

# DISCOUNT TYRE AND WHEEL PTY LTD

ABN 31 169 153 468

## Modern Slavery Statement 2023

### Introduction

This statement is made pursuant to section 15 of the *Modern Slavery Act 2018* and constitutes Discount Tyre & Wheel Pty Ltd's ('DTW') statement for the financial year ending 30 June 2023. It sets out the potential modern slavery risks identified in our operations and supply chains and the steps we will take to minimise the risk and measure the effectiveness of our actions.

### **Our commitment**

DTW is committed to ensuring that human rights are respected and upheld throughout our business, not only in Australia, but throughout our international supply chain. We are committed to continuously improving our policies to enhance our risk-management and control systems and expect the same commitment from our suppliers and partners across the globe. Additionally, we are committed to complying with the relevant local and national laws relating to human rights and modern slavery with respect to our employees and business operations. As part of this commitment, we do not tolerate any form of discrimination or harassment and we strive to be an equal opportunity employer across all aspects of our business. We are committed to creating and maintaining a diverse, inclusive and safe environment for all, including employees, contractors and our customers. DTW is committed to working with its suppliers and partners to ensure we operate our business lawfully and ethically at all levels. We expect the same level of commitment from our business partners and suppliers. Our commitment to addressing the potential modern slavery risks can be summarised as follows:

- DTW will provide the relevant training to any new employees of the company during induction and onboarding and will maintain employee awareness of modern slavery risks regularly;

- DTW will regularly, and especially in preparation of submitting an annual statement, assess the potential modern slavery risks in our business in Australia and internationally;
- DTW will maintain awareness of supplier practices, and will work with them to improve those practices where appropriate and required. This includes maintaining a record of modern slavery policies and other documents of suppliers; and
- DTW will review and update its own policies and documents, including the annual Modern Slavery Statement annually, and when required.

## **Our structure, operations and supply chain**

DTW is a company incorporated in Australia. We are an independent importer and wholesaler of wheels and tyres for automotive vehicles. We wholesale wheels and tyres to retailers in Australia - we do not supply to retail outlets overseas.

Our supply chain involves the purchase and distribution of tyres and automotive parts which we source from a number of suppliers, mostly located in Australia, Asia and Europe. We are committed to ensuring that our business and the supply chains involved are free from modern slavery.

### **General Policy**

## **Our processes and procedures**

We have a number of our own processes in place for protecting the human rights of those involved in our business and supply chain to assist us in managing and reducing the potential risks of modern slavery practices. In many instances, we engage with manufacturers and conduct an assessment of their relevant policies and guidelines, including their modern slavery policies, before acquiring supply from them. A review of such policies is a minimum requirement and important step which we take when assessing and selecting manufacturers. Not only do we consider the quality and cost of the product to assess that it is fair and reasonable but not indicative of underpayment of workers, but we also consider their social and ethical responsibilities and how they address them. We use this due diligence process to gain information about supplier guidelines on human and labour rights and if we are not satisfied with a potential manufacturer's responses, we will not engage them.

We will also conduct manufacturing site audits to verify compliance in relation to labour, environment and business ethics as well as local laws and regulations. If during those audits any non-conformities are found, then we will require them to agree to a recovery plan which sets out the actions they must take in order to continue or commence their contractual relationship with us.

In addition to ensuring that our partners and suppliers mitigate potential modern slavery risks, in Australia we also focus on employment conditions, including only employing individuals who are eligible to work in Australia and ensuring that all employee minimum wages and conditions are met in line with National Employment Standards and the relevant Modern Award. Further, we review the Modern Slavery Statements of our partners or suppliers within Australia with annual revenue in excess of \$100 million, as well as those which implement similar policies internationally, such as under the EU's legal framework.

## Our modern slavery risks

In our domestic operations we have policies in place to protect the human rights of the individual staff members, including a Code of Conduct, in addition to their legal rights under the Fair Work Act. DTW also engages suppliers for goods and services within Australia which we view as low risk for modern slavery, such as Australian providers of professional services, including legal and accounting services.

Whilst we view our domestic operations as low-risk, we understand and recognise that the risks of modern slavery can occur anywhere along the supply chain, including in Australia and overseas. During the reporting period, we undertook a review to consider the modern slavery risks that may be present anywhere in our operations and supply chains. We considered immediate areas of risk as well as areas of risk that may be linked to our business further down the supply chain. We also considered operations which we may not necessarily have visibility over, but which we are still loosely linked with, such as those in other sectors, industries or geographical locations. We are committed to the continuous assessment and monitoring of risks that may be linked to our operations.

