

# The Mix Australia Modern Slavery Statement FY22



# thermomix themix shop kobold

A message from The Mix Australia	3
1. REPORTING AND CONSULTATION	4
2. MODERN SLAVERY STATEMENT OVERVIEW	5
3. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS	6
5. ACTIONS TAKEN TO ADDRESS MODERN SLAVERY RISKS	22
6. ASSESSMENT OF ACTIONS TAKEN TO ADDRESS RISKS	28
7. MOVING FORWARD	30

# A message from The Mix Australia

We are pleased to present our third modern slavery statement, which has been prepared to meet reporting requirements under the Australian *Modern Slavery Act 2018* (Cth).

During FY22, The Mix Australia (TMA) has continued to work on human rights due diligence and the identification of the modern slavery risk that may be present in our operations and supply chains. We understand that our awareness and actions as business are vital to addressing those risks. We have carried on this work through the ongoing impact of the COVID-19 pandemic, with a focus on working collaboratively with our suppliers.

TMA is dedicated to the process of identifying and addressing instances of modern slavery anywhere in our supply chain or operations. We want our decisions and sourcing practices to reflect and align with the pride we have in our brand and reputation as a responsible Australian business. We are focussed on making practical changes and taking effective actions, which include the provision of support and guidance for our buying and procurement teams. We are also committed to the goal of identification of all our Tier 1 and 2 suppliers, and a risk-based approach to the ongoing review of our supply chain. We want to work to positively impact all the workers that form part of our supply chains and operations.

TMA has continued the process of reviewing review responses from our suppliers to assess our modern slavery risk and have gathered further information from our direct suppliers. We have also accessed detailed information from Vorwerk (our Thermomix machine and accessories supplier).

As we continue this work, we are consistently looking for ways to learn and improve. As a business we understand the importance of education and awareness for our team and are focussed on ensuring that our training initiatives are practical and incorporate guidance from global organisations that are focussed on combatting modern slavery.

We have set goals to take real action to address our risks, to practice responsible purchasing and to continue the important work of addressing the global challenge of modern slavery during FY23.

Grace Mazur

**Grant Vernon** 

Managing Director 8 December 2022 Chief Operating Officer 8 December 2022

Grant Vernon

#### 1. REPORTING AND CONSULTATION

We have prepared this modern slavery statement to meet the requirements of the Modern Slavery Act 2018 (Cth). It sets out the steps taken by The Mix Australia Pty Ltd (ABN 88069944930) to identify and address its modern slavery risk over the period 1 July 2021 - 30 June 2022 (FY22).

The registered office of TMA is 30 Ledgar Road, Balcatta WA 6021.

Our modern slavery working group consulted relevant management, procurement and buying teams within TMA.

We gathered some information about the supply chains and operations from each of those teams and reviewed the processes that they have in place to monitor and address modern slavery risk.

This modern slavery statement was also circulated to relevant members of our leadership team for comment prior to being put to the Board for approval.

This modern slavery statement was approved by the Board of TMA on 8 December 2022.



## 2. MODERN SLAVERY STATEMENT OVERVIEW

The Modern Slavery Act 2018 (Cth) section 16 mandatory criteria and reporting requirements have been addressed in this statement as follows:

#### Identification of the reporting entity

This is addressed in on page 4.

# Description of the process of consultation with any entities the reporting entity owns or controls

This is addressed in on page 4.

#### Description of our structure, operations, and supply chain

This is addressed in on page 5-8.

# Description of the risks of modern slavery practices in our operations and supply chains and any entities we own or control

This is addressed in on page 9-21.

#### Description of the actions we have taken to assess and address these risks

This is addressed in on page 22-27.

#### How we assess the effectiveness of our actions

This is addressed in on page 28-30.

## 3. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

#### **About Us**

Our organisation is headed by our Managing Director and co-founder, Grace Mazur. The Thermomix was introduced into the Australian market by Grace in 2001. TMA is the sole Australian distributor of Thermomix machines, which are made by Vorwerk SE & Co. KG (Vorwerk). We are proud that TMA has become the world's leading independent Thermomix distributor.

Grace is supported by our Executive Director, Bianca Mazur.

Our Chief Operating Officer, Grant Vernon manages our Finance, Warehouse, People & Culture, Customer Experience, Service, Kobold and Business Transformation teams.

Mollie Hill is the Director Marketing and Ecommerce who is in charge of the Marketing, Ecommerce, Publications, Brands and Communications teams.

Kristy Young is our Executive Manager of TheMix Shop.

Leading the Sales team is Samantha Needle our Executive Manager, Sales.

Brooke Long is our Executive Manager of Community Engagement.

Mark Balding is our Executive Manager of Business Transformation, which includes all of our systems and technology.

TMA believes in investment in compliance, in order to decrease our modern slavery risks and to improve transparency across our supply chains and operations. Our team members work alongside our external compliance consultants to implement initiatives and to work towards our modern slavery goals.

The Thermomix is demonstrated and sold by approximately 2,300 Thermomix Consultants, who run virtual or in-home cooking experiences for current model Thermomix machines.

TMA employs approximately 150 to support our customers and consultants, including a Perth-based customer service centre. Our business has also expanded to include offices in Melbourne, Brisbane and TMNZ in Auckland, New Zealand.

