



Modern Slavery Statement FY25

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Our vision

‘To be a united force in Tasmanian food and grocery retailing, with a thriving and engaged network of independently-owned stores supported by industry-leading practices that make them the shopping destination of choice within the communities they operate.’



Introduction

Tasmanian Independent Retailers (TIR) recognises that Modern Slavery is a crime and a violation of fundamental human rights. We are aware that Modern Slavery takes various forms, including slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another to exploit them for personal or commercial gain.

TIR is committed to ensure there is no modern slavery or any scope for modern slavery in our supply chain or in any part of our business operations. This is our first statement, and we will continue to encourage and strive towards a culture where all employees are aware of their responsibilities in identifying any potential modern slavery practices and bringing it to the attention of the board of directors.

This Modern Slavery Statement has been prepared in accordance with the Australian Modern Slavery Act 2018 (the Modern Slavery Act). It describes the risk of modern slavery in our own operations and supply chains during FY25 and the actions we are taking.

The following operations are included under the TIR Group:



Other interests

TIR holds a 40% interest in Statewide Independent Wholesalers (SIW) with Woolworths Limited (60%). SIW and Woolworths are reporting entities as defined in the Modern Slavery Act 2018.

Our operations & supply chain

Tasmanian Independent Retailers

TIR's primary role is to facilitate and support cooperative members and IGA Retailers in the key areas of advocacy, merchandising, marketing and promotions, and member services.

TIR is a 40% co-owner of SIW with Woolworths. SIW supplies goods to Woolworths and TIR in Tasmania, whilst Woolworths and TIR are responsible for negotiating trading terms and managing the relationship with their respective suppliers. TIR also owns Island Fresh Produce.

Island Fresh Produce

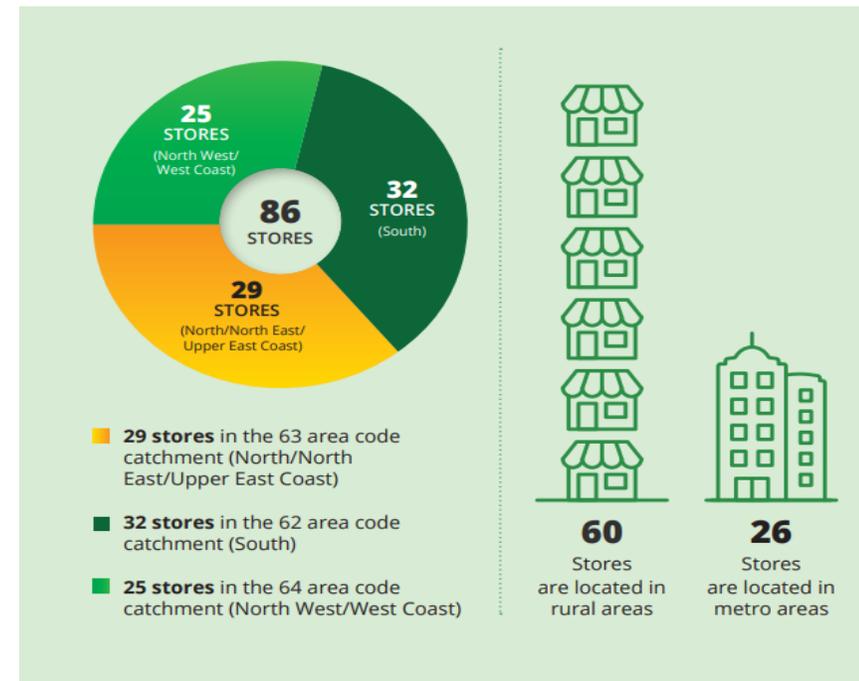
TIR acquired Island Fresh Produce (IFP) in 1995 and it is now one of Tasmania's leading fruit and vegetable distribution wholesalers, supplying both independent retailers and hospitality customers across Tasmania.

As a Tasmanian business, IFP supports local growers by focusing on sourcing fresh fruit and vegetables from Tasmanian farmers where possible and sources additional produce from markets across Australia. IFP services its members and customer network from its composite DC facility in Launceston. IFP is 100% owned by TIR.

Our Co-operative Members

TIR's Member Network consists of 86 IGA retail outlets across Tasmania trading under the IGA or IGA Local Grocer. Most of the network is represented by single store operators (SSO) with 9 multi store operators (MSO) representing 27 of the 86 IGA retail outlets.

