



**MODERN SLAVERY STATEMENT 2021-2022** 



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#### 1. About TAMS



Total AMS Pty trading as TAMS Group ACN 91839619 is a diverse marine service provider that protect, maintain and enhance the spaces and places in which we live and work. At TAMS Group we are committed to the sustainability of the communities in which we work and to integrating responsible corporate behaviour into every aspect of our business. We employ over 500 people.

Every one of our business divisions has comprehensive experience in its field, and our list of satisfied clients ranges from small local operators to some of the largest companies in the world. The diversity of our skills and capabilities means we can execute a broad range of marine projects including harbours, wharfs, jetties and wide range of marine inspection services.

TAMS Group brings together the talents and capabilities of a diverse collection of specialists. Our business divisions are supported by a significant inventory of marine construction equipment – from piling hammers to heavy lift cranes. Our services include marine manning, harbour tug services, synthetic fibre ropes, marine dredging and commercial diving.

We have commercial marine vessels to suit a wide range of applications, and we can meet client needs around Australia. Our commercial marine vessel fleet includes tugs, barges, multicats, dive support boats, utility vessels, landing craft and dredges. Our shore bases include Gladstone, Broome, Cairns, Dampier, Port Hedland, Onslow, Cape-Preston and Fremantle.

#### Our operations include:

- Direct employment of workers
- Processing and production
- Provision and delivery of products and services
- Construction and Leasing of property, products and/or services and
- Charitable activities

TAMS Group operates in North Fremantle at 12 Rous Head Road.

TAMS Group also owns TAMS Group Queensland Pty Ltd 108258019.

The coverage of operations and reporting system of these two

TAMS Group entities is identical and as such this statement is a joint statement for both entities.





#### 2. Introduction to Modern Slavery

Modern Slavery is a broad term to represent human trafficking, forced labour, and slavery like practices such as debt bondage, and the sale or exploitation of children. TAMS Group reject any and all forms of modern slavery which can take the form of unpaid or underpaid servitude, human trafficking and forced labour. We are committed to implementing effective systems and controls to mitigate the risk of modern slavery occurring within our own business or through any of our supply chains. TAMS Group is committed to the safe and ethical supply of goods and services. Our goal is to work with suppliers that are honest and transparent and committed to continuous improvement. We will work in partnership with suppliers, who share this commitment, to address deficiencies unique to their business, industry or country of origin.

TAMS Group regards non-conformances with our requirements related to the Commonwealth Modern Slavery Act 2018 as unacceptable. If non-conformance with this act has been identified and confirmed, TAMS Group will not proceed with supply and will de-register the concerned suppliers.





#### 3. Operational Risk

The largest proportion of our operations are conducted within Australia, where most of our employees are located. From a geographical perspective, given the controls, legislation and societal expectations, conducting business in Australia lessens the risk to most of our workforce from being subjected to modern slavery labour practices.

We continue to monitor our businesses to ensure all operations are undertaken in safe environments and our workforce is treated fairly under the relevant legislation and/or enterprise agreements.

#### 4. Supply Chain Risk

At TAMS Group we purchase materials such as steel and aluminum for structural marine projects and mechanical spare parts. Our international suppliers include organizations from China, Malaysia, Vietnam and Indonesia. These countries have been identified as high-risk suppliers. All subcontractors for fabrication in these countries are also considered to be at high risk.

At TAMS Group we make every effort to procure materials locally. If this is not possible then we attempt to source our materials from low-risk suppliers. When this is not possible TAMS Group follows the advice given in the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities to manage this risk.





#### 5. Procurement Visibility

TAMS Group aims to partner with international and national suppliers and vendors who share our ethical values regarding modern slavery, anti-corruption, personal data protection and human rights more broadly. TAMS Group will not knowingly contract with or purchase from companies who are in violation of human rights practices and we understand that external providers who TAMS Group interact with may reflect on our organisation.

TAMS Group records our supplier in an approved vendor, contractor and suppliers register. To be a TAMS Group approved supplier, the external entity is subject to an onboarding process conducted by TAMS Group Procurement Department and with the assistance of the online platform "Eftsure", which includes the acknowledgment and declaration of respect of TAMS Group Modern Slavery statement, the Commonwealth Modern Slavery Act 2018 and TAMS Group Sustainable Procurement Policy. The onboarding process for new suppliers, vendors and contractors will also identify and classify them into three categories of risk (low, medium, and high) allowing for the relevant legal documentations, which will then be recorded and updated when needed.

