trading entities:

**Australian trading entities (together Tyremax Australia):**

- A) The Trustee for The On Track Tyres No. 2 Trust  
(ABN 98 050 635 023);
- B) TMA Imports Pty Ltd (ACN 646 270 706);
- C) The Trustee for Tasmanian Property Unit Trust  
(ABN 89 823 018 755).

**New Zealand trading entity (Tyremax NZ):**

- A) Tyremax Limited Partnership  
(2578043/NZBN 9429043244317)

In addition to the above trading entities Tyremax includes 7 Australian non-trading entities and 2 New Zealand non-trading entities.

Tyremax Australia and Tyremax NZ are independently owned, however, are centrally managed through a common Board of Directors, an Australian-based CEO and a unified management structure. Therefore, Tyremax is required to report under the Modern Slavery Act 2018 (Cth) (the "Act").



Tyremax proudly offers a diverse portfolio of globally recognized tyre brands, catering to both on and off-highway market segments. Our reputation for quality and exceptional service is built on our unwavering commitment to excellence. With eighteen strategically located warehouses across Australia and New Zealand, we ensure robust inventory levels and industry-leading delivery services, maximising customer satisfaction. Above all, our team embodies a culture of care and dedication at every level, ensuring that we not only meet but exceed our customers' expectations. The core values that underpin the way we work and how we interact with others are:



As an importer and wholesaler, our supply chain involves the purchase of products from manufacturers based overseas and services needed to support the inbound freight, storage and delivery of products to our customers. Products are sourced from numerous overseas manufacturers based in Europe, USA and Asia.

Tyremax is overseen by a common Board of Directors. This Board works through the Chief Executive Officer. The CEO leads an Executive Leadership Team, which is responsible for managing the business's operations, including adherence to human rights standards. While Tyremax currently does not have a formal Human Rights Steering Committee, the responsibility for ensuring compliance with the Act lies with the Chief Executive Officer and the Executive Leadership Team.

Key roles within the wider Tyremax leadership team include the Chief Financial Officer, Chief Operations Officer, Chief People Officer, Chief Merchandising Officer, Chief Technology Officer, Group Procurement Manager and National Sales Managers in both Australia and New Zealand. Together, they are committed to upholding Tyremax's obligations under the Act and promoting ethical practices throughout our operations and supply chain.

# Our Operations and Supply Chain

Tyremax operates exclusively across Australia and New Zealand, with its Australian registered office located at 1 Heyington Avenue, Thomastown VIC 3074. Our organisational structure includes twelve associated entities and operates from eighteen strategically located distribution centres across Australia and New Zealand: Adelaide, Auckland, Brisbane, Christchurch, Darwin, Dunedin, Hamilton, Hobart, Invercargill, Launceston, Melbourne, Palmerston North, Perth, Sydney, Townsville and Wangaratta.

Tyremax’s comprehensive sales and distribution facilities ensures efficient distribution coverage of both metropolitan and regional areas nationally across Australia and New Zealand.

Our business activities encompass the importation, storage and wholesale distribution of tyres to retailers across Australia and New Zealand, servicing both the on and off-highway market segments. It is important to note that Tyremax does not engage in the manufacturing of the products we distribute, nor do we engage in the retail sale of our products.

## Below is a diagram illustrating the Executive Leadership Team structure:



# Operations

All Tyremax employees and management are based within Australia and New Zealand, reflecting our commitment to local employment.

Our internal operations comprise employees on both permanent and casual contracts. Recognising that casual contracts can pose risks, we are proactively reviewing and updating our employment policies to mitigate these risks. Our goal is to ensure fair and secure employment conditions for all staff.

Given the nature of our business, we employ individuals from diverse backgrounds, including immigrants and those considered more vulnerable who may be less aware of their rights. To support these employees, we provide comprehensive training and ensuring they are fully informed of their rights and protections within our organisation.

# Products and Services

Tyremax is an importer and wholesaler of multiple global tyre brands for companies and consumers.

