

Financial Year - June 2022

# Modern Slavery Statement

TNA Australia Pty Limited  
(ACN 002 937 859)

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## **Modern Slavery Statement**

This statement sets out TNA Australia Pty Limited (ACN 002 937 859) and its subsidiaries' (TNA), commitment to tackling and eradicating modern slavery from our supply chains, and ensuring our policies and procedures protect the rights of all employees and those companies to whom we provide services.

This statement is made for TNA covering the financial year ending 30 June 2022.

### **1. OUR BUSINESS, STRUCTURE AND SUPPLY CHAINS**

#### **BACKGROUND**

TNA is a leading global supplier of integrated food packaging solutions with over 14,000 systems installed across more than 120 countries.

TNA provides a comprehensive range of products including spraying, distribution, seasoning, weighing, packaging, metal detection and identification solutions. TNA's unique combination of innovative technologies, extensive project management experience, and global support, ensures customers achieve faster, more reliable and flexible packaged food products at the lowest cost of ownership.

TNA designs and manufactures Vertical Form Fill and Seal (VFFS) machines.

TNA's products, which include a range of patented robag® stand-alone and turnkey systems, are renowned in the industry for bagging speed capabilities, efficiency and overall performance. The patented robag® Vertical Form Fill and Seal System has been an outstanding success in the snack, confectionery, cereal, biscuit and pasta markets.

Since its inception in 1982, TNA has earned the acceptance and respect of the global food packaging industry. With 40% of the VFFS market in TNA's embrace, over 6,000 machines have been installed in factories in over 120 countries globally.

#### **OUR BUSINESS**

TNA uses its head office located in Sydney, Australia to test and evaluate packaged products prior to their release in the market. The robag® machines are manufactured at TNA's manufacturing plant in Victoria, Australia.

TNA's extensive range of products include the robag®, weighers, metal detectors, seal testers, inserters, labellers, formers, thermal transfer coders, film perforators, dynamic check weighers, and data logging software also known as Supervisory Control and Data Acquisition (SCADA).

TNA has extensive local and international skills in high-speed applications across a wide variety of products and a product range that can be totally integrated to maximise the strength and capacity of each piece of equipment. TNA brings together the right configuration that best suits the unique packaging requirements of each customer. This is the hallmark of TNA's superior performance delivery system.

#### **ORGANISATIONAL STRUCTURE**

TNA Australia Pty Limited itself is an Australian proprietary company, limited by shares. TNA's directors are made up of highly skilled and experienced leaders who act in the best interests of our organisation to ensure long term growth and sustainability.

Overall, TNA is headquartered in Sydney Australia, and has other Australian offices in Victoria.

TNA is organised into **8 geographical units**, which include:

- Australia headquartered in Sydney;
- New Zealand headquartered in Auckland;
- North America headquartered in Dallas, Texas;
- South America headquartered in Queretaro, Mexico;
- the Middle East headquartered in Dubai, United Arab Emirates;
- Asia headquartered in Bangkok, Thailand;
- Europe headquartered in Birmingham, United Kingdom (**UK**); and
- South Africa headquartered in Johannesburg.

TNA's entities which conduct business in Australia include:

1. TNA Australia Pty Limited, which holds the subsidiaries of:
  - a. TNA Solutions Pty Limited;
  - b. TNA Australia Solutions Pty Limited;
  - c. TNA Australia Manufacturing Pty Limited;
  - d. NID from TNA Pty Limited;
  - e. TNA 87 Pty Limited; and
  - f. TNA 94 Pty Limited.

TNA also owns the following international entities which it has acquired over the years:

1. TNA Japan KK;
2. TNA Eurasia LLC (currently being re-registered);
3. TNA (Shanghai) Solutions Limited;
4. TNA Southern Europe S.r.L; and
5. TNA UK Manufacturing Limited;
6. TNA Europe Limited;
7. TNA Norther America Inc;
8. TNA New Zealand Limited;
9. TNA Packaging Systems Asia, Inc;

10. P y L Servicio s S de R L de CV (dormant);
11. TNA Solutions (Qingdao) Limited;
12. TNA Packaging Systems (South Africa) Pty Ltd;
13. TNA MENA FZCO;
14. TNA Central Europe GMBH;
15. TNA Sud America Limitada (dormant);
16. TNA NL Manufacturing B.V.;
17. TNA NA Manufacturing Inc;
18. TNA Packaging Equipment LTDA;
19. TNA Asia Limited;
20. Testamatic Limited (dormant);
21. TNAMEX S de RL de CV; and
22. TNA Canada Limited.