#### Products we sell

#### Thermomix Machines, Parts and Accessories

Our current Thermomix model, the TM6, replaces over 20 traditional kitchen appliances - allowing our customers to chop, beat, blend, whip, weigh, mill, knead, mince, cook and more. The Mittelsten Scheid family have been at the helm of the Vorwerk company for over 135 years.

The Thermomix design has evolved and improved over the years to created one of the worlds most celebrated and versatile kitchen appliances.

#### Cooking and Homeware products sold on TheMix Shop

TheMix Shop proudly sells Thermomix and Vorwerk products, as well as a trusted range of quality kitchenware including:

- Bakeware, including our Rose Gold Line, and specialty items such as doughnut pans and madeleine moulds, silicone baking mats and consumable parchment liners and sheets.
- Specialty bread making equipment including proofing bowls, lame tools and baguette trays.
- A diverse range of recipes can be found in our Thermomix cookbooks, recipe chip and Cook-key (and via wi-fi at Cookidoo.com)
- Outdoor entertaining drinkware, utensils, BBQ and travel accessories. A broad range of cleaning and storage products including silicone freezer trays, vacuum sealer and bags and yogurt jars.
- Cake and cupcake baking accessories including silicone moulds, decorating equipment, displays and travel storage items.
- A broad range of cleaning and storage products including silicone freezer trays, vacuum sealer and bags and yogurt jars.



# Services we engage

TMA utilises a range of services to that are required to support our head office, to promote and deliver our products and to host our events. These include suppliers of freight distribution, logistics, cleaning services, security, communications and recruitment services.

We are aware that some of these supply sectors, source lower-skilled workers, recent migrants, overseas students and other workers who may be at risk of exploitation or may become victims of modern slavery practices. TMA may also rely on recruiters or third-party labour hire services, which we are aware can have an associated modern slavery risk.



#### 4. OUR RISKS OF MODERN SLAVERY PRACTICES

As a business, we recognise that due to the prevalence of modern slavery practices across the world, sourcing products comes with modern slavery risks. We have outlined in this statement the general risks we are aware exist and have also provided detail on the specific modern slavery risks that TMA faces.

We understand that modern slavery could manifest in our supply chains and operations in several ways. Our modern slavery team aims to make our buyers aware of certain general industry and geographic risks that they can look out for. We are aware of the challenges that we face due to some lack of transparency over local operating contexts, and we know this hinders our business' effective modern slavery risk identification. We have therefore focussed on remaining informed and updated about current global challenges as best we can and have relied on published guidance in order to understand our modern slavery risks. We have noted practical advice, such as the need for businesses to prevent downward pricing pressure resulting from irresponsible procurement, and this has informed the development of our internal policies and training content. We are also aware of specific modern slavery risks such as non-payment of a living wage by suppliers, workers being denied freedom of association and also issues with workers being charged recruitment fees.

TMA sells a relatively narrow range of products - being Thermomix machines (accessories & parts), cooking and homeware products. Our product risk assessment has focussed on grouping our product types, to allow us to identify the current risks of modern slavery that we have in relation to each of those products. We have also considered and reviewed the modern slavery risks associated with goods not for resale related inputs for these products - such as shipping, freight, logistics, cleaning and packaging. As we use large businesses for most of these services, this process has relied on our monitoring and review of published modern slavery statements and information for these businesses.

Generally, we are aware that the following business practices could increase modern slavery risk in our supply chains and operations:

- **complex supply chains** where there are multiple suppliers at each production level which make transparency over product sourcing a challenge;
- **unauthorised sub-contracting** where a product is made in a facility by a supplier we haven't visited, checked or interacted with directly;
- **shortening lead times** which may occur if our business was to place pressure on our suppliers to produce orders for specific sales periods or promotions, potentially leading to problems such as forced overtime for workers; and
- **reducing cost price** which we know can force suppliers to underpay workers and cut costs on items such as factory fit out and PPE.

As a business we aim to avoid these general risks by engaging in responsible sourcing from suppliers with whom we have a trusted and developed relationship.

Specifically, TMA's modern slavery risks relate to our:

- Supply chain transparency;
- The ongoing Covid-19 pandemic;
- Electronic and technological products;
- Cotton products;
- Pulp and paper products;
- Rattan, bamboo, wood and silicone products;
- Silicone- based products; and
- Procurement of services and goods not for resale.

We discuss these specific modern slavery risks for our business and their nature below.



# **Supply Chain Transparency**

TMA sources products from wholesalers in Australia and also by direct dealings with overseas factories or their supply agents. These are the cooking and homeware products that we sell on the TheMix Shop website - <a href="https://thermomix.com.au/pages/themix-shop">https://thermomix.com.au/pages/themix-shop</a>.

During FY22 we continued our direct supplier review process. Fortunately, we have been able to access and review detailed information about the production and manufacture of the Thermomix machines and Vorwerk products that we sell, as a result of the assistance of Vorwerk's Sustainability Specialist, and the publication of the Vorwerk Sustainability Report for 2020. We were able to rely on the detailed information provided in that report, as well as information provided directly to us by Vorwerk's specialist, about the policies and processes that are in place in the Vorwerk factories.

Most of the suppliers we have contacted during FY22 have provided us independent audit reports and other useful information about their operations. There are still only a few suppliers that have provided us with detailed tier 2 or 3 supply chain details at this stage.