### These brands include:

- |                    |                |                   |
|--------------------|----------------|-------------------|
| <b>Continental</b> | <b>Maxxis</b>  | <b>Starmaxx</b>   |
| <b>Goodyear</b>    | <b>Ontraka</b> | <b>Vitora</b>     |
| <b>Hifly</b>       | <b>Rovelo</b>  | <b>Vredestein</b> |
| <b>Maxam</b>       | <b>Sailun</b>  |                   |





# Supply Chain

Category	Number of suppliers Australia	Percentage of total suppliers Australia	Number of suppliers NZ	Percentage of total suppliers NZ
'Product' suppliers surveyed	11	68.2%	7	75.8%
Other suppliers with own Modern Slavery statements	10	5.3%	1	0.5%
Low-risk suppliers with no Modern Slavery statements (landlords, storage operators, telecommunications, IT, consulting)	11	6.0%	7	5.6%
All other suppliers (none of which exceeds 1% of total Tyremax spend)	1000+	20.5%	500+	18.1%

As an importer and wholesaler, our supply chain involves the purchase of products from manufacturers based overseas and services needed to support the inbound freight, storage and delivery of products to our customers.

Products are sourced from numerous overseas manufacturers headquartered in Taiwan, the USA, China, Germany, Korea, India and Türkiye. Many of these manufacturers have multiple production facilities both in their home countries and other locations, including Thailand, Malaysia, Vietnam and Cambodia. Products (mostly tyres) from key suppliers make up 68.2% of Tyremax Australia's total purchases and 75.8% of Tyremax NZ's total purchases.

Tyremax has hundreds of other suppliers ranging from large multi-national businesses to small local enterprises who provide ancillary goods and support services. These businesses provide a broad range of services and products to Tyremax, including local freight, maintenance, cleaning, vehicles and warehouse supplies. In no case do any of these 'other' suppliers make up more than 1% of our total annual purchases.





# Identifying Modern Slavery Risk.



The Act provides eight types of exploitation that meet the definition of modern slavery. They are:

- 1) **trafficking in persons**
- 2) **slavery**
- 3) **servitude**
- 4) **forced marriage**
- 5) **forced labour**
- 6) **debt bondage**
- 7) **deceptive recruiting for labour or services; and**
- 8) **the worst forms of child labour.**

The worst forms of child labour refer to slavery practices or hazardous work involving children.

## **Risk in Supply Chain**

In previous reporting periods, Tyremax has considered risks that may potentially cause, contribute to or be directly participating in modern slavery practices, consistent with the Act and the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities. These risks included: Financial; Geographic; Industry; and whether the supplier has submitted a modern slavery statement.

A review of Tyremax accounts payable data and categorisation of the spend allowed to conduct an assessment based on the following risk factors:

### **Sector and industry risks:**

Certain sectors and industries may have high modern slavery risks because of their characteristics, products and processes. For example, mining, textiles and fashion, fishing, electronics, cleaning, and agriculture are recognised as high-risk industries globally.



### **Product and services risks:**

Certain products and services may have high modern slavery risks because of the way they are produced, provided or used. For example, bricks, cobalt, cotton and rubber are recognised as high-risk products globally. Similarly, services that involve lower wages, manual labour, casual/seasonal workers or low qualification, such as cleaning may have high modern slavery risks.

### **Geographic risks:**

Some countries may have higher risks of modern slavery, including due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors like poverty.

Based on these criteria Tyremax assesses that its product suppliers are more likely than others to present a Modern Slavery risk. These are typically large businesses with extensive and complex upstream supply chains and several of them have multiple production facilities in different countries. 11 product manufacturers make up 68.2% of Tyremax Australia's total purchases, and 7 of these same 11 manufacturers together make up 75.8% of Tyremax New Zealand's total purchases.

11 other suppliers are also required to submit Modern Slavery Statements in Australia, making up 5.3% of Tyremax Australia's total purchases and 0.5% of Tyremax NZ's total purchases. These companies largely provide services such as freight and insurance.

There are a further 11 suppliers in Australia and 7 in New Zealand that are not required to submit Modern Slavery statements but that we have assessed as inherently low risk. These businesses include landlords and local communications and IT providers, along with consulting businesses. Together these make up 6.0% of Tyremax Australia's total purchases, and 5.6% of Tyremax NZ's total purchases.