TIR "Group" Network consists of 86 IGA Members and 74 Non-Member retail stores.



Our operations & supply chain

40% of fruit & vegetables sourced in Tasmania

TIRs suppliers can be categorised into 3 broad categories

1

Suppliers of goods for resale

Suppliers provide goods for resale which are labelled with a trademark not owned by TIR, as well as goods produced by suppliers who produce IFP own brands.

2

Goods not for resale suppliers

Goods not for resale (GNFR) suppliers provide non-tradeable goods and services that TIR procures to support its operations, including running its member stores and corporate function. Some examples include transport services, store fixtures and services, marketing materials, IT hardware and packaging materials.

3

Indirect suppliers

Indirect suppliers supply both goods and services to proprietary suppliers, Indirect suppliers do not have a direct trading relationship with TIR.

IFP operates within a global supply network but follows a Tasmanian-first sourcing approach. In FY25, 40 percent of our fresh produce volume was sourced from growers and supply partners across Tasmania.

Our modern slavery risks

Given the nature of our operations, we recognise that modern slavery risks can occur both in our operations and supply chain.

We have therefore included a Principal Risk and a subcategory risk in our Enterprise Risk Management Framework that is monitored by our Risk and Audit Committee:

Principal Risk

Responsible Sourcing & Supply Chain

The risk that we may be unable to effectively deliver day to day services, capital operational or change program without a sustainable, resilient, cost-effective supply of goods, services and high calibre third party contractors. In addition, there is a risk the products we sell are unsafe, not ethically sourced or meet the integrity that our customers expect.



Sub category risk

Modern Slavery

There is a risk within our supply chain and operations that we source goods and services from suppliers and contractors who operate in areas of higher risk leading to the perception of or potential for risk factors of modern slavery.

In consultation with our Department Heads, we have almost finalised a risk assessment process for our Tier 1 Suppliers, providing insights into potential issues, areas of higher risk, and priorities for future focus

These assessments consider not only modern slavery risks, but also broader human rights risks which could indicate a supplier has inadequate controls in place to prevent against modern slavery.

During FY25, TIR has not identified any instances of modern slavery in its supply chain or own operations. As outlined in Our Future Focus (page 15), we use insights obtained via NGO, our supplier due diligence checks and business conduct mechanisms (page 12), to continue identifying which countries, sectors, products and services pose the highest risks.

We have identified that 1 supplier had some contract breaches and their response was that they address these as they arise.

See page 9 for a map of our operations and supply chain risks

*Tier 1 are those that we buy directly from.

Assessing risks in our supply chain & operations

Risks in Our Operations

TIRs operations are based in Tasmania, Australia. However, we recognise that we operate in some sectors which are at higher risk of modern slavery based on the inherent characteristics of those sectors, including:

- Labour in our warehouses and transport operations; and
- Cleaning.

We consider the actual risk of modern slavery in our own operations to be low, based on the following key factors:

- The majority of TIR' team members within the above mentioned higher-risk areas are directly employed by TIR, which means we have direct control of contractual and employment arrangements to ensure they are appropriate and lawful.
- We have implemented policies and procedures and business conduct channels (refer to page 12) to minimise the likelihood of modern slavery and to provide avenues for reporting. Recently TIR have updated its Modern Slavery Policy and the Code of conduct is currently under review.

Risks in our Supply Chain

Fruit & Vegetables: It is important to us that our fruit and vegetables are sourced locally, Although all of our direct suppliers are based in Australia, some of our approved agents may source product from other market agents who import produce to fill seasonal or supply gaps. Where this occurs, these market-sourced products are covered under the agents SEDEX certification and verification processes to ensure that international suppliers meet our ethical sourcing and modern slavery requirements. Despite being a typically “low risk” country, we recognise horticulture is an area of risk because of the risks of deceptive recruitment, debt bondage and forced labour in supply chains. This is based on the nature of the industry, its reliance on third party labour providers and the high prevalence of migrant and vulnerable workers often working on a casual or seasonal basis.