A network of sales offices and agents in various parts of the world have also been established to support the international customer base. These subsidiaries and agents have been established to meet the sales and technical support requirements of the market.

As at 30 June 2022, TNA had approximately 580 employees. We list in more detail below the operations and business conducted for our teams.

#### ***Sales Team***

In Australia, our Sales Team is headed by the Chief Sales Officer. The team comprises approximately 150 employees and these employees are accountable for sales, project management and technical support. The Sales Team sells food processing and packaging equipment to large snack food, French fry, and confectionary manufacturers. The project management section of the team installs equipment and machinery on customer premises. The technical support section of the team services the equipment as and when required.

#### ***Group After Market and Services Team***

In Australia, our Group After Market and Services Team is headed by the Group After Market and Services Manager. The team is accountable for creating and executing aftermarket strategies globally, creating and executing strategies for spare parts and field services, pricing, developing upgrades in consultation with engineering and innovation teams, deploying new systems, and creating and deploying training programs which include technical and soft skills globally.

The Group After Market and Services Team's operations are primarily undertaken in Australia, Asia, North and South America, as well as Europe.

### ***Packaging and Distribution Team***

In Australia, our Packaging and Distribution Team is headed by the General Manager of Packaging and Distribution.

The team comprises approximately 30 employees in China, 500 employees in the UK, and 60 employees in Australia. These employees are accountable for manufacturing functions particularly in the Victoria manufacturing facility. This facility builds packaging machines and associated equipment that is needed to give customers complete solutions.

There is also a customer service element, which ensures that orders are in the system and freight is organised for different destinations around the world. The Packaging and Distribution Team is accountable for production, finance, purchasing departments and warehousing of stock. A small number of workers are employed from workforce agencies.

The Packaging and Distribution Team's operations are primarily undertaken in Australia, China, the Netherlands, North America and the UK.

### ***Marketing Team***

In Australia, our Marketing Team is headed by the Chief Marketing Officer. The team is accountable for maintaining business relationships with stable and long term suppliers.

The Marketing Team's operations are primarily undertaken in Australia, the UK, the US and the Netherlands.

### ***Business Transformation Team***

Our Business Transformation Team is headed by the Chief Business Transformation Officer.

The Business Transformation Team is accountable for procuring products and services including license and software purchasing, hardware purchasing, and consulting on new Microsoft dynamics technology. The team supports IT services to all of Europe, South Africa, North America, South America, and Asia.

The Business Transformation Team's operations are primarily undertaken in Australia, the UK the Netherlands and North America.

### ***People and Culture Team***

In Australia, our People and Culture Team is headed by the Chief People and Culture Officer.

The People and Culture Team is accountable for human resource management, recruitment, learning and development, employee relations, contract management and organisation design.

The People and Culture Team's operations are primarily undertaken in Australia, North and South America, Europe, and the UK.

### ***Financial Services Team***

In Australia, our Financial Services Team is headed by the Chief Financial Officer.

The Financial Services Team comprises of 38 employees. These employees are accountable for accounts receivable, accounts payable, general ledgers, inventories, fixed assets, payroll and cash management.

The Financial Services Team's operations are primarily undertaken in Australia, New Zealand, Thailand, United Arab Emirates, China, the UK, Germany, South Africa, North and South America and the Netherlands.

### ***Leadership Team***

Our leadership team comprises of industry experts who strategically guide our business. More information on our directors and our leadership team can be found here on our website: <https://www.tnasolutions.com/about-us/whos-who/>

## **OUR SUPPLY CHAIN**

TNA deals with a number of its suppliers directly for items including goods and services used in providing products to clients.