The remaining Tyremax purchases (20.5% in Australia and 18.5% in New Zealand) are sourced from hundreds of low-volume suppliers, none of which provide more than 1% of Tyremax's total purchases.

Tyremax assesses that these other suppliers are somewhat less likely to present a Modern Slavery risk, although this does not mean that there is no risk.

Tyremax currently has a view that its in-depth evaluations should focus on 'product' suppliers. At this point in time modern slavery risk within the 'other' suppliers is primarily managed through training and awareness, although the formal evaluations may be extended to a wider range of businesses in future reporting periods. Many of the larger entities are required to lodge their own Modern Slavery statements in Australia.

With that in mind we see the focus of our actions to strengthen our understanding of our suppliers' supply chain and raise their awareness of the issue, as well as strengthening our supplier on-boarding process procedures.



## Supplier Due Diligence: SAQ

In 2024, we conducted a Supplier Due Diligence process comprising a self-assessment questionnaire, which was sent to 11 of our tyre and tube manufacturing suppliers. Through this residual risk assessment, we asked these suppliers to provide insight into the nature of their business operations, employee relations and risk management processes using 32 questions that covered five key areas:

- **Worker Information**
- **Auditing, Certifications & Attributes**
- **Due Diligence Activities**
- **Employee and Labour Hire Risks, and**
- **Grievance and Remediation**

In summary, the analysis revealed that each of our Product Suppliers employ over 250 workers, with seasonal or contract workers ranging from none to over 250. The youngest workers are aged 18 to 24. The use of labour hire firms varies among suppliers but with all demonstrating a strong commitment in their policies to workplace health and safety, fair work contracts and human rights.

Suppliers conduct various social compliance audits, and all participate in responsible sourcing certification schemes, mainly ISO standards. Of note, six suppliers are members of the **Global Platform for Sustainable Natural Rubber** which requires alignment with a shared code of conduct and commitment to a set of 12 principles to improve social, environmental and economic standards in the sourcing and manufacturing of rubber. For suppliers based in China, policy development and due diligence activities are driven by government directives.



### **Other findings include:**

- Training on modern slavery risks is inconsistent with only six suppliers providing such training.
- Most suppliers stated that they assess modern slavery risks in their supply chains, implement corrective action plans for suspected modern slavery practices, and require that their suppliers conduct social compliance audits on their facilities. However, for those based in China, this was not seen as a current priority.
- Suppliers do not retain identity documents or require security deposits and provide written contracts, allowing lawful resignation without penalty.
- Most suppliers have mechanisms for anonymously raising concerns and accessing remedies.

Based on this assessment, our next step is to engage each supplier individually to ascertain the extent of their due diligence activities, to improve their understanding of business and human rights, and to explore ways to improve their self-reporting score.

## **Risk in Operation**

Tyremax has identified key areas of risk among those entities who service our warehouse facilities including risks in labour hire, cleaning and maintenance. We currently take steps to ensure all our facilities throughout Australia and New Zealand adhere to specific workplace health and safety standards as well as fair labour practice governed by the Fair Work Act 2009 (AUS) and Employment Relations Act 2000 (NZ). In future reporting periods, we will take steps to identify and verify the risk of workplace exploitation throughout our operations.



# Actions Taken.

In the 2024 reporting period, we took steps to advance our engagement with the issue of modern slavery and the implementation of the Act.

In April 2024, we began consulting with Unchained Solutions Pty Ltd to help us assess the residual risk of modern slavery with eleven tyre and tube manufacturing suppliers, as well as to develop the Group's 2024 Modern Slavery Statement.



**In the 2025 reporting period, we have committed to the following actions:**

1. Executive engagement with the issue of modern slavery and the impact of the Act on the business.
2. Formation of a modern slavery working group to steer the implementation process comprising the Group Procurement Manager, Chief Merchandising Officer, Chief People Officer, Chief Operations Officer and Group Risk Manager.
3. Gaps analysis of governance framework including our key policies and procedures on procurement, recruitment, grievance and remediation with a view to developing our policy portfolio.
4. Development of an action roadmap to address modern slavery for the next 1-3 years.
5. Supplier categorisation and initial risk assessment based on the remaining spends data of key risk categories in our supply chain including cleaning, logistics, transport, warehouse and labour hire.
6. Evaluation of a modern slavery risk management framework to monitor and report on the risk of modern slavery in our supply chains.
7. Supplier Engagement awareness training for our tyre and tube manufacturing suppliers to improve their governance and approach to human rights due diligence.
8. Awareness training of key stakeholders through e-learning module.
9. Development of modern slavery statement for 2025 financial year.



