



Modern Slavery Statement

2021

Statewide Independent Wholesalers Limited

ABN 51 009 519 546

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Statewide Independent Wholesalers Limited (**SIW**) is an Australian Public Company (ACN: 009 519 546). The company is registered at 8 Translink Avenue, Western Junction, TAS, Australia. This statement is published in accordance with the *Modern Slavery Act 2018* (Cth). It identifies the steps taken by SIW to identify, manage and mitigate risks of modern slavery within our operations and supply chains. This Statement is in respect of financial year end 27th June 2021.



Modern Slavery Statement 2021

Introduction

This Modern Slavery Statement is prepared in accordance with the Australian Modern Slavery Act 2018 (Cth). It applies to Statewide Independent Wholesalers Limited (SIW) and describes the steps taken during the 2021 financial year to identify, manage and mitigate the risk of modern slavery occurring in our business and supply chains. We are committed to continuous improvement to ensure our processes and actions remain effective in preventing and remediating modern slavery.

Our Business

Statewide Independent Wholesalers Limited is Tasmania's largest distributor of fast-moving consumer goods (FMCG). Established in 1981, it is structured as a public company with joint ownership by Woolworths Group Limited (Woolworths) and Tasmanian Independent Retailers (TIR). Woolworths have a 60% ownership, with TIR holding the remaining 40%. We do not own or control any other entities.

Our Operation

SIW operates a Distribution Centre (DC) in Launceston, Tasmania. This DC receives, picks and dispatches around 14,500 wholesale grocery and liquor product lines, including ambient, temperature-controlled and produce goods to Woolworths Supermarkets, BWS and Dan Murphy's Liquor outlets and IGA and independently bannered stores throughout Tasmania.

SIW's workforce is made up of around 400 employees consisting of full time, part time and casual arrangements. Our employees are employed either under Contract or Enterprise Award conditions. On site, there are also personnel from several contracted companies that provide security, cleaning, maintenance, transport and health & well-being services to SIW.

Our Supply Chains

Our supply chain relationships can be categorised into trade and non-trade components.

Trade Supply Chains

Through our relationships with Woolworths and TIR we procure food, general merchandise and liquor goods directly from suppliers for supply to our customers. Woolworths and TIR are responsible for initially sourcing the goods, negotiating trading terms and managing the relationship with these suppliers. We therefore liaise closely with these businesses to understand the policies and processes they use to mitigate modern slavery risks in our trade supply chains.

Non-Trade (Non-Resale) Supply Chains

SIW sources various non-resale products and services to support its operation. These can include information technology equipment, furniture and fixtures, uniform and stationery, maintenance and machinery suppliers and maintenance teams, transport services and specialized services such as legal and technological specialists.



Identifying Risks

During the financial year 2021, SIW has continued to review its Operations and Supply Chains for potential risks of Modern Slavery. As a business, operating only in Tasmania, SIW has identified the residual risk of modern slavery occurring within our direct business operations as low, however, we recognise we could be indirectly exposed to the risk of modern slavery and human trafficking through our supply chains which is where we have focused our efforts.

Operation

Employment Risk

Most of our team members are employed directly. This lowers modern slavery risks within our direct team however we monitor and address human rights issues in our operations through the application of SIW's Code of Conduct, Compliance Policy and through various processes including:-

- Pre-employment screening, including confirming rights to work in Australia and an understanding of Visa restrictions and requirements (if applicable).
- Employment Contracts and Enterprise Agreements which are in line with the Fair Work Act 2009 (Cth).
- Several policies which ensure the fair and equitable treatment of SIW employees, contractors and suppliers.

Service Suppliers Risk

SIW deals with several contracted companies within its operation. These companies are all Australian based. All employees working for contracted companies are required to comply with all SIW policies and Code of Conduct. Mediation is available to these employees through all SIW policies.

This year, we identified new processes to be implemented to ensure all contracted companies complete a due diligence questionnaire and report on their Modern Slavery Compliance annually. Although not yet fully rolled out in all areas, to date our investigations have revealed no non-compliant practices by our service providers.

Non-Trade (Non-Resale) Suppliers Risk

During FY21, SIW's risk assessments focused on those suppliers that the Company has a direct contract with (Tier 1 suppliers). Given SIW's practices to deal with Tasmanian based companies wherever possible and the fact other businesses and contractors engaged by SIW are generally Australian based, the risk of modern slavery within these companies is considered low. To strengthen our systems and ensure our risks remain low, we have updated our processes to ensure all major suppliers contracting with SIW either at the beginning or renewal of a relationship, are required to complete a Due Diligence Questionnaire and annually complete our Modern Slavery Compliance Statement. A supplier that fails to confirm or acknowledge these requirements may, be disqualified from further participation in our procurement process. If SIW suspects or becomes aware that an existing supplier is in breach of slavery or human trafficking legislation, SIW will investigate and if appropriate, report the matter to the relevant authorities. Further, SIW will review its relationship with the supplier in question which may result in termination of that supplier contract.

Trade (Re-Sale) Suppliers Risk

SIW deals directly with Woolworths', Endeavour Drinks' and TIR's Australian based suppliers to purchase goods for wholesale supply.

The majority of foreign sourced products supplied by SIW to its customers are imported directly into either Woolworths' Australian DCs for supply to Woolworths stores or through the Victorian Metcash DC for supply to TIR member retailers. These products are transferred from those Australian DCs into the SIW DC. As such, we ensure we continue to keep abreast of Woolworths and Metcash actions in identifying and mitigating risks of modern slavery within their global supply chains. Further details can be found in their Modern Slavery Statements for 2021.