TNA's supply chain is made up of approximately 400 contracted suppliers across 12 countries.

Our existing supplier partners are often established suppliers whose products and services assist in the creation and development of our own products.

Our Sales Team suppliers are predominantly located in Australia, China, the Netherlands, the UK, North and South America and Japan. The main types of goods and services this team procures includes: potato washing, peeling, cutting, frying, weighing and packaging equipment.

Our Group After Market and Services Team has a predominant supplier, which is a third party training organisation. The structure of the arrangement with the training organisation includes a retainer for them to build customised material, and deliver training to TNA's customer service and logistics function. This training organisation provides trainers in Australia, Brazil and Belgium.

Our Packaging and Distribution Team employs staff in Australia from workforce agencies. The team predominantly provides machines and fabricated components to create TNA's products. The team's suppliers are located in Australia, and China, and low volumes of suppliers are located in the UK, Japan, Taiwan, France, Italy and Singapore.

Our Marketing Team sources services from suppliers in Australia, the UK, North and South America and Singapore. The products that it procures include promotional services and graphic design.

Our Business Transformation Team procures consulting services, IT hardware and IT licensing from major IT companies including Microsoft, Lenovo, Insight Global, Autodesk and HSO. The team's suppliers are predominantly located in Australia, the Netherlands, the UK, Thailand, New Zealand, North and South America.

Our suppliers and partners are largely categorised as follows:

1. Marketing services, creative content, design and event management;
2. Human Resource services, including payroll processing and recruitment;
3. Accounting and finance services;
4. Professional services, including legal and tax advice;
5. Freight, transportation and packaging supplies;
6. IT and cloud services, including hardware, software supplies, maintenance, web-hosting and design;

7. Office, administration related services, supplies, cleaning and courier services; and
8. Machine parts procurement and warehouse manufacturing.

## **2. RISKS OF MODERN SLAVERY PRACTICES IN TNA'S OPERATIONS AND SUPPLY CHAINS**

TNA is a services based business, and continues to build on innovative technologies in relation to food processing, packaging and design. In turn TNA procures products for its clients from third party suppliers.

The products of third-party suppliers are predominantly sourced through TNA's Australian operations, however, at times TNA can procure services outside of Australia.

Our teams listed above have suppliers in the following locations:

1. Australia;
2. New Zealand;
3. South Africa;
4. Europe and specifically, the UK, the Netherlands, Belgium, France, Spain, Russia, Germany, Serbia and Italy;
5. Asia and specifically, China, Japan, Taiwan, Singapore, and Thailand;
6. North and South America, and specifically, Brazil, Chile, Mexico, and Texas;
7. Middle East, and specifically, Israel, United Arab Emirates (Dubai); and
8. South Africa.

Operational or manual services described above can be procured from a global supply chain, which heightens the risk of purchasing from operations or countries where slavery may be taking place. With this in mind, we take all reasonable steps to ensure we source responsibly.

We acknowledge that our Sales Team also has operations in high-risk sectors and emerging markets, including selling machinery to large multinational global businesses.

We acknowledge in particular that several countries TNA has supplier relationships in, including Russia, China and Thailand are identified as much higher-risk countries under the Modern Slavery Index published by the Walk Free Foundation. The Global Slavery Index conducted in 2018 ranked Russia 11 out of 50 countries within the Europe and Central Asia region for prevalence of modern slavery, with Thailand and China respectively ranked 11 and 21 out of 28 countries within the Asia Pacific region. TNA is also cognisant of the impacts the ongoing war and conflict in Ukraine has had on the risks of modern slavery, human trafficking and exploitation within the Ukraine and Russia, with this conflict leading to an increase in human trafficking and exploitation, particularly for displaced women and children according to a 2022 report of the UK Anti-Slavery Commissioner.

In managing these supplier relationships, TNA seeks to comply with all laws and regulations of Russia and Thailand as well as adhering to our own organisational policies and procedures that are intended to eliminate modern slavery in our supply chains.

