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## 2024 Modern Slavery Statement

NTAW Holdings Limited  
ACN 095 843 020

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## 1. INTRODUCTION

This statement, pursuant to the *Modern Slavery Act 2018 (Cth)*, reports on the risks of modern slavery in NTAW Holdings Limited's ("NTAW" or the "Company" or the "Group") operations and supply chains, and actions taken to address those risks during the financial year ended 30 June 2024 ("FY2024").

NTAW commits to supporting and respecting the protection of internationally proclaimed human rights, as set out in the Universal Declaration of Human Rights and the Ten Principles of the United Nations Global Compact.

This aligns with the NTAW Board's commitment to maintaining a high standard of corporate governance to promote responsible management and conduct within NTAW. It is also supported by NTAW's Code of Conduct, and in particular, our firm commitments to safety, lawful and ethical conduct, respect for others, and to responsibly consider the broader community in our decision making and operations.

NTAW understands that modern slavery and human trafficking can occur in many forms. We are committed to operating responsibly and ensuring we have robust standards and processes to minimise and address modern slavery risks. We are committed to providing transparency on our modern slavery risks and how they are being addressed.

This Modern Slavery Statement addresses NTAW's obligations contained in the *Modern Slavery Act 2018 (Cth)*.

The purpose of our statement is to:

- Describe the risk of modern slavery in NTAW's operations and supply chains;
- Explain actions taken to address those risks in FY2024; and
- Introduce our plan to further strengthen our commitment to address modern slavery risks in the future.

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## **2. OUR BUSINESS**

NTAW is an Australian Public Company having been established in 1989 and listing on the Australian Securities Exchange in 2017. NTAW operates throughout Australia, New Zealand and South Africa with Group headquarters located in Brisbane, Queensland. Through its subsidiary operating entities (refer Appendix One), NTAW wholesales and distributes a range of motor vehicle tyres, wheels, tubes and related products. NTAW imports products for the car, SUV, 4WD, caravan, light commercial, truck & bus, industrial, agricultural and off-the-road segments, acting as the exclusive importer and distributor of over 27 brands to the aforementioned geographic regions.

In Australia, NTAW operates wholesale distribution centres, comprised of third-party logistic providers and our own premises as well as Black Rubber and Tyreright retail stores. The Tyreright network is comprised of NTAW owned and externally owned and operated licensees.

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## **3. OUR VALUES**

NTAW's values are defined as DICE, being Decent, Innovative, Collaborative and Energetic.

We believe these values represent the Company's commitment to being an ethical, transparent and environmentally friendly participant in the community, of which our efforts to address modern slavery risks in our operations and supply chain is one instance of.

NTAW's values along with vision and mission statement are broadcast throughout the workforce and are available on the Company's website.

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## **4. OUR OPERATIONS**

NTAW employs over 850 team members throughout its Australian, New Zealand and South African operations (as at the end of FY2024).

People are considered NTAW's greatest asset and, as a result, the Group strives to create a workplace where all team members feel valued, safe, included and supported.

Team members across NTAW bring a diverse set of skills to the variety of positions performed e.g. Warehouse Store person to Sales Account Manager; Retail Store Managers to specialist roles such as IT Developers.

The majority of NTAW team members are permanent, full-time employees, however, a very small number of casual team members are utilised to complement and support any fluctuations in business needs. These casual team members are usually sourced via word of mouth through current team members who are familiar with the NTAW policies and procedures. Employment agents are only utilised for senior leadership roles and only if essential. All permanent vacancies are advertised via on-line mediums such as Seek or LinkedIn and are jointly coordinated by People & Culture and the relevant Hiring Manager.

Most of NTAW team members are either office/warehouse based or active on the road or in retail stores selling direct to customers.

NTAW has implemented the following requirements that each employee must:

- Consent freely and without constraint to be hired by NTAW;
- Be provided with a working contract which is in accordance with all local laws and relevant legislation;
- Have the ability to leave the company at any time (in accordance with their employment contract and local legislation);
- Receive a regular market based salary; and
- Be provided with a remuneration which conforms with local laws.