We have initiated the process of reviewing and monitoring our systems and processes and have dedicated resources to manage the risks of modern slavery in our business. As part of the review process, we consulted with our international suppliers and identified the below areas of risk which are present in our supply chain due to the geographical location from which products and raw materials are sourced:

1. Forced labour;
2. Child labour; and
3. Excessive working hours or deceptive recruiting.

The above risks are identified as a result of the nature of the products DTW acquires from international manufacturers. For example, we source tyres from a number of international manufacturers and as with all tyre manufacturers, some of the key raw materials used are natural rubber, synthetic rubber and fillers. The cultivation of natural rubber can be labour-intensive and

the risk of modern slavery heightened in countries where forced labour, child labour or other modern slavery risks are elevated. To ensure that we are mitigating such risks, we regularly seek assurance and written confirmation from our suppliers each year, including obtaining and keeping records of their modern slavery policies and guidelines.

## **Actions to assess and address risk**

DTW's approach to mitigating risk is now embedded in each stage of the relationship with our suppliers, beginning at the qualification stage and continuing throughout the entire relationship through third-party audits. We have been assessing and addressing the identified risks within our business and supply chain in the following ways:

- Maintain a senior manager to oversee DTW's management of its modern slavery risks;
- Reviewing our policy, including modifying policy to improve our existing processes and procedures;
- Reviewing supplier policies and assessing suppliers' awareness of risks through dialogue and discussion;
- Developing our internal staff training and development program to build awareness for staff and key partners of modern slavery risks in our business and in particular in our overseas supply chain;
- Consulting with relevant management and using key performance indicators to measure the effectiveness of our policies in preventing modern slavery in our business;
- Requesting audit feedback and information from suppliers about third-party or sub-suppliers;
- Collaborating and engaging with key suppliers across various countries to understand how they are addressing their modern slavery risks and potentially carrying out a joint assessment of high risk areas of the supply chain;
- Continuing to review our action plan for improvements in our response to modern slavery risks in the next reporting period, including measurable outcomes.

## **Assessing the effectiveness of our actions**

The effectiveness of our actions to assess and address modern slavery risks has been overseen and measured during 2022/2023 in the following ways:

- Partnering with direct suppliers who conduct audits of their own suppliers to stay informed of risks identified and the ways they may be resolved. In particular, we have undertaken discussions at a senior level with several of our suppliers who source product in China to ensure that they have in place policies and processes in place to ensure avoidance of slavery type conditions;

- Identified from media reports any geographic areas which are reportedly using slave labour type conditions, such as the Uighurs in Xinjiang Province of China, to determine that none of our product range is being sourced from high 'at risk' areas;
- Establishing key performance indicators, including the number of internal policies updated implemented which address modern slavery risks, the number of supplier contracts which include modern slavery clauses or policies and the number relevant staff who have completed the internal modern slavery awareness program following its development and implementation.

## **Remediation**

During 2022/2023, no incidents or issues have been specifically identified or brought to the attention of senior management.

Our policy remains that where a genuine issue is identified following an audit, feedback or complaint to DTW, our senior management will assess the concern and take the appropriate action. We are committed to working with relevant suppliers, organisations and government bodies to ensure that the appropriate action is taken to remedy or correct any legitimate issue that may arise in order to minimise modern slavery risks.

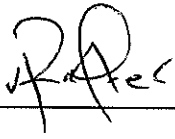
## **Beyond 2022/2023 - Future commitments**

A process of consultation within the DTW business, including Directors and senior management, relevant staff and external advisers, aided in the drafting of this statement. We will continue to monitor, assess, address and measure our modern slavery risks and policies, in consultation with the relevant DTW staff, to minimise the risk of modern slavery in connection with our business.

Specific steps planned for 2023/2024 include –

- Where and when permitted, to resume on-site visits to manufacturers off-shore, specifically China;
- Continue our regular dialogue group with selected suppliers;
- Undertake an external review of this Policy;
- Update internal training course where required for DTW staff.

**Approved by the Board.**



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**Veronica Rafter**

Director

Discount Tyre & Wheel Pty Ltd

Dated - 16/01/2024