TNA's suppliers can be larger organisations, and for this reason, TNA considers that the risks of modern slavery may be likely beyond the first tier of TNA's supply chains. We acknowledge that



TNA's suppliers may outsource tasks, including manufacturing and development of products in higher risk countries overseas, which may increase the risk of exploited labour.

### 3. ACTIONS TNA TAKES TO ASSESS AND ADDRESS THESE RISKS

We are committed to a process of upholding practices against modern slavery or human trafficking in our supply chains, or in any part of our business.

TNA employs all staff in accordance with the laws of each country within which it operates. TNA ensures that it pays wages as per the local laws, industry guidelines and benchmarks. These operations are closely managed and monitored by TNA's global People and Culture Team.

TNA commits to acting ethically and with integrity in all of our business relationships. Our commitment is also supported by policies and procedures, as detailed below, which ensures responsibility and accountability for improving business practices, and eliminating modern slavery in supply chains at all levels of our business.

TNA aims to never cause or contribute to modern slavery and continues to conduct its due diligence to identify, prevent, mitigate, account for and address modern slavery risks. TNA recruits professional staff in our People and Culture Team to check on working conditions, and ensure subsidiaries comply with local laws and guidelines. Our People and Culture Team also ensures that when utilising labour hire agencies, that they obtain agency contracts and detailed audits of pay rates to ensure staff are being paid correctly.

Our Business Transformation Team also takes steps to ensure that its IT suppliers are socially, legally, and ethically responsible, as they are often large companies with global supply chains of their own. The Business Transformation Team requests responsible sourcing statements from all of its suppliers, to ensure suppliers are treating their employees fairly and with dignity.

### OUR POLICY FRAMEWORK

Our Leadership Team at TNA has overall responsibility to establish and enforce policies. Our Leadership Team delegate this responsibility to management teams within TNA.

TNA's Employee Handbook sets the behavioural standards for all TNA employees, contractors and consultants. The Employee Handbook helps set a consistent global approach for all TNA employees.

At TNA, our values underpin our everyday actions, and we use them as a guiding benchmark in our conduct and working relationships with customers and suppliers. TNA's values are:

1. **We enjoy our work:** we are passionate, professional, committed and always act with integrity.
2. **We get on with the job:** politics are out, and bureaucracy is avoided wherever possible.
3. **We support our people:** we are honest and treat everyone with dignity and respect.
4. **We act as a team:** we each take responsibility for our work, we share our successes and learn from our mistakes.

Our Employee Handbook also sets out our Corporate Social Responsibility regime, which sets an example and standard for both our employees and our suppliers. Our Corporate Social Responsibility regime sets the social, moral and ethical benchmark in which TNA brands itself to seek out like-minded suppliers.

Our Corporate Social Responsibility regime includes the following initiatives.

***Global Goodwill - Lending a hand to the world's underprivileged children***

Caring for underprivileged children globally has been a TNA focus since the company's inception. We believe it is a responsibility that we should all share. It is a way to not only improve the life and conditions of children and their families, but also to encourage the advancement and quality of communities in which we work.

TNA's main priority is education as well as the building of schools, which is a step that can help to considerably limit modern day slavery for children. TNA is proud to actively support many charities through funds and personally participating in important projects.

Abuse, hunger, slavery, poverty and the ramifications of war and injustice are problems that are rife across the globe. TNA is playing an active part in assisting to stop these devastating realities, particularly where children are involved. Some of the projects TNA participates in include the following:

1. ***Indigenous communities (Australia)***  
Assisting with establishing a house for children who live in extreme poverty, children who have been sexually abused, and teenagers who are at risk of committing suicide.
2. ***Make a Difference (Australia)***  
A service that provides support for children and their families who are experiencing severe poverty, trauma or other difficulties. It is a charity with a very special charter to provide financial and mentoring support.
3. ***Donated Goods (Australia)***  
A warehouse that was reopened by TNA after it was shut down by the government. Providing free of charge furniture, home appliances, kitchenware and clothing to underprivileged children and their families.
4. ***Diepsloot School (South Africa)***  
TNA worked with the committee of the South African School Children's Help Appeal (SAScHA), who provide support for children and their families who are experiencing severe poverty, trauma or other difficulties. SAScHA were looking for corporate partners. TNA assisted in the building of classrooms and the school hall. In 2001, the school housed 247 students, today the number of children being educated is at 1,600.
5. ***Kids Care (South Africa)***  
TNA are assisting Kids Care by feeding 100 orphaned children (who have lost their parents to AIDS), as well as single mothers and fathers who are unemployed and struggling to survive.