# Measuring Effectiveness.

Since our initial engagement with the Act, we have been monitoring the effectiveness of our actions by keeping a register of the number of stakeholders, including employees and direct suppliers, who have completed key due diligence activities such as self-reporting questionnaires and awareness training modules. We have also maintained a monitoring and reporting mechanism to record any cases of modern slavery in our supply chains and operations.

ACTION	METRIC	DETAIL
Product Suppliers	% of product suppliers with Modern Slavery wording in contracts. % of product suppliers that have completed due diligence questionnaires or provided their own statements.	Contracts to be updated on renewal. All surveyed suppliers responded
Training	Number of people within the business who received Modern Slavery Training within the reporting period	No formal training completed during reporting period (planned for 2025 reporting period)
Reporting	Number of Modern Slavery concerns reported	None reported

As we develop an action roadmap for the 2025 reporting period and beyond, we will design a more comprehensive impact measurement framework to track the effectiveness of actions taken that incorporates both quantitative and qualitative metrics from a range of impact areas. This framework will include a theory of change and logic model through which we can establish appropriate goals, objectives, inputs and outputs, and long-term outcomes for our business operations and supply chain.



## Consultation Process

Tyremax Australia functions as a single integrated business, with all Australian employees directly employed by Tyremax Pty Ltd (ACN 111 414 218) as trustee for The On Track Tyres No. 2 Trust (ABN 98 050 635 023). From a functional perspective, although some transactions are processed by different entities within Tyremax these are all carried out by the same Tyremax employees and there is thus no need for separate consultation with Australian entities owned and managed by us.

Tyremax NZ is managed alongside Tyremax Australia inside the Tyremax Group structure. Tyremax NZ shared its transactional data and supplier information with Tyremax as part of the assessment process for this statement.

Some Tyremax NZ staff also have responsibilities within the Australian Tyremax business; however, all staff in both Australia and New Zealand are accountable to the Tyremax Group's Australian-based CEO and the Executive Leadership Team.

## Other Relevant Information

At present, Tyremax is not actively engaged with any consortium, peak body group or civil society organisation to address modern slavery. However, we are aware of the actions of some of our largest tyre and tube manufacturing suppliers who are members of the **Global Platform for Sustainable Natural Rubber**. In subsequent years we will explore opportunities for collaboration partnership within our trade and industry to strengthen efforts to end modern slavery.

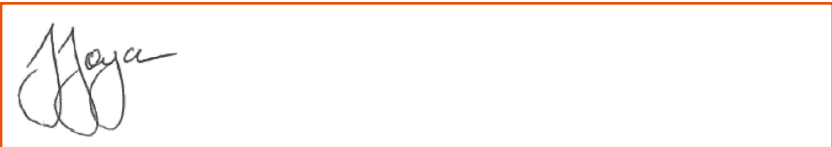


# Conclusion.

This annual Modern Slavery Statement for the 2024 financial year highlights our organisation's journey to assess, engage, address and monitor modern slavery risks and to positive actions against violation of human rights.

# MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

This modern slavery statement for the reporting period was approved by the Tyremax Board of Directors and Executive Leadership Team on as the governing authority of Tyremax Australia and Tyremax NZ.



**Jeremy Joyce**  
Director – Tyremax Group  
27 August 2024



## Mandatory Criteria

Below table outlines the page number/s of our statement that addresses each of the mandatory criteria in section 16 of the Act.

MANDATORY CRITERIA	PAGE NUMBER/S
Identify the reporting entity	5
Describe the reporting entity's structure, operations and supply chains.	7
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	10
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	16
Describe how the reporting entity assesses the effectiveness of these actions.	18
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultations with the entity covered by the statement). *	19
Any other information that the reporting entity, or the entity giving the statement, consider relevant. **	19

\* If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement 'Do not own or control any other entities' instead of a page number.

\*\* You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

