

# Modern Slavery Statement 2020

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 28th June 2020.

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## Modern Slavery Statement 2020

## Introduction

This is Statewide Independent Wholesalers Limited's (SIW) Modern Slavery Statement for year ending 30th June 2020, which outlines the steps we have taken to identify, manage and mitigate the specific risks of modern slavery in our operations and supply chain.

Modern Slavery is a term that covers a range of exploitive practices including human trafficking, slavery, servitude, forced labour, debt bondage and forced marriage. Modern Slavery is a growing global issue with an estimated 40.3 million people affected and around 16 million people in forced labour within the private economy. SIW, along with our co-owners Woolworths Group Limited (Woolworths) and Tasmanian Independent Retailers (TIR), are committed to ensuring these abhorrent activities do not occur within our supply chains or operations.

SIW is committed to continuous improvement and realises that there is much to be done to eradicate Modern Slavery from supply chains globally. Australia and Tasmania are not immune from the risk and through our core value of "Think People" we commit to educating our team, and to discover, mitigate and remediate any risks of modern slavery within our operation and supply chains.

## **Our Business, Operation and Supply Chains**

SIW is Tasmania's largest distributor of fast-moving consumer goods (FMCG) which operates as a joint venture between Woolworths (60% ownership) and Tasmanian Independent Retailers (40% ownership). The SIW Board is represented by Woolworths and TIR nominee directors, reflecting the ownership distribution. SIW provide wholesale grocery and liquor lines to 31 Woolworths Stores, 35 BWS and 2 Dan Murphy's Liquor outlets as well as supplying around 170 IGA and independently bannered stores around Tasmania.

SIW operates a Distribution Centre (DC) in Launceston, Tasmania. This DC receives, picks and dispatches around 14,500 product lines, including ambient, temperaturecontrolled and produce goods. Annually, SIW deals with approximately 700 suppliers who provide both trade and non-trade goods to our operation.

#### Operations

SIW's workforce is made up of around 350 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 several contracted companies providing security, cleaning, maintenance, transport and health & well-being services to SIW.

#### Trade (Re-Sale) Supply Chains

SIW wholesale supplies goods to Woolworths and TIR in Tasmania. Although SIW procures the goods directly from suppliers, Woolworths and TIR are responsible for negotiating trading terms and managing the relationship with their respective suppliers.

#### Non-Trade (Non-Resale) Supply Chains

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

## **Identifying Risks**

SIW has worked to understand modern slavery and its potential impact within its operation and supply chains. During the financial year 2020, SIW has reviewed its Operations and Supply Chains for potential risk of Modern Slavery. While the risk of Modern Slavery within SIW's operations is low, there exists inherent risks in our supply chain. SIW will continue to explore opportunities for further improvement in its processes to ensure risk is appropriately managed.

#### Operation

#### Employment Risk

SIW is committed to treating employees and prospective employees fairly. SIW already has several processes and policies in place to ensure there is no risk of Modern Slavery within its operation. These include:

- 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 Fair Work Australia.
- A number of policies which ensure the fair and equitable treatment of SIW employees, contractors and suppliers. These policies are described below under "Mitigation and Remediation."

#### **Contracted Team members Risk**

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

#### Non-Trade (Non-Resale) Suppliers Risk

Where possible, SIW deals with Tasmanian based companies. Other businesses and contractors engaged by SIW are generally Australian based and the risk of modern slavery within these companies is considered low. SIW has, where available, reviewed the Modern Slavery Statements produced by its larger suppliers.

#### Trade (Re-Sale) Suppliers Risk

SIW deals directly with Woolworths' and TIR's Australian based suppliers to purchase goods for wholesale supply to Woolworths and TIR. Woolworths' Modern Slavery Statement details how Woolworths has worked to identify risk across its supplier network.

The majority of foreign sourced products supplied by SIW to its customers are imported directly into either Woolworths' Australian DCs for Woolworths supply 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 with local suppliers, Woolworths and Metcash have outlined their work in identifying and mitigating risks of modern slavery within their global supply chains.

Woolworths Group Modern Slavery Statement 2020 Metcash Modern Slavery Statement 2020



## **Mitigation and Remediation**

SIW's core value is "Think People". We believe in the fair and equitable treatment of all employees and we work hard every day to ensure that we provide a workplace that everyone is proud of. 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.