Non-trade suppliers: Our biggest non-trade categories include apparel, IT, fixtures and fittings, logistics, packaging and marketing. For TIR, there are risks of modern slavery in our extended supply chain with the following having the greatest:

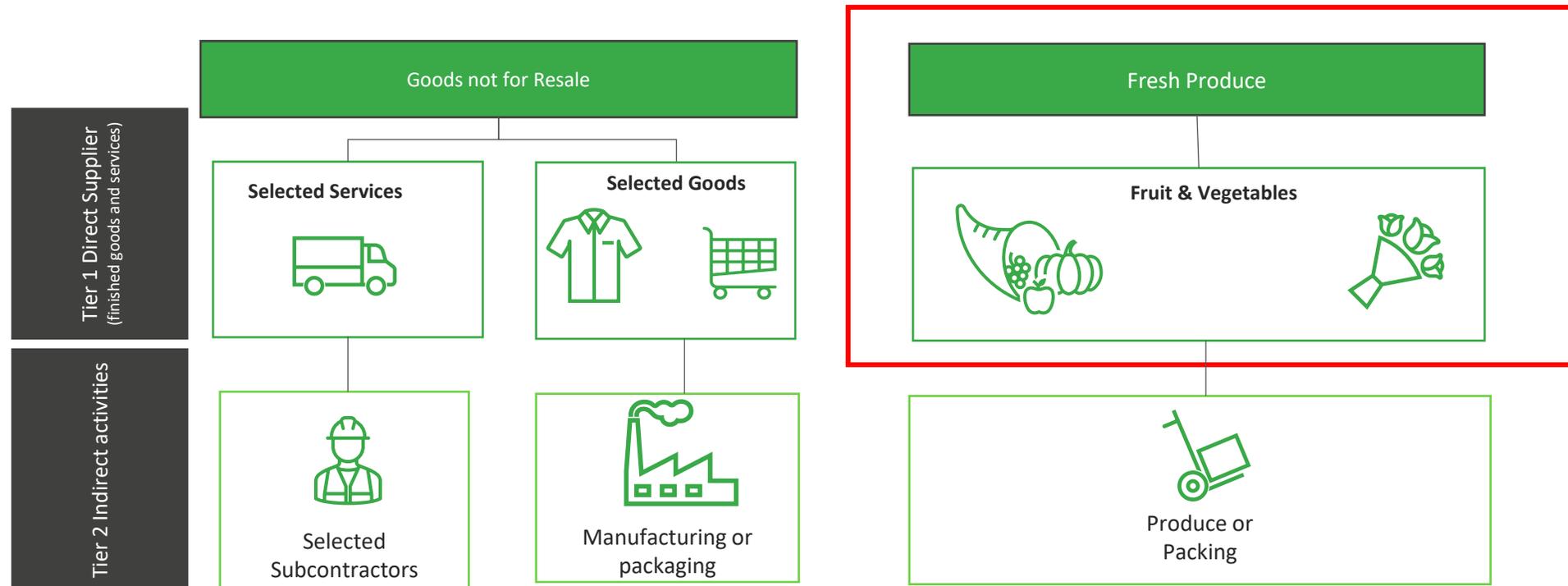
- Excessive working hours
- Underpayment of wages and benefits,
- Deceptive recruitment,
- Exploitation of migrant workers,
- Bonded or forced labour.

Supply chain due diligence

This year TIR continued conducting due diligence checks over its Tier 1 suppliers using a suppliers this year through our supplier due diligence questionnaire, with Tier 1 review now nearing completion.

The diagram below and the red outline marks the FY25 in scope focus areas across our supply chain. Our scope will continue to evolve and expand to other areas of our supply chain as we progress.

Refer to Pages 9-10 which outlines how we have started to use the information from our due diligence checks to understand our operations and supply chain risks areas.