We are aware of, and have included details in our internal training for our buying teams about some 'red flags' or indicators of modern slavery that they need to be aware of when visiting or onboarding new suppliers including:

- situations where suppliers delay or refuse to provide relevant information, certifications or independent audit reports;
- indications that workers are being made by suppliers to work compulsory or excessive overtime so that urgent orders can be fulfilled;
- any evidence that workers are being subjected to intimidation or threats;
- signs that suppliers that may be isolating workers geographically, socially or linguistically;
- any indicators that workers are living at the factory/ workplace or another place that is owned or controlled by an employer;
- evidence of worker wages being withheld or worker underpayment;
- travel or other important documents being confiscated by a supplier;
- evidence or reports of debt bondage;
- workers that are not free to end their employment/ the supplier at any time; and
- situations where workers appear to be being deceived or not given information about nature and conditions of the work they will be required to do for the supplier.

We will continue to work with our suppliers to gather more detail about their factories, facilities and the workforce they engage, to try and mitigate these types of modern slavery risks.

#### The COVID-19 Pandemic

TMA is aware that the ongoing effects of the COVID-19 pandemic have increased modern slavery risks for workers, especially in many of the main production areas in China, Bangladesh and Vietnam.

We understand that the ongoing pandemic has increased modern slavery risks for our business by:

- creating new opportunities for exploitation and abuse of workers;
- increasing risks for migrant workers that may be fleeing the effects of the pandemic;
- disruption of normal supply chains and raw materials sourcing;
- impeding global efforts to address and mitigate modern slavery; and
- increasing the need for sub-contracting by some suppliers in order to fill orders.

Our buying teams have been made aware of these risks by means of our internal training which we will continue to update during FY23.

# **Electrical and Technology Product Risks**

TMA has considered our modern slavery risks associated with the manufacture of the electronic and electrical products we sell (e.g. Thermomix machines made by Vorwerk). These include:

- risks associated with the production of the raw materials that are used by the manufacturer (Vorwerk) to produce those products; and
- risks associated with the factory and other labour required to manufacture those products.

Electronic and technology products are manufactured using a wide array of metals and minerals, including copper, aluminium, titanium, and gold. Plastics made from petroleum products and other chemicals are also used. The Walk Free Foundation suggests that suppliers of products that contain 'conflict minerals' such as gold, should take steps to ensure the traceability of these minerals to at least the smelter level.

The Thermomix machines, accessories and parts that we sell are made by Vorwerk which has an international reputation for producing superior quality products. In 2020, Vorwerk published its 'Sustainability Report' which set out its sustainability and corporate and social responsibility initiatives.

Vorwerk reported that its suppliers of raw materials, finished parts, and consumables must meet Vorwerk's quality, environmental, and social standards.

They report that the production sites of the Engineering business unit are committed to compliance with the SA 8000 social accountability standard and that Vorwerk supports the California Transparency in Supply Chains Act (CATSCA), whose requirements are integrated into the framework agreements with suppliers. In addition, Vorwerk Elektrowerke signed the 'Code of Conduct on Social Responsibility' of the German Electrical and Electronic Manufacturers' Association (ZVEI) on behalf of the Vorwerk Engineering business unit.

#### Vorwerk supplier contractual obligations

Vorwerk Engineering works directly and exclusively with its suppliers and sets out its environmental and social standards in framework agreements. The formal review and documentation of contractual commitments, self-assessments, and codes of conduct is carried out by Vorwerk at regular intervals, and when a new contract is formed.

Before placing an order, Vorwerk surveys potential suppliers of production materials on aspects of sustainability and social responsibility by asking the supplier to complete a self-assessment. They also require their suppliers for the manufacture of materials or components specific to Vorwerk to sign a purchase agreement that includes a compliance module. This is an agreement on compliance with legal, environmental, and social requirements – including the exclusion of child and forced labour – made by the supplier and its up - stream suppliers.

For high-volume categories such as development and system assemblies, Vorwerk ensures the commitment of suppliers through the compliance module described above. For categories with lower revenue from must-match parts, raw materials, and catalogue parts, Vorwerk accepts the self-assessment of the suppliers in relation to social compliance, if available. If there is none, the compliance module is also signed. Vorwerk has reported that every year, between 15 and 20 percent of their suppliers go through the process of renewing their contracts, which means that they also undergo a review of their documentation with regard to social and environmental compliance standards.

#### Vorwerk risk assessment and review

Since 2019, Vorwerk has been conducting a risk assessment of its suppliers, and has put in place a monitoring and evaluation plan for at-risk suppliers, that includes processing the results of compliance screenings and country-specific risks. In addition to relying on contractual obligations and self-assessment, they also audit suppliers using random sampling procedures. These assess quality indicators in accordance with the VDA audit standard as well as environmental criteria in accordance with ISO 14001. If there are any obvious violations of social criteria pursuant to SA 8000 or DIN ISO 14001 identified during the audit, Vorwerk reports that takes immediate action to address this and, in cases where the issue cannot be remediated, terminates the business relationship.

Vorwerk has also reported that it is working on the modernization of its processes, and that they intend to further digitalise contract management and its underlying modules to increase transparency and reaction times across all sites. In addition, its suppliers are constantly under review via a web-based risk monitoring system. This monitoring process employs the 'risk methods' tool to report as early as possible on any potential breaches of the law or other suspicious matters that have become public. Vorwerk has reported that in their reviews to date, no supplier was flagged as suspicious.