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## 5. SUPPLY CHAIN

As NTAW's supply chains are diverse (operationally and geographically), there is potential for modern slavery risks to be present within these supply chains.

NTAW sources tyres, wheels, tubes and related products from suppliers located in a number of countries including, but not limited to:

Australia;	India;	Malaysia;	South Korea;	Turkey;
China;	Indonesia;	Mexico;	Spain;	United States of America; &
Czech Republic;	Israel;	New Zealand;	Sri Lanka;	Vietnam.
Germany;	Japan;	Netherlands;	Taiwan;	
Finland;	Luxembourg;	South Africa;	Thailand;	

NTAW also has established supplier relationships in the transportation and shipping industries, locally in Australia and overseas.

To the extent NTAW is aware, raw materials used in products acquired are also sourced from the countries listed above. NTAW acknowledges some of these countries are generally considered to have a higher prevalence of modern slavery.

Although NTAW purchases finished goods, natural rubber is one of the key raw materials used in tyres, the Group's main product type. The farming and development of natural rubber presents second-tier supplier risks for modern slavery as it is labour intensive and produced in countries where the risk of modern slavery is higher.

NTAW also uses suppliers who provide services related to freight, logistics, warehousing and technology support.

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## 6. GOVERNANCE APPROACH

NTAW has a global Code of Conduct, accessible to all via the Company's website, which sets out the Company's commitment to ensuring a safe workplace, identifying and mitigating risks, complying with relevant legislative requirements and not knowingly participating in any illegal or unethical activity.

In support of the above, NTAW has a Risk Management Policy that provides guidance on the identification, assessment, management and reporting of risk. NTAW also has a Modern Slavery Policy and Anti-Discrimination and Harassment policies which are referred to in all new employment agreements.

NTAW's People and Culture function ("People and Culture") is responsible for assessing and conducting due diligence activities to ensure ongoing compliance to all related policies and the effectiveness of these policies. This includes ensuring our talent acquisition processes are fair, transparent, and open to everyone to apply, regardless of gender, ethnicity or ability.

NTAW is also mindful that leadership capability is fundamental to creating an inclusive culture underpinned by safety and performance values, which is supported through key leadership activities targeted at leaders of all levels across the Company.

NTAW would consider taking disciplinary action against a team member found to be non-compliant with any of the above-mentioned policies.

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## **7. WHISTLEBLOWER POLICY**

NTAW is committed to providing opportunity for employees, contractors and the general community to report suspected or known unethical, illegal, fraudulent, corrupt or dishonest conduct and shall ensure that those who report may do so with confidence and without fear of intimidation, ramifications or adverse consequences.

NTAW has a Whistleblower Policy designed to ensure the protection of those “speaking up” about misconduct (also known as “whistleblowers”) and sets out how NTAW will respond to reports of misconduct.

Reports of known or suspected reportable conduct can be made confidentially and anonymously at any time (whether during or outside office hours) to the Whistleblower Protection Officer. At the date of this Statement, no reports regarding modern slavery have been raised to the Whistleblower Protection Officer.

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## **8. ASSESSMENT OF MODERN SLAVERY RISKS**

NTAW has undertaken a risk assessment process to understand our exposure to modern slavery risks. This process was designed to assist the Group to develop strategies to mitigate current and potential future risks. The assessment considered the primary modern slavery risk indicators including the type and quantum of goods and services supplied, high risk industries, geographic and entity-specific risks.

NTAW considers that the risks of modern slavery may be present in our supply chain as a result of the geographical location of some suppliers and source materials used in products supplied to NTAW. As detailed in Section 4, natural rubber has been identified as a product whose production carries with it particular risks of modern slavery. NTAW acknowledges that, where NTAW currently lacks visibility, additional risks of modern slavery may exist in secondary levels of the chain of suppliers and sources materials used in goods and services supplied directly to NTAW.

The steps NTAW has taken to address the modern slavery risks are detailed in section 9 below.

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## **9. ACTIONS**

NTAW has a focus on further developing the systems currently in place for ensuring ethical behaviour.