Understanding our operations & supply chain

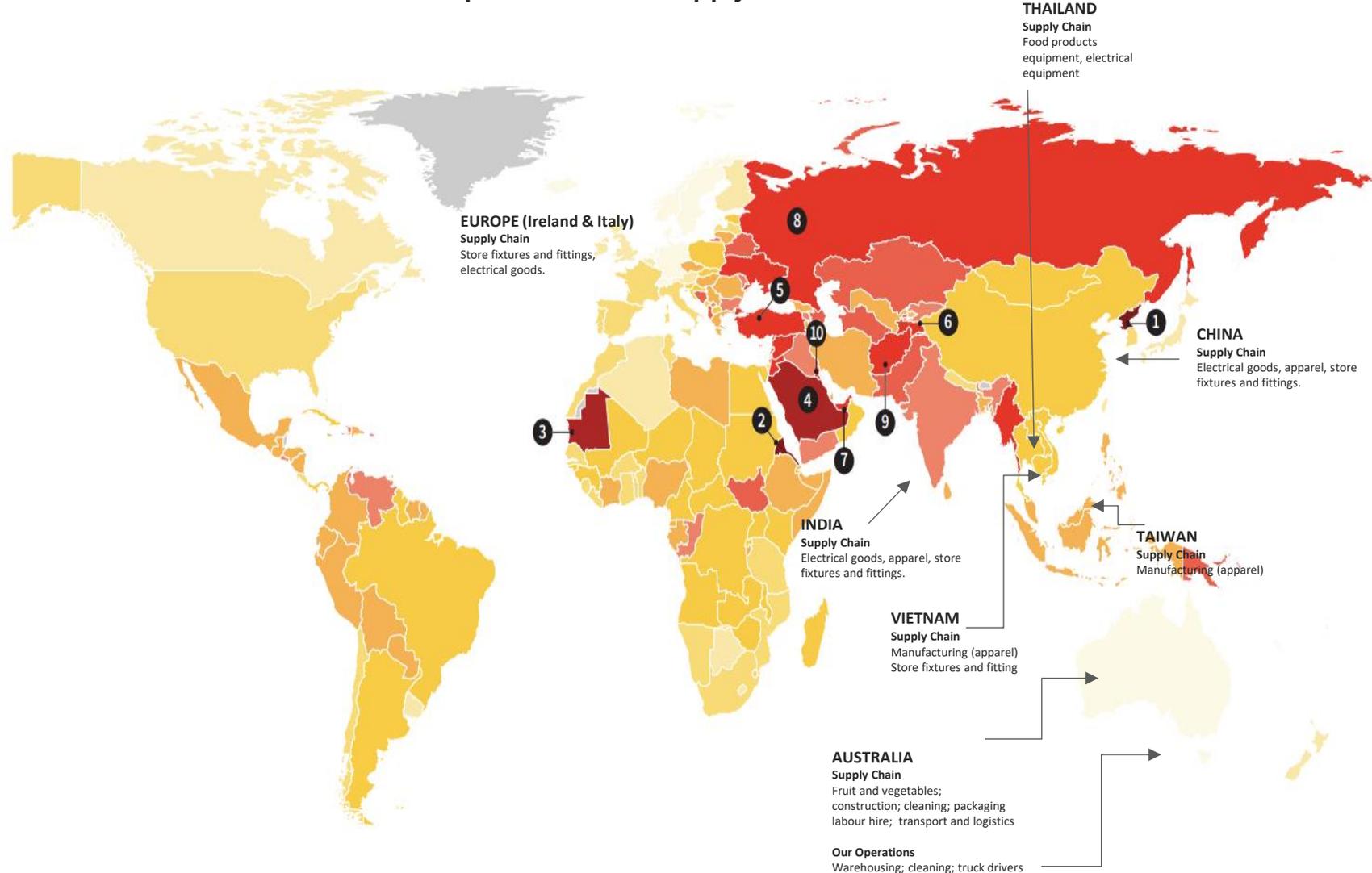
Using the information from our in-scope tier 1 suppliers through the due diligence questionnaire and knowledge of our operations, we have started to map the countries, sectors and risks across our operations & supply chain.

Modern slavery risks

1. Forced or bonded labour
2. Exploitation of migrant workers
3. Deceptive recruitment
4. Underpayment of wages
5. Child labour
6. Excessive working hours
7. Human trafficking.

Further detail on responses received from our suppliers can be found on page 10.