#### Vorwerk corporate and social responsibility

The Vorwerk family business has reported that it has always practiced corporate and social responsibility. In its 2020 report, Vorwerk reported that it is committed to reducing social disadvantage and that it has been supporting the SOS Children's Villages Worldwide for many years. The SOS Children's Villages are home for many young people who, for a variety of reasons, do not have a family home of their own. Through the Vorwerk Family Fund, they have collected money which has been used to support the construction of several children's homes for in India and Costa Rica, and to set up and finance a facility in Vietnam.

In the central Vietnamese province of Bin Dinh, Vorwerk enabled the construction of the SOS Children's Village Quy Nhon, which was completed in 2011, and since then have been largely financing its maintenance. At the end of 2020, 120 children and young people - 64 girls and 56 boys - were living in one of the 14 family houses in Quy Nhon and were attending either primary or secondary school near the village. Some children were still going to kindergarten in the grounds of the village, which is also attended every day by about 240 children from the surrounding area. In 2018, Vorwerk reported that they cofinanced a house for 32 young people aged 14 and over on the site to better meet their needs. The children are cared for by fourteen SOS mothers, four SOS aunts (family assistants), and five SOS educators. In addition, there are two employees in administration and six service and maintenance employees.

We will continue to monitor and rely on reports and updates from Vorwerk as to the corporate and social responsibility.



#### **Cotton Product Risks**



At TMA we sell products made from cotton such as aprons, cleaning cloths, scourers, nut milk bags and tea towels. As we source these items from our direct suppliers as finished products, we do not have full transparency over the supply chains and operations that are involved in their production. We also do not have full details about where the raw materials that go into their production are sourced from.

To identify and address our risks in relation to cotton products, we have - as a business - ensured that we have remained informed of the risks that exist in relation to the sourcing of cotton products and have informed our buying and procurement teams of these risks.

We are aware that during FY22, there were continued reports of forced labour of Uyghurs and other Turkic Muslims in the Xinjiang Uyghur Autonomous Region of China. This modern slavery reportedly included the use of forced labour in cotton and garment production. We note that the Office of the UN High Commissioner for Human Rights reported on the noted the presence of forced labour in 'Vocational Education and Training Centres' facilities and 'labour transfer' schemes.

We are also informed of developments in the United State of America regarding the introduction of the US Uyghur Forced Labor Prevention Act (in June 2022). We understand that the Act bans the import of all goods made in Xinjiang and presumes that any goods made in Xinjiang have been made using forced labour. In Europe, the European Commission has also proposed regulations that would prohibit goods made with forced labour.

TMA is also aware of the risk that forced-labor-produced cotton and cotton-based goods from the Uyghur region could work their way into international supply chains. We therefore understand that where possible, we need to engage in supply chain tracing to determine if the products we import - even from countries outside China - are made with Xinjiang cotton.

TMA understands obligation to investigate the sourcing of cotton as a raw material for its products and will continue to monitor this risk. Our understanding of these risks informs our product and supplier choices.

We have gathered some detailed information during our supplier review about the following cotton products we sell in TheMix Shop.

#### Cotton bread bags and reusable produce bags

TMA sells cotton bread bags and reusable produce bags which are made in a factory in Hefei, Anhui Province, China.

We have identified that the bread and produce bags we sell are sourced from China by a B Corp certified business that is based in Perth, Australia. B Corp Certification measures a company's entire social and environmental performance and evaluates how the company's operations and business model impact workers, community, environment, and customers. Our supplier has advised that they ensure that all their manufacturers in China pass all internationally approved standards in both social and environmental audits i.e. for the environmental audits - ISO 14001 and for social responsibility - SA8000.

The supplier has advised that they have mapped the full supply chain for key products and services used by their organisation and have identified key suppliers at all levels of their supply chain. They have advised that although they do not have anything written (policies), as a certified B Corporation they are committed to ensuring every link in our supply chain upholds our expected working standards & conditions for their workers included no bonded or indentured labour, no child exploitation or modern day slavery. They usually do this by independently auditing our production partners to international standards and visiting production locations regularly. However, our supplier has advised that the region where the bread bags made as been under lockdown several times over the course of the pandemic and so it is difficult to get into those regions to do the work. They have advised that inspectors do not want to go into the region if there is a threat of a lockdown, as they get no warning and it means they could be stuck there for weeks at a time. There have also been rolling blackouts in their region, so it has been difficult for the factory to keep its usual opening hours.

The supplier usually conducts independent audits to international standards such as IS14001/ SA8000 / BSCI as well as conduct factory visits to any prospective suppliers as well as existing ones. Before taking on a new supplier, the supplier would usually have them independently audited along with site visits to the factory location. Once the results from the audit are known, they either proceed with onboarding or continue to look for another supplier who meets their standards.

#### Aprons and nut milk bags

Our aprons and nut milk bags are made at our supplier factory in Weifang City, Shandong, China. We have reviewed the Sedex Members Ethical Trade Audit Report (SMETA) for the factory that produces these produces for TMA. The audit included an opening meeting, factory tour, document review and interviews with management members and workers.

TMA will continue to review audit reports done for this supplier to ensure that this compliance continues. As part of our ongoing supplier review and transparency efforts, we will be seeking to gather information from our supplier about where the raw materials used to make these products are sourced.

We are still in the process of seeking information from our suppliers in relation to some of our other cotton products, so we can identify any modern slavery related risks that may be associated with them.

