



Tasman Cargo Airlines  
for the Financial Year 2022  
**MODERN SLAVERY  
STATEMENT**



# Introduction

Tasman Cargo Airlines has a zero-tolerance approach to Modern Slavery.

Tasman Cargo Airlines is committed to acting ethically and with integrity in all business dealings and relationships and to implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place anywhere within its own business operations or supply chains.

Tasman Cargo Airlines is further committed to ensuring transparency in its approach to tackling Modern Slavery throughout its business and supply chains, consistent with Tasman Cargo Airlines disclosure obligations under the Modern Slavery Act.

The prevention, detection and reporting of Modern Slavery in any part of the business and supply chains is the responsibility of all those working for it or under its control. Employees, who also include contractors, are encouraged to raise concerns with the Compliance Office about any possible Modern Slavery breaches in any parts of Tasman Cargo Airlines supply chains or business, at the earliest possible stage.

Tasman Cargo Airlines expects the same high standards from all of its contractors, suppliers and other business partners. Tasman Cargo Airlines processes will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and expect vendors and suppliers to hold their own suppliers to the same high standards.



## Section 1:

# Reporting Entity

This statement constitutes the modern slavery statement for Tasman Cargo Airlines Pty Ltd (TCA), ACN 073 412 272, for the calendar year 1 January 2022 - 31 December 2022, covering all geographical locations within Australia and New Zealand.



TCA supports the principles contained in the Universal Declaration of Human Rights and seeks to reflect these in the context of its business activities.

This statement confirms TCA's position in respect of such matters and highlights the steps that are being taken to safeguard that there is a process to identify, address and minimise any slavery or human trafficking known to be taking place in the course of business activities.

## Section 2:

# Structure, Operations & Supply Chain

TCA is an Australian registered Freighter Airline connecting Australia with New Zealand and Singapore, operating B767-300 aircraft. TCA was incorporated in 1996 as Asian express Airlines Pty and later changed its name in 2008 to Tasman Cargo Airlines Pty Ltd. TCA shareholding comprise of 51% shares held by two Australian individuals and an Entity, while 49% shares are owned by Deutsche Post Beteiligungen Holding GMBH.

TCA Operates through its offices in Melbourne and Sydney in Australia and Auckland Christchurch in New Zealand, with 80 employees spread across the canvas.

The Head office is based in Sydney at 3 Keith Smith Avenue, Domestic Airport, Mascot.

## Section 3:

# Risks of Modern Slavery in Supply Chain and Operations

TCA identifies that internally the risk of modern slavery is minimal as all employees are directly contracted and all contracts are templated based on legislative and policy standards and are cross referenced before issue. However, TCA has a number of people related policies in place to ensure that the risk remains minimal.

TCA engages with a wide range of Aviation operations service and material providers from across the world, of which 42% are based in Australia. TCA assesses that most of its suppliers are based in countries where the risk of modern slavery is much lower.

### Vendors by Country %age

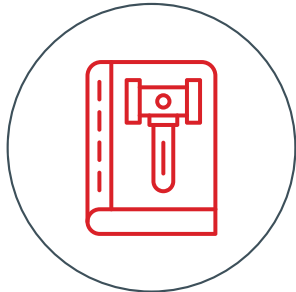
- Australia 42%
- New Zealand 36%
- United Kingdom 6%
- USA 6%
- Singapore 4%
- Germany 2%
- Others 4%



## Section 4:

# Actions to mitigate risks

### Employee Code of Conduct



Our employee code of conduct outlines TCA's expectations in relation to compliance with the law, and respect in the workplace. TCA's Board of Directors, CEO and senior management team fully endorse the standards of behaviour expected.

The Code further expands on the value of providing a safe working environment with support for workplace safety policies that apply.

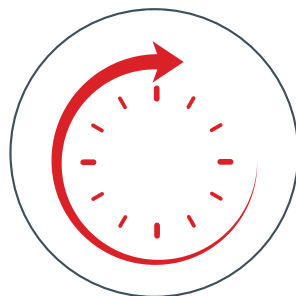
### Employee Compensation and Benefits



TCA manages remuneration and compensation in line with local legislative minimum wages and employment conditions as outlined in the National Employment Standards, relevant Awards and individual employment agreements, in many areas compensation is higher than minimum standards. We pay wages in accordance with all agreements on time and communicate with payment advice statements.

Annually TCA review payment rates at an individual level to ensure that payments are in line with local industry and labour market rates.

### Working Hours and Leave Provisions



TCA is compliant with all appropriate legislation and duty hours guidelines as set out in the National Employment Standards, relevant Awards, and Civil Aviation Safety Authority regulations, and complies with working hours, overtime and applicable penalty rates, public holiday working arrangements, rest periods and paid and unpaid leave entitlements.

### Diversity, Equity and Inclusion



At TCA we consider the diversity of our employees to be a real strength. We recognise and promote diversity, equity and inclusion (DEI) within TCA and see diversity as a strength that contributes to our overall effectiveness and success.

We are a committed equal opportunity employer and do not tolerate any forms of discriminatory behaviours on the grounds of any protected personal attribute.

## Training and Awareness



In 2022 TCA launched a series of compliance based mandatory training modules to raise awareness across the business across a multitude of legislative and business related activities.

## Supplier Management

### Supplier Selection process:



The goal of our standardised, multistep supplier selection process is to ensure that, right from the tender / quotation stage, only bidders who share our values are invited to participate. Suppliers are provided with our Vendor onboarding Form and Supplier Code of Conduct in advance to learn about our requirements.