The countries and sectors in our operations and supply chain



Supplier questionnaire outputs

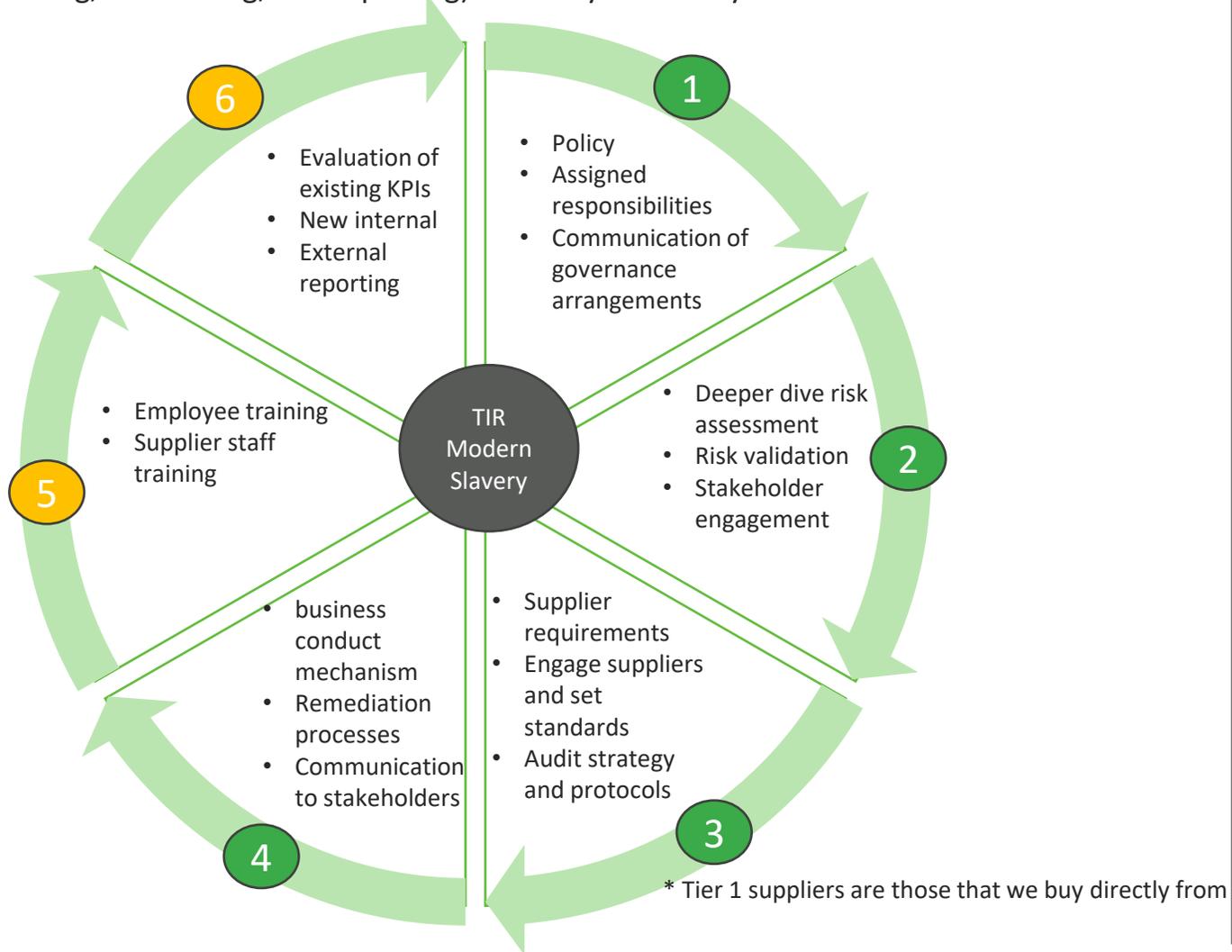


The following summarises the key insights and actions arising from our Supplier Due Diligence Questionnaire:

- Our direct suppliers continue to present a low to medium risk of modern slavery within their own operations.
- A proportion of suppliers source products from geographically high-risk countries; however, this is predominantly limited to packaging materials rather than fresh produce. Most suppliers operating in these regions have appropriate controls in place, including supplier audit procedures and pre-engagement checks. For the small number of suppliers sourcing from high-risk locations without documented due diligence, we will work closely with them to encourage the introduction of reasonable and proportionate checks to minimise exposure to modern slavery risks. One supplier also identified that they have received multiple contract breaches and have assured us they are addressing this.
- Where relevant, suppliers have submitted an Australian Modern Slavery Statement to the appropriate regulator.
- The majority of suppliers have policies and procedures in place, either provided through their submission or publicly available, including Ethical Trading Policies, Human Rights Policies, Whistleblower Policies, Supplier Codes of Conduct, Quality Management Systems, and Supplier Audit Procedures.
- Many of our larger suppliers undertake audits as part of their assessment processes prior to engagement and hold SEDEX accreditation, demonstrating their commitment to ethical auditing standards.
- In addition, we have undertaken site visits with 14 produce suppliers and 2 transport suppliers, informed by insights from their questionnaire responses. These visits have strengthened relationships and supported suppliers in identifying opportunities for improvement, including training needs, policy development, and enhanced governance practices.
- Overall, the results indicate that most suppliers are taking positive and proactive steps to manage modern slavery risks. Where gaps have been identified, we will continue to support suppliers to build appropriate capability and establish suitable controls.