We will continue our review of our cotton product suppliers and will report on our findings in the FY23 statement.



# **Pulp and Paper Product Risks**

At TMA we sell products made from paper pulp such as baking paper, parchment paper and cookbooks. We also sell wooden products including rolling pins and a bread knife with a wooden handle. TMA is aware that timber and forestry products have an inherently high risk of modern slavery. Risks in this sector include:

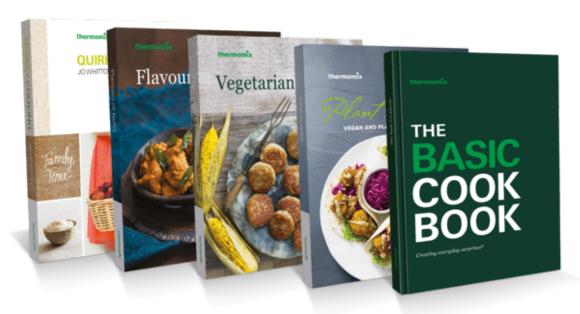
- hazardous/undesirable work;
- vulnerable, easily replaced, and/or low-skilled workforce;
- migrant workforce;
- presence of labour contractors, recruiters, agents or other middlemen in labour
- supply chain; and
- long, complex, and/or non-transparent supply chains.

TMA's risks in regard to the pulp, fibre-based or wood products that are the raw materials for our paper products will be higher where we don't have visibility over our own supplier's supply chains. This will also be the case if some of our suppliers upstream from the first tier operate in higher risk geographic areas. TMA is aware that there have been reports that forced labour can occur in logging, and may include threats, violence, poor living and working conditions, a lack of formal contracts, and non-payment of wages.

#### Cookbooks

In order to investigate this risk, and as part of our supplier review, we contacted our cookbook supplier to gather information about the manufacture of our cookbooks and the raw materials that go into this.

Our supplier, Imago, has advised our cookbooks are made in Shenzhen City, Guangdong Province, China. There is only the one factory used to make the cookbooks that TMA sells, and there are SMETA reports and Corrective Action Plan Report (CAPR) reports available for that factory.



#### **Paper Used**

The source timber for the paper our suppliers use is a species of Eucalyptus that is grown in both Australia and Thailand. These suppliers advised that they only use paper where all the forest sources are known - and these sources are either legal, low risk and/or Forest Stewardship Council (FSC) or PEFC accredited. The PREPS database holds technical specifications and details of the pulps and forest sources of papers that the group members use. Based on the forest source information, each paper is risk assessed and awarded a grade of 1, 3, or 5 using the PREPS Grading System. Paper that is graded 1 is considered the highest risk as these contain unknown or undesirable forest sources. The assessment considers the country of origin of the wood fibre and how the forest sources have been managed. The paper used to make our cookbooks is a PREPS 3 star paper.

Our suppliers are active participants of the Book Chain Project (BCP), a collaboration of publishers who formed originally in 2003 to create a framework to help drive improvement through the supply chain and enable informed and ethical sourcing of materials. As members of The Book Chain Project: Forest Sourcing module, our first-tier supplier has access to detailed analysis and assessment of the mills and papers that their factory is using. Unfortunately, the Book Chain Project's information is only made available to subscribing members, but our suppliers have been able to share with TMA that the mill is producing Preps Grade 5 (FSC) and Preps Grade 3 papers (Grade 3: where all the forest sources are known, legal, low risk or either FSC or PEFC accredited) and has participated in The Book Chain Projects initiatives such as Environmental Questionnaires and Mill Assessments.

Our supplier has also advised that their involvement with Book Chain Project: Labour & Environment module has been invaluable in helping them keep informed and assisting them to deal with any ethical supply chain issues that fall outside their regular corporate and social responsibility audit process.

They have also advised that they foster long-term partnerships with their suppliers and require them to work positively and transparently to continuously improve conditions in the workplace.

As a member of the Labour & Environment element of BCP, Imago is committed to ensuring that its suppliers meet the criteria set out in BCP's Code of Conduct for labour and environmental standards. Imago requires its suppliers to undertake regular and widely recognised ethical audits such as the ICTI Ethical Toy Program, SMETA (4 pillar), BSCI, or SA8000.

Based on our inquiries and due diligence during FY22, we have determined that the modern slavery risk relating to the growing and harvesting of the wood pulp that is used to make paper for our cookbooks is low. TMA considers that the supplier of cookbooks to the business is operating within the requirements of the TMA Code of Conduct and that there have not been any modern slavery risks identified in relation to this supplier. TMA will continue to review audit reports done for this supplier to ensure that this compliance continues.

# Rattan, Bamboo, Wood and Silicone Products

TMA sells silicone-based products such as lids, seals, spatulas, brushes, bowls, cups, moulds and oven trays. These are sourced either from our first-tier wholesalers in Australia or imported from overseas.

Liquid silicone rubber (LSR) is a high purity platinum-cure silicone widely used for injection moulding. Silicone is made of carbon, hydrogen, oxygen and silicon (which comes from silica that is derived from sand). The LSR industry is mainly led by the United States, Europe and China.12 China is the world's most competitive market due to its large number of manufacturers and has grown rapidly in the past few years.

TMA is aware of reports human rights violations involved in some sand mining operations in India and that this is an issue in many parts of the world. However as TMA does not have full transparency over our supply chain as yet, during FY23 we will be seeking further and more detailed information from our suppliers of silicon products, about the sand and raw materials used to make our silicone products.