SIW expects any organisations or supply partners we deal with will place the same value on ethical workplace conditions.

As at June 2020, SIW has a number of policies in place which underpin our desire to be a reputable company where the fair and ethical treatment of people is at the core of what we do. Training is provided on these policies and they are highly visible throughout our workplace. These policies provide remediation processes for both employees, contractors and suppliers to SIW.

#### SIW Code of Conduct

SIW's Code of Conduct sets out the minimum standards of behaviour that we expect of our team members, customers, contractors and suppliers.

Our Code of Conduct sets the guiding principles for working with and at SIW – to encourage an inclusive, productive and enjoyable workplace for the whole team. 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 is important we strive to create an inclusive environment that celebrates the diversity of our team, making sure all team members feel valued, respected and empowered.

#### SIW Respectful Workplace Policy

SIW values the diversity of the people with whom we work and the contributions they make. We are committed to equal opportunity and an inclusive workplace, and do not tolerate discrimination or harassment on the basis of race, gender, colour, national or social origin, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law.

Recruitment, hiring, placement, training, compensation, and advancement at SIW is based on merit, including qualifications, performance, skills, and experience. We do not tolerate disrespectful or inappropriate behaviour, unfair treatment, or retaliation of any kind. Harassment is unacceptable in the workplace and in any work-related circumstance outside the workplace. All conditions of employment must be based on an individual's ability to do the job, not on the basis of personal characteristics, such as gender, ethnic origin, religion, age, disability, personal beliefs, marital status, sexual orientation, union membership or political affiliation.

#### **SIW Whistleblower Policy**

SIW is committed to the highest standards of conduct and ethical behaviour in all business activities and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance.

SIW encourages the reporting of any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving SIW and provides protections and measures so that those persons who make a report may do so confidentially and without fear of intimidation, disadvantage or reprisal.

The whistleblower policy provides a guide to report any unethical and inappropriate conduct or concerns such as fraudulent, corrupt, illegal activity, or a complaint related to modern slavery. Complaints can be made anonymously, and we have appropriate measures in place to protect any whistleblower. All allegations received are investigated by an independent and objective investigation team. The investigations are conducted to maintain both the confidentiality of the matter investigated and to protect the identity of the whistleblower. The outcomes of investigations are reported to senior management. Under the policy, all whistleblowers are protected from detrimental conduct, such as reprisals and retaliation.

During F20, SIW did not receive a report of concerns regarding allegations of improper conduct that potentially had modern slavery-related implications.

## **Measuring Effectiveness**

As of June 2020, SIW has identified ways to measure the effectiveness of current policies and processes. SIW has also identified ways to measure effectiveness of any future endeavors undertaken to minimise the risk of modern slavery within its supply chains and operation.

Workstream	Activity	Measurement
Governance	<ul> <li>Board Oversight</li> <li>Team Member Training</li> <li>Policy Reviews</li> <li>Contracts with modern slavery provisions</li> </ul>	<ul> <li>Discussed at each board meeting</li> <li>% of team trained</li> <li>Completed policy reviews in line with plan</li> <li>% of contracts with modern slavery commitments</li> </ul>
Risk Management	<ul> <li>Supplier Onboarding and Risk Assessment</li> </ul>	
Monitoring	In-house audits	Audits completed in line with plan.
Grievance Mechanisms	<ul> <li>Channels and mechanisims for grievances to be raised</li> <li>Cases remediated</li> </ul>	<ul><li>Total number of issues raised</li><li>Number of cases remediated</li></ul>

## COVID-19

The COVID-19 pandemic has increased the vulnerability of workers in our operations and supply chains. SIW's priorities were reset to focus on protecting the health and well being of our people and keeping our supply chains open to ensure the delivery of essential goods. This delayed progress in establishing and commencing our monitoring processes relating to modern slavery. This work will recommence in F21.



## **Future Direction**

SIW is committed to identifying and remedying modern slavery risks within our supply chains and operations.

#### F21

- In conjunction with TIR, review current TIR suppliers (questionnaire, declaration)
- Service Agreements provided to all Suppliers, including those providing contractor work within operations
- · Modern Slavery clauses inserted into all new contracts
- · Develop awareness raising programs for team members
- Formalise Modern Slavery working group
- Establish a process for annual review of actions taken and response to modern slavery

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

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Drew Freeman – SIW General Manager March 2021

Paul Graham – SIW Chairman March 2021





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