Mitigation and Remediation

To manage the risk of modern slavery in SIW's operations and supply chains and to identify emerging issues, we rely on strong policies, procedures and monitoring processes. The foundation documents for human rights protection are our Code of Conduct and our core value of "Think People". We also have a number of other policies and procedures in place that outline our approach to establishing the essential standards of personal and corporate conduct and the behaviour expected of everyone who works for or with SIW including directors, employees, contractors, suppliers and business partners.



Code of Conduct

SIW's Code of Conduct sets out the minimum standards of behaviour that we expect of our team members and contractors. It sets the guiding principles for working with and at SIW. At the heart of our Code of Conduct is treating each other with respect, keeping ourselves and our teammates safe and doing the right thing. It promotes a culture of transparency, honesty and fairness.

Respectful Workplace Policy

SIW is committed to equal opportunity and an inclusive workplace, and do not tolerate discrimination or harassment. All team members are expected to treat customers, team members and others with dignity, courtesy and respect, do the right thing, be fair and be honest, listen, learn and respond appropriately to the views and concerns of others and think about how everything they say and do might impact others.

Compliance Policy

SIW is committed to meeting high compliance and ethical standards when conducting business. Our Compliance Policy clearly states that compliance is everyone's responsibility and team members are encouraged to promptly raise any compliance issues or suspected breaches.

Employment Agreements

All employees receive an employment agreement which clearly communicates their working rights and terms of employment, including, working hours, remuneration and notice periods. The employment conditions and remuneration of each employee is in line with all employment legislation and industrial awards. SIW also invests heavily in the health and wellbeing of our employees through several programs and policies.

Procurement Guidelines

Our newly introduced Procurement Guidelines set out the minimum requirements in respect of any procurement, selection and on-boarding of new non-resale suppliers. These guidelines commit SIW to ensuring that all purchasing and contracting activities are legal, auditable, compliant with health and safety regulations, ethically, environmentally and socially responsible, economically effective, subject to an appropriate level of risk management, open to continuous improvement and development and in adherence with SIW's Code of Conduct. Furthermore, to support these guidelines, our internal procurement team will receive regular training to ensure that the procurement of all goods and services by SIW is consistent with the principles above and is conducted in an honest, competitive, fair and transparent manner.

Whistleblower Policy

SIW encourages the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct via our Whistleblower Policy. This policy provides protections and measures so that those persons who make a report may do so confidentially and without fear of intimidation, disadvantage or reprisal. All allegations received are confidentially investigated by an independent and objective investigation team. During F21, SIW did not receive any reports of concern regarding allegations of improper conduct that potentially had modern slavery-related implications.

In addition to these policies, we provide training to relevant team members and collaborate with various stakeholders to embed our ethical sourcing and modern slavery mitigation practices into our procedures.

The Company's standard terms and conditions also require that minimum standards in environmental, ethical, health and safety measures are met.

Measuring Effectiveness

During F21 we have concentrated our efforts on setting up a robust system with enhanced controls to monitor the effectiveness of our policies and processes. All our team have undertaken training to enhance their awareness of modern slavery risks and understanding of the modern slavery policies and processes in place to address those risks. Further specialized training is planned for key stakeholders during F22. Policy reviews have been completed in line with plans and modern slavery provisions have been built into key supplier contracts.

We recognise that we need to take appropriate steps to ensure our controls are being consistently implemented, and that they are appropriate and effective. The key activities that enable us to monitor the implementation and assess the effectiveness of our modern slavery approach include:-

Workstream	Activity	Measurement
GOVERNANCE	Team Member Training	% of team trained
	Policy Reviews	Completed policy reviews in line with plan
	Contracts with modern slavery provisions	% of contracts with modern slavery commitments
	Annual Review	Effectiveness of due diligence system
RISK MANAGEMENT	Due Diligence Questionnaire	% of Questionnaires returned
	Compliance Statement	% of Compliance Statements returned
	Risk Assessments	% of Risk Assessments completed
MONITORING	In-house audits	Audits completed in line with plan
GRIEVANCE MECHANISMS	Channels and mechanisms for grievances to be raised	Awareness of Channels & mechanisms for grievances to be raised Cases remediated

Given this is the first period during which we have carried out due diligence activities over our supply chain, we will continue rolling out further due diligence for our suppliers, as required over the coming year. We plan to track the performance of our suppliers, and evaluate the effectiveness of our approach to address, mitigate and remediate modern slavery.

COVID 19

The COVID-19 pandemic continues to increase the vulnerability of workers in our operations and supply chains. SIW's priority continues to be protecting the health and wellbeing of our people and keeping our supply chains open to ensure the delivery of essential goods.

Future Direction

SIW will continue to collaborate with stakeholders to identify and evaluate risks relating to human rights and develop our policies, procedures, and training to help combat modern slavery within our supply chains and operations.

Our focus for the coming year includes:-

- Targeted training for team members involved in the procurement of goods / services
- Inclusion of Modern Slavery terms on all Purchase Orders
- Increased risk screening for all existing and future suppliers in relation to modern slavery compliance

This statement was approved by the General Manager and Board of Statewide Independent Wholesalers Limited.



Drew Freeman – General Manager



Paul Graham – Chairman

December 2021

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