NTAW established a modern slavery committee comprised of representatives from operations, logistics, People & Culture and administration areas of the Group, whose role is to be the impetus within NTAW in identifying and mitigating potential modern slavery risks.

NTAW continues to provide training in relation to modern slavery risks and the Company’s approach to identifying and mitigating those risks within our supply chains and operations to employees who have responsibility over supply chain management. During FY2024, NTAW released a new online training platform which included mandatory online training modules for employees to complete regarding harassment and discrimination prevention and understanding the NTAW code of conduct. In FY2025, NTAW will include a mandatory Modern Slavery Awareness module to be completed by all managers and employees involved in the Group’s supply chain. This module will also be included in the new employee induction training.

Throughout FY2024, NTAW conducted a thorough review of our suppliers within the supply chain. As part of this process, NTAW carried out a risk assessment, taking into account the geographic location of each supplier, and assigned a corresponding risk level. This risk categorisation was based on data regarding the vulnerability to and prevalence of modern slavery in the countries where our suppliers operate. NTAW are actively working on developing tailored strategies for each risk level to effectively address and reduce the potential risks of modern slavery in our supply chain.

NTAW has distributed written questionnaires to a sample of group of Tier 1 suppliers to assess their practices and compliance in the past and intend to distribute updated questionnaires in FY2025 as part of a bi-annual program. NTAW remain committed to working closely with our suppliers to reinforce our expectations regarding modern slavery, fostering collaboration where possible, and enhancing awareness and understanding of modern slavery issues within our supply chain. As part of this initiative, the NTAW management team visited several supplier facilities, including six factories in China, one in Thailand, one in Finland (which included both a supplier factory and a testing facility), and one in Malaysia. NTAW are dedicated to continuing our efforts to conduct periodic supplier factory visits to ensure ongoing engagement and to monitor progress in addressing modern slavery risks.

A copy of NTAW's Code of Conduct has been made accessible to all employees and has also been included in our mandatory induction training module which was rolled out in FY2024. Since 2021, all new employment contracts have been amended to make specific reference to modern slavery risks.

Modern slavery was included as part of the annual review of the Company's risk management framework completed by the Audit & Risk Committee.

NTAW recognises that its employees play an important part in driving compliance and mitigating modern slavery risks. In early FY2025, a senior member of the procurement team was admitted as a Chartered Professional member of the Chartered Institute of Procurement Supply with specialised training in ethical procurement. This training ensures our team are well-equipped to make informed decisions and supports NTAW's broader efforts to mitigate modern slavery risks throughout our supply chain.

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## **10. MEASURING OUR EFFECTIVENESS**

NTAW is committed to regularly assessing the effectiveness of our Modern Slavery policy and actions taken to mitigate the risk of modern slavery in our operations and supply chain. People and Culture will be responsible for conducting an annual review of the policy and actions taken to measure the effectiveness.

NTAW monitor the progress of our actions regarding modern slavery risks in our supply chain via the engagement of our suppliers, the number and timeliness of responses to our queries and feedback on our code of conduct and Modern Slavery policy.

NTAW conducted a staff engagement survey during the year and will continue to do so on an annual basis. These surveys provide an opportunity to assess and receive feedback from all team members across the Group as to whether ethical and compliant behaviour is evident across the Company. Based on the results of the surveys, People and Culture along with senior management will develop initiatives to address any employee concerns.

NTAW will continue to measure the effectiveness of our policy and actions through the completion of training modules by the workforce as well as employees' ability to confidently challenge and educate our suppliers.

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## **11. CONSULTATION WITHIN OUR GROUP**

This statement was produced following consultation with operations, logistics, People and Culture and senior management across the Company and its controlled entities.

All entities controlled by NTAW have been included in our risk based approach to the identification, assessment and mitigation of modern slavery risks. The Group will be developing global frameworks, policies and procedures in line with the emerging Australian and international legislation in this space.

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## 12. FINALISATION

This statement was approved by NTAW's Board of Directors on 3 December 2024.



Murray Boyte  
Chairman



John Peter Ludemann  
Managing Director