Our ThermoMat, Oven ThermoMat and Barbeque ThermoMat products are made from durable flexible silicone, by our direct supplier based in Anhui Province Yang Lei, China.

The factory that makes these products for TMA, specialises in the manufacturing of silicone pads, the main production activities include coating, cutting, side dipping, silk printing, inspection and packing.

Other products that TMA sells, provided by the same supplier that supplies our Thermomats are our:

- silicone snack bar mould
- silicon lid (colour)
- spatula and brush set
- French-style rolling pin.

We have been advised that these are made in 3 other factories in China. We have not been provided with audit reports and details for these products as yet, and this is one of the product supply matters that we will be following up moving forward.

During FY23 we will continue our supplier review and to work with our suppliers to gather information about the products we sell. We are committed to the goal of having full transparency over our first-tier suppliers, and on gathering as much information as we can about the factories and raw material involved in the production of the goods we sell.

# Services and goods not for resale risk

We have outlined the types of services that we engage to support our business earlier in this statement. Our focus for FY22 has continued to be on our suppliers of product review, but we have done some review of our services and goods not for resale risks based on information publicly available.

We have reviewed the modern slavery statements and other relevant information for our suppliers listed below:

- Australia Post/ StarTrack (MS Statement)
- CS Express (MS Statement)
- Fedex Express (MS Statement UK)
- TNT Express (MS Statement UK)
- UPS SCS (Australia) Pty Ltd (UPS Slavery and Human Trafficking Statement)
- Other local and small business partners
- Telstra (MS Statement)
- Carat Australia Media Services Pty Ltd (Dentsu Japan Inc) (MS Statement UK)
- Other local and small business partners
- SIMS E-Recycling (NZ) Ltd (MS Statement)
- Other local and small business partners
- We use third-party local and small business partners for our security
- Other local and small business partners
- SEEK (MS Statement)
- Michael Page International (Australia) Pty Ltd (Page Group) (MS Statement UK)
- Hudson Global Resources (Hudson RPO) (MS Website Statement UK)
- Other local and small business partners

We use third-party local and small business partners and venues for our promotion and event needs - Alsco Fresh & Clean (NZ) (MS Statement UK)- for CLEAN UK-based division of Alsco.

## 5. ACTIONS TAKEN TO ADDRESS MODERN SLAVERY RISKS

TMA is aware that there are actions we can take to identify and address modern slavery in our operations and supply chains. These include actions we have taken in FY22 such as:

- continued supply chain review and due diligence;
- the implementation of company policies and procedures;
- meaningful and support engagement with our suppliers;
- buying and procurement team training focus on supplier workforce working conditions; and
- the development and implementation of effective and fair supplier remediation processes.

Our aim is to have these approaches to addressing modern slavery and integral part of our business operations.

# Our commitment to supply chain review and due diligence



At TMA we understand that we have a responsibility and a duty not to tolerate any forms of modern slavery in our supply chains or operations.

We continue to work to gain full transparency over our supply chains and operations. We understand that we need to continue our focus on identifying, preventing and addressing any impacts on human rights that may be caused by or linked to our business.

We are aware that TMA needs to be aware of what impacts it may be having in relation to current products, and also the products that we will source and sell in the future.

We need to be across modern slavery risks that are common in supply chains and develop strategic guidance that informs TMA's responsible purchasing practices - It feeds into effective remediation with concrete, appropriate outcomes for workers where a company is implicated in harm - It involves companies examining the impacts of their own sourcing practices and models, as well as suppliers.

## **Policies and Procedures**

At TMA there is a clear understanding of modern slavery, and a commitment to tackling it. This is reflected in our company policies, which are clearly communicated to our suppliers. These policies, which have been developed with the oversight of senior leadership, are applied in practice. During FY22 we have updated our procedures and training for our buying and procurement team to guide them in terms of responsible purchasing practice.

This guidance and training is focussed on carrying out effective modern slavery due diligence, that is focussed on the everyday conditions for workers and involves meaningful supplier consultation.

As a business, we have continued the implementation of our TMA Supplier Code of Conduct (Code) which we developed to be in line with the Principles outlined in International Labour Organization (ILO) standards, the Ethical Trading Initiative (ETI) Base Code and accepted best ethical and sustainable business practice. The Code requires that our suppliers read, understand and adhere to the Code, and also sign and return a Supplier Commitment that needs to be returned to TMA. We will also take steps to ensure the Code is known to all our staff and consultants, across all levels of TMA.

Critically, the Code advises all our suppliers that we expect them to provide full transparency over their supply chains and operations, including disclosure to TMA of the sources of manufacturing and raw materials used in the production of our products and any other relevant information relating to the supply of goods or service to TMA. Based on our experience of the first review of our suppliers, we want to work with our suppliers to encourage them to do their own due diligence where necessary, so that they are able to be part of the modern slavery solution.

We continue to support our suppliers and working to assist them to come to terms with this way of doing business, where large businesses are required to provide proper and honest reports on the source of the products that they sell. Traditional procurement that was focused only acquiring the best product for the best price will need to be addressed by all Australian businesses, and the focus will need to include other aspects such as the social compliance of the supplier.