In line with our Procurement Policy, preference is given to suppliers and transportation service providers with high social standards, particularly around human rights, anti-corruption & strong business ethics.

A standardised supplier monitoring and evaluation process is an integral component of our procurement platform, which we use to manage all procurement processes throughout the business. Using a risk based approach, consideration is given to factors such as the procurement of goods or services, country of origin and the suppliers past performance. Suppliers are then evaluated regularly as part of our due diligence screening. Our activities are also aligned with external standards, such as those defined by the United Nations, in order to take country-specific factors into account more effectively.

Suppliers are selected after a process where the supplier's capability is assessed to ensure that they are meeting the business requirements, as well as their economic significance and risk impact in the supply chain can be identified. This is embedded within the procurement sourcing process.

Furthermore, a "Supplier Due Diligence" policy (establishing minimum criteria for screening, process and a due diligence Questionnaire) is embedded in the TCA Procurement Policy. This procedure incorporates assessments on our standards in the areas of Human Rights and Fair Labour Practices as well as Health & Safety, Data Protection, Bribery and Corruption, Environment, and Business Continuity Planning, with standards from our Supplier Code of Conduct.

# Supplier Management continued.

The engagement of suppliers requires full compliance with internal company policies, particularly with procurement policies. In addition, before entering into a new business relationship with a supplier, the below criteria of the Third Party Screening Process need to be assessed and applied. While the Third Party Screening is generally recommended for evaluating all suppliers, it is obligatory in all cases where the supplier provides temporary labour services or 2 of the following 3 criteria are met:

1. The supplier provides an important element (i.e. if the annual cash-transaction with the proposed supplier exceeds or is expected to exceed \$2.5m or local currency equivalent) of TCA's service and for Suppliers providing products/ services to country entities with an annual spend of at least \$250k being part of grouped companies exceeding \$2.5m annual spend;
2. The relationship will be established and/ or the services will be provided in a country with a Transparency International Corruption Perceptions Index score of 45 (based on Transparency international's survey);
3. The Third Party will be licensed to use any logo of TCA and/or products/services having a high risk exposure to violation of Health & Safety and Human Relation related aspects (applies for suppliers in Transportation FTL/LTL, Promotional items, Uniforms, Protective Clothing, Security Services, Cleaning/ Catering Services)

The Third Party Screening is to be initiated by approaching the supplier with the Due Diligence Questionnaire.

## Supplier Code of Conduct



We expect all of our suppliers, including subcontractors, to adhere to the same high ethical standards as our internal operations. For this purpose, TCA has produced a Supplier Code of Conduct (S CoC), which sets the minimum standards for doing business with us.

For more detailed information on the Supplier Code of Conduct, please contact [compliance@tsamancargo.com](mailto:compliance@tsamancargo.com)

TCA ensure that our suppliers and other third parties are well aware and bound by these standards and take their responsibility towards employees, society, the environment and governance standards seriously. TCA are required to only buy products and services from suppliers and subcontractors that have accepted and signed our Supplier Code of Conduct (with the exception of small ad hoc purchases) or exceptions approved by the Chief Compliance Officer.

## Section 5: Effectiveness

TCA has a comprehensive set of procurement and compliance policies and processes surrounding Vendors. Supplier Code of conduct sign off, Due Diligence Questionnaire Assessments, Monthly Denied party screenings are all various activities carried on to ensure that TCA remains compliant with the corporate governance policies and local as well as international laws. The results of these assessments are reviewed and monitored on quarterly basis by the Compliance Office to take necessary actions to mitigate risks.

Training is a continuous part of keeping all employees aware of the policies to ensure that TCA remains aware of the legal and corporate requirements and fulfill responsibilities accordingly. The training results are shared with the Compliance Office, Audit & Risk Committee and the Board of directors.

TCA performs internal audit of the effectiveness of compliance and procurement processes, embedded in our business processes. The assessment is performed bi-annually and the results are reviewed by Compliance Office, Audit & Risk Committee and if required Board of Directors.

In addition, TCA has a dedicated email to review and assess any reports of potential breaches or risks of breaches of any compliance matter ([compliance@tasmancargo.com](mailto:compliance@tasmancargo.com)) plus an anonymous reporting form for anyone to report corporate compliance incidents.





## Section 6: Consultation

This statement has been produced by a collaborative effort between the Tasman Cargo Airlines Compliance Office, the People and Business Services Team which includes HR, Learning & Development and Purchasing, the Finance Team which maintains responsibility for supply chain integrity, and the Chief Executive Officer who maintains overarching responsibility for the airline.

## Section 7: Other Information

TCA understands and respects the need for vigilance in respect to Modern Slavery and as a result continues to review and develop policies and processes to ensure that no instances of modern slavery is present within its business or its business operations.

As part of our ongoing development we will be launching a Whistleblower policy and hotline together with a Modern Slavery Policy and training for all staff.



# Endorsed and Approved

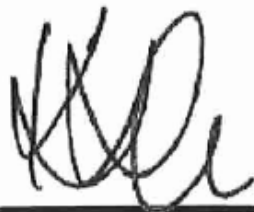
This statement has been approved and fully endorsed by the Chief Executive Officer, and Board of Directors to Tasman Cargo Airlines on **9 June 2023**



Kim Rasmussen, CEO Tasman Cargo Airlines



Gary Edstein, Director Tasman Cargo Airlines



Teresa Kwan, Director Tasman Cargo Airlines