Actions to address our risks

Our 6-step approach to address modern slavery risks in our supply chain and operations. To date, we have implemented Steps 1–4 of this approach: establishing governance arrangements, conducting risk assessments of Tier 1 suppliers, completing due diligence on high-risk suppliers and operations. Steps 5–6 (training, monitoring, and reporting) currently underway.



Six Step Approach

1 Governance: Leverage existing policies and implement new ones needed to communicate modern slavery commitment to staff, suppliers and members. (Page 12)

2. Risk Assurance: Map broad operations and Tier 1 suppliers* in supply chain to identify and consider modern slavery risks.

3. Due Diligence: Screen high risk operations and supply chains agreements and implement protections to address modern slavery risks. (page 6-9)

4. Business Conduct and Remediation: Review escalation, investigation and response plans to ensure allegations or actual incidents of modern slavery would be appropriately managed.

5. Training: Train teams to understand modern slavery risks as well as their role and responsibilities in managing such risk.

6. Monitoring and Reporting: Review reporting mechanism to assist management in evaluating progress against commitment and invest in areas for improvement.

Policies in our operations

As part of our continuous improvement and future focus we are undertaking a review of policies and procedures that play a role in embedding ethics throughout our business what we expect from our suppliers, consultants and contractors working with or for TIR.

Training

TIR has achieved strong uptake of modern slavery training across the organisation, with all applicable employees having completed the required module. This represents a 100% completion rate and ensures that all key leaders and Department Heads are equipped with the awareness and capability needed to identify and respond to modern slavery risks.

The following policies have been developed and updated to prevent Modern Slavery

Policy	Description
Modern Slavery Policy-updated version	Our commitment to address modern slavery risks in our operations and Supply Chain.
Code of Conduct- under review	The expected behaviours of our employees, team members, and contractors.
Health, Safety and Wellbeing Policy	Our commitment to provide a safe and healthy work environment for our employees, members customers, contractors, suppliers and visitors.
Business Conduct Policy	Applies to suspected or actual unethical, illegal, corrupt, fraudulent or undesirable conduct, or any breach of the TIR' Code of Conduct.



Business Conduct & Remediation

It's important to have business conduct mechanisms in place that create a safe environment for all that work for and with TIR to report acts of potential unethical behaviours.

TIRs Business Conduct and Speak Up

At TIR we are committed to driving the highest levels of ethics and integrity in the way we do business. We understand that this is crucial to maintain the trust of our stakeholders and protect our reputation as an ethical business.

Our values, Code of Conduct, and policies guide our everyday conduct. We all have a professional responsibility to speak up and report unethical behaviour.

To support this, we have a Business Conduct Policy and provide several mechanisms for concerns and complaints to be raised, with the option to do so confidentially and anonymously. TIR's business conduct channel can be used by anyone, including Cooperative Members, Suppliers and employees, to raise complaints or concerns about human rights issues. Our avenues for reporting includes a dedicated email address:

SpeakUp@igatas.com.au

All reports received are triaged and investigated by a Business Conduct Investigation Officer appointed by the Risk and Audit Committee.

A copy of this Policy will always be available on internal and external TIR and IGA websites.

In FY25 we did not receive any notifications of ethical conduct breaches relating to our supply chain through our business conduct channels.

Assessing the effectiveness of our approach

At TIR, we continue to strengthen the way we manage risk by embedding modern risk and audit practices that support both our current operations and our long-term ambitions.

Our uplift began with the establishment of the Risk and Audit Committee, a long-standing sub-committee of the TIR Board. The Committee now provides ongoing oversight of Business Conduct Reports, champions our Business Conduct and Modern Slavery Policies, and monitors their implementation and effectiveness.