6. ***Nuestros Pequeños Hermanos (NPH) "Our Little Brothers & Sisters" (Mexico)***  
TNA provides financial support to this charitable organisation which serves over 1,000 orphaned and abandoned children from all corners of Mexico, ranging in age from infancy to young adults. NPH provides shelter, food, clothing, health care and education. The children are loved and prepared to support themselves in life.
7. ***Sri Aurobindo Yoga Mandir Trust (Nepal)***  
TNA assisted in the housing, teaching and feeding of orphans and children of single mothers. The Trust creates a high level of education so that children can become independent.
8. ***Albania***  
TNA purchased a home to be used as a safe house/community centre for girls who have been sold into slavery and prostitution, so that when they are rescued by police in countries like Italy and Greece, they can be returned to the Albanian border, and have a home to prevent the Mafia from capturing the children to resell them.
9. ***Sri Jai Sankara Trust (India)***  
TNA funded the building of a permanent home/rehabilitation centre (close to a school) for orphaned and deprived children from a tsunami hit fishing village to accommodate 30 to 40 children.
10. ***Global Vision International (GVI) - (Guatemala) Education***  
Donating funds in the form of scholarships to 250 children to attend school in Guatemala, providing indigenous children of the village with a means of breaking out of the poverty cycle.
11. ***Women in the community***  
To empower women in the community through support of women's co-ops and manufacturing of traditional clothing. To support poor families of children attending the program through provision of adequate nutritious food.
12. ***Nakuru, Kenya and Cutteslowe, Oxford Community Development Project (Kenya)***  
TNA helped to build and equip a garage with tools to provide a business and jobs for underprivileged children, and provide a school for them. In Nakuru there is 70% unemployment, very high rates of HIV and Malaria.

Our Employee Handbook is provided to all employees during their induction. Employees are also required to sign, witness and acknowledge that the employee is aware of TNA's values, the initiatives it is involved in, and the ethics that underpin the business with respect to corporate social responsibility and modern day slavery.

Our Code of Ethics and Professional Conduct (**Code of Ethics**), located in our Employee Handbook, is another important tool used by TNA to list our key moral and social responsibilities and ensures that our employees' values are aligned to that of the business. Our Code of Ethics strictly prohibits discrimination, harassment or vilification on the basis of:

1. Age;
2. Race or Ethnicity;
3. Gender;
4. Religious or political beliefs;
5. Profession; and

## 6. Socio-economic background.

Workplace harassment, bullying and violence is also strictly prohibited.

Our Employee Handbook is strict and clear on Fair Dealings. Fair Dealings is an obligation to conduct our business activities in a lawful, ethical and fair manner. The Employee Handbook is clear that if TNA employees are approached to provide any gifts or favours to suppliers, to report it to their relevant manager.

Health and Safety is also paramount to TNA's operations. TNA is committed to work health and safety and makes every reasonable effort to prevent accidents, protect employees and promote health, safety and wellbeing to all whilst on our premises and whilst acting on our behalf at other locations (e.g. client sites). TNA also expects its suppliers to comply with the relevant work health and safety laws of each country we and our suppliers operate in.

Our Employee Handbook is clear that TNA is committed to conducting regular inspections to identify potential hazards and risks to employee health and safety with the view to eliminating, mitigating or minimising safety risks (where possible).

The Employee Handbook encourages employees to not work in excess of a certain number of hours, and requests that at the minimum, employees have at least 10 hours rest and personal time between shifts, or regular days of work. This is regularly enforced in the workplace by line managers.