Being implemented in different states and regions of Australia, TAMS Group make local sourcing a priority, when possible. This allows for better transparency and view of our suppliers, subcontractors and vendors activities and operations.

The evaluation and audit of TAMS Group's suppliers can be decided upon and conducted at any time by TAMS Group Procurement Department if any suspicion of breach of the Commonwealth Modern Slavery Act 2018 or non-respect of the TAMS Group Sustainable policy is found. Reports and required action will then be established and communicated to the concerned parties.



#### 6. Policies and training

At TAMS Group we have a Business Management System where established policies, standard operation procedures and guidelines that outline our expectations of employees and contractors who undertake tasks on behalf of the Group.

Our policies and procedures help implement our commitment to ethics, wellbeing, safety and demonstrate the protections afforded to our team members.

Constant training and e-learning through "Learn Upon" are conducted for existing and new employees to ensure the acquaintance of our valued employees to TAMS Group policies, procedures and ethical principles.

A few important policies and procedures of TAMS Group that are accessible by all employees include:

- Procurement Sustainable Policy
- Procurement, Stores and Logistics Procedure
- Environmental Policy
- Project Management Procedure

Our policies and procedures help implement our commitment to ethics, wellbeing & safety.



#### 7. De-registering Suppliers

TAMS Group may choose to cease purchasing from a supplier that fails to demonstrate a commitment to this statement. This lack of commitment may become evident through a lack of cooperation and participation in the supplier self-assessment process, poor audit results or a failure to address identified breaches within agreed timeframes. TAMS Group is committed to the prevention and detection of any slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain within its organisation.

TAMS Group seeks to ensure that its business is conducted with integrity and in an environment of transparency. This means that TAMS Group also seeks to ensure that its suppliers and business partners understand and appreciate its requirements to operate in this way, and that they also commit to doing so, in all their dealings with or on behalf of TAMS Group.



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#### 8. Reporting Obligations

TAMS Group personnel and all suppliers and business partners must immediately report to TAMS Group Procurement Department all actual or suspected breach in respecting the Modern Slavery Act 2018.

#### 9. Ongoing Review

At TAMS Group our executive team makes an annual review of our response to modern slavery. We regularly check our risk assessment process particularly in relation to suppliers in high risk countries.

#### 10. TAMS in the Community

TAMS Group is committed to the community in which we operate and are passionate about being able to make a positive contribution to society. TAMS Group has a long history of supporting the community and philanthropy. The TAMS Group fund, held by the Fremantle Foundation, facilitates our commitment to sustainable giving.

The TAMS Group Fund allows TAMS Group employees to nominate community organisations they are passionate about to receive grants. The Fund will be overseen by a group of TAMS Group employees who will meet regularly to review applications and identify not for profit organisations that are making a positive difference.

If you would like to be involved in the TAMS Group Fund or get more information about how to apply for a grant please contact us.



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# The Fremantle Foundation

About the Fremantle Foundation

Founded in 2010 by ex AFL player, Dylan Smith, the Fremantle Foundation has grown to be WA's premier Community Foundation. It provides philanthropic advice and administration to individual, families and businesses that want to give effectively in their community. Based in Fremantle, it connects donors to community projects throughout Fremantle, Western Australia and the world.

Some of TAMS Group recent Corporate Social Responsibility Campaigns include:

- Sponsor of the Port to Pub Swim, provision of the Flag ship vessel and installation of the floating swim distance markers.
- Annual Support of Impact 100 Fremantle, which has varying focuses around the support of Aboriginal Health and Wellbeing in Fremantle.
- Assisting the Rottnest Island Authority with re-vegetation for the Wadjemup walking trail.
- Event Sponsor for the Fremantle Port Maritime Day and providing a vessel that gives the local community opportunity for a Port Tour.
- Event Sponsor for the Leeuwin Ocean Adventure Foundation Maritime event and other in-kind donations.
- Facilitation of Local school groups, allowing any young aspiring marine enthusiast to come aboard our vessels and experience what we do.



This statement was approved by the board of Total AMS Pty in their capacity as principal governing body of TAMS Group on 29 May 2023.

During the reporting period this statement covers, we actively engaged and consulted with all companies we own or control in the development of this statement. We discussed details of the Modern Slavery Act 2018's reporting requirements including actions we intend to take to address these requirements. We also provided them with relevant materials and updates.

This statement is signed by Lee Bartlett in his role as the CEO of TAMS Group on 29 May 2023.

Lee Bartlett

**CEO of TAMS Group** 

29 May 2023







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