Throughout FY25, we progressed well through our six-step approach (page 9), building on the foundations set in previous years to deepen our understanding of modern slavery risks across our operations and supply chain. This included:

Due Diligence Supplier Program participation

We continued our Supplier Due Diligence Program, requesting a proportion of our high-spend Tier 1 suppliers to assess their own operations. The statements and insights received have guided our actions and informed our improvement priorities.

Business Conduct

We strengthened our business conduct mechanisms by reviewing existing processes and implementing a clearer, more accessible reporting pathway, supported by a dedicated email address: SpeakUp@igatas.com.au.

Monitoring

We carried out targeted spot-check reviews on equipment and fresh produce entering our warehouse, enhancing our visibility over potential risk areas

Capacity Building & Training

We introduced modern slavery training for key leaders, with Department Heads and Team Leads completing the online module. This training will continue to expand across the organisation to embed awareness and capability.

The Risk and Audit Committee will continue to build additional mechanisms to support its oversight responsibilities relating to modern slavery. These next steps are outlined in our Future Focus (page 15).

Future activities

Due Diligence

- Continue to implement and embed the TIR Modern Slavery 6 step improvement plan.
- Expand assessments and due diligence activities within high-risk Fresh Produce, GNFR and Corporate Services.
- Review the effectiveness of policies and procedures internal reporting avenues
- Monitor risk-based assurance activities monitored through our Risk and Audit Committee.

Governance

- Continue to develop and roll out policies and procedures in relation to governing our operations and supply chain, ensuring our commitment to ethical behavior is clearly outlined.
- Review our procurement procedures and contracts to ensure they include modern slavery contract clauses and prequalification requirements.

Education and Training

- Promote eLearning training to teams and coop members to increase awareness of modern slavery.
- Increase learning for suppliers on human rights and the activities TIR is undertaking to prevent these abuses from taking place.
- Create educational materials to support our supply chain.
- Roll out a 'safe to speak' initiative promoting ethical behaviours across our business.

Collaborate

- Set up a collaboration working group with SIW and Woolworths to share approaches and increase awareness across our supply chain.
- Increase learning for suppliers on human rights and the activities TIR is undertaking to prevent these abuses from taking place.
- Develop relationship with external organisations like NGOs to understand current trends and insights.

Process of consultation

Where TIR held a “controlling interest” in an entity during FY25 we met with the appropriate organisational representative to share our approach and provide information to help guide the drafting of this Modern Slavery Statement and inform their entities own submission.

The CEO and TIR Board have reviewed and approved this Statement.



CEO
Drew Freeman



Chairman of the Board
Michael Baxter

Appendix

This Modern Slavery Statement was prepared in accordance with the criteria set out in the Modern Slavery Act 2018 (Cth) (Australia).

The table below outlines where information related to each mandatory reporting criteria can be located within the report.

Mandatory Criteria	Location of information
Identify the reporting entity	<ul style="list-style-type: none"> • Our operations and supply chain (Page 4-5)
Describe the structure operations and Supply chain of the reporting entity	<ul style="list-style-type: none"> • Our operations and supply chain (Page 4-5)
Describe the risk of modern slavery practices in operation and supply chain of the reporting entity and any entities that reporting entity owns or controls	<ul style="list-style-type: none"> • Our modern slavery risks (Page 6-7) • Understanding our operations & supply chain (Page 9)
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls to assess and address those risk including due diligence and remediation processes	<ul style="list-style-type: none"> • Assessing risks in our operations & supply chain (Page 7) • Supply chain due diligence (Page 8) • Mapping our operations and supply chain (Page 9) • Supplier due diligence – Outputs (Page 10) • Actions to assess and address risk (Page 11) • Our policies (Page 12) • Business conduct & remediation (Page 13)
Describe how the reporting entity assesses the effectiveness of such actions	<ul style="list-style-type: none"> • Assessing the effectiveness of our approach (Page 14)
Describe the process of consultation with any entities that the reporting entity owns or controls	<ul style="list-style-type: none"> • Process of consultation (Page 16)
Provide any other information that the reporting entity, or the entity giving the statement, considers relevant	<ul style="list-style-type: none"> • Future activities (Page 15)