Our TMA Supplier Code of Conduct requires all our suppliers to take all steps necessary to ensure that there is no:

- slavery or forced servitude of any kind;
- trafficking in persons;
- forced, compulsory, bonded, indentured or prison labour;
- debt bondage;
- labour facilitated by any form of coercion or deception; or
- child labour;

in any part of their supply chain.

We also have an expectation that our suppliers will make inquiries in relation to any authorised sub-contactor's own operations and supply chains, to ensure this requirement is upheld in relation to TMA's whole supply chain.

The Code requires our supplier to ensure that any business partners used for outsourcing of production or supply of raw materials retain all necessary information and documentation to allow verification of their compliance with all aspects of our Code. It also sets out restrictions on the sourcing of particular raw materials or products in our supply chain, such as cotton, where those raw materials have been sourced from high-risk areas.

We acknowledge that the roll out and implementation of the Code will take significant work and effort on our part, but we also know that addressing modern slavery is a very important business and moral obligation and will be required if big businesses in Australia want to do their part to eliminate modern slavery.

Our Code also includes requirements that our suppliers:

- comply with all relevant and applicable local laws;
- adopt and adhere to conditions of employment that respect worker's rights;
- provide a healthy and safe workplace to all workers involved in the production of the products that we sell;
- ensure that all workers that form part of our supply chain are paid a living wage;
- ensure workers who form part of our supply chain are not required to work excessive
- or involuntary overtime;
- recognise the right of workers to freedom of association and collective bargaining
  such as the right to join a union and have this recognised by their employer; and
- treat their workers with respect and dignity and do not discriminate in recruitment, hiring or employment.



We will also be undertaking a process of review of our vendor and supplier contracts to insert a reference to adherence to the Code, and also specific modern slavery provisions. During FY23-4 we will also be focussed on the development of TMA Ethical Sourcing.

#### **Whistleblower Policy**

We will be adding modern slavery related provisions and reporting provisions into our Whistleblower Protection Policy which is currently in place. TMA also has an effective Complaints Handling System (CHS) which is consistent with the relevant Australian Standard AS.NZ 10002:2014 Guidelines for complaint handling management in organisations.

#### **Responsible Purchasing Practices**

During FY23 TMA will be focussed on responsible purchasing practices and the implementation of new policy to guide our teams.



# **Supplier Engagement**

We understand the important of our buyers and procurement teams being able to assess and address TMA's modern slavery risks on a day to day basis. This is why our revised training has been developed to provide specific guidance to our buying teams so that proactive work can be done with suppliers to ensure that modern slavery standards can be implemented throughout our entire supply chain. Our buying and procurement teams are focussed on their areas of concern and our suppliers are regularly monitored to ensure that they understand our Code and are complying with its terms.

# **Supply Chain Review and Assessment**

During FY22 our external compliance consultants, who form part of our Modern Slavery Working Group (MSWG), continued our review of suppliers. The MSWG has previously established that TMA has gaps in terms of the amount and type of information that we collect and review in relation to our overseas and local suppliers of goods and services.

We also determined that it was vital that we update and amend our modern slavery training to ensure that our buying and procurement teams were supported and able to review the conditions of workers in our supply chains and to take steps to do checks and take precautions to ensure that our suppliers pay their workers a living wage. We also understand the importance of providing support for freedom of association in our operations and supply chains, that we positively impact recruitment practices, and do what we can to lift labour standards.

One of the ways we have tried to have an impact has been to gather information by means of our supplier questionnaire which is sent to suppliers. These suppliers were ranked in terms of their modern slavery risk based on the type of product that they supplied TMA and the region/ country in which those products were made. Our questionnaire asks suppliers about their understanding of their own supply chains and asked them to report on any steps that they may have taken to address modern slavery risk.

The responses that we received during FY22 have given us some further insights and knowledge about our product supply chain, where our products are made and the raw materials that are use to make these products. We will continue this important work during FY23 with a focus on further investigating issues such as whether the workers in our supply chain are receiving a living wage and whether the suppliers we engage allow their workers freedom of association.

# **Modern Slavery Training**

During FY22 our MSWG worked to develop a new tailored online modern slavery training program for our relevant staff to complete during FY23.

This training provides our teams with information about the business' reporting obligations under the Modern Slavery Act 2018 and also other modern slavery legislation and initiatives around the world and covers topics including:

- What is modern slavery?
- Why does The Mix need to address modern slavery?
- How could modern slavery manifest in The Mix's supply chains and operations;
- Modern Slavery Risks in the Manufacturing Industry;
- The Impact of COVID-19 on our modern slavery risks;
- What is The Mix doing to address modern slavery?
- Next steps your role in addressing modern slavery at The Mix;
- Conducting a supplier review for The Mix.

This training provides TMA teams with information about the business' reporting obligations under the Modern Slavery Act 2018 (Cth) and also other modern slavery legislation and initiatives around the world.

Our staff will also be provided with the opportunity to ask questions and request more information about specific industry or product related modern slavery risks from our external compliance team when they complete the training module.

#### 6. ASSESSMENT OF ACTIONS TAKEN TO ADDRESS RISKS

# Reporting on our Modern Slavery KPIs

We have developed Key Performance Indicators (KPIs) that we will put in place, with a goal to meet them before the end of our 2023 financial year. The KPIs that we put in place and the progress we have made towards meeting them are detailed below.