TNA has policies and procedures which support a zero-tolerance approach to modern day slavery in our business, including our:

1. Equal Opportunity Policy;
2. Health and Safety Policy;
3. Workplace Bullying Policy;
4. Workplace Harassment Policy;
5. Whistleblower Policy; and
6. Grievance Policy.

We see ourselves as being advocates in our industry and understand the role we play in setting an example.

We strongly encourage and support diversity across all levels of our business to improve business performance, encourage innovation, attract and retain the best talent and provide excellent customer outcomes.

All staff members are responsible for being aware of the policies whether they are ethical, or legal and for ensuring they apply those policies to their jobs and when performing their duties. Our Leadership Team and managers are responsible for creating and promoting environments in which we comply and ensure ethical business is conducted.

TNA expects its suppliers to maintain the highest standards of business ethics and become familiar with and comply with all laws that are relevant to the supplier relationship, including the laws that govern TNA.

We do our utmost to act with integrity, honesty, trust, respect and fairness. If employees are aware of any violation of the law or company rules, including any modern slavery practices, we encourage

employees to contact their supervisors for complaints, grievances and suggestions immediately. In the event that supervisors cannot assist, it is recommended that employees contact the People and Culture Team.

If employees still require assistance to report grievances or concerns that they have, they are encouraged to report complaints and suggestions to their managers or our People and Culture Team.

#### **WHISTEBLOWER POLICY**

TNA encourages a culture of transparency and accountability and promotes a high standard of lawful and ethical conduct in all of TNA's internal and external dealings and operations.

TNA has a Whistleblower Policy, which encourages all staff to report misconduct or improper state of affairs or circumstances which includes any modern slavery practices. TNA takes all instances of disclosures under its Whistleblower Policy extremely seriously. Disclosures can be made by TNA's employees which are then reviewed and where necessary investigated in accordance with the Whistleblower Policy.

#### **TRAINING**

Training is an integral part of our business framework. It ensures that all employees are aware of their responsibilities.

All new employees are required to review, acknowledge and sign our Employee Handbook on induction, which details our core values and responsibilities at TNA globally. During the onboarding and induction of new employees, aspects covered include our values, code of conduct, key policies, health and safety, discrimination, bullying and harassment.

With regards to modern slavery TNA is committed moving forward to ensuring all our employees are also inducted into our Whistleblower Policy and Modern Slavery Statement moving forward to create awareness of modern slavery risks and measures to address such risks moving forward.

#### **4. HOW TNA ASSESSES THE EFFECTIVENESS OF ACTIONS BEING TAKEN TO ASSESS AND ADDRESS THESE RISKS**

TNA is committed to assessing the effectiveness of actions being taken to assess and address the risks of modern slavery within its operations.

At present, TNA has set up recordkeeping within the People and Culture Team. Employee guidelines specify that should any issues arise with respect to the risks associated with modern slavery such issues are to be notified to management and People and Culture. Records are to be kept of any such reports and actions taken to address any such risks, if identified, including alternate sourcing of material or components where required.

Moving forward, TNA will determine what further actions and measures can be taken to ensure TNA is able to regularly assess the effectiveness of the actions being taken to address modern slavery risks.

## 5. CONSULTATION WITH CONTROLLED ENTITIES

Before lodging this statement, TNA consulted and undertook discussions with all its subsidiary companies involved in the production of its products, including all entities over which TNA held a "controlling interest" in the relevant financial year, namely those entities identified in the organisational structure outlined above. The input of those subsidiary entities was taken into account in preparing this statement. TNA did not engage in any such discussions with any parent entities because TNA is the ultimate parent entity in the corporate structure.

TNA strives to take a consultative approach to modern slavery risks and plans to continue its discussions with controlled entities throughout the next financial year and into the future in the interests of encouraging dialogue within its supply chains in relation to modern slavery risks. This dialogue also enables greater visibility over the supply chains so that TNA can readily continue to identify new and evolving modern slavery risks.

## 6. APPROVAL

This statement was approved on 30<sup>th</sup> May 2023 by the Board of TNA Australia Pty Limited.

Signed,



Alf Taylor

Director, TNA Australia Pty Limited

30<sup>th</sup> May 2023