- 1. TMA will provide 100% of new and current TheMix shop suppliers with a copy of the TMA Supplier Code of Conduct (in an appropriate language for that supplier) and will guide and educate those suppliers as to its contents and requirements of the Code.
- 2. TMA will take steps to ensure that 100% of new and current suppliers sign and return the Supplier Commitment page that forms part of our Code and returned this to TMA.
- 3. TMA will provide 100% of new and current suppliers with a copy of TMA's Global Sourcing Principles and will guide and educate those suppliers as to its contents and requirements of those Principles.

#### Progress toward meeting KPIs 1, 2 & 3:

Our MSWG has been sending our the TMA Code of Conduct to all of our identified product suppliers with a request that they return the signed supplier commitment to us. We are still working on developing the Global Sourcing Principles. This work will continue in FY23.

- 4. TMA will provide 100% of its new and current suppliers with a one page fact sheet on its modern slavery initiatives, requirements and expectations with TMA contact information made available.
- 5. TMA will take steps to ensure that 100% of new supplier contracts include modern slavery causes and a reference to the modern slavery compliance obligations the supplier has to meet (including a reference to the TMA Supplier Code of Conduct and the TMA Ethical Sourcing Principles).

#### **Progress toward meeting KPIs 4 & 5:**

Numerous suppliers have been contacted and updated in relation to the TMA Code of Conduct and as part of our supplier review. We are continuing work on this in FY23.

6. TMA will ask all its vendors and suppliers to provide information about their modern slavery compliance as part of their annual review, which will include a survey each to gauge their understanding of modern slavery risks and the actions taken to address these. This will include a survey of TMA suppliers that are in a high-risk geographic areas or in areas where risks may have increased due to the ongoing COVID-19 pandemic.

#### **Progress toward meeting KPI 6:**

We are continuing our work to contact as many of our product suppliers as possible to improve our supply chain transparency. We will report further on this work in FY23.

7. TMA will take steps to establish an email address and/or hotline to ensure that workers in any part of TMA's supply chain have a confidential and safe process for raising any concerns. TMA will also take steps to ensure that 100% of emails sent to TMA or its Whistleblower contact email, that have modern slavery content, will be addressed and remediation of those issues will begin within a three-month time period from receipt of the email.

#### **Progress toward meeting KPI 7:**

This has been done and our new TMA Supplier Code of Conduct includes a contact email for this purpose.

8. TMA will take steps to develop a plan for proper checks and audits be done on suppliers and factories that TMA deals with directly to source products for sale on TheMix Shop including factory visits (if appropriate and possible) and or review of modern slavery audit reports or self-assessments to be provided by our suppliers or factories.

#### **Progress toward meeting KPI 8:**

This planning has been started and we will report further on this in our FY23 statement.

- 9. TMA will review its supplier sourcing processes to ensure that that our key modern slavery standards and requirements flow through all aspects of supplier sourcing and management, including supplier contracts, Request for Tender (RFT) and purchasing processes, auditing and compliance action and performance standards for procurement staff.
- 10. TMA will list modern slavery as a risk on TMA's risk register and this will be regularly reviewed by TMA's risk team.
- 11. TMA will commit to an annual review of its response to modern slavery by senior management, the results of which will be reported to the Board within 3 months of the conduct of the review, and will form the basis for its annual reporting under the Modern Slavery Act 2018 (Cth).

#### Progress toward meeting KPIs 9, 10 & 11:

This work is ongoing and our MSWG is focussed on these goals. We will report further on this in our FY23 statement.

## 7. MOVING FORWARD

# Moving towards better transparency



We are also committed to a process of continuing transparency and will be working during FY23 to address the gaps we have identified in relation to information gathered from our suppliers about their own suppliers.

We are committed to taking steps to identify all our Tier 1 and 2 suppliers, and to then develop a risk-based approach to the further review of our supply chain. This approach will high risk suppliers based on their risk levels which will depend on geographic and industry factors. We look forward to reporting on this work in our FY23 statement.

# **Our Responsible Buying Plan**

TMA understands that through our purchasing decisions, especially those made in relation to the products that we sell on TheMix Shop website, we have the capacity to improve the working conditions of all workers in our supply chain and operations and to reward our suppliers who treat workers with dignity and respect.

We are aware that all of our team members should be aware of what modern slavery looks like, and how TMA may contribute or be directly linked to modern slavery. During FY23 we will be focussed on responsible buying and will be encouraging our teams to reflect on their own behaviour and how this may impact modern slavery.

Our approach will be based on key guidance for human rights due diligence by the UN's Guiding principles on business and human rights:

- 1. Identify your own actions and how these might contribute or be directly linked to modern slavery.
- 2. Prevent modern slavery risks from being contributed or directly linked to your actions by assessing how you could do things to reduce the risk.
- 3. Mitigate any future risk by assessing modern slavery before beginning a new process.

We will be supporting and training our teams to understand they have a responsibility to conduct initial supplier checks (for both current and potential suppliers) to determine if the products or services they are sourcing are from high-risk modern slavery countries or regions.

# **Monitoring and Awareness**

TMA will continue to monitor modern slavery related media and news in order to identify any emerging human rights risks that may be present in the industry or geographic locations from which our products are sourced. This will include Government guidance on cotton sourcing from the Xinjiang region in China, the recent initiatives of the Australian Government in relation to the banning of imported goods made with forced labour and on supplier treatment of workers during the COVID-19 situation. We are aware that as a responsible corporate citizen, we need to play our part to mitigate and work to eradicate